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**Birmingham Plan 2031 – Hearing Statement
Matter A: Housing Need and the Housing Trajectory**

**Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Localism Act 2011**

On Behalf Of: Bloor Homes Western

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Birmingham Plan 2031 Hearing Statement

Matter A: Housing Need and the Housing Trajectory

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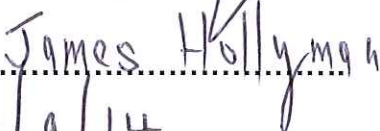
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Matter A: Housing Need and the Housing Trajectory

APPENDICES

Appendix 1 - Strategic Housing Needs Study – Interim Report following Stages 1 and 2 and Developing the Scenarios for Testing and Stage 3 – Refinement of Brief

1.0 MATTER A: HOUSING NEED AND THE HOUSING TRAJECTORY (BDP POLICIES PG1, TP28 & TP30) ACCORDANCE WITH NATIONAL POLICY?

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?*

1.1. The submitted version of the Birmingham Plan does not specifically state what the objectively assessed housing need for Birmingham city is. There are, however, a number of supporting evidence based documents that confirm what the Council believe the objectively assessed need to be.

1.2 The Birmingham Strategic Housing Market Assessment (SHMA)(January 2013) sets out conclusions on the amount of housing required to meet the city's growing population during the course of the plan period. Paragraphs 11.50 and 11.51 of the document advise that:

“Demographic projections for Birmingham suggest that, over the plan period 2011 – 2031, in round numbers the minimum effective demand for net new homes in the city will be between 81,500 and 105,200 homes. These figures are unavoidably uncertain. They are also business-as-usual predictions – which assumes that the factors that drive housing demand will be the same in the future as they were in the past. In reality, however, at least two of these drivers are liable to change.”

“The first is the economic climate. Early results of the 2011 Census suggest that the credit crunch and recession have lifted housing demand, by reducing net migration to neighbouring districts. If adverse economic conditions continue, this could result in demand considerably above the business as usual scenarios possibly for around 119,000 over the Plan period. Alternatively, a bad economic climate could depress household formation more than it depresses migration. In that case

demand would not be so high but the quality of life would deteriorate as people who would otherwise form their own households would remain (or become) part of other peoples households.”

- 1.3 This is expanded upon in the conclusions of the SHMA. It is advised that in the housing market area (Birmingham, the Black Country, Bromsgrove, Coventry, Lichfield and Solihull) the best available estimate of objectively assessed needs to 2031 is 9,300 net new homes per annum. At least 4,100 of these homes are required to meet Birmingham’s growth requirements. The Conclusion section goes on to advise that this estimate is based on the 2008 CLG household projections and that:

“Ideally this figure should be reviewed in the light of more recent evidence – including the 2010 – based ONS population projections of the 2011 Census, and in due course the 2010 based DCLG household projections. But in the absence of further analysis the 2008 based figures are a good starting point (paragraph 13.4).”

- 1.4 The SHMA is then expanded upon by the Birmingham City Council Housing Targets 2011 – 31 Technical Paper (September 2013). The “results” section of this document state at paragraph 3.7 that the SHMA concludes that the 2008 DCLG Household Projections provide a robust minimum indication of objectively assessed need. This projection shows an increase of 81,500 households during the course of the Plan period. Applying a vacancy rate of 3% translates into a minimum objectively assessed need for 84,000 new homes.

- 1.5 It is, however, acknowledged at paragraph 3.9 that since the SHMA was produced more recent demographic information has become available in the form of interim demographic projection and additional from the 2011 Census.

- 1.6 It is noted that in the document “Birmingham City Council Response to Inspectors Initial Questions on the Submitted Birmingham Development Plan (BDP)” the Council advise that the plan’s objectively assessed need for new

housing is derived from the SHMA. However, the GBSLEP Strategic Housing Needs Study will make use of more recent data than was available when the SHMA was provided. The Council recognise that the GBSLEP study may produce a different level of household growth for Birmingham and that the general expectation is that this is more likely to increase than to reduce the objectively assessed need figures from the SHMA.

- 1.7 On the 30th July 2014 the “Strategic Housing Needs Study – Interim Report following Stages 1 and 2 and Developing the Scenarios for Testing and Stage 3 – Refinement of Brief” report was presented to the Greater Birmingham Solihull Supervisory Board. The Strategic Housing Land Study was commissioned to establish the scale and distribution of housing growth required in the LEP areas. The report summarises the key outcomes for the GBSLEP following the completion of Stages 1 and 2. Appendix 2 of the paper provides a district breakdown of the study results. This appendix is attached in Appendix 1 of this Hearing Statement for reference.

