

What Good Looks Like: Birmingham

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Introduction

Ever since the introduction of the Planning and Compulsory Purchase Act in 2004 the Planning Advisory Service has been helping planners make local plans for councils. A local plan represents a significant investment in time and money for councils, and it is fair to say that there are significant challenges for planners from a changing context.

A question we are often asked is "can you tell us what 'good' looks like?" There is a reluctance to label any plan as 'good' both from the Inspectorate, and from local authorities themselves. So what can we do? This set of small case studies takes recently adopted local plans and asks four simple questions. These questions take some of the key elements of the HWP about ensuring plans deliver and can respond to challenges:

1. How does the plan make best use of land?
2. Does the plan demonstrate a clear narrative in first identifying and then tackling the issues?
3. How does the plan promote a diversity of suppliers and developers?
4. How does the plan contribute to the delivery of strategic objectives?

We also look at a set of metrics to assess some of the other issues that can trouble us as a sector. These look at the length of the plan, how much housing is it delivering (and what percentage of the OAN is that?), how many objectives does it have and what was the level of representations received? These provide some context and, when looked at over a number of plans, patterns may start to emerge. Time will tell.

The case studies look at the adopted plan, the Inspectors' Report, and parts of the evidence base to provide some learning. Each one starts with some simple metrics.

For each question you will see a brief summary of what the plan does with any useful principles covered at the end.

Metrics

Length – 148 pages

Number of objectives – 11

Number of homes – 51,100 representing 61% of identified need. The rest to be delivered across the housing market area (HMA).

Representations on submitted plan – 1,524 people and organisations responded. 5,863 individual comments/ representations were made.

Time from Publication to Adoption – 1,100 days (includes 6 month period under Holding Direction from SoS, 26 May to 24 Nov 2016)

Pre-Publication work started in 2007 (source: Birmingham Plan 2031)

Time from first formal consultation to Publication Autumn 2008 – January 2014

Useful links

Inspector's Report -

https://www.birmingham.gov.uk/directory_record/1380/inspector_s_report

Birmingham Development Plan -

https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/78/birmingham_development_plan

Big City Plan -

https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/298/big_city_plan

Employment Land and Office Targets Study -

https://www.birmingham.gov.uk/directory_record/970/employment_land_and_office_targets_study_2013

1) How does the plan make best use of land?

The council identifies 10 growth areas, including one large urban extension and one large employment site, as a means of seeking to maximize capacity and stimulate delivery. Each growth area has a policy setting out the amount of development to be delivered for both housing and employment.

Most sites are brownfield and in built-up urban areas. They are therefore mostly small to medium sites (fewer than 100 dwellings). The council offers a conservative estimate of windfalls (5%) which, although ramping up throughout the plan period, never exceeds 2007 'boom' levels.

The plan sets different density levels in differing areas, with the most accessible urban areas looking to a minimum of 40 dwellings per hectare (dph). The Inspector was satisfied that this would not lead to an over-concentration of smaller units in these areas:

“Policy TP29 sets out target densities for residential development in the city centre, in areas well served by public transport, and the substantial shortfall in housing land in Birmingham overall, it is sensible to seek to maximise the yield from each development site, and there is no clear evidence to support the claim that a minimum target density of 40dph is incompatible with the provision of family or specialist housing.”

It is important to remember the role of monitoring here. The Inspector noted that monitoring on densities has not been comprehensive in the past; it will need to be in the future to demonstrate that targets are being met.

Employment sites are identified as a combination of former industrial land in now-defunct uses and intensifying existing business parks or other industrial areas. The plan delivers 6 'Economic Zones': “to provide the clustering of economic activity within high quality business environments that are supported by the right infrastructure.”

The 'Employment Land and Office Targets Study' (ELOTS) goes into some detail about the different types of employment site available in Birmingham. This recognizes the regional as well as the local role and identifies four broad categories of site: Regional Investment Sites (RIS), and Best Urban, Good Urban and Other Urban land. The methodology looks at several factors rather than treating employment land solely in terms of trend based information. It analyses the property market and the policy context. It considers different growth scenarios and comes up with the 'most likely' demand estimates.

