

Birmingham Development Plan 2031

Examination Hearings

Further Written Statement by

Paul Hoad B.Sc.(Hons), M.Sc.(Eng.), Ph.D.

Matter A: Housing need and the housing trajectory (BDP policies PG1, TP28 & TP30)

Main issue: Does the Plan appropriately identify housing needs and does it seek to meet them in accordance with national policy?

Question 1 - Is the Plan based on an objective assessment of the full needs for market and affordable housing in the housing market area over the Plan period?

There is no strong evidence to support the view that an objective assessment has been carried out to establish the housing needs for the Plan period. Instead numbers are quoted without any reference to how these have been derived, which lead on to the Plan's assumption that Green Belt land must be sacrificed to supply the land that is allegedly required for the claimed housing needs.

There is no evidence that housing needs have taken into account the requirement to relate to the needs of land requirements (i.e. to aim to accommodate new building as far as possible within existing developed areas). As with all preceding strategic plans in the last few decades produced by Birmingham there is the claim that Green Belt land is needed for housing development, and yet again the council seem effectively to be working backwards from what land they want to take and then inflating the housing figures to justify this.

Paragraph 4.4 of the Plan states that "The Office of National Statistics (ONS) projections (2010) indicate that by 2031 Birmingham's population will rise by 150,000 and that this will mean an increase of 80,000 in the number of households." This would equate to an average of 1.875 persons per household. The latest data from the Office of National Statistics (ONS) (Table H01UK, downloaded from <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-294273>) shows that the average occupancy for Birmingham at the 2011 census was 2.6 people per household. The council are therefore using a figure that is 28% too low with a corresponding increase in projected new households.

On the basis of this occupancy, an additional population of 150,000 would only need 57,693 residences. This is 22,307 lower than the total on which the Plan is based. Taking from this the 6,000 new homes that are claimed to be required on land that is currently Green Belt, this leaves a surplus of 16,307 of housing that can be built within existing developed land.

Whilst it is true that there has been a long term decrease in the average occupancy which might suggest a higher number of new households, this change is relatively modest and could not account for the Plan's higher number. The ONS document "Measuring National Well-being - Households and Families, 2012" (Table 1) shows that the average UK occupancy has declined from 3.1 in 1961 to 2.4 in 2011. However the bulk of this change happened in the earlier years between 1961 and 1981, and the occupancy was unchanged between 2001 and 2011.

To estimate an absolute limit on the possible change in occupancy it is possible to apply a simple linear regression across the data which gives an estimate of approximately 2.0, still much higher than the assumption the Plan has used. This would still be overestimating the potential for the average occupancy to decline (using a simple linear relationship would ultimately lead to an average of less than 1.0 person per household which would be nonsensical, and hence a more complex exponential function would be required which would give a slower rate of decline year on year). Given the stability in household size between 2011 and 2011 it is not unreasonable to assume that this level will be maintained up to 2031.

Question 2 - If not, what alternative objective assessment of housing needs should the Plan be based upon?

The assessment should be based upon a reasonable level of average occupancy. The expected 150,000 population stated in paragraph 4.4 should therefore equate not to the stated 80,000 new households but to 58,000 based upon the existing average occupancy of 2.6 persons per household. This therefore removes the need for 22,000 new residences.

In addition there needs to be greater emphasis on smaller residences rather than the conventional houses that are generally built. The controversy over what has been called the “bedroom tax” has revealed that there is a shortfall in the amount of accommodation with just one or two bedrooms. There is therefore a clear need for greater emphasis on smaller types of accommodation that can be accommodated within much smaller land areas.

Question 5 - Is there justification for the staged housing trajectory set out in policy TP28?

Given that the Plan overestimates the need for new housing by 22,000 within the 2031 timescale, the justification for the new housing trajectory is clearly removed. Instead the overall total needs to be reduced by 22,000.

Question 6- If not, what alternative trajectory should be pursued?

The stated new housing trajectory gives a total of 51,100 dwellings. Removing the 22,000 excess due to the error in the average occupancy, the trajectory should have a total of 29,100 new dwellings. Keeping the same profile in how these new dwellings would be delivered would give the following trajectory:

- 740 dwellings per annum (2011/2012 - 2013/2014);
- 1,082 dwellings per annum (2014/2015 - 2015/2016);
- 1,424 dwellings per annum (2016/2017 - 2020/2021); and
- 1,760 dwellings per annum (2021/2022 - 2030/2031).

Overall Conclusion to Matter A

The Plan is based on an overestimation of housing needs for Birmingham, which appears to be due to an average occupancy being assumed which is much too low to be reasonable. Instead of an increase in population of 150,000 leading to 80,000 new households, this should equate to 58,000 new households. Therefore the Plan is overestimating the housing needs by 22,000 residences.

This therefore obviates the need to release any Green Belt land for residential development as this was only required for 6,000 new households which is much less than the 22,000 excess.

The plan is therefore:

1. **not positively prepared** as it has not objectively assessed development needs based on the available evidence;
2. **not justified** as it has not derived an appropriate strategy nor considered reasonable alternatives, based on proportionate evidence;
3. **not effective** as the plan will not be deliverable due to seeking to over provide new housing development; and
4. **not consistent** with national policy as it does not follow residential occupancy rates set out by the Office of National Statistics.