

Birmingham Development Plan 2031  
Examination Hearing Statement on behalf of  
Richborough Estates

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

September 2014

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**Client**  
Richborough Estates

**LPA reference**  
Birmingham Development Plan 2031 Examination

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# Executive Summary

1. This hearing statement is submitted by Turley on behalf of Richborough Estates in respect of their objections to the Birmingham Development Plan 2031 with reference to land at Fox Hill, Roughley.
2. It addresses Matter D: About Birmingham, Vision, Objectives, Strategy and general policies (BDP sections 2 & 3, policies PG2-3) due to be heard on Thursday 23 October (Day 3).
3. Richborough Estates is also making further submissions in respect of Matters A (Housing Need), E (Green Belt), F (Duty to Co-operate), and H (housing provision).
4. The statement is set out as a response to the Inspector's Issues and Questions for Discussion as set out in the Programme for Hearing Sessions (version 1) dated 20 August 2014.

## **Main Issue: Do sections 2 and 3 of the plan set out a sound basis for its policies and proposals?**

5. Richborough Estates supports the vision for Birmingham as an enterprising, innovative and green city but does not consider the plan will have "delivered sustainable growth meeting the needs of its population".
6. By 2031, Birmingham's population is expected to grow by 150,000 and the city faces significant challenges in identifying appropriate sites to accommodate this level of growth within its administrative boundary.
7. Richborough Estates considers that the Council could and should do more to accommodate this population growth within the City boundary in order to support the long-term economic growth of the city. Given its economic success and potential to create jobs, we would expect to see the Council wish to retain more economically active people as residents, particularly in areas that people aspire to residing such as Sutton Coldfield, with the associated socio-economic benefits that they would bring.
8. As a result, we do not consider that these sections of the Plan provide a sound basis for the policies and proposals contained within the rest of the Plan.

# 1. Q1: 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 thrust of the NPPF is to proactively drive and support sustainable economic development. It states that planning policies should address potential barriers to investment, including a lack of housing. There are key functional linkages between places where people live and work and associated sustainable
- 1.2 As set out in respect of Matter A, the Council has not determined the full objectively assessed need for housing but, even on its own numbers, 40% of the city's housing needs cannot be met within the city boundary and there is no indication (see Matter F Hearing Statement) of where and when this need will be met. This is at odds with the Strategy set out in Section 3 of the Plan that seeks to accommodate as much of the City's housing requirement as possible within the boundary.
- 1.3 The economic strategy of the Plan is clear – *a strong and prosperous economy supported by a skilled workforce*. To do this, Birmingham will need to position itself as a place to do business and attract national and international investment and provide housing opportunities that meet the needs of all residents. The city is already a major employment centre, and forecasts indicate that 51,000 jobs are likely to be generated in Birmingham between 2011 and 2021. However the economic strategies of the LEPS estimate much higher employment growth; the target for the GBSLEP is to create 100,000 net new private sector jobs by 2020 alone.
- 1.4 This forecast growth in jobs is not matched by a supply of working age population that is economically active; the working age population is only projected to grow by 47,000 between 2011 and 2021. The mismatch between economically active working age population and the forecast employment growth, compounded by the unmet housing need to be accommodated outside of the City boundary, could result in unsustainable commuting patterns. Research suggests that there is already high jobs leakage outside of the city despite the growing population and the higher levels of job creation and potential. The PPG is clear that plan makers should consider how the location of new housing could help to address such an issue.
- 1.5 The Plan allocates one major new employment site at Peddimore in the north east of the city, and identifies many Core Employment Areas, the majority of which are located to the north east of the city centre along the A38(M) and M6 corridors. Such areas are highly accessible from Sutton Coldfield. Whilst the proposed Langley SUE is well located, there is potential for more of the job creation potential of Peddimore and the other Core Employment Areas to be secured for Birmingham residents with the provision of increased housing in the Green Belt arc.

- 1.6 Given the significant potential to create jobs within the city in key sectors relevant to Birmingham's economic success, it is surprising how little of the growth in economically active people the city wishes to accommodate as residents, particularly in areas that people aspire to residing in such as Sutton Coldfield, with the associated socio-economic benefits that they would bring. As previously mentioned, much of the jobs growth will be to the east of the city, making Sutton Coldfield and the Green Belt arc an ideal location to provide the sort of housing which would prevent the 'brain drain' to equally accessible locations such as Lichfield, north Warwickshire, Solihull and north of Stratford District which are all well served by the M42 and public transport services in to Birmingham.
- 1.7 In failing to assess its housing needs objectively and then failing to accommodate as much of them within the city as possible, the Council has not been consistent with its own policies towards economic growth and the retention of economically active people. As a result, we do not consider that these sections of the Plan provide a sound basis for the policies and proposals contained within the rest of the Plan.

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