As the Inspector notes *“The Study examines the policy, economic, demographic and property market factors influencing future employment development in Birmingham. Its “most likely” estimates of demand for land and floorspace over the Plan period are derived by integrating a range of estimates based on growth projections and past completion rates..... This is a robust methodology leading to realistic demand estimates.”*

Demand estimates are how the targets are arrived at and the council has taken a rather innovative approach to considering how to maintain a steady supply. *“The City Council’s approach to employment land to date has sought to ensure that an adequate reservoir of readily available land is maintained to allow the City to accommodate development proposals from inward investors, start-ups and existing companies wishing to expand or move within the City.”*

The Inspector applauded this approach in his report, noting: *“This flexible “reservoir” approach allows for peaks and troughs in the demand for employment land. It is appropriate in Birmingham in view of the substantial opportunities for land recycling. However, careful monitoring of planning permissions and site availability will be necessary to ensure that the reservoir is maintained.”*

We think that for the plan to make the best use of land it has to:

Consider identifying specific growth areas – Be clear about how supply is going to be delivered there, both housing and employment

Don't rely on economic trend-based information alone - Ensure the employment land study examines the policy, economic, demographic and property market factors influencing future employment development in your area

Identify the different types of employment land requirements – Defining specific employment land requirements this shows deeper understanding of differing market needs, and how you are specifically addressing them

Be realistic about windfall sites – Make sure there is evidence to support all the assumptions. Look at trends but also consider how demographic changes will impact the future

Embed monitoring of completions and site activity into the authority monitoring report – close monitoring of the pipeline will help ensure appropriate action can be taken to maintain supply.

Consider how density will be monitored – Demonstrating how higher density is being delivered will not only track policy effectiveness but also provide assurances that high density can also be high quality.

2) Does the plan demonstrate a clear narrative in first identifying and then tackling the issues?

Birmingham has a big story to tell. It is the UK's 'second city' and has a young and diverse population. The city centre is a major attraction and it has a significant influence on the surrounding region. The city centre has undergone major regeneration in recent years, with the upgrading of the New Street Station, the Bull Ring and now a tram system. The council produced the 'Big City Plan' focusing on the city centre. Although this plan is not a statutory document it provides the vision, aims and objectives for the city centre. This masterplan identifies key infrastructure and investment. Adopted in 2011, it provides clear signposts to long term commitment to the strategy by stating "The key principles of this masterplan will be embedded in the Council's Core Strategy". This kind of simple statement should be music to the ears of anyone considering investing in Birmingham, confirming that the masterplan is going to be supported by a statutory framework.

By the time the Big City Plan was adopted, a number of key projects were already under way, such as the regeneration of New Street Station and the new library. This provides further signals and emphasis that the council is not only serious about delivery but also able to bring it about.

The Big City Plan identifies the other areas within Birmingham that will be regenerated alongside the city centre, providing further conviction and positive signals about investment and delivery in the area. That these other action plans are emerging adds yet further conviction to the story.

The Big City Plan discusses 5 main themes:

- Innovation and skills
- Cultural and economic diversity
- Connectivity
- Place quality
- Strategic decision making

It then sets out 6 objectives: Livable city, connected city, authentic city, knowledge city, creative city and smart city.

The key here is how Birmingham clearly understand their area. The plan really gets into the DNA of the place. It looks at recent trends as well as deeper history. It understands how global trends may have affected the area but also what local factors are at play. Birmingham has some areas traditionally reliant on one single large employer (such as at Longbridge) as well as concentrations of areas of disadvantage or deprivation (such as Aston). Both areas require action. The action plan for Longbridge has been in place for over 6 years. The Inspector was keen to see evidence that this be kept under review. It is as important to monitor individual elements of the strategy as well as the overall strategy. Policies in place 6 years ago may no longer be appropriate or may be holding back development.

The Greater Icknield Master Plan, adds further weight to the proactive approach to delivery. It describes the role of Greater Icknield as part of the bigger picture. Sets out the broad strategy for what type of development will be delivered, and then goes in to site specific detail to promote available sites for development.

Development opportunities

1 Icknield Port Loop

Size:	26.8ha
Location:	Adjacent to the City Centre and Edgbaston Reservoir
Current use:	Industrial/Community/Vacant
Proposed use:	Residential led mixed use

Icknield Port Loop (IPL) is a regionally significant development site, given its size, edge of City Centre location and consolidated land ownership. It is centred on a canal loop that offers waterside development opportunities adjacent to the major recreational asset of Edgbaston Reservoir, and adjoins the Ring Road. It is largely surrounded by attractive, mainly Victorian residential neighbourhoods including Summerfield - Birmingham's first eco-neighbourhood.

