

HEARING STATEMENT

MATTER 4: DEVELOPMENT NEEDS & REQUIREMENT

BLOOR HOMES LTD, CAMERON HOMES LTD, LOVELL HOMES LTD, FOUR ASHES ROAD LTD

1. ISSUE 1

Whether the identified future housing development need and requirement set out in the Plan are justified, effective and consistent with national policy.

Question 2: Are there any circumstances where it is justified to set a housing figure that is higher than the standard method indicates?

- 1.1 Paragraph 67 of the NPPF (December 2023) states that the housing requirement may be higher than the identified housing need if it includes provision for neighbouring LPAs or reflects growth ambitions linked to economic development or infrastructure investment.
- 1.2 There is an acute unmet housing need in wider housing market area which justifies a housing requirement higher than the standard method.
- 1.3 In addition, the forecast for jobs creation identified in the EDNA [EB44] through committed strategic employment proposals provides further justification for an uplift in the housing requirement to provide an increase in the working age population, to achieve an improved balance between jobs and workers. The EDNA projects an additional 5,326 jobs growth by 2041, whereas the HMA forecasts a marginal increase in the working age population of just 1,012 people. The imbalance between jobs growth and working age population growth would undermine the economic strategy.

Question 3: In Policy DS4 the Local Plan identifies a minimum housing requirement of 4,726 homes over the period 2023-2041. Is this justified? If not, what should the housing requirement be?

- 1.4 The minimum housing requirement of 4,726 homes over the plan period is not justified as it fails to incorporate an evidenced contribution to the GBBCHMA shortfall and fails to support an increase in working age population to support committed jobs growth.
- 1.5 The housing requirement should include an additional 4,000 dwellings to contribute to the unmet needs of the GBBCHMA in the absence of more up to date evidence between the partner LPAs (see response to Question 5).
- 1.6 The reintroduction of a contribution of 4,000 homes to contribute to the unmet needs of the GBBCHMA would also provide a better balance between jobs growth and an increase in the working age population.

Question 4: The housing requirement figure includes an approximate 10% additional number of homes to ensure plan flexibility. Is this figure justified?

- 1.7 It is not clear why the Council has reduced the plan flexibility buffer from 13% in the 2022 Publication Plan [PC1] to 10%. A reduction in the overall housing requirement and selection of allocated sites would, in theory, reduce plan flexibility.

Question 5: The housing requirement includes an additional 640 dwellings to contribute to the unmet needs of the Greater Birmingham and Black Country Housing Market Area. Is this justified? If not, what should the figure be and why?

- 1.8 The Regulation 19 Publication Local Plan (November 2022) identified a contribution of 4,000 dwellings to meet identified unmet needs within the GBBCHMA. The 4,000 dwelling contribution was based on an acceptance of the significant shortfall and the level of opportunity that existed within the district to accommodate a proportion of this shortfall. The approach was evidenced by the GBBCHMA Strategic Growth Study, which provided a number of recommended strategic growth options across the HMA, providing a logical response to the matter and a reasonable level of justification.

- 1.9 The capacity-led approach outlined in the submission Local Plan, resulting in a contribution of 640 homes towards the unmet needs of the GBBCHMA is not justified. It has no regard to the scale of the housing shortfall and completely disregards the Strategic Growth Study which, at the very least, provided a strategic approach to remedying the shortfall across the HMA.

- 1.10 The Local Plan should revert to the original 4,000 dwelling contribution.

Question 6: In terms of the capacity of housing site allocations is the approach calculating the minimum capacity for each housing allocation sound?

- 1.11 The Council has taken a broad-brush approach in determining the housing yield from each housing allocation rather. This is in line with the developable land thresholds and density assumptions set out in the SHELAA 2023 [EB19 para.518 & para. 5.20]

- 1.12 The SHELAA recognises that the developable land thresholds and density assumptions can only be considered starting points for estimating site capacity however, in many cases there has been no deviation from these assumptions despite further information being submitted by site promoters. In some cases, the identified capacities are too low and in others it will be too high

- 1.13 Set out below, are Evolve client examples, where a number of allocations have now progressed to planning applications:

Housing Allocation Ref	Minimum Local Plan Capacity	Application Capacity	Site Status
Land East of Bilbrook (SA1)	750	750	Outline Planning Application pending determination
Land at Landywood Lane (SA3 Ref: 136)	159	193	Part completed (50), part U/C (13) and Full Planning Application pending (130) determination
Four Ashes Road (SA3 Ref: 617)	63	73	Full Planning Application pending determination
Pool House Road (SA3 Ref: 459)	82	65	Full Planning Application pending determination
Pool House Road (SA3 Ref: 562/415)	44	56	Full Planning Application pending determination

- 1.14 With the exception of Pool House Road (Ref: 459) all applications are proposing a level of development in line with the minimum yield requirement set out in the Local Plan. Site 459 cannot deliver 82 homes as a large proportion of the site is constrained by high voltage power lines. This is agreed with the Council through a Statement of Common Ground [DC37]. The Local Plan should be amended accordingly.
- 1.15 Collectively, the above examples provide around over 20% of the planned supply identified within the Local Plan and, subject to the outcome of current planning applications, would result in a marginal uplift against the assumed supply of approx. +3.5%. This would suggest the overall assumption of supply from allocated sites is accurate.

