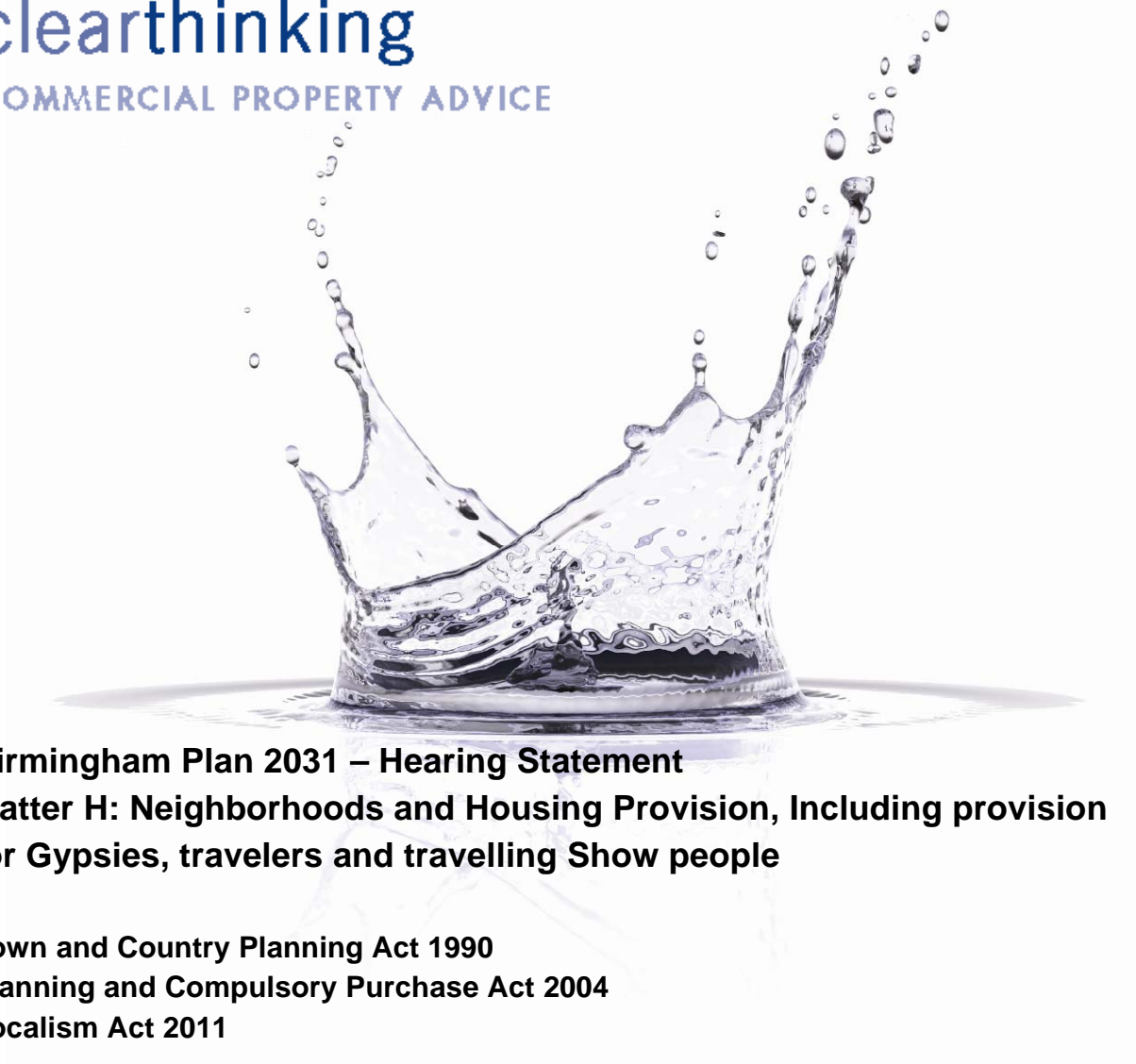


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COMMERCIAL PROPERTY ADVICE



Birmingham Plan 2031 – Hearing Statement
Matter H: Neighborhoods and Housing Provision, Including provision
for Gypsies, travelers and travelling Show people

