

Our ref: SMS/VW/ST14483/LET-003

Date: 9 April 2015

Digital ref:

Your ref:

Email Only

Ian Kemp

Programme Officer

Dear Mr Kemp

COMMENTS RELATED TO PBA OAHN SUPPLEMENTARY REPORT (MARCH 2009) – EXAM 145.

This representation is made on behalf of Barratt Developments plc in the context of its proposals for a new settlement, commercial and leisure development in the A38 corridor within both Lichfield District and East Staffordshire Borough (within both the Stoke & Staffordshire and the Greater Birmingham and Solihull Local Enterprise Partnership areas).

Paragraph 1.3 of the Supplementary report sets out the interpretation of the **Greater Birmingham HMA** and states this comprises 14no local authority areas. Figure 1.1 confirms the geographical extent.

This brings up an immediate anomaly in that the Birmingham Plan Inspector's Interim Findings letter of 5th January 2015 section on 'Definition of the housing market area' (sections 8 and 9) states that:

'I see no difficulty in the fact that the **SHNS Stage 2 also considers East Staffordshire (and Wyre Forest) as well as the 14 HMA authorities** as part of its overall study area. Given the basis on which the study was commissioned, that is a sensible and pragmatic position...'

The Supplementary report has now, without any reasoning or justification, arbitrarily removed and therefore not considered two local authority areas – East Staffordshire and Wyre Forest – from the HMA study area. This is contended inappropriate in the context of due process and potential outcomes, and is an unjustified change of approach from that already put to and commented on by the Inspector.



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Relevant context is also provided in the East Staffordshire BC Local Plan Inspector's Interim findings letter of 11th November 2014 (Doc E.19), which makes reference in Paragraph 6 to 'consideration of the amount and disposition of unmet need from the City of Birmingham, albeit that is as yet uncertain'.

Paragraph 21 of the same letter also states that:

'Moreover, notwithstanding the evidently weak market relationship between East Staffordshire and the Birmingham conurbation, the current uncertainty surrounding unmet housing need in Birmingham, whilst not requiring an immediate elevation of the East Staffordshire requirement, fully justifies a clear commitment to flexible review of the ESLP. That would take account of any change in circumstances'.

The approach taken in restricting the HMA and thus the scale of the SHNS is considered unjustified, contrary to what has previously been put to both Birmingham and East Staffordshire Plan Inspectors and it is suggested, therefore, that it be rectified in order that the aforementioned considerations are properly considered.

For the purposes of clarification, please note that further representations in respect of OAN will be made by Barton Willmore plc on behalf of Barratt Developments consistent with previous practice.

Would you please keep me informed of relevant updated matters in the normal manner.

Yours sincerely

for Wardell Armstrong LLP

Stephen Stoney

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