- 1.8 The preferred assessment of objectively assessed need (PBA Trends 2001 – 2011) for the GBSLEP area over the period 2011 – 2031 is 8,000 households per annum (Report paragraph 4.2). Birmingham City Council is expected to provide 5,620 dwellings to meet its portion of the objectively assessed housing need.

- 1.9 In conclusion, the Council's SHMA suggest that the objectively assessed housing requirement for Birmingham is between 81,500 and 105,200 homes depending upon the methodology used. It is advised that the best available estimate of objectively assessed housing need for Birmingham should be taken from the 2008 based CLG Household Projections that identifies a minimum requirement for 84,000 new homes during the Plan period. However, there does appear to be general acknowledgement from the Council that this information is out-of-date. Furthermore, the 84,000 dwelling requirement has simply been established by adding a vacancy rates to the 2008 Household Projections indication of this increased number of

households expecting to arise during the plan period rather than through modelling using a recognised approach (POPGROUP/Chelmer for example).

- 1.10 Whilst it is not yet fully completed it is our view that the most accurate reflection of the objectively assessed housing need for Birmingham identified in a document produced by the Council is that set out in the emerging GBSLEP study of 5,600 dpa (112,400 dwellings during the course of the Plan period). It should be noted, however, that Bloor Homes are part of a consortium who have instructed Barton Wilmore to undertake detailed housing modelling on their behalf. Whilst we are of the view that the most robust evidence produced by the Council on the objectively assessed housing need is the interim findings of the GBSLEP study, we are of the view that the housing modelling undertaken by Barton Wilmore on behalf of Bloor Homes is the most credible assessment of objectively assessed housing need
- 1.11 The Council's evidence based documents acknowledge that regardless of what the housing requirement is in the range identified there is insufficient capacity within the city's administrative boundary to meet this requirement. However, it is imperative that a full and proper objectively assessed housing requirement is identified within the Plan as required by the Framework (paragraph 47 and paragraph 149) to establish the extent of the shortfall. Furthermore, it is essential for the full extent of the capacity of Birmingham's urban area to be established so the quantum of development required in neighbouring authority is understood.
- 1.12 On this point we are of the view that additional land is available in the city boundary that can help meet the housing requirement. Specifically, the North Worcestershire Golf Club is a suitable location for the delivery of in the region of 800 homes to meet the housing requirement.

Affordable Housing

- 1.13 Turning to the requirement for Affordable Housing the SHMA set's out its conclusions on affordable housing need in Chapter 8. It advises that

following the assessment model specified in the Practice Guidance there is a net need for 10,427 affordable dwellings per year in Birmingham. This annual figure is based on a model that assesses housing need over a five year period. If a higher affordability threshold and houses in the private rental sector contributing to the affordable housing supply are factored into the analysis the need for affordable housing reduces to 1,989 per annum.

- 1.14 It is understood that the principal supply of affordable housing during the course of the Plan period will be through planning obligations. That being the case, the greater the Plan's overall housing requirement the greater the quantum of affordable housing that will be delivered. Policy TP30 – Affordable Housing, the draft Plan advises that the City Council will seek a developer contribution of 35% affordable housing on residential developments of 15 dwellings or more. 35% of 5,600 dwellings per annum (the objectively assessed housing requirement for Birmingham identified in the emerging GBSLEP Strategic Housing Needs Study) equates to 1,967 dwellings. This broadly equates to the quantum of affordable housing identified as being required by the SHMA.
- 1.15 It is, however, necessary to note that not all housing sites will meet with affordable housing thresholds. Furthermore, the affordable housing requirement set out within the Plan has been established departing from the guidance in the Practice Guidance (as referred to above a higher affordability threshold has been used and significance reliance has been placed on households in the private rental sector contribute to the affordable housing supply). That being the case the 5,620 dpa figure identified by the GBSLEP Strategic Housing Needs Study should be treated as a minimum to help to meet the Council's affordable housing aspirations.

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

1.16 Bloor Homes are participating in the preparation of the Barton Wilmore assessment of objectively assessed housing need for Birmingham. We rely on Barton Wilmore's representations in this regard.

