

provision that will need to be made to help meet Birmingham's needs in neighbouring areas.

We consider that the plan should be based on OAN determined in accordance with the Framework.

However, our representations are not dependent upon any increase in OAN. Our representations as submitted in February 2014 challenge BCC's approach in the plan with particular regard to Green Belt and housing delivery in the North Eastern area of the City. In short the Plan fails to accommodate as much of its OAN within the City as would be consistent with its strategy for the Plan and the Framework.

BCC's position is that the level of new housing proposed in the BDP is the **maximum** that could reasonably be delivered in Birmingham over the plan period. We disagree with this view for the reasons that are set out in detail in our representations. We note that BCC has provided no rebuttal of our position other than in relation to the supplementary paper prepared by Peter Brett (PG4), on which we will respond later.

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