

## evant statements:

- 'There are significant challenges in identifying appropriate sites to accommodate and deliver the long term levels of growth needed within the built up area. This will require joint working with partners in adjacent areas to address where housing and employment is best located' (para 2.18)
- 'The land available to the City to accommodate future development is limited. Alongside the BDP a wider growth strategy for the LEP and other adjoining authorities will set out how and where remaining houses could be delivered' (para 3.27)
- 'Options outside the City's boundaries will need to be explored (para 4.6).

The BDP acknowledges a need for 80,000 new homes over the period 2011 to 2031 (para 4.4 and 8.11). However, Birmingham City Council ('BCC') plans to deliver only 51,000 within its boundaries (Policy PG1). To deliver the 'missing 29,000' it relies upon effective collaborative work with neighbouring councils ('NC') (also refer to para 4.7 and 8.11).

Para 4.7 of the Plan again re-iterates the need to work collaboratively with neighbouring authorities to secure the development of further homes to contribute toward meeting the (Birmingham's) requirement over the period to 2031.

The housing trajectory at Policy TP28 plans for delivery within BCC's administrative boundary. There is no trajectory for 'the missing 29,000'. The BDP Chapter 10 'Implementation' and Chapter 11 'Monitoring' similarly contain no references to 'the missing 29,000'.

The housing shortfall has recently (end of July 2014) been announced as between 30,000 and 55,000 and is clearly a strategic matter which is well advanced and therefore should not be either ignored or put to one side for further consideration. The report of 30 July to the GBSLEP Supervisory Board, already requested to be seen by the Inspector, emphasises at 4.4 'the importance that the PBA (consultants) work is brought to a conclusion. Para 4.7 states that 'the Steering Group will be required to endorse the (housing shortfall) distribution to be quantified ...

## Soundness

The BDP has not been 'positively prepared'

- a) There is no effective strategy in place to meet the full objectively assessed need for housing (the Plan's 80,000). The BDP contains only a strategy for meeting the need for 51,000 homes
- b) The strategy relies on future collaborative working with NC without effective arrangements being in place (see submissions on Matter F: Duty to Co-operate on Strategic Matters)

The approach is not 'effective'

- a) There is no sufficient evidence that the 'missing 29,000' are deliverable (see submissions  
aha aolgtl)

‘engagement’.

- There is insufficient evidence to show that a co-operative process has influenced the content of the BDP. Therefore effectiveness has not been maximised.

Birmingham housing needs – the strategic implications

Strategic planning for housing, of which Birmingham City sits at the strategic heart, has failed.

LPA's in the GBSLEP area cannot simply 'blame Birmingham'. The replacement of regional planning by the DtC from the 'bottom up' means that if there is such a failure as has happened here, no LPA should be able to be allowed to adopt a local plan until the matter is resolved.

Effectively plan-making to c2030 is moving forward in full knowledge of a huge black-hole of unmet housing need in Birmingham.

It is simply a case that LPA's including, as a prime example Lichfield District Council, are not actively (properly) engaged over regional strategic planning.

The fact that there has been such a failure outlined in detail above does not justify a 'pragmatic response'; what is required is an effective and robust response to a failure to deliver required outcome under a 'political fudge'. The BCC housing shortfall is recently announced as between 30,000 and 55,000 and is therefore clearly a strategic matter which is well advanced and therefore should not be either ignored or put to one side for later consideration.

If 'migration patterns and travel to work' are 'particularly strong around Birmingham' and BCC, the largest local authority in the country, cannot anywhere near meet its housing needs within its