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?

1.17 As referred to above the emerging GBSLEP Strategic Housing Need Study suggests that 5,620 dwellings per annum should be provided to meet Birmingham's growth requirement (112,400 dwellings during the course of the Plan period). The submission draft Plan advises that there is capacity to develop 45,000 dwellings in the urban area of Birmingham. These dwellings will be provided on poor quality industrial land, areas of open space that no longer perform their original function and through the re-use of vacant properties. Furthermore, land is to be removed from the Green Belt in Sutton Coldfield to allow for the development of 6,000 homes. Policy TG1 – Overall Level of Growth, advises that the Plan makes provision for development of 50,100 dwellings within its administrative area. There is, therefore, a shortfall in the region of 61,300 dwellings.

1.18 There are numerous references throughout the Plan to the fact that Birmingham cannot accommodate its objectively assessed housing requirement within its administrative area. That being the case, the Council should work with neighbouring authorities to ensure that sufficient provision is made elsewhere to meet the overall housing requirement.

1.19 In terms of a general approach we have no objection to this strategy. Paragraph 47 of the Framework confirms that the Local Plan should meet the full objectively assessed need for marketing affordable housing in the housing market area. Paragraph 179 of the Framework confirms that joint working should enable the planning authorities to work together to meet development requirements which could not wholly be met within their own administrative areas due to, amongst other reasons, the lack of physical capacity.

1.20 We would submit, however, that it is necessary for the local authority to ensure that all available, suitable and sustainable land within the city's administrative boundary is brought forward for development before land in neighbouring authorities is allocated. Indeed, it is a stated objective of the Plan in paragraph 3.2, 3.25, 3.27, and 8.12 that the plan should accommodate as much of the city's housing growth as possible within the city boundary. Furthermore, it is inevitable that development outside of the city boundary will result in Green Belt land release. The development of non-Green Belt sites should be prioritised before Green Belt land. The implications of this are expanded upon further in our response to question 4 below.

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?

1.21 Before the distribution of the development outside of the Plan area is explored it is necessary to ensure that the Plan identifies and delivers as much housing within the city's existing settlement boundary as possible. The emerging Plan suggests that there is capacity for a development of 51,100 dwellings on land within the city's administrative boundary. However, this has no regard to the capacity of the North Worcestershire Golf Club.

1.22 HLPC have submitted detailed representations promoting the development of the North Worcestershire Golf Club on behalf of Bloor Homes and the Golf Club itself through the plan making process. Furthermore, HLPC's statement on Matter E addresses the development potential of the North Worcestershire Golf Club and confirms that the North Worcestershire Golf Club is a sustainable, suitable and deliverable housing site. As such these representations are not repeated in this Hearing Statement. The North Worcestershire Golf Club should be allocated for residential led development in the plan. As the plan fails to allocate the North Worcestershire Gold Club for development it is not sound as it is not based on the most appropriate strategy.

5) Is there justification for a staged housing trajectory set out in Policy TP28?

- 1.23 Paragraph 8.12 of the Plan confirms that the trajectory takes account of the anticipated capacity of the urban area to accommodate additional housing evidenced by the SHLAA. Appendix 10 – Output, of the SHLAA identifies how many dwellings can be expected to come forward during the Plan period in five year tranches (excluding completions to-date, vacant properties and windfalls). This table confirms that the capacity for residential development towards the start of the Plan period is limited with the lowest rates of completions expected, with improving capacity as the Plan period progresses. This is broadly mirrored by the approach of Policy TP28 that suggests that there should be reduced levels of housing provision towards the beginning of the Plan period with a significant increase beyond 2021. The trajectory set out in Policy TP28 is a reflection of the Council's identified capacity. It has not been prepared to meet need as and when it arises.
- 1.24 Furthermore the approach to delivery outlined in the trajectory in Policy TP28 will only meet a proportion of Birmingham's housing needs. A significant amount of development will have to take place in the neighbouring authorities' areas to meet Birmingham's objectively assessed housing requirement. Given that there are no allocations in place to meet this requirement as of yet, it is reasonable to assume that no development will take place for a number of years to meet the overflow requirement.
- 1.25 Paragraph 6.2 of the Housing Targets 2011 – 2031 Technical Paper suggests the trajectory takes account of difficult economic circumstances prevailing at that time. This is not, however, reflected in the wording of paragraph 8.12 of the submission plan. In any event, the economic climate is improving and there is a clear demand for additional houses now.
- 1.26 In summary, there is a lack of development capacity towards the beginning of the plan period. Sites will not become available to meet the plans housing

requirement for a number of year. The North Worcestershire Golf Club is available for development in the short term. It is estimated that the site could start to deliver new houses in two years' time with notable contributions towards the beginning of the Plan period. Allocating the North Worcestershire Golf Club for development will help better balance the housing trajectory plan supporting early delivery.

