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Reference:

Date: 3rd March 2014

Dear Sir / Madam,

Please accept the following comments in response to Birmingham City Council's (BCC) Proposed Submission Draft. Please note that these comments have been prepared by Coventry City Council (CCC) officers and have not been formally endorsed by Full Council.

Duty to Cooperate (DtC)

We recognise that a significant degree of work has been undertaken by BCC with a view to discharging the DtC and we note that BCC's issues, especially in relation to housing provision have been well documented.

Coventry's specific position in terms of its cooperation with BCC, is being documented within a DtC Checklist. Although not finalised at this time, we would expect it to be completed prior to formal submission of BCC's plan. Subject to the completion of this checklist, we are therefore satisfied that the DtC has been discharged in relation to BCC and CCC.

We recognise that at this current time BCC continue to undertake additional work with other members of the GBSLEP. We understand that this is intended to provide an objective assessment of housing need for the Birmingham Housing Market Area. Although the timing of this additional work is sub-optimal in terms of developing the plan, we appreciate that developing such evidence can be time consuming and that the data that feeds into it is fast moving. As such, we hold no objection to the plan on this basis and support the development of this additional evidence.

Notwithstanding this, it is our view that to fully discharge the DtC BCC must be satisfied that prior to submission the results of these subsequent assessments and the implications they have for BCC, other GBSLEP members and any other authorities are fully recognised, understood and planned for. Failure to do this, in our view, may jeopardise the ability to realise the objectively assessed housing need for BCC. By default this would mean cooperation between respective authorities may not have been sufficiently constructive.

Again however, we would stress that at this stage we hold no formal objection on this matter, but do wish to hold a 'watching brief'.

Executive Director, Place
Martin Yardley
*Assistant Director for Planning Transport
and Highways*
Colin Knight

Housing Need

Building upon our comments to the DtC, we recognise that unless a significant reduction in housing need is evidenced by the GBSLEP housing study, then there is a significant need to provide for Birmingham's housing requirements in other local authority areas. Indeed the Submission Draft suggests this equates to around 29,000 dwellings (based on the BCC SHMA).

The management of this circa 29,000 homes is commented upon in our DtC Checklist, however we would re-emphasise that this must be dealt with in a sequentially sustainable way that reflects the wider Birmingham Housing Market Area and adjoining Housing Market Areas as and where appropriate. We would recommend that this is undertaken as follows:

1. All reasonable alternative options have been considered and justifiably dismissed within the BCC local authority area – this includes all Green Belt options;
2. That all reasonable alternative options have been considered and justifiably dismissed within local authority areas that are solely within the defined Birmingham Housing Market Area;
3. That all reasonable alternative options have been considered and justifiably dismissed within local authority areas that are within the defined Birmingham Housing Market Area but that also overlap with an adjoining Housing Market Area;
4. Only once all reasonable alternative options within stages 1-3 have been evidenced and dismissed should consideration be given to authorities within neighboring Housing Market Areas that do not overlap with the BCC HMA .

We would acknowledge that in some circumstances local authorities that would sit within point 4 may choose to deliver some of BCC's housing growth. If such a desire is expressed then we would expect BCC to explore this option accordingly and with a view to delivering sustainable development.

At this stage however, it is our view that BCC may not have sufficiently demonstrated that housing supply options have been maximised within their local authority area. This is principally in relation to the proposed urban extension at Sutton Coldfield. This is clearly identified as a deliverable and developable site for residential development, yet only 5,000 of the possible 6,000 dwellings are identified for the plan period. We recognise the evidence developed by PBA in terms of market conditions etc., however to suggest the remaining 1,000 dwellings cannot be delivered in the plan period is not accepted. If these 1,000 homes are not built at Sutton Coldfield as part of a wider developable scheme in this plan period then they need to be built elsewhere (outside of Birmingham and potentially within wider Green Belt areas that, subject to the results of an SA/SEA, may not be as sustainable as the Sutton Coldfield site). The fact is the need remains for the homes to be built by the development industry and that this area of land has been identified as a developable option for the plan period. It is therefore the responsibility of the development industry to deliver these homes within the plan period, in simple terms this could include an additional house builder or an additional point of sale being added to the development program, or alternatively a promotion of the site starting sooner in the plan period. As such, our view is that the capacity of the proposed urban extension at Sutton Coldfield should be 6,000 homes within the plan period as opposed to the 5,000 currently identified. This would reduce the need for further land to be released unnecessarily and support sustainable development.

Summary

We would stress at this stage that we hold no objection to the BCC proposed plan, subject to the satisfactory completion of our DtC checklist and appropriate management of the BCC OAN housing overspill (as evidenced by the new GBSLEP Housing study). As part of this position, it is our view that all reasonably alternative options within the BCC boundary should be maximised first and that a key aspect of this includes an increase in the capacity of the Sutton Coldfield urban extension from 5,000 dwellings to 6,000 dwellings for the plan period.

Further Input and Attendance at Hearings.

Coventry City Council and Birmingham City Council, have a strong and longstanding working relationship, which will be formally evidenced through the DtC Checklist. With a view to maintaining these on-going and constructive channels of co-operation, Coventry City Council are happy to attend the appropriate examination sessions of the Birmingham plan in order to support the Inspector in reaching their recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Andrews', with a stylized flourish underneath.

Mark Andrews
Acting Planning Policy Manager