
PMG INVESTMENTS LTD

SUPPLEMENTARY STATEMENT

BIRMINGHAM CITY COUNCIL DEVELOPMENT PLAN EXAMINATION

MATTER H: NEIGHBOURHOODS AND HOUSING PROVISION, INCLUDING PROVISION FOR GYPSIES, TRAVELLERS
AND TRAVELLING SHOW PEOPLE

We set out below further representations on behalf of our Clients in respect of the above matters. This supplements our representations on Matter A: Housing Need and Housing Trajectory dated the 15 September 2014.

MAIN ISSUE

1. AS REQUIRED BY THE 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 6-10 AND WHERE POSSIBLE, FOR YEARS 11-15?

1.1. The City of Birmingham can only provide properly for housing provision within its defined local government boundary that element of housing growth / need that can be properly and reasonably provided. We understand that that figure is circa 51,000 new dwellings. However, if other parcels of land within the local government boundary can reasonably and properly be provided then that should happen at this time and that land Allocated for delivery prior to 2031.

1.2. In our view, providing the Examination can establish the extent of the land within the City boundary that could reasonably be released for sustainable housing, and then Allocate accordingly, that really is the reasonable extent that the City Development Plan 2031 can reasonably be expected to contribute towards the Objectively Assessed Housing Need figure. The expectation, and it is only an expectation, is that the remainder should be found from the surrounding Local Planning Authorities but that is entirely in their control and agreement. Strangely, we know of no statutory requirement for an individual surrounding Local Planning Authority to agree to take any specific overspill from Birmingham. This is a somewhat bizarre situation. The government should really make the situation entirely clear for the general public.

(A)

1.3. In our view the City have tried through their SHLAA to address the quantum of potential urban housing sites for release. Site S40, Lakeside, records a provision of only 50 dwellings on 4.8 hectares. The net developable area on two sites is some 4.0 hectares. This is a site calling for high density blocks along parts of the canal frontages, there are three and mixed high density on this part of Kings Norton. Proper figures should be 150-175 dwelling units. Commercial development on this site is simply not viable and it has to be entirely residential and will help in a little way to chip away at the need.

1.4. As far as they are able, the City have tried to provide a five year supply of housing. However, this is entirely in their hands to make sure that releases such as the SUEs and other major sites have grants of planning permission that allow early release. Agreements on Section 106 matters, including the legal framework, often take up to two years which is far too long. It is recorded by the City that the 2014 SHLAA was a truncated and rushed affair. They should be encouraged to seek an early and proper update of this document as it is clear that some additional housing could reasonably be found in addition.

(B)

1.5. Therefore, the supply, particularly from urban site release, is most often beyond the Planning Authority's control. The supply of land is entirely limited. However, the City could and should carry out an in-depth review of potential housing sites as a proactive approach rather than waiting for occupiers / developers to bring sites forward. The City should task a team and attack this on an area by area approach. The shortfall in housing delivery for the City is so high that every avenue should be explored.

2. IS THERE REASONABLE CERTAINTY THAT A FIVE-YEAR SUPPLY OF SPECIFIC DELIVERABLE SITES CAN BE MAINTAINED THROUGHOUT THE PLAN PERIOD?

- 2.1. We are certainly not sure that the City can positively confirm deliverability throughout the Plan period. Proactive release in the urban area will also assist. This is particularly the case for the Lakeside redevelopment where the city should be encouraged to continue to meet with our Clients to seek early release and a proper delivery programme for the whole of this land for housing redevelopment in an area of high demand for housing, particularly middle market.

3. IS POLICY TP27 JUSTIFIED IN REQUIRING INFRASTRUCTURE TO BE PUT IN PLACE BEFORE NEW HOUSING IS PROVIDED?

- 3.1. The provision of new infrastructure must always be phased in major development releases. To do otherwise will marginalise sites if not put their viability at risk. This has never been the view adopted by the City previously where they have reasonably negotiated trigger dates for highway and community provision. But this has to be reasonable. There is a lot at stake in delivery of housing for the City and delay is not a factor that will assist the housing need or positive economic growth as required by government. With the Lakeside site, delivery of a new bridge and access over the canal is essential to maximise the development potential for the land. Early support from the City on this issue would be helpful.

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?

(A)

- 4.1. Provision of a mix of housing is generally accepted by the house-building industry. However, that has to be fully consistent with the surrounding area. However, the national house-builders generally only provide market housing. Other mixed housing remains with Housing Allocations or specialist housing providers for sheltered housing and most particularly for extra-care, nursing homes and accommodation for specialist housing for those with educational, mental health or Alzheimer / Dementia care, etc. This provision is entirely outside the control of housing authorities. Land could be Allocated but development is not certain so that flexibility must be the key to reasonable provision.

(B)

- 4.2. No, it must be entirely flexible for positive delivery particularly for specialist housing. Delivery of affordable housing needs to have some flexibility built into its provisions. In this connection a proper and reasonable approach to tenure in affordable housing provision is essential and must be approached through full recognition of the parameters of the surrounding area.

5. ARE THE DENSITY REQUIREMENTS OF POLICY TP29 JUSTIFIED?

- 5.1. We have previously made representations on density requirements where, for the SUEs, the density thresholds are too high and not consistent with the proper planning of the SUEs. For the urban areas of Birmingham the City have, where appropriate, adopted a more flexible approach, this can be seen best from its approach for students and at major cross-roads and junctions. More can be done and this policy must be expressed in order to allow the development sector the opportunity to make a proper case for what they believe to be the appropriate density to meet the proper market requirements for a particular area where they can provide an objective study base to support their planning application. A top-down approach is not consistent with present government policy.
- 5.2. Sites that are set within an existing green framework, such as Lakeside, should be developed with positive links, maximising the development and help for the continued upgrading of the surrounding urban green infrastructure, ie the River Rea Valley green lung.

- 5.3. Provision for student accommodation is obviously very important for Birmingham to maintain the high standard of Institutions that the City supports. However, this is specialist housing aside from the requirements for market housing and affordable housing. It is not market housing and there should be no misassumption in the provision of the OAHN figure. We are aware that other Planning Authorities have not sought to include the provision of student housing within their 5-year housing supply. This matter needs further investigation.

NIGEL GOUGH ASSOCIATES LTD

10th October 2014