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

On Behalf Of: Bloor Homes Western

Prepared By:

Simon Hawley BA (Hons) MA MRTPI

Harris Lamb | Grosvenor House | 75-76 Francis Road | Edgbaston | Birmingham B16 8SP

Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: simon.hawley@harrislamb.com

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Main Contributors

Simon Hawley, BA (Hons) MA MRTPI

Issued By

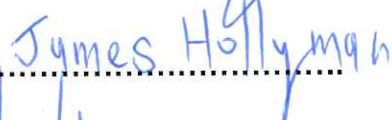
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**Matter H: Neighborhoods and Housing Provision, Including provision
for Gypsies, travelers and travelling Show people**

APPENDICES

1.0 Matter H: Neighbourhoods and housing provision, including provision for gypsies, travellers and travelling show people (BDP policies TP26-27, TP29 & TP31-34)

Main issue: Does the Plan make adequate and appropriate provision to meet the identified housing needs, including the needs of gypsies and travellers?

Questions:

*1) As required by NPPF paragraph 47,
have the Council identified:*

- (a) A five-year supply of specific deliverable housing sites; and*
- (b) A supply of specific deliverable sites or broad locations for growth for years 5-10 and where possibility for years 11-15?*

1.1 The Submission Plan and its evidence based documents demonstrate that Birmingham City Council is unable to demonstrate a five-year supply of specific deliverable housing sites. As referred in HLPC's Matter A Hearing Statement the Birmingham SHMA (January 2013) and the Birmingham City Council Housing Targets 2011 – 31 Technical Paper (December 2013) suggest that 84,000 dwellings are required during the course of the plan period in order to meet the Council's objective assessed housing need (4,200 dpa). However, the "Strategic Housing Needs Study – Interim Report Following Stages 1 and 2 and Developing the Scenarios for Testing in Stage 3 – Refinement of Brief" report presented to the Greater Birmingham and Solihull LEP Supervisory Board on 3rd July 2014 suggests that the objective assessment of housing need for Birmingham during the plan period is 112,400 dwellings (5,620 dpa).

1.2 The Birmingham Development Plan Strategic Housing Land Availability Assessment (SHLAA) 2014 (September 2014) includes information on the supply of sites which are available to meet the housing requirement. Paragraph 1.3 of the SHLAA advises that between 2011 and 2014 a total of

4,952 dwellings have been completed or have been returned to use. This equates to an annual average of 1,651 dwellings per annum. This is significantly below the annualised housing requirements identified above.

1.3 Table 3 – Planning Status by Supply Period of the SHLAA identifies the number of dwellings that are expected to come forward within the following five year period and from what source of supply. A total of 14,041 dwellings are expected to come forward within the five year period which equates to an annual rate of provision of 2,808 dwellings per annum. The pro rata annual rate of provision is significantly below the annualised housing requirements referred to above.

1.4 Set out below is a five year housing land supply calculation based upon the information in the SHLAA. It clearly demonstrates that the five year supply of housing land is not available.

Table 2 – Five Year Housing Land Supply Calculation

	Technical Paper	LEP Study
Housing Target 2011-2031	84,000	112,400
Annualised housing target	4,200 dpa	5,620
Completions 2011-2014	4,159	
Vacant dwellings returned to use 2011 - 2014	793	
Undersupply 2011-2014	7,648	11,908
5 Year Target excluding undersupply (2014-2019)	21,000	28,000
Five year target including full undersupply	28,648	39,908
5 year target + 5%	30,080 (6,016 dpa)	41,903 (8,381 dpa)
5 year target + 20%	34,378 (6,876 dpa)	47,890 (9,578 dpa)
Source of Supply 2014-2019		
Under Construction	4,034	
Detailed Permission (not started)	4,107	
Outline Permission	1,571	
Permitted Development (B1a - C3)	332	
Allocated in Adopted Plan	120	
Allocated in Draft Plan	392	