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

-

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

-

8) Is Policy TP30 justified for seeking affordable housing provision and specialist housing and extra care housing schemes?

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APPENDIX 1

Report to the Greater Birmingham and Solihull Supervisory Board

30 July 2014

STRATEGIC HOUSING NEEDS STUDY INTERIM REPORT FOLLOWING STAGES 1 and 2 AND DEVELOPING THE SCENARIOS FOR TESTING IN STAGE 3 – REFINEMENT OF BRIEF

1. Purpose of the Report

1.1 This report summarises the key outcomes following the completion of Stages 1 and 2 of the Strategic Housing Needs Study and refines the brief for Stage 3 of the work.

2. Recommendation(s)

- (1) That the Supervisory Board notes the outcome of the interim report stage of the Strategic Housing Needs Study.
- (2) That Members are asked to endorse the LEP Board decision of 16 July 2014 to agree the brief for Stage 3 of the Strategic Housing Needs Study as set out in paragraphs 4.5 to 4.11 of the report
- (3) That the arrangements for a briefing meeting for other local authorities and a workshop for partner organisations be noted.
- (4) That any minor revisions to the brief as a consequence of the workshop with partner organisations on 31 July be delegated to the Supervisory Board Chair in liaison with the Chairman of the Black Country Joint Committee and otherwise to the full Supervisory Board, electronically if needed for speed of decision-making.
- (5) That Members note that a further report to the Supervisory Board will cover the final consultants' report and consequential preferred scenario for sign-off at a future meeting.

3. Background

3.1 The Strategic Housing Study has been commissioned to look at the long term scale and distribution of housing growth. This report summarises the key outcomes for the GBSLEP following the completion of Stages 1 and 2 of the work and refines the brief for Stage 3. The approach in the report is designed to reduce the level of risk to all constituent local authorities and to provide the information to 'mix and match' elements taken from the various distribution scenarios which, in turn, will help inform a decision on the level of growth that should be taken forward in the Spatial Plan for Recovery and Growth (SPRG).

4. Key Issues

Progress to Date
Stages 1 and 2 – Interim Findings

- 4.1 The Interim Report stage of the Strategic Housing Needs Study sets out the Objective Assessment of Needs for the GBSLEP and the Black Country which the consultants (Peter Brett Associates - PBA) consider to be a Housing Market Area (HMA) in accordance with government guidance based on consideration of factors such as migration and commuting patterns. This confirms a significant housing shortfall across the HMA. The findings for the GBSLEP at this stage are set out in a series of slides with commentary which is attached at Appendix 1. The findings for the Black Country will be reported separately to the Black Country Joint Committee.
- 4.2 PBA's preferred estimate of objectively set needs (PBA Trends 2001-11 in Appendix 2) for the GBSLEP area over the period 2011 to 2031 is 8,000 households per annum which results in a housing shortfall of c2,900 dwellings per annum compared to proposals in emerging and adopted development plans.
- 4.3 PBA has also estimated (ONS/PBA 2012 in Appendix 2) that housing need could be reduced following the publication of new population projections on 29 May 2014. These would result in a need to accommodate 6,800 households 2011-31. This would translate into a housing shortfall of 1,700 dwellings per annum in the GBSLEP. PBA advise that this later estimate should be treated with caution since it projects forward recessionary trends and is therefore open to challenge.
- 4.4 A decision will need to be taken on the level of growth that should be carried forward but at this stage it is recommended that this should be deferred until full completion of the study. This is because the assessment of need has to be a 'policy off' assessment with relevant policy considerations applied at the end of the process. This would also mean that the interim findings can be shared and considered by partners.
- 4.4 Appendix 2 also includes a District breakdown of the study results. While the proposed levels of growth appear high it is important to stress that representatives of the development industry (see for example, Barton Willmore, Birmingham Sub-Regional Housing Study 2014, submitted as a response to the Birmingham Development Plan consultation) have published their own assessments with significantly higher results. As an example, for Birmingham, the highest PBA estimate equates to c112,000 household growth 2011-31 whereas the developers estimate the household increase is in a range 135,000-153,000 over the same time period. The Barton Willmore report then proposes a market driven distribution of the housing shortfall across the HMA. This emphasises the importance that the PBA work is brought to a conclusion.

