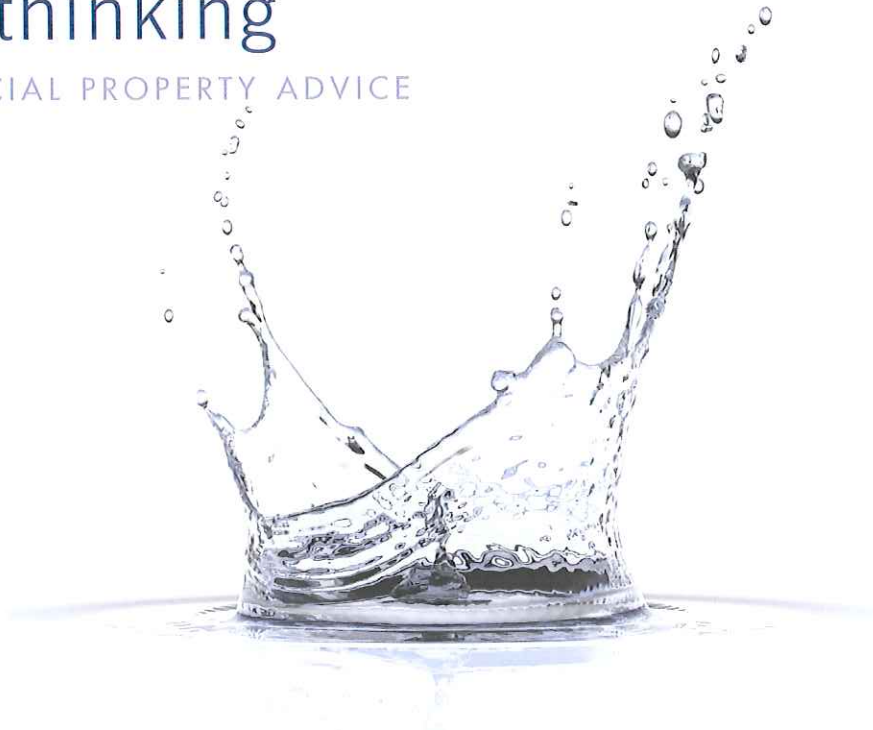


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**Birmingham Plan 2031 – Hearing Statement
Matter D: About Birmingham, Vision, Objectives, Strategy and
General Policies**

**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 D: About Birmingham, Vision, Objectives, Strategy and General Policies

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CONTENTS

*Matter D: About Birmingham, Vision, Objectives, Strategy and general policies
(BDP sections 2 & 3, policies PG2-3)*

APPENDIXES

1.0 Matter D: About Birmingham, Vision, Objectives, Strategy and general policies (BDP sections 2 & 3, policies PG2-3)

Main issues: Do sections 2 and 3 of the Plan set out a sound basis for its policies and proposals? Are the provisions of policies PG2 and PG3 justified and effective?

Questions:

- 1) *Do the sections of the Plan entitled About Birmingham and The Vision, Objectives and Strategy provide a sound basis for the policies and proposals in the rest of the Plan?*
- 1.1 The reference in paragraph 3.2 of the submission draft plan to Birmingham City aiming to deliver housing to meet the needs of all is supported, as is Objective 2 which advises that provision will be made for a significant increase in the City's population. This approach is in accordance with the requirements of paragraph 47 of the Framework which requires local authorities to 'boost significantly' the supply of housing and to meet 'the full objectively assessed needs for market and affordable housing in the housing market area'. We are, however, concerned that the policies in the emerging plan do not fulfil the stated objective. The draft plan is not considered to be sound as it does not meet the 'effective' or 'justified' tests of the Framework as it does not allocate the most suitable, sustainable and deliverable residential sites that are available to meet the objectively assessed housing requirement.
- 1.2 We are of the view that the 'Challenges' identified in Chapter 2 of the Plan are appropriate. Furthermore, the general strategy the Plan suggests the City Council will take to address these challenges is supported. However, the approach that it is advised that the City Council will adopt to address the Challenges is not reflected in the Plan's wider policies.
- 1.3 Bullet points 2 and 3 in the 'Challenges' section of the Plan confirm that Birmingham's population is expected to grow significantly during the course of the Plan period. There are significant challenges in identifying appropriate sites to accommodate and deliver the long term levels of growth needed within the existing built-up area of Birmingham. Consequently it will be necessary to undertake joint working with partners in adjoining local

authority areas to identify sites where housing and employment can be best located to meet the requirements of Birmingham's growing population.

- 1.4 Whilst it is clear that the Council will need assistance from neighbouring local authorities to meet its housing growth requirements the Council will seek to maximise delivery in the urban area in the first instance. It is confirmed at paragraphs 3.2, 3.25, 3.27 and at 8.11 that it is the Council's intention to deliver as much of the new housing that the city needs within the urban area as possible, subject to maintaining the attractiveness of the urban area as a place to live.
- 1.5 The Plan suggests that the capacity in the urban area for new residential development is some 45,000 new homes, which includes bringing vacant properties back into use and developing industrial land and some open space that no longer performs its original function. Due to the Council's pressing housing need, land will be removed from the Green Belt at Sutton Coldfield to allow for the development of an additional 6,000 homes. This is not, however, sufficient to meet the Plan's overall housing target. Alongside the Birmingham Development Plan 2031 a wider growth strategy for the LEP area and other adjoining authorities is being prepared to set out how and where the remaining housing will be delivered.
- 1.6 As a general approach this is supported. Development should first be focused on available sites in the urban area. Only once all sustainable, suitable and deliverable opportunities in the urban area are identified should land within the Green Belt be allocated for development. As well as the Sutton Coldfield Urban Extension, it is inevitable that a significant proportion of the development outside of the city's boundaries will be within the Green Belt, given that the Green Belt's boundary is wrapped around the majority of the greater Birmingham area.
- 1.7 Our concern is that whilst the Plan advises that the capacity within the existing urban area of Birmingham is some 45,000 dwellings, this has no regard to the development potential of the North Worcestershire Golf Club.

Detailed representations are provided in response to Matter E on the development potential of the North Worcestershire Golf Club, as such they are not repeated here. However, to confirm the position, the North Worcestershire Golf Club will soon close leaving the site available for development. Whilst the site is greenfield, it is a private golf club and there is no public right-of-access to the site. The development of the site for residential led scheme will create new areas of open space and facilities on the site accessible to all. It can provide approximately 800 houses increasing the city's urban capacity to 45,800 dwellings, reducing the need to develop Green Belt sites.

- 2) *Does policy PG3 effectively identify what is necessary for successful place-making, and are its requirements justified?*

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