Previously a declining industrial area, much of the site has been cleared, and the former Ladywood Arts and Leisure Centre was demolished in 2014. Primarily owned by Birmingham City Council and The Canal and River Trust, the majority of the site (17.5ha) benefits from an outline planning

permission approved in September 2013 following the completion of a Section 106 agreement. A further detailed Masterplan is being prepared for sites surrounding Edgbaston Reservoir. This Masterplan will address the needs of existing users while protecting its status as a Local Nature Reserve.

Growth

IPL is a key site for delivering growth and regeneration in the Greater Icknield area. It should deliver around 1,400 new homes over the entire site, aimed predominantly at families, together with a mix of commercial and community uses.

URBAN STRUCTURE at present



KEY

Activity nodes
Major highways

Main walking routes
Canal

Development opportunities

URBAN STRUCTURE in 20 years



Good quality education provision is considered crucial to attracting families to live in the area and this together with developments will be expected to contribute to this. As the number of residents grow, local community, leisure, shopping and employment facilities will need to be provided. These will be focussed at Icknield Port Road and Rotton Park Street junction. Commercial buildings should be adaptable to market conditions.

The prominent Ladywood Middleway frontage of the site would be appropriate for a mix of uses, including residential, retail, hotel and offices.

There is a recognised need for a swimming pool within the Greater Icknield area and it is proposed that the City Council will provide this as part of the Icknield Port Loop developments.

There is a major opportunity to enhance recreational facilities at the 32ha Edgbaston Reservoir which is currently underused. To ensure that the nature conservation value of the reservoir is not adversely affected any proposals will need to be subject to a detailed ecological impact assessment. The canal loop offers the potential for residential and visitor moorings.

Connectivity and public space

Icknield Port Loop occupies a prime location adjacent to Edgbaston

Reservoir and close to the City Centre (New Street Station is a 30 minute walk). Development must be well connected to these facilities and surrounding neighbourhoods. Providing good walking and cycling connections will be essential, including new vehicle and pedestrian/cycle bridges over the canals, routes along the canals and across the Middleway.

New public open space including formal play facilities for children of all ages will be required within the development to meet the needs of new and existing communities. Residents' access to facilities at the Reservoir and Summerfield Park should also be improved.

The site benefits from some mature trees towards the Middleway: these should be incorporated into the development layout.

Design and heritage

Development at IPL should create its own positive identity based on the site's 2.5km of canal frontage, through a mix of high quality waterside buildings, public spaces and a legible urban layout.

Most of the attractive industrial buildings in the area have been lost over time. Surviving Victorian brick buildings on Rotton Park Street and Icknield Square therefore have added significance for sensitive conversion to new uses.



Model of Icknield Port Loop site

The location of the site close to the City Centre and the large area of canal and reservoir frontages provide the opportunity to support high density development and innovative housing types. Residential buildings will predominantly be 2 to 3 storeys, but there is scope for mid-rise buildings alongside canals and the Middleway Ring Road. Commercial buildings may be taller by the Middleway and at the community hub.

Key outcomes

Phased development on this site will be guided by a detailed Masterplan as part of the planning management process, to achieve:

- A vibrant, family-oriented residential neighbourhood with supporting infrastructure and community assets.
- Housing and public spaces that make the most of the waterfront environment.
- A clear neighbourhood identity with a consistent development approach to buildings and open spaces.
- Heritage assets given positive uses and integrated into the new neighbourhood.
- Phased provision of a range of community facilities at the heart of the neighbourhood, to include new public open space and buildings that can accommodate education, leisure, community and commercial uses.
- An enhanced recreational role for the Reservoir whilst respecting its nature conservation value.
- Walking and cycling routes and public transport facilities that allow residents to easily access City Centre jobs and attractions.
- Sustainable energy for the development, of which a CCHP plant is the preferred option as it would be able to service both the site and the surrounding area as part of a wider district heating network.
- A new swimming pool accessible to all.

