

Matter A Hearing Statement – Mr Paul Gilmour (186064)

In response to the inspectors guidance I do not feel it necessary to rehash my previous representations to address the main issues & question.

However, below I set out my additional comments:

TUESDAY 21 OCTOBER 2014, AM & PM

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?

Questions:

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?

By Birmingham's own admission the AON in the Plan is not NPPF compliant, nor is the recent GBSLEP study.

However, the size of the AON does not affect the option's open to Birmingham as whatever the AON actually is Birmingham cannot meet it all within their boundary.

The problem with this plan not being based on a sound AON is that it gives the adjacent authorities wriggle room to avoid having to take proper action over the shortfall.

The options open to the city range from doing nothing to provide additional land for housing to providing as much as they can.

The city say that they have provided as much as they can, because any additional land released will not generate any additional completions. However this is based on evidence where the demand and delivery of housing were broadly in line with each other

Even using the smallest AON (that in the Plan) the demand and the delivery of housing in Birmingham are no longer in line with each other. The demand so far outstrips the supply that evidence being used becomes worthless.

The effect of a massive imbalance between demand and delivery can most clearly be seen in London, with spiralling prices, 40% of dwelling sold off plan and fast completions.

In London no one would suggest that additional house building would not lead to additional completions – given the unmet need (even with an additional SUE) of at least 25,000 units the same must be true of Birmingham.

All of which is before we look the effect of unmet demand based on the more

up to date AON from the GBSLEP study of 105,000 or the Barton Wilmore AON.

4) What proportion of the assessed housing needs should be met outside the Plan area, and by what mechanism should that proportion be distributed to other local planning authorities' areas?

The smallest amount possible – the need is Birmingham's the solution as far as possible should come from Birmingham

This requires both additional allocation of B and safeguarding of parts of A