Other Opportunity within BDP Growth Areas	1,061	
Other Opportunity outside BDP Growth Area	264	
Windfalls	1,360	
Long Term Vacant properties	800	
Total	14,041	
<i>Five Year land Supply with 5% buffer</i>	<i>2.33 years</i>	<i>1.68 years</i>
<i>Five Year land Supply with 20% buffer</i>	<i>2.04 years</i>	<i>1.47 years</i>

1.5 The emerging Plan acknowledges that Birmingham has significant development capacity issues. Indeed, Table 3 of the SHLAA suggests that there is capacity to deliver a total of 46,830 dwellings within Birmingham during the remainder of the Plan period (this includes the Green Belt Urban Extension at Sutton Coldfield that is expected to provide 6,000 dwellings). Adding this to the completions to date and the vacant dwellings that have been returned to use, the total number of dwellings that the SHLAA suggests are available within the urban area is 51,872 dwellings, 61% of the housing requirement identified by the Technical Paper and 46% of the requirement identified in the LEP report. The Plan does not demonstrate a five year supply of specific deliverable sites nor does it identify a supply of sites or broad locations capable of meeting development needs for years 6 – 10 or years 11 – 15.

1.6 The Submission draft Plan acknowledges that there is a lack of available sites within Birmingham's administrative boundary to meet the housing requirement and it is necessary for land in neighbouring authorities to come forward for development to meet Birmingham's growth requirements. Work is ongoing in order to understand how this is best addressed. However work will take some time to complete. Furthermore, it will be necessary for adjoining authorities' local plans to be amended, or new local plans prepared, to allocate land to meet Birmingham's growth requirements. Planning applications will then need to be submitted and for work to start on site before the development starts to come forward. The majority of Birmingham's housing requirement proposed to be delivered outside of the city's administrative boundary will not, therefore, be met until the end of the plan period at best.

1.7 That being the case, every opportunity should be taken to allocate sustainable and suitable sites for housing development that can deliver housing in the short term. As detailed in HLPC's representations to Matter E the North Worcestershire Golf Club (NWGC) provides opportunity to deliver much needed market and affordable housing in the short term. It can provide 800 dwellings towards the beginning of the plan period helping to address the lack of available and deliverable sites.

(b) A supply of specific, developable sites or broad locations for growth for years -10 and, where possible, for years 11-15?

2) Is there reasonable certainty that a five-year supply of specific deliverable sites can be maintained throughout the Plan period?

1.8 For reasons identified above it is highly unlikely that a five year supply of specific deliverable sites can be maintained through the plan period when compared to Birmingham's objectively assessed housing need. Through housing Policy TP28 – The Housing Trajectory, the draft plan seeks to delay the delivery of a significant proportion of its housing requirement until the end of the plan period. This has been necessary due to a lack of available sites. This reinforces the need for sustainable sites, such as the North Worcestershire Golf Club, to be allocated for development early in the plan period to maintain as far as possible a steady supply of housing completions to meet demand.

3) Is policy TP27 justified in requiring infrastructure to be put in place before new housing is provided?

1.9 We have no specific concerns with requirements of TP27. It should, however, be noted that the proposed development of the NWGC will meet all of the policy requirements. To confirm:

- The NWGC is within Zone 1

- All necessary infrastructure that is required can be put in place.
- The site is in a highly sustainable location for development. This is referred to in HLPC's Hearing Statement to Matter E. The site is in close proximity to a range of services, facilities, job opportunities and public transport opportunities.
- There is no known contamination on the site.
- The proposed development will have no adverse impact on historic, cultural or natural assets.
- The site is not identified as a core employment area, area of open space or Green Belt by the Policies Map or Green infrastructure network map (plan 14) of the emerging Plan or by the adopted UDP.

4) (a) Are the provisions of policy TP29 adequate to ensure the provision of a mix of housing to meet the needs of different groups in the community?

(b) Is the policy sufficiently flexible to ensure its effectiveness?

5) Are the density requirements of policy TP29 justified?