It feels like the plan has been developed in conjunction with these other planning strategies in Birmingham and not in isolation. There are clear links to existing strategies, as well as very clear signposting to future ones. The overall picture is therefore one of a coherent, consistent strategy, that understands the challenges of the area and seeks to proactively address them.

The plan sets out 11 broad objectives and unpacks these into the topic areas of environment and sustainability, economy and network of centres, homes and neighbourhoods, and connectivity. Each topic area has an illustrative key diagram showing the spatial delivery of key elements.

The plan then sets out how the strategy will be delivered covering first the spatial policies and then the thematic ones. The spatial policies focus on the identified regeneration areas and set out the spatial growth strategy. They describe the areas and the reasons why they are identified, as well as what is going to be delivered, and how. The thematic policy sections then cover each of the themes described after the objectives in the introduction. The thread is clear and the plan is internally consistent.

This approach provides a nice clarity to how each area will contribute, rather than having to look for a location within a broader topic. Each policy has a simple checklist at the end to set out how it will be delivered in terms of funding and additional policy documents. This checklist covers: Local/National funding, Partnerships, Compulsory Purchase Order, Community infrastructure levy/ Section106, Planning management and Other local plan/Supplementary Planning Document/regeneration framework. This provides an at-a-glance look at the delivery and helps set out how each policy sits within that broader framework.

With regard to engagement, as with most plans, the Inspector noted the challenges to the consultation process, but concluded: “*satisfactory consultation was carried out on the Plan. The consultations met all the relevant legal requirements, including compliance with the Council’s Statement of Community Involvement.*”

We think that for a plan to create a clear narrative and identify issues it has to:

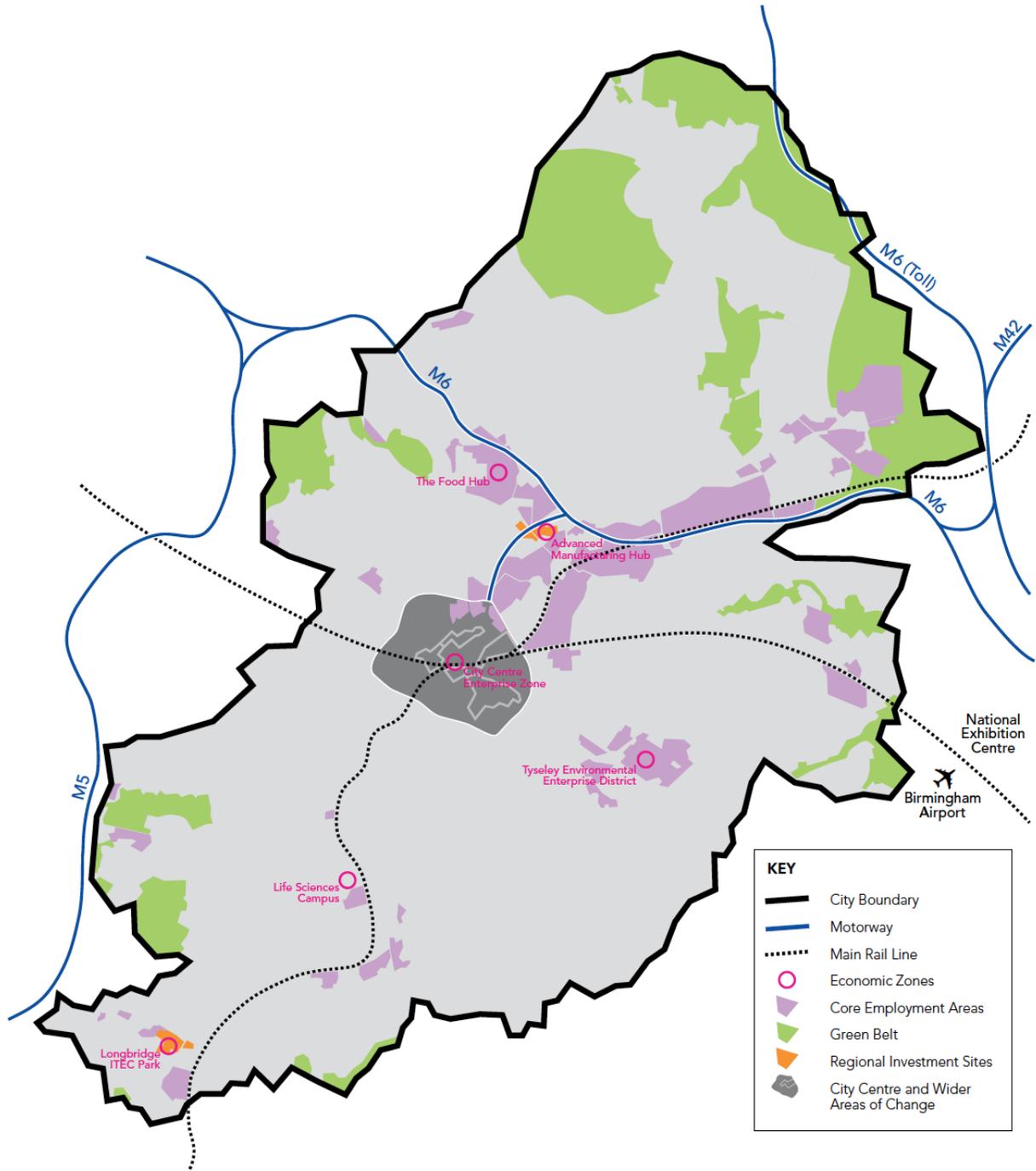
Provide specific policies in dedicated sections for any key identified growth areas – Don’t expect the reader to find each area under separate topic headings

