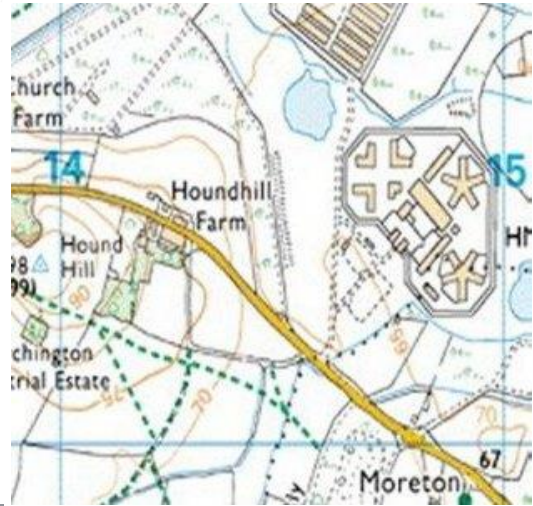


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# JVH TOWN PLANNING CONSULTANTS LTD

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Matter A

*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?**

Document H1 the Housing targets technical paper looks at the requirement for Birmingham City over the period 2011 to 2031 and that required 81,500 new households over the period based on the CLG 2008 household projections. That document indicated that a further full analysis across the HMA would be provided and commissioned by the GBSLEP.

The information provided in Exam E [ Appendix 2] and Exam 2F indicates that now in the PBA preferred scenario Birmingham would be required to plan for 5,620 new households per annum, rather than the planned for 4,077; increasing the new households requirement for the plan period to some 112,400 from 81,500. On this basis alone the Plan as drafted and submitted does not meet the updated assessment of housing need over the plan period taking into account more recent information that was not available at the time of drafting the Plan. At face value the Plan is not meeting a need for at least 30,900 new households; on the basis of accepting that the PBA scenario is the most appropriate approach to the assessment calculation.

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

The Plan should be based on an assessment that is the most robust available. Our view is that it should be at least the scenario described above to ensure that sufficient new homes are delivered to the market in a reasonable timescale.

- 3) Does the Plan meet the full needs for market and affordable housing, as far as is consistent with the policies set out in the *National Planning Policy Framework*?

The NPPF requires at para 47 that the full objectively assessed housing needs should be met as far as consistent with the policies in the NPPF. The objectively assessed housing need identified in Policy PG1 is a need to meet 81,500 new households or 84,000 new dwellings, the Plan only proposes to provide for 51,100 new dwellings. The Plan does not therefore aim to meet the need identified by a shortfall of over 30,000 new homes.

In the circumstances where the objectively assessed needs are greater than 81,500 new households and based on the above they are considered to be 112,400 new households over the Plan period; then the Plan is very seriously underproviding.

The NPPF makes clear at para 83 that the Green Belt boundary can be altered through the preparation of or review of a Local Plan. Birmingham are proposing to do this to an extent and have identified a SUE for 6,000 homes at Langley. Our position is that in addition to this site there are other Green Belt locations such as Dutton's Lane, which can be released to allow significant new development within the Birmingham boundary and assist in meeting the housing need closer to the source of that requirement and in sustainable locations, this would reduce the amount of housing that has to be displaced to the surrounding districts with all the consequences that follow including an increase in commuting.

We consider that a Green Belt review can be made which releases additional sites without compromise to the objectives of the Green Belt at para 80.

On the basis of the above the Plan does not meet the objectively assessed needs as far as it is able in accordance with the NPPF.

**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 submitted plan proposes that 61% of the identified need in PG1 is met within the City Boundary. At least a further 750 -1000 homes can be met at Dutton's Lane; an allocation on this area alone would reduce that requirement. Displacing 39% of the city's housing requirement is a very large proportion and when translated into tangible numbers requires a displacement of between 32,900 new homes [on the submitted plan figures] and 64,600 new homes on the revised needs scenario.

It is clear from the report in Exam 2E that the stage of working out where these new homes are to go is not advanced, and there is no certainty that this can be achieved.

As things stand the Birmingham Plan does not provide for its own objectively assessed needs [on either the submitted or the variant calculations] and there is no agreed mechanism to show with any degree of certainty how it will be achieved. As an example the Lichfield Local Plan entering a second round of examination in September 2014 merely includes a modification paragraph which says the following:

*Inclusion of the following new paragraph after para 4.5: **Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Lichfield District Council will work collaboratively with Birmingham and other authorities and with GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review of the Lichfield District Local Plan will be brought forward to address this.***

This is not a Policy commitment to review the Plan and there is no timing imperative to be included within the modification. This makes it clear that the scale and distribution of the shortfall is not yet agreed and that the work to agree both the quantum, the proportions and the final distribution is a long way in the future. This is insufficient to demonstrate that the housing requirement of Birmingham City either can be or will be met in the plan period.

**5) Is there justification for the staged housing trajectory set out in policy TP28?**

The trajectory shows that the delivery of the 51,100 new homes is skewed toward the end of the Plan period. The aim should be to boost the housing supply as quickly as possible, the Plan period started in 2011 and has been under delivering in the first two years of the Plan. The annual requirement on the submitted figures is 2,555 annually and it is likely that this will rise in the event that the Plan meets the fully objectively assessed needs of the City. The trajectory shows that this delivery rate is not met until after 2021 some seven years away. The trajectory is reflecting the strategy to rely in part on the release of a single large green

field SUE at Langley for 6,000 new homes. Sites such as this take time to deliver to the market due to infrastructure investment etc. A strategy that provided the market with additional green field sites of a lesser scale would bring homes to the market earlier in the plan period, to support the 2016-2020 period, which would be realistic for the release of additional Green Belt sites.

TP28 says that the housing requirement will be met in accordance with the rates suggested. This is effectively making the trajectory into a phasing policy, whereby the requirement is met on a differential basis through the plan period. This is not a policy to boost the housing supply in accordance with the NPPF and actually to provide the people of Birmingham with homes to live in.

It is noted that in the five year housing land supply calculation document H 10 does not apply the requirement on the annual basis of 51,100 over 20 years i.e. 2,555 per annum plus a 5% buffer which would be the traditional methodology, but applies the trajectory delivery rates of TP 28. Para 5.2 of that document does apply the annualised rates over the plan period resulting in the position that the City does not have a five year land supply but on the Councils own figures [ untested] it is 4.7 years.

Table 1.3 of H 10 seeks to demonstrate that the Development Plan targets have been exceeded under the UDP and the RS, however table 5.1 indicates that since the start of the Plan period in 2011 the delivery rates have been well below the annualised requirement and that the cumulative total of under provision from 2011 to 2013 is 2,551 dwellings. These should be made up in the next five years in accordance with the Sedgfield methodology.

The NPPF requires a step change to housing delivery and the drafting of the trajectory and the preferred methodology used in the five year land supply calculation do not support this approach.

**6) If not, what alternative trajectory should be pursued?**

The strategy and the trajectory should aim to meet the annualised requirement and any backlog as soon as possible.

7) Does policy TP30 set out a sound approach to the provision of affordable housing?

8) Is policy TP30 justified in seeking affordable housing provision in specialist housing and extra care housing schemes?

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