



BIRMINGHAM PLAN 2031

Statement by West Midlands CPRE

Matter H: Neighbourhoods and housing provision, including provision for gypsies, travellers and travelling showpeople (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, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15?*

1. The 5 Year Land Supply document H10 suggests the council has a five year land supply. If the level of housing need was lower than suggested, as in our Matter A evidence, the situation could be even more satisfactory.

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

2. The 5 Year Land Supply document H10 suggests the council could maintain a five year land supply. If the level of housing need was lower than suggested, as in our Matter A, evidence the situation could be even more satisfactory.

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

3. Yes, it is and we specifically suggested Area Action Plans for any Urban Extensions.

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?

4. We are happy with the policy in this respect.

5) Are the density requirements of policy TP29 justified?

5. In our response we welcomed the emphasis on good design and the minimum density requirements. However, we believe the council could go further, since the Birmingham Plan Housing Delivery Statement/WM CPRE/Oct 2014

NPPF (Para 47) allows councils ‘to set out their own approach to housing density to reflect local circumstances’. We think the policy should include a requirement to ensure ‘the most efficient use of land for all developments subject to other policy constraints within the plan.’

6. This would prevent housing development gravitating towards the lower density limits while also ensuring the Council’s continued to properly protect its historic suburbs from inappropriate infill.

7. This would also help ensure areas of renewal and windfall sites, as well as any Urban Extensions, fulfilled their potential and thereby reduced the need in future for any Green Belt releases.

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

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

8. As far as we can tell, yes.

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

9. We believe that the policy on provision for Gypsies and Travellers (TP33) is inadequate in relation to Green Belt. This states that sites should only be allowed ‘where there is no conflict with other relevant policies such as those relating to the protection of the Green Belt’.

10. In our view this allows too much room for interpretation. We believe that the policy should be strengthened, in line with the DCLG policy statement on Gypsies and Travellers of 1 July 2013, to state that the Council does not consider any Green Belt land will need to be released for any such sites during the plan period and that no ‘very special circumstances’ would apply. This would make the situation clear and help avoid contention arising over sites in the Green Belt.

11. This would also be in line with Para 15 of the PPTS which confirms that changes to Green Belt for gypsy and travellers sites should only be made through the plan making process:

‘Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.’

12. The published Plan does not propose any ‘exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site’. This being the case, there is no reason not to strengthen Policy TP33 as proposed above.

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?

13. See above. Policy TP33 is not satisfactory as it stands to achieve the intended purpose.