Clarify the relationship between this plan document and other plans – If there are existing plans, reference them when setting the context. If there are further plans to be written, set out where, on what subjects and how they will relate to this plan document

Set out how each policy is going to be delivered – This can be as a simple checklist, covering funding and policy.

Actively promote sites where there is a geographical focus for regeneration and development – Use a ‘Prospectus’ to promote sites and set out key details such as site size, opportunities and policy context

Use graphics to help explain areas and their relationships – This is an obvious point but can get lost when the serious policy writing gets under way.



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Plan 1 Employment sites

Source: Birmingham Plan 2031

Sidebar: Birmingham's greenbelt

Like any authority with green belt, Birmingham had to consider what to do with theirs in this plan. The legal question is 'are there exceptional circumstances that can justify the release of green belt land?' The more interesting question for authorities is "will the release of green belt make for a better place in the long run?" If the answer is 'yes', then it's time to gather all the appropriate evidence.

The most important thing is to remember this is about making places, not plans. It's about the wider impacts of development, relating not only to the environment but also the economy and equity. In America, the 'social' leg of the sustainability stool is replaced with 'equity'. Not only does this make for a nice 'three e's' rule, it also provides the right focus for what 'social' aims should be seeking to achieve. What follows is classic planning. Make decisions based on a weighing up of pros and cons. Balancing and making judgments. Always with the outcomes in mind.

In answering this question, of course Birmingham had to satisfy the Inspector that they had followed due process and could support arguments with evidence. Yes, they had to go back and re-run significant parts of this to demonstrate they had considered reasonable alternatives, and used the right weights and measures in determining where the balance came. Yes, this looks like a typical local plan evidence base, made up of sustainability appraisal, site analysis, objections and counter-evidence. The outcome is not 'Birmingham released x hectares of green belt'. The outcome is 'Birmingham is planning for the right amount and mix of development in the right places'. Not in isolation, but in relation to the wider area.

There is no 'free-for-all' on developing in or releasing land from, the green belt. The rules are the same. The focus, though, has to be on the bigger picture. How can we achieve our objectives to develop a place that respects the environment, develops the economy and improves equitable access to a better quality of life for everyone? There is always a trade-off. Judgments to be made. Understanding that this is about all the components of society makes for better places. It may well be that it is inappropriate to release any green belt. It isn't appropriate to refuse to consider it.

3) How does the plan promote a diversity of suppliers and developers?

There is one sustainable urban extension and one large employment site allocated on green belt. Up to 90% of the new housing and about 80% of the employment land will be on brownfield sites and are smaller in nature.

The plan highlights the large student population and increase in elderly accommodation. The council also seeks 35% affordable housing.

