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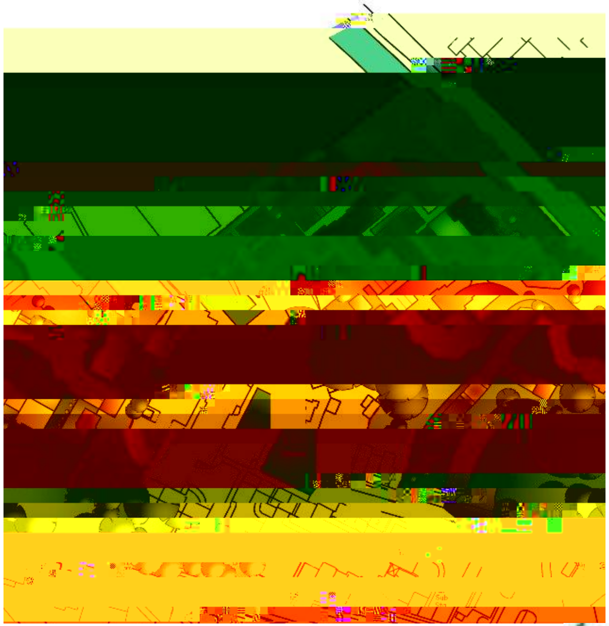

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Matter A

Main issue: Does the Plan appropriately identify housing needs and does it seek to meet them in accordance with national policy?

Questions:

1) Is the Plan based on an objective assessment of the full needs for market and affordable housing in the housing market area over the Plan period?

Document H1 the Housing targets technical paper looks at the requirement for Birmingham City over the period 2011 to 2031 and that required 81,500 new households over the period based on the CLG 2008 household projections. That document indicated that a further full analysis across the HMA would be provided and commissioned by the GBSLEP.

The information provided in Exam E

Inclusion of the following new paragraph after para 4.5: Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs Lichfield Council will work collaboratively with Birmingham and other authorities and with GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review of the Lichfield District Local Plan will be brought forward to address this.

This is not a Policy commitment to review the Plan and there is no timing imperative to be included within the modification. This makes it clear that the scale and distribution of the shortfall is not yet agreed and that the work to agree both the quantum, the proportions and the final distribution is a long way in the future. This is insufficient to demonstrate that the housing requirement of Birmingham City either can be or will be met in the plan period.

5) Is there justification for the staged housing trajectory set out in policy TP28?

The trajectory shows that the delivery of the 51,100 new homes is skewed toward the end of the Plan period. The aim should be to boost the housing supply as quickly as possible, the Plan period started in 2011 and has been under delivering in the first two years of the Plan. The annual requirement on the submitted figures is 2,555 annually and it is likely that this will rise in the event that the Plan meets the fully objectively assessed needs of the City. The trajectory shows that this delivery rate is not met until after 2021 some seven years away. The trajectory is reflecting the strategy to rely in part on the release of a single large green field SUE at Langley for 6,000 new homes. Sites such as this take time to deliver to the market due to infrastructure investment etc. A strategy that provided the market with additional green field sites of a lesser scale would bring homes to the market earlier in the plan period, to support the 2016-2020 period, which would be realistic for the release of additional Green Belt sites.

TP28 says that the housing requirement will be met in accordance with the rates suggested. This is effectively making the trajectory into a phasing policy, whereby the requirement is met on a differential basis through the plan period. This is not a policy to boost the housing supply in accordance with the NPPF and actually to provide the people of Birmingham with homes to live in.

It is noted that in the five year housing land supply calculation document H 10 does not apply the requirement on the annual basis of 51,100 over 20 years i.e. 2,555 per annum plus a 5% buffer which would be the traditional methodology, but applies the trajectory delivery rates of TP 28. Para 5.2 of that document does apply the annualised rates over the plan period resulting in the position that the City does not have a five year land supply but on the Councils own figures [untested] it is 4.7 years.

Table 1.3 of H 10 seeks to demonstrate that the Development Plan targets have been exceeded under the UDP and the RS, however table 5.1 indicates that since the start of the Plan period in 2011 the delivery rates have been well below the annualised requirement and that the cumulative total of under provision from 2011 to 2013 is 2,551 dwellings. These should be made up in the next five years in accordance with the Sedgefield methodology.