

Director of Planning and Regeneration
Development and Culture Directorate
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

13th January 2014

Dear Sir / Madam,

Birmingham Development Plan Pre-submission consultation

Thank you for consulting Redditch Borough Council on the above mentioned consultation.

We would like to submit the following representations and in due course be informed of the submission of the Plan for examination, the publication of the inspector's recommendations and the adoption of the Plan.

Policies PG1: Overall levels of growth and TP28: The housing trajectory

Redditch Borough Council note that 51,100 homes are planned to be delivered within Birmingham's administrative boundary over the plan period 2011 - 2031. Birmingham's SHMA concluded that there was a minimum objectively assessed need for 84,000 net new homes. Para. 8.11 acknowledges that this planned provision would not meet objectively assessed need and that additional provision will be required beyond the City boundary. Para. 3.27 states that 'alongside the BDP a wider growth strategy for the LEP area and other adjoining authorities will set out how and where the remaining housing could be delivered.'

The remainder of the BDP is, perhaps intentionally, silent about the shortfall of homes required outside of Birmingham's administrative area to meet the objectively assessed need identified in the SHMA. The Borough Council are mindful that there is a lack of detail in terms of how Birmingham will deal with the remaining level and distribution of growth owing to a lack of evidence. There is also considered to a lack of clarity as to when the expected rates of housing will be delivered across the plan period for those homes outside of the City's boundary. As such, the Council recognises that the BDP does not make adequate provision for the unmet housing needs

Paragraph 3.25 of the BDP explains that land from the Green Belt will be removed to provide for an additional 6,000 homes as a sustainable urban extension (SUE) which is supported. Both Birmingham and the neighbouring Local Authorities would need to be confident that the sustainable capacities of the Green Belt areas for development have been fully considered. Therefore any evidence that exists to contradict the 6,000 homes capacity needs to be explored.

Policy TP16: Portfolio of employment land and premises

The Borough Council notes that the policy sets out the provision of employment land required to meet the needs of businesses or employment development over the plan period. Paragraph 7.3 explains that an adequate supply of employment land throughout the plan period is considered essential in enabling long-term balanced growth to be sustained. It should be clear in the BDP that a balance of housing and employment needs is to be ensured within Birmingham and that any employment which is required to accompany the unmet housing needs is fairly distributed.

Policy T25: Local Employment

Redditch Borough Council are looking to implement a similar policy in the Borough of Redditch Local Plan 4 which supports new employment opportunities that are accessible to the local population.

Duty to Cooperate Statement

Birmingham's Duty to Cooperate Statement (October 2013) references Redditch Borough Council. These references to Redditch are supported by the Borough Council.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Bill Hartnett', written in a cursive style.

Councillor Bill Hartnett
Leader of the Council