Stage 3 – Refinement of the Study brief

- 4.5 Stage 3 of the study will look at realistic scenarios to distribute the potential shortfall and be informed by the response to consultation on the First Iteration of the GBSLEP's Spatial Plan for Recovery and Growth (SPRG). The suggested approach reflects the discussion at the Housing Study Steering Group meeting held on 16 April 2014, the Executive Officers meetings on 21 May 2014 and 25 June 2014 and a joint meeting of Leaders from all local authorities in the GBSLEP and Black Country held on the 3rd July. A copy of the brief for Stage 3 in the original tender brief is included for information at Appendix 3.
- 4.6 An important caveat to the exercise is that in distributing growth to each scenario it is important that the levels are constrained to that which would be realistically deliverable given sustained optimistic market conditions. The policy assumptions/ resource implications of possibly differing levels of growth under each scenario will need to be made explicit. This means the full extent of the shortfall may not be practically distributed in each of the scenarios. The suggested scenarios are as follows:

Scenario 1 – Intensification. Seek to distribute the shortfall by local planning authority with the scope for extra dwelling capacity being delivered through increased density and/or intensification in existing urban areas.

Scenario 2 – Peripheral Urban Extensions. Distribute the shortfall to the urban periphery of the conurbation close to areas where growth pressures are greatest. The proportion of growth in each sector (N. Birmingham, Solihull, Bromsgrove, Dudley, Wolverhampton, Walsall) broadly related to sound planning and sustainability features.

Scenario 3 – Public Transport Corridors of Growth. Distribute the shortfall on the basis of development at 'beads on a string' using spare capacity coupled with consideration of the growth potential of the local rail network. This option should take account of the implications of HS2 which might include, for example, the release capacity on the classic network.

Scenario 4 – The Enterprise Option. Distribute the housing shortfall to growth as part of UK Central and the towns in the Enterprise Belt. Distribute the additional housing in proportion to the scale of employment proposed whilst ensuring a broad balance between the levels of housing and employment growth proposed.

Scenario 5 – Dispersed, Multi-centred Growth – Distribute the growth to shire districts with distribution based on the population of the main urban settlements. This scenario should include certain centres beyond the GBSLEP and Black Country where there is scope to accommodate in-migration e.g. such as Telford, South Worcestershire and parts of Warwickshire.

Scenario 6 – New towns/settlements - Focus the distribution of the shortfall to expansion at Redditch and Telford together with new potential settlements (including locations arising in the recent consultation).

- 4.7 The Steering Group will be required to endorse the distribution to be quantified by PBA for each local planning authority under each scenario. Significant proposed and as yet uncommitted allocations of the types highlighted in each scenario should be considered as part of this. For example the UK Central proposal includes some additional housing which should be considered as forming part of Scenario 4. PBA will be expected to work with planning officers in each local planning authority in identifying the potential levels of growth under each scenario.
- 4.8 The realistic scope of development capacity beyond the GBSLEP and Black Country areas should be built in only where this is consistent with the particular scenario under consideration. This should include consideration of the realistic potential in the 'related authorities'.
- 4.9 The analysis should then include SWOT testing of the implications of that scenario for each local planning authority as well consideration as part of the Sustainability Assessment (SA) which will take place as a parallel workstream. This analysis should take account of any views expressed by the respective local planning authorities.
- 4.10 At this stage the respective local planning authority should then give its views (caveated as necessary) on its ability to accept the level of growth under each scenario, taking account of the SWOT analysis and SA assessment. The analysis should be subject to peer review before the outcomes are completed.
- 4.11 At this point this should be the limit of the work to be undertaken as part of the PBA Study.

Developing the Preferred Option

- 4.12 The final study and its findings should then be subject to discussion by Leaders with the scope for the preferred approach to be identified. In reality this is likely to draw on elements from a number of the scenarios. If the preferred approach relies on capacity outside the GBSLEP/ Black Country areas then this should be based on formal agreement with the respective authority(ies).
- 4.13 The Leaders discussions should be informed by an analysis which enables all LPAs to indicate both the preferred approach for their District - although it is important that all Districts do not simply default to the lowest level as this would not be NPPF-compliant – and their preferred approach for the housing market area as a whole.