1.10 The density requirements are potentially ambitious. Without undertaking a detailed assessments of constraints it is not possible to confirm what density can be provided across sites within the City. It would be more appropriate for the Policy TP29 to advise that new development should be making the best and most efficient use of the site whilst ensuring that good design is delivered taking account of constraints and development opportunities.

6) (a) Does the Plan meet the requirements of paragraphs 9(a) &(b) of Planning Policy for Traveller Sites [PPTS]?

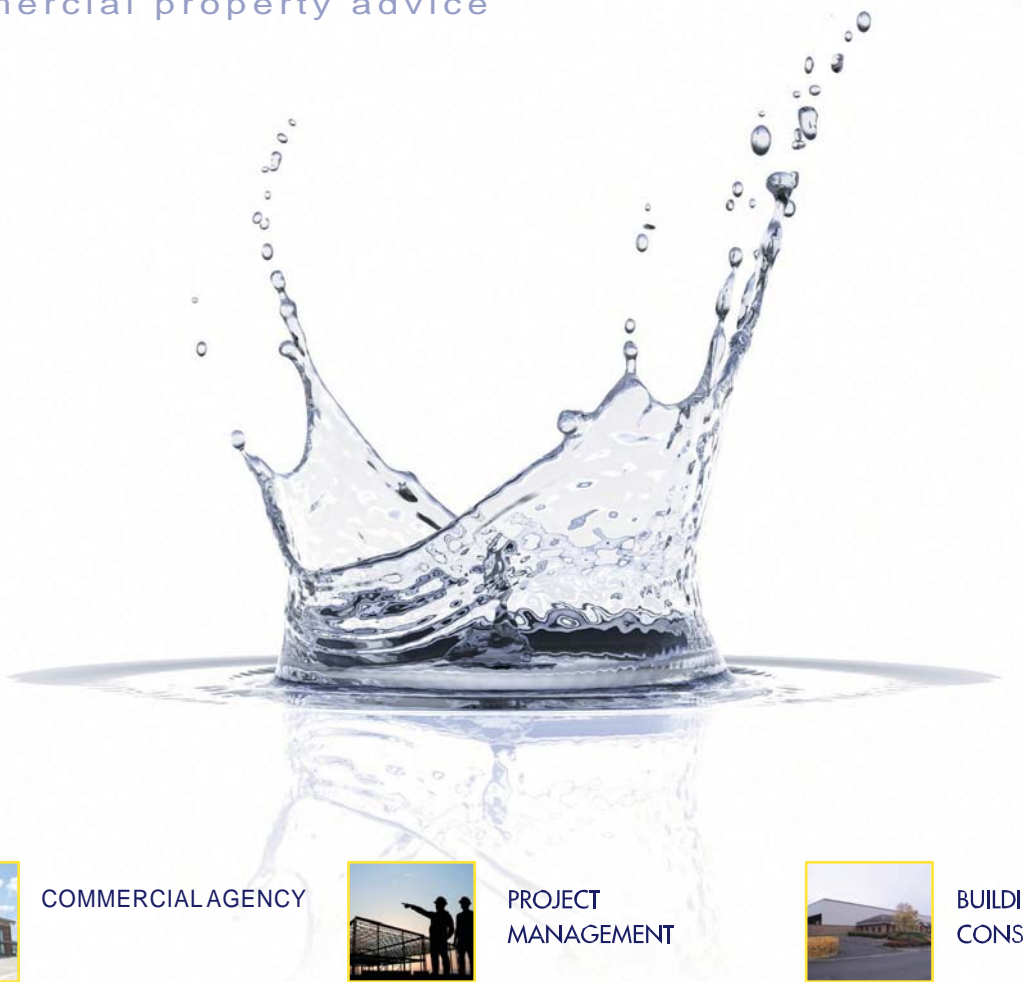
(b) If not, how will this situation be rectified?

7) Are the criteria contained in policy TP33 justified and consistent with national policy in PPTS?

8) Are these policies effectively drafted to achieve their intended purpose and do they provide a clear indication of how a decision-maker should react to a development proposal?

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