

Examination of the Birmingham Development Plan 2031

Matter A² Housing Need and the Housing Trajectory

Hearing Statement on behalf of St Modwen Developments Ltd

1.0 Introduction

1.1 These further submissions are made on behalf of St Modwen Developments in respect of Matter A of the Birmingham Development Plan (BDP) Examination concerning housing need and the housing trajectory.

1.2 Their views point to the Plan being unsound by reasons of not being consistent with national policy, and not being justified, effective or positively prepared. In particular our concerns are that the BDP will not meet the full, objectively assessed need for housing over the plan period.

1.3 This is explained further below (VWUXFWXUHGDURXQG WKH, QVSHFWRU·V OD Questions RQO\ WKRVH TXHVWLRQV DUH LQFOXGHG EHORZ WKDW DU duly made objections to the Plan).

2.0 Matter A : Housing Need and the Housing Trajectory

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?

2) If not, what alternative objective assessment of housing needs should the Plan be based upon?

3) Does the Plan meet the full needs for market and affordable housing, as far as is consistent with the policies set out in the National Planning Policy Framework?

2.1 The concerns expressed in our representation to the Plan and as re-affirmed here are that ;

- The BDP does not plan for the full objective need for housing – it merely Plans for what the City perceive they can accommodate within the City and does not explain or yet make provision for how the unmet need will be accommodated elsewhere.

- The full objective need would be significantly higher if assessed against more (UHDOLVWLF H[SHFWDWLRQV RI HFRQRPLF JURZWK RU LQGH SHMA recognises this and include a full assessment of around 119, 000 over the plan period

- (7R SODQ IRU QHZ KRXLQJ RQ D p[ecific conflict with XVXDOP DS WKH 133)·V DLPV WR VLJQLILFDQWO\ ERRVW WKH VXSSO\ RI objectives for economic growth.

- * U H D W H U S U R Y L V L R Q V K R X O G E H P D G H W R G H O L Y H U P R U H I
administrative area with a greater focus on previously developed land with significantly more opportunities which would suggest even the provision of 51,000 within the Plan is too low .
- Proper consideration should also be given to the release of Green Belt land in areas adjoining the administrative boundary and arrangements should be in place within the BDP to explain how this will be instigated
- There is no evidence to confirm how the unmet need within the City is going to be met elsewhere with no evidence of adjoining Authority areas willingly addressing such unmet need , or not formal , statutory Development Plan mechanism in place
- The negative implications of planning for insufficient housing are considerable, not least the impediment to economic growth but also affordability of housing generally , all conflicting generally with the Government s policy to significantly boost the supply of housing and economic development objectives.

2.2 The BDP proposes that provision be made for 51,000 new homes (an average of 2,550 per annum) in the City over the plan period 2011 ¹ 2031. The full objective need is set out by the Council is significantly higher ¹ however a constrained provision of 51,000 is provided for within the Plan given the Council s view that there are limited opportunities to accommodate any greater level of need within the City

SHMA January 2014) as the basis for projected need. It readily accepts that there is significant evidence pointing to substantially higher objective need for housing if a more positive approach to economic forecasts is taken (para 11.51) .

2.7 This is a position cautioned by Inspector Mr Robert Yuille in his consideration of the Lichfield Core Strategy and expressed in his interim report. Paragraphs 23 and 24 are set out in response to pressure to adopt lower housing figures in light of the 2011 SNHP face of the policy of boosting significantly the supply of housing land, an aim that, as has already been established, should be a dominant consideration in any housing 2011 CLG household projections are lower than those in the 2008 projections, this is a result of poor economic conditions that the latter projection took account of.

2.12 There are damaging negative impacts that wts

2.17 This is particularly concerning since a number of adjoining Authorities are questioning the level of unmet need and no formal arrangements are in place with any Authority that quantifies or identifies any sites which could accommodate this unmet need. Unless the BDP grapples with this issue there is no other statutory process to do so.

2.18 It is essential, as required in the Act, that the City Council has engaged constructively, actively and on an ongoing basis with neighbouring councils on the strategic matter of the number of houses proposed in the Plan and the distribution of unmet need otherwise the BDP does not plan for their full housing needs, only the needs they ; they must have had regard to the responses of those consulted; and sufficiently considered whether to enter into agreements on joint approaches to plan making and thereby maximising the effectiveness of its plan preparation. These are all requirements of s 33A of the Act.

2.19 This is a key matter for the BDP in circumstances where it clearly cannot meet its own needs within its boundaries. The BDP has not been prepared within the full and true spirit of the Duty to Co-operate under the Act and further evidence of such co-operation and genuine engagement with adjoining authorities is needed. No evidence has been prepared to explain the consequences of meeting more of the identified need within the City.

2.20 Further work and evidence is essential to demonstrate that the Duty to Co-operate KDV EHHQ JHQXLQHO\ LQWHJUDWHG DQG IXOO\ HPEUDFHG DV SD 7KLV LQFOXGHV D QHHG WR IXOO\ XQGHUVWDQG WKH DGMRLQLQ growth and ability to accommodate growth within their areas. Such engagement in cooperation could include a varied range of on-going and diligent workshops, joint studies (the joint Strategic Housing Needs Study goes some way towards this but will in no way address the full picture, is not binding, is not a SHMA and is not within the Development Plan statute and will not be tested through examination), meetings, all with the aim of gaining clear common ground that the Authorities can endorse.

2.21 It is not sound to merely suggest this can be provided for upon a review of the adjoining Authority areas plans. This provides no certainty. This is recognition of failure of the BDP to plan for the full need, the failure of the duty to cooperate at this stage (and which is the mechanism to deal with unmet need), merely postponing this key issue to a later stage, and it provides no certainty that the unmet need will be delivered.

2.22 These are challenges which other Authorities face and have led to their Plans being found unsound, most notably within the West Midlands region, the failure of the Coventry Core Strategy to be found sound f RU WKHVH YHU\ UHDVRQV, Q WKH, FRQFOXVLRQ RI WKLV PDWWHU LQ UHODWLRQ WR &RYHQWU\ V 3C WR FRRSHUDWH SOD\ V D FULWLFDO UROH LQ WKH SODQQLQJ SUF even with a Statement of Common Ground between the Councils (and no such Statements have yet been prepared for any of the Authorities around Birmingham), 'LV LV FOHDU IURP WKH HYLGHQFH WKDW >WKH FRXQFLO@ KDV and has actively sought to discharge that duty on an ongoing basis. However that is not the end of the story. S33a of the 2004 Act also requires the council to engage constructively with its neighbours. The evidence does not show that cooperation

between Coventry and its neighbouring councils has been constructive, as required by the 2004 Act, or effective as is expected by p D U D J U D S K R I W K H) U D P H Z R U N p

2.23 In summary in respect of the proposed scale of housing provision;

- The BDP does not plan for the full objective need for housing
- The full objective need would be significantly higher if assessed against more U H D O L V W L F H [S H F W D W L R Q V R I H F R Q R P L F J U R Z W K R U L Q G H around 119,000 new homes should be provided over the plan period even on more positive economic projections acknowledged within the SHMA.
- 7 R S O D Q I R U Q H Z K R X V L Q J R Q D p r e a c h i s c o n f l i c t w i t h X V X D O μ D S W K H 1 3 3) . V D L P V W R V L J Q L I L F D Q W O \ E R R V W W K H V X S S O \ R I objectives for economic growth.
- * U H D W H U S U R Y L V L R Q V K R X O G E H P D G H W R G H O L Y H U P R U H administrative area with a greater focus on previously developed land.
- There is no evidence to confirm how the unmet need within the City is going to be met elsewhere wi