



*Matter A: Housing need and the housing trajectory (BDP policies PG1, TP28 & TP30)*

1. In responding to the housing questions CPRE West Midlands is concerned that the detailed housing report undertaken by the GBS LEP is not available to assist in preparation of evidence. Figures were published in a presentation but we do not have the background to those.
2. We are particularly concerned that the evidence base does not, therefore, include an assessment of the impact of the recently updated 2012 population projections and the impact they might have on household growth, particularly if some or all of the 'unattributable growth' in migration is the result of miscounting in the previous census. As well as potentially reducing the population in Birmingham, a reduction in the projected population in the Black Country may allow more housing need to be accommodated in that part of the conurbation.
3. The plan's figure of 80,000 is no more than a projection over 20 years with a great deal of accompanying uncertainty. Birmingham's 2013 Strategic Housing Market Assessment (SHMA - H2) acknowledges the inherent uncertainty of forward projections in relation to birth and death rates, levels of migration and household formation (SHMA para 11.8).
4. As the ONS states: 'Projections are uncertain and become increasingly so the further they are carried forward in time, particularly for smaller geographical areas.' (SHMA para 11.8)
5. We are particularly concerned that the assumptions about migration and household formation are subject to considerable and immediate uncertainty.

6. The Migration figures used in the Plan come from the 2008 and 2010 CLG projections and a trend based approach. However, these have to be considered in the light of the ONS mid-2012-based population projections which suggest some unattributable growth may result from miscalculations. Table 6.4 of the Barton Wilmore report shows the key nature of this in determining migration patterns over the last ten years.

7. The SHMA also considers the impact of Government Policy to reduce international migration and suggests this could by itself reduce the overall housing need by 8,000 in the plan (SHMA Para 11.36).

8. While the current migration levels have not shown a reduction there is no reason to believe that some new international migrants, particularly from the EU, will not return to their country of origin as the economic situation changes or that the pattern of migration to other parts of the UK will be reversed.

9. The second area of significant uncertainty is household formation. The 2011 census showed an increase in the population of Birmingham since 2001 by 30,000 but reduced household formation by 6,000, a significant variance even during a recession. Average household sizes have simply not fallen as steeply as predicted. The trend has not only tailed off but in some areas household size appears to have slightly increased. The SHMA puts this down almost entirely to economic factors and asserts that as the recovery takes hold household formation will return to previous levels. (SHMA Para 11.37, 11.38)

10. We do not consider high levels of household formation inherently good nor that a

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23. It cites the change in planning policy in 2010 which removed domestic gardens from the definition of previously-developed land. However it is not clear how many pre-2010 windfalls were on such sites and the 2010 change of policy does not actually stop intensification taking place. So while consistent with Para 48 of the NPPF, this assumption is hard to justify logically.

24. At the same time the SHLAA acknowledges that its figures for sites under 0.6 is conservative (Para 4.86).

25. The SHLAA goes on to explain that the rate at which larger new windfall sites are coming forward has slowed in recent years, due, in the main,

better converted to open space or environmental schemes. Even so we are not convinced the opportunity for housing projects has been maximised.

32. Furthermore as a renewable resource we would expect changes in the economy to release further sites over the next twenty years.

33. Another potential area for brownfield capacity is opening up in relation to retail development. Trends in retail expenditure would suggest the model of large



47. With the exception of the Black Country any development beyond Birmingham's boundaries, for example in Bromsgrove or Lichfield, is likely to involve the loss of open countryside, often - and in cases such as Bromsgrove inevitably - in the Green Belt.

48. Any assumption that housing numbers for Birmingham should be transferred to the Green Belt in other authorities is, in our view, premature and would conflict with the DCLG policy statement of 1 July 2013 on Green Belt and housing numbers:

'The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the 'very special circumstances' justifi