Future Considerations

- 4.14 Since the work under Stage 3 and the final outcome could have significant implications for some local authorities out with the GBSLEP and Black Country LEP at the Joint Leaders meeting it was agreed that a briefing for the Leaders of North Warwickshire District Council, South Staffordshire District Council, Stratford upon Avon District Council and Telford & Wrekin Council should be held. Subsequent to that meeting it has been suggested that the South Worcestershire authorities should also be invited.
- 4.15 There is much interest in this work from other sectors. To reflect this, and to enable discussion on the implications at this interim stage the Joint Leaders meeting (endorsed by the GBSLEP Board) agreed that a meeting be held to which partner organisations are invited. This would receive the presentation by PBA alongside the Stage 3 brief. The discussion at this event due to be held on 31 July 2014 will be carefully recorded so that due consideration could be given to any points that are made and where relevant and appropriate duly taken into account. It is suggested that any minor* changes to the brief could be signed off by the Supervisory Board Chair in liaison with the Chairman of the Black Country Joint Committee.
[*minor means any changes that does not alter the substance and intent of the approach set out in paragraphs 4.5 to 4.11.]
- 4.16 A timescale for taking this work forward will be outlined at the meeting.

5. Financial Implications

- 5.1 Funding for Stages 1 to 3 of the Strategic Housing Study has been approved by the GBSLEP Board. The Black Country 'add-on' is funded separately but this has no financial implications for the authorities in the GBSLEP. The study has been procured by Solihull MBC.

6. Conclusions

- 6.1 Members will be aware of the controversy surrounding the level of housing growth in relation to the preparation of development plans. Completion of the technical study will provide a reliable analysis of objectively assessed housing needs. This will be followed by collaborative working to agree the scale and distribution of growth which, under the current planning system, is the point at which policy considerations can be applied. This work is not only essential to enable the production of sound development plans and to facilitate the Duty to Co-operate.

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Agenda item No 8

Appendix 2 – Headline results for the Objective Assessment of Housing Needs 2011-31

Local authority	Birmingham	Bromsgrove	Cannock	East Staffs	Lichfield	Redditch	Solihull	Tamworth	Wyre Forest	Total
Net new households per annum	CLG 2008 4,077	364	274	479	428	214	679	221	317	7,053
	CLG 2011 3,668	305	232	485	406	211	633	248	268	6,456
	PBA Trends 2007-12 6,297	211	335	526	272	258	563	158	75	8,695
	PBA Trends 2001-11 5,620	261	293	603	338	286	434	111	83	8,029
	ONS/PBA 2012 4,317	288	290	448	324	174	589	204	194	6,828
Housebuilding (AMR 2002-12)	Past 5 years 1,710	149	213	537	295	139	324	165	196	3,728
New dwellings per annum (dpa)	Past 10 years 1,843	288	308	464	420	240	454	216	274	4,507
Latest (proposed) target dpa	Local plan 2,555	368	241	613	478	336	500	250	200	5,541

PBA Trends 2001-11 = PBA Preferred Scenario, ONS/PBA 2012 = PBA Alternative post 2012 ONS Population Projections Scenario

Appendix 3 - Extract from Original Tender Brief

Stage 3

The opportunity will be taken to review and refine the specification for Stage 3 of the study taking account of the outcomes of stages 1 and 2.

Identify a number of broad spatial options (to be agreed by the Steering Group) for addressing any shortfall of suitable land for housing (or surplus of land suitable for housing – after needs within the LPA have been met.). These will:

- Take account of migration trends, the relationship with adjoining housing market areas and other relevant evidence.
- Take account of the type and size and tenure of housing where these will affect the strategic nature of the study.
- Be both feasible and deliverable (acknowledging that some existing policy designations may need to be revisited).
- Provide local planning authorities and decision makers with a clear basis on which to undertake more detailed work and where necessary review their development plans.
- Provide broad indicative housing requirement figures for each option for each local authority.

In developing options a Sustainability Appraisal (SA) process will need to be developed and undertaken in parallel with the Housing Needs Study. The consultants appointed to undertake the needs study will be required to work closely with the body appointed to undertake the SA.

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