





Matter E



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19. Therefore withholding this information from being considered as a part of the examination by not including the information is not compliant with SEA legislation.
20. Therefore, pursuant to the representations already made in respect of their being no robust SEA/SA justification for the Langley SUE it is considered that the SA/SEA Report available to the examination is also similarly significantly deficient as there is no evidence of justification of the location in light of other reasonable alternatives, or evidence on why those alternatives have not been selected. Furthermore, there is no evidence available to the examination on how the Council has considered the representations made by the SCCT&BVGS in advance of submission to the examination under Article 8 .

Question 4 (b) Is the SUE Deliverable within the expected timescales?

21. The entire SUE is not considered deliverable within the Plan period for 5,000 dwellings. The Council has not fully demonstrated how the development of 5,000 dwellings will be delivered within the Plan period.

Question 8 : Do exceptional circumstances exist which justify further alterations to the Green Belt boundary to release additional land for housing and/or employment development, either within the Plan period or as safeguarded la nd for development beyond the Plan period?

22. As set out in the SCCT&BVGS response to Matter A and the paragraphs above, the Council has identified exceptional circumstances do exist for the release of Green Belt land and this is soundly based. RPS concurs that the circumstances justify the release of further land in the Green Belt S D U W L F X O D U O \ J L Y H Q W K H stated aim of delivering the objectively assessed need.
23. In the context of the extent to which further Green Belt land should be released, this should be considered fully within the policies contained within the NPPF.
24. The NPPF provides the authority of not meeting its Objectively Assessed Need (OAN) for housing if it considers that Green Belt policy should be used as a constraint on meeting housing need (paragraph 14 refers). However, the Council has not enacted this component of the NPPF as it is amending its Green Belt to meet housing need. The question of Green Belt in principle being used has therefore already been accepted. It therefore considers that housing need does outweigh the importance of the Green Belt in light of paragraph 14 of the NPPF. This is confirmed as set out in more detail within RPS response to Matter A where it is demonstrated that the Council has made an expressly clear commitment to meet its unmet need, albeit through suggesting that growth elsewhere in neighbouring authorities can achieve this need.
25. The Plan is therefore built on this basis that housing need outweighs Green Belt policy and therefore to be sound, the Plan must establish mechanisms to meet its full aspirations of meeting housing need. If it does not, then a radical alteration to the Plan would be necessary to develop a strategy that sought at the outset to not meet unmet housing need, which would be radically different to that submitted.



26. In this context it is therefore clear that the Council is intending to meet its full OAN and while the mechanisms to fully do so are not contained within the Plan, there is clear justification to release additional land from the Green Belt within the & R X Q F L O ¶ V 9 L V L R Q D Q G 6 W U D W H J L F 3 U L R U L W L H V

27. While the decision to release land in the Green Belt has been made and the justification is robust, the most pertinent consideration on this issue is the extent to which the Council ¶ V D F W L R Q V I R O O R Z r e l e a s e l a n d f r o m t h e L V L R Q W R Green Belt are consistent with the components of the NPPF Green Belt policy that set out the procedure for redefining the Green Belt boundaries. This is set out below.

28. Paragraph 83 sets out that the Green Belt boundaries should have regard to their intended permanence in the long term so that they are capable of enduring beyond the Plan period;

29. Paragraph 84 sets out that when reviewing Green Belt boundaries local authorities should promote sustainable patterns of development

30. Paragraph 85 sets out that

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- x ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- x not include land which it is unnecessary to keep permanently open;
- x Z K H U H Q H F H V V D U \ L G H Q W L I \ L Q W K H L U S O D Q V D U H O D Q G ¶ E H W Z H H Q W K H e G r e e n B e l t D r u h e t o D r e e longer -term development needs stretching well beyond the plan period;
- x make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- x satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- x define boundaries clearly, using physical features that are readily U H F R J Q L V D E O H D Q G O L N H O \ W R E H S H U P D Q H Q W ´

31. It is therefore expected that when reviewing Green Belt boundaries, the Council must demonstrate how it is consistent with each of the above criteria. Most pertinent of these is the requirement to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. In this context, the Council has (as set out in the SCCT&BVGS response to Matter A) set out a strategy of meeting housing need, a vision for a healthy and economically prosperous city.

32. On the basis of the above and given that the City has set out a Vision and Strategic Priorities for positive housing and economic outcomes, a sustainable



Birmingham is one where the City will meet its full housing and employment needs.

33. Therefore given that the City is not planning on meeting its full needs and a shortfall of 30,000 plus dwellings will lead to unsustainable levels of poor housing provision and increasing housing need, W K H & L W \ ¶ V





were inconsistent or incorrect. Appendix 3 of the February 2014 representations made by RPS provides the accurate assessment of the land at Withy Hill illustrating that the proposals is a highly sustainable location for development, SULQFLSDOO\ XVLQJ WKH FRXQFLO¶V HYLGHQFH

46. The land at Withy Hill Farm is therefore considered highly sustainable, consistent with the strategy of the Plan, without significant land or ownership constraint and available.