84 sites in the Strategic Housing Land Availability Assessment 2016 (SHLAA) are between 100 and 500 dwellings providing a capacity of 15,487 dwellings. This represents 43% of the total SHLAA capacity. There are 6 sites over 500 dwellings with a capacity of 9,154 dwellings. There is no absolute determinant of what constitutes a small, medium or large site nationally, because many areas differ greatly in terms of available supply. It is clear though that the majority of sites, being under 100 dwellings, are normally classed as 'small to medium' sites.

Added together, the diversity of sites will help provide for a range of suppliers and developers that perhaps an area with mostly brownfield sites may not otherwise do. Developers specialising in different forms of housing will have to meet a large need. The urban sites will vary somewhat in size, but the area cannot offer a number of much larger alternative sites on greenfield, as these sites do not exist in Birmingham. One consequence is the need to find sites outside the LPA area. These sites are more likely to be larger greenfield sites, and so across the HMA, there will be diversity in the housing offer, meaning different suppliers and developers will be interested.

The SHLAA contains a robust methodology for assessing sites. Site visits are an important part of gathering evidence. The Inspector noted that some 1,200 site visits had been made in producing the SHLAA. It is not always possible to carry out such a comprehensive assessment. Desk top exercises can be supplemented with local knowledge. Consider also the role of the wider council. Staff in Development Management, as well as other council services will regularly visit sites as part of their routine. It may be possible to combine those visits with at least a passing visit to any SHLAA sites to confirm basic information. Developers and promoters are involved in capacity assessments on sites with existing interest.

We think that for a plan to promote a diversity of suppliers and developers it should:

Ensure that supply is thoroughly assessed – factor in the need for site visits. Consider how these can be spread between officers outside of Policy as well, given that many officers are ‘out and about’ as part of their day job

Identify student need and consider how this market may differ from the general housing market

Consider an approach to employment sites that promotes different uses, in different types of location – a ‘reservoir’ of sites may not always be appropriate, but where demand is high and churn is an essential element of that, demonstrate how the different types of sites can continue to contribute in order to maintain the pipeline

Clarify the approach taken to different geographical areas – Remember small and medium enterprises may operate in very small catchment areas. Area-specific policies help identify acceptable types of development early. They may be more interesting to local developers than a blanket approach.

The approach to employment sites will also keep a range of developers and builders in this market interested. The reservoir of sites will help keep the churn of small sites alongside the larger strategic sites. The diversity of the offer should therefore maintain a diversity of suppliers. This is backed up by the way the relevant policies are worded.

4) How does the plan contribute to the delivery of strategic objectives?

As mentioned elsewhere in this case study, there are a number of other plans and strategies, both in place and emerging, that set out the spatial strategy for this part of the West Midlands. At the examination, one major area of discussion centred on the definition of the housing market area for Birmingham. It became clear that many authorities are influenced and have influence on Birmingham, whilst not all are strictly part of the HMA. This highlighted the reach that Birmingham has, and the number of authorities required to be involved in discussions about strategic objectives.

The plan signposts the issue of unmet housing need “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.”

Such is the scope of Birmingham’s reach, and the scale of the unmet need, that the Inspector requested a Local Plan Position Statement and information on intention to review.

This unmet need from Birmingham is spread across 13 LPAs. The amount of housing is almost 38,000 dwellings. It is not possible to set distribution at this stage. What is needed, and what has been achieved to date is a plan, a methodology and agreement on both. Seven authorities have already agreed to revise/review their plans once a distribution is agreed upon. This represents a significant body of work, and requires firm commitment in order to make Birmingham’s plan effective. The level and form of that commitment varies by authority, related mainly to where they are in their local plan process. Adopted local plans may contain

statements referring to the potential for review once Birmingham's plan is adopted and numbers are known. Others are either at or have been recently examined, with the Inspector at those examinations asking specific questions regarding commitment to consider how to help meet Birmingham's needs.

Connectivity between different parts of Birmingham and the wider area is crucial to the delivery of objectives. The plan contains a section dedicated to this. It can often be a forgotten area of planning, with each development focused on meeting immediate and very local infrastructure requirements, such as junction improvements. A focus on overall connectivity is essential to ensure cumulative impacts are considered, and can be planned for.

Birmingham also recognises its role as an international city and considers how to meet the objective of increasing its profile. This overarching policy is a simple one, to promote Birmingham as an international destination. It is underpinned by more specific policies in the rest of the plan, