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Letter ref BDP to BL\_200616.docx



Brandon Lewis MP  
Minister of State for Housing and Planning  
Department for Communities and Local Government  
4th Floor  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

E: [REDACTED]@savills.com

Innovation Court  
121 Edmund Street  
Birmingham B3 2HJ  
T: +44 (0) 121 633 3733  
savills.com

By Post & Email: [REDACTED]@communities.gsi.gov.uk

Dear Mr Lewis

### Birmingham Development Plan 2031

I write on behalf of a consortium of landowners and developers who are promoting the Langley Sustainable Urban Extension (SUE) which is included in the Birmingham Development Plan. The consortium members wish to express their concerns regarding the decision taken by Government to issue a direction preventing the adoption of the Plan following a request made by Andrew Mitchell MP to have the Plan called in.

The Langley SUE has been considered through an independent examination process and confirmed in the Examiner's Report<sup>1</sup> on the Examination, dated 11 March 2016, as being a justifiable and sound allocation on Green Belt land<sup>2</sup>. The proposal has been promoted through the Plan, Mr Mitchell attended the Examination and his views were considered by the Examiner<sup>3</sup>

We have not been able to obtain a copy of the formal request made by Mr Mitchell to have the Plan called in for consideration, and therefore we are not entirely clear on what grounds he has made this request. From Hansard Papers<sup>4</sup> we have found references to Mr Mitchell's concerns that the loss of Green Belt is "unnecessary" and that there is a need to prioritise the use of brownfield land.

Birmingham City Council has embraced a 'pro-growth' agenda in its Plan with proposals to support a population increase of 150,000. The city and wider region currently provide some of the most attractive places to invest in the UK outside of London, with proposals such as HS2 acting as further incentive for businesses and families to locate in and around Birmingham.

The objectively assessed housing need confirmed by the Examiner was 89,000 and Birmingham City Council has provided proposals for 51,800 new homes to be built. Langley SUE (5,000 homes) and the former Yardley sewage works (350 dwellings) represent the only Green Belt releases in the Plan and only 10% of the overall dwelling numbers available. The majority (90%) of the dwellings proposed in the Plan fall within the existing urban areas of Birmingham. The Examiner confirms<sup>5</sup> the Council's emphasis on the promotion of brownfield land and the skew in the location of new housing opportunities, stating:

***"It is true that a high proportion of the identified sites are relatively small, and that most of the larger sites are located in the inner-city wards (particularly Ladywood and Nechells), rather than the higher value suburbs. But that is because Birmingham is heavily built-up, with most development opportunities to be found on brownfield land in the older parts of the city."***

<sup>1</sup> Examiner's Report - Planning Inspectorate Reference PINS/P4605/429/7

<sup>2</sup> Paragraph 224 - Examiner's Report

<sup>3</sup> Paragraph 136 - Examiner's Report

<sup>4</sup> House of Commons debate 26 January 2016 and 24 May 2016

<sup>5</sup> Paragraph - 56 Examiner's Report



The provision of new family housing opportunities on the brownfield sites available in Birmingham does not meet the overall housing requirements in the City, both in terms of number and type of housing. Many of the inner city sites are small and only suitable for high density apartments which are generally unsuitable or undesirable for family living.

- Only 32 sites (2.5%) available in Birmingham’s urban area are suitable for typical family housing density (30-35 dwellings per hectare)
- On the sites available, densities range from 40 dwellings per hectare (dph) to 600 dph
- 18,000 plots (40%) are in Birmingham City Centre or inner wards
- 12,000 plots (30%) are in Ladywood and Nechells)
- 90% of sites (1,170) are in the lower half of the CIL value type areas
- The Langley SUE (5,000 dwellings) is the only major exception, in providing a large scale urban extension opportunity.

The proposals for 5,000 dwellings at Langley will deliver much needed high quality family housing which will meet some (around 5.6%) of the housing requirement identified in the Plan. These houses will be essential in meeting the needs of existing and new families attracted to live in the City through investments in infrastructure such as HS2 and major global company moves into the city. For example, HSBC is creating the head office of ring-fenced banking in Birmingham with:

- *Around 1,000 roles relocating to Birmingham*
- *The Global bank serving its UK personal and business customers from Birmingham; and*
- *The move to Arena Central being the largest property deal in Birmingham since 2002*

If Birmingham is to properly support such investment decisions it needs to provide a commensurate supply of high quality family housing. The Langley SUE proposals represent an opportunity to support the Council’s growth agenda and provide the city with new attractive locations to live in, and an increase in new homes for families, to support the investment planned. In order for the 5,000 houses to be delivered in the Plan period, delays need to be avoided, not created, to enable planning permission to be secured and construction to commence.

We invite you to consider the findings of the Examiner’s Report and the information provided in this letter and ensure that a positive decision is reached as expediently as possible to enable Birmingham City Council to adopt its Local Plan in accordance with the findings of the Examiner that it is “sound<sup>6</sup>”. The positive approach that Birmingham City Council has taken in identifying Langley SUE in its Plan for new family housing is fully in accordance with paragraph 47 of the NPPF, which seeks to **significantly boost the supply of housing**. It is disappointing that even if you decide not to call the Plan in, there will still be minimum further delay of around 2-3 months before Birmingham City Council can adopt its Plan due to Mr Mitchell’s request. This creates unnecessary investment uncertainty in progressing the Langley SUE. Should you consider that the Plan does not need to be called in for determination, then this will enable Birmingham City Council to adopt its Local Plan and the Langley SUE Consortium can continue to make positive investment decisions in the preparation and submission of a much needed planning application.

Yours sincerely



Director

CC: The Rt Hon Greg Clark MP  
 – Special Advisors  
 – Special Advisor, Policy Unit: Housing, Planning and Local Government  
The Rt Hon George Osborne MP  
Henry Smith MP – Parliamentary Private Secretary  
Councillor John Clancy – Leader Birmingham City Council

<sup>6</sup> In accordance with paragraph 182 of the NPPF.