

Matter E 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:

WEEK 2

TUESDAY 28 OCTOBER 2014, AM & PM & WEDNESDAY 29 OCTOBER 2014, AM & PM

Matter E: Green Belt policy, the Langley Sustainable Urban Extension [SUE] allocation and the Peddimore employment allocation (BDP policies TP10 & GA5-6)

Main issues: Does the Plan comply with national policy in its approach to the Green Belt? Are the Langley SUE and Peddimore employment allocations justified and deliverable? Should other Green Belt and/or major greenfield allocations be made?

8) Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing and/or employment development, either within the Plan period or as safeguarded land for development beyond the Plan period?

Yes, given the evidence before us Birmingham should be making better use of its green belt land for both employment and housing.

The Plan should provide flexibility because whilst the City believe delivery is constrained, planning as if it was not, would do no harm.

If the City are right and the market cannot deliver more than 250 units a year in Sutton Coldfield then any additional land allocated would simply come forward in the next plan period – no harm done. This also provides an enduring green belt boundary in accordance with policy

If the City are wrong and the markets can deliver more than 250 units a year then Birmingham would be able to provide for much more of its own population without them commuting in from Lichfield, Burton and Telford.

This is all about supply and demand to suggest that with an need of between 81,500 and 105,000 units but a supply of only 55,000 units, extra housing if built would not sell is plainly wrong. Outside of London we have no evidence of what such an imbalance of supply to demand will do.

In none of the cases within the evidence provide by the city, is the level of unmet need comparable to that of Birmingham and therefore the conclusions drawn from the evidence are wrong.

c) Should it/they be safeguarded for development beyond the Plan period?

If the city are right with their SHAA projections the greenbelt boundary will need to be reviewed again next plan - clearly in in contradiction with national policy.

In addition to allocating Area's B & C for development within the plan period - Suitable sustainable parcels within A should be removed from the green belt and safeguarded for development beyond the plan period.

15th September 2014



Mr Roger Clews
c/o Ian Kemp
Programme Officer
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Dear Mr Clews

The development at Harvest Fields has been complete for some time now and it was not expected that we would comment on the BDP at this stage.

However, having had the PBA report Sutton Coldfield Green belt sites, phase 2 brought to our attention we feel it necessary as the report draws conclusions that, whilst they look correct from the numbers, are not an accurate reflection of the information available or indeed the actual events and delivery rates.

Whilst significant in itself, we have no idea if this issue is the same for the other two Sutton sites, do the bare statistics tell the actual story?

To aid the Inspector we will comment on individual paragraphs within the report.

2.6

Peak output at Harvest Fields (219 units in 2002) was achieved when we had 5 outlets all selling at the same time, these were Crest Homes, Barratt, Westbury, Persimmon & Kings Oak. This rate was not maintained because on our 60% of the site we chose to use only one developer – the other 40% of the site was essentially built out by 4 developers within that year.

Had the other 4 developers had more land to build on we are sure they would have done so.

Ignoring 2001 as mobilisation and as detailed planning permissions for the individual developers were put in place the lower output figures after 2002 are from periods when only one outlet was selling (Crest)

Moving to the gap in completions from 2006 – 2012, as Birmingham are aware, (but possibly not pba as they don't have the history), development of Harvest Fields was brought to a standstill in 2006 due to landfill remediation issues and Section 106 constraints.

These were cleared in late 2007/early 2008 by which time the credit crunch had taken hold and Crest did not want to remobilise to site.

It took until 2012 and a High Court action to get our contract moving again.

15th September 2014

Therefore, to take 1591 units and divide it by 15 years as done at 3.26 is plainly wrong.

Additional detail – the section 106 limited the number of dwellings we could complete without providing the public open space etc. This POS was located over an old Landfill site which took longer than expected to remediate, followed then by delays in receiving planning permission for the POS. Obviously this constraint is not a market constraint but one imposed by Birmingham – without the S106 the last 65 units would have been completed in 2006.

3.26

6-7 years

Whilst allocated in the Birmingham UDP 7 years before first delivery Harvest Fields was not released from green belt until the end of 1996. Para 9.50 adopted UDP say's "To guard against the possible oversupply of housing land and to ensure that the most attractive sites are not all used up first, the land south of Duttons Lane (H1) will not be released until the end of 1996". Actual release happened in 1997 It then took a further three years to obtain detailed planning permission and start building. It took 3 years for first delivery not 6/7

Maximum delivery

As noted above 219 units per year was with 5 developers (not 2/3) - they couldn't build any more or any faster because they did not have any more land available to them.

5.8

The sweeping 40dph on average policy produces high density, low value housing, as demonstrated by pba's an average unit value of £150k, for comparison at Harvest Fields phase 4 (post credit crunch) at 33ish dph produced an average of £285k.

By relaxing the policy on 40dph BCC could produce distinct market areas within the green belt arc – as the existing adjacent areas are and therefore provide additional distinct sites.

We would invite the Inspector to visit Harvest Fields when he is in the area to see what can be achieved with care and thought.

Yours faithfully



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Chairman

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