

BIRMINGHAM DEVELOPMENT PLAN 2031 EXAMINATION HEARINGS

Hearing Statement prepared on behalf Jon Flowith
and Partners

**MATTER A: Housing Need and the Housing
Trajectory**

September 2014

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Introduction

OVERVIEW

1. This Hearing Statement has been prepared by CBRE who act on behalf Jon Flowith & Partners as agent for a number of land owners with land adjacent to Mere Green, Sutton Coldfield. For completeness and ease of reference, this Statement also refers to relevant details included in previous representations by our Client’s former advisors (Deloitte LLP).

Matter A: Housing Need and Trajectory

MAIN ISSUE: DOES THE PLAN APPROPRIATELY IDENTIFY HOUSING NEEDS AND DOES IT SEEK TO MEET THEM IN ACCORDANCE WITH NATIONAL POLICY?

Question 3: Does the Plan meet the full needs for market and affordable housing, as far as consistent with the policies set out in the NPPF?

2. NPPF paragraph 47 states that to boost significantly the supply of housing, local planning authorities should:
 - *“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
 - *Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
 - *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
 - *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and*
 - *Set out their own approach to housing density to reflect local circumstances.”*
3. At present the Plan fails to meet the full needs for market and affordable housing. It fails in terms of ensuring the identification of sufficient land and site opportunities which are deliverable in the early part of the Plan period and also in terms of the overall level of housing provision through the Plan. These points are dealt with in turn below.

The Need to Increase Overall Housing Land Supply

4. As the Plan stands, it falls well short of being able to meet in full Birmingham’s needs for market and affordable housing. As a minimum, there is a shortfall of circa 30,000 houses which will need to be provided within adjacent authority areas.
5. The amount of Birmingham’s housing which needs to be distributed to nearby local authority areas will be further clarified later this year through the finalisation of the joint Strategic Housing Needs Study being completed by Peter Brett Associates on behalf of the GBSLEP (see **Appendix 1** for an overview of the main stages and timetable associated with this work). Phases 1 and 2 of this work are complete and this has re-confirmed the scale of Birmingham’s housing issues.

6. It is also conceivable that the level of shortfall identified in the Plan will increase with many commentators noting that the household growth rates assumed for the area (on which housing requirements are based) could in reality be higher than is currently being assumed. Moreover, and as expressed in previous representations made on behalf of our Client, for a number of reasons it is considered that the Plan places an overly ambitious reliance on high housing densities which in practice will often not be achieved. If these housing densities are not achieved, this will reduce the level of housing currently anticipated from the land proposed in the Plan.
7. Fundamental to achieving growth will therefore be to ensure that the Plan explores all possible sustainable and deliverable opportunities to increase the level of housing in the area. An important component of this will include the identification of further sites critical to the delivery of the housing strategy. In the case of Birmingham this should include consideration of the release of a greater amount of Green Belt land than is currently being proposed (which is currently limited to the release of a single SUE at Langley) – also see our response to Matters E and F.

The Need to Increase Deliverable Sites

8. Policy TP28 – Housing Trajectory is generally back loaded beyond 2021. Whilst understanding some of the assumptions made in the PBA Technical Paper 2013 (Para 8.1), we are concerned that this is totally against the thrust of Government policy to boost housing supply. For Birmingham the issue of housing growth is fundamental to the success of the overall strategy for the area. It is therefore imperative that the Plan does all that it can to boost significantly the supply, and hence delivery, of housing.
9. As such, there should be less artificial interference in the early part of the plan to “kick start” development opportunities with perhaps a more controlled regime in the latter part of the plan guided by the success or otherwise of how the market has responded to housing delivery across Birmingham. If it is the case that the constrained delivery of housing during the early part of the Plan period is a consequence of sites being delayed by infrastructure issues, then the answer must be to identify further appropriate sites whose delivery is less constrained by such factors. Adding to the supply of sites, such as through the land being promoted by our Clients at Mere Green, will make a valuable and necessary contribution in this regard. Adopting the Plan’s current approach will bring into question whether the Plan will result in Birmingham being able to demonstrate a 5 year supply of deliverable housing sites.

Question 4: What proportion of the assessed housing needs should be met outside of the Plan area, and by what mechanism should the proportion be distributed to other local planning authority areas?

10. Whilst it is recognised that it would not be realistic to assume that Birmingham could accommodate all of its housing needs given the very significant scale of the requirement balanced with other factors, additional sustainable and deliverable sites within Birmingham’s administrative boundary beyond those currently being proposed in the Plan are available and should be identified. In this regard, please also refer to our response to Matter E which specifically outlines the sustainability and other benefits of land at Mere Green and the potential valuable contribution that this site would play in increasing the supply of land to meet the area’s full and objectively assessed needs for market and affordable housing.

11. The identification of additional key sites in the Plan would reduce the level of reliance currently being placed on other authorities in the GBSLEP area (and potentially beyond) on delivering Birmingham’s unmet growth requirements. At present, we are not aware of any specific mechanism or agreement in place between local authorities to ensure Birmingham’s surplus housing requirements are met (also see our response to Matter F).
12. Thus, maximising the amount of housing provided within Birmingham’s own administrative boundary will provide greater certainty and clarity so that Birmingham’s growth needs are capable of being realised in full and at the time when housing is needed. This solution could also deliver additional important benefits in terms of overall sustainability and sustainable travel patterns through locating housing closer to the sources of need.

Appendix 1: GBSLEP Joint Strategic Housing Needs Study

Activity / Event	Date
<p>Brief to Consultant's issued to tender for completion of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) joint Strategic Housing Needs Study. Peter Brett Associates are appointed to complete the study.</p>	<p>September 2013</p>
<p>GBSLEP Spatial Plan for Recovery and Growth consultation draft issued. This set out potential ways of accommodating future growth in the area including new settlements and extending existing major urban areas.</p>	<p>September 2013</p>
<p>Draft Birmingham Development Plan issued for consultation. Within the Plan it is identified that of Birmingham's objectively assessed housing needs, there will be a shortfall of 30,000 dwellings which are unable to be accommodated within Birmingham's administrative boundary.</p>	<p>December 2013</p>
<p>Launch of Findings of Stages 1 and 2 of the GBSLEP joint Strategic Housing Needs Study. These findings confirm the position that Birmingham has a substantial shortfall in deliverable and developable housing land to meet its own objectively assessed housing needs, and that this unmet requirement will need to be provided from beyond its own administrative boundaries.</p>	<p>31st July 2014</p>
<p>Completion of Stage 3 (final stage) of the Strategic Housing Needs Study and associated Sustainability Assessment. At Launch event on 31st July the intention is announced that the final stage of the study will be completed by autumn 2013. This stage will test six spatial options for accommodating Birmingham's unmet growth requirements to other local authority areas and will identify the preferred option agreed by the various GBSLEP local authority partners.</p>	<p>Autumn 2014</p>
<p>Publication of Revised GBSLEP Spatial Plan articulating the findings of the agreed joint Strategic Housing Needs Study.</p>	<p>By end of 2014</p>