

## Part B – Please use a separate sheet for each representation

Name or Organisation: Planning Prospects on behalf of Persimmon Homes

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

It is noted that Policy P5 proposes to allocate at least 5,270 dwellings as part of an overall suggested supply of 15,017 dwellings over the plan period to 2036. It states that the annual average target is 938 dpa. A significant reliance is placed upon windfall, a very large proportion of development at the UK Central Hub and previous allocations which have not come forward, as well as current planning permissions both started and not implemented.

The accompanying text suggests the need of 12,912 and the provision at 15,017 represents a balance of 2,105 being for unmet needs from Birmingham. This is a need for housing which arises from unmet needs from Birmingham identified as part of the Birmingham Development Plan some years ago.

Context here must recognise a fundamental aspects of government policy and initiatives<sup>1</sup> are to seek to boost the supply of housing and support the Government's regularly stated commitment to delivering 300,000 homes a year by the mid-2020s. The Government has been clear for many years, that housebuilding is critical to boosting the country's economic growth. This extends through such statements as "Laying the Foundations; A Housing Strategy for England (November 2011)", "Housing and Growth" a Written Statement to Parliament, (September 2012), and "Fixing the Foundations: Creating a More Prosperous

<sup>1</sup> A number of economic initiatives also sit alongside planning reforms in order to work towards the same government aims and objectives to see more homes being built including for example Help to Buy, Stamp Duty incentives, Housing Infrastructure Fund and financial guarantees, Right to Buy, Home Building Fund, amongst many others

Nation” (July 2015). All contain policies and initiatives which strongly support the necessity for more house building.

The Government’s latest consultation “Planning for the Future” (White Paper) sought views on its package of proposals to fundamentally reform the planning system in England. The Prime Minister’s forward to the “Planning for the Future” White Paper is clear that a principal reason to reform the planning system in England is because ***‘Thanks to our planning system’*** there are ***‘nowhere near enough homes in the right places’***. The Secretary of State’s forward reiterates the impact that the COVID-19 pandemic is having on delivery of housing, setting out that ***‘Reforming the planning system isn’t a task we undertake lightly, but it is both an overdue and a timely reform. Millions of jobs depend on the construction sector and in every economic recovery, it has played a crucial role.’*** Its ‘Introduction’ continues by stating that ***‘The planning system is central to our most important national challenges: tackling head on the shortage of beautiful, high quality homes and places where people want to live and work... It simply does not lead to enough homes being built, especially in those places where the need for new homes is the highest. Adopted Local Plans, where they are in place, provide for 187,000 homes per year across England – not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (over 241,000). The result of long-term and persisting undersupply is that housing is becoming increasingly expensive, including relative to our European neighbours. In Italy, Germany and the Netherlands, you can get twice as much housing space for your money compared to the UK. We need to address the inequalities this has entrenched’***.

The concerns of Government, self-evidently, remain about housing delivery and the Government is as committed as ever to addressing the lack of housing supply. This message could scarcely be stronger and its commitment to deliver 300,000 new homes in England per year remains one of the Government’s key objectives and a fundamental driver behind the drive to an updated standard method and ongoing reforms to the planning system.

This context is a fundamentally important material consideration and backdrop to these representations. These are the principal reason behind many of the reforms that have taken place to planning and sets out a significant context to understanding housing land needs, supply and its aims. The approach is to ensure that housing delivery is used as a tool to positively support and ensure delivery of the homes that people need in line with the Government’s objectives to boost supply to significantly greater levels than seen in the past. It is therefore essential that the new Plan provides for an appropriate level of housing.

In order to identify a 5 year supply of land for housing (stated at 5.37 years, although we make no comment about the calculation and the components of supply in the context of the definition of “Deliverable” in Annex 2 of the NPPF) upon adoption of the plan, the Plan adopts a stepped trajectory, reducing the annual average requirement to 851 dpa for the period to 2026.

The stepped approach is unfortunate as runs contrary to the Governments aims to significantly boost the supply of land for housing. All efforts should be made to deliver a more balanced trajectory over the plan period. The priority should be to deliver earlier in the plan period to avoid the need for a step and support needs for housing now – such early delivery would also address the longstanding unmet needs from Birmingham, it would also adhere to wider economic objectives. The reduced requirement in the plan in the early years should there be expressed as a minimum and the plan should confirm all will be done to exceed this, including working with developers to bring sites forward early, including

supporting phased delivery where this will boost early plan period supply.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should be clear as to what the annual requirement is over the plan period. Where a stepped trajectory is adopted, the plan should make it clear that this is a minimum annual requirement and that they will work with developers to try and bring forward developments sooner, including supporting phased delivery where this will boost early plan period supply. The plan should make it clear there is no impediment in the Plan's policy for delivering development earlier than the trajectory, moreover it is encouraged.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The representations here (and others on behalf of Persimmon) set out a numbers of technical matters which would require more detailed explanation to the Examining Inspector in order to explore the extent of the issues of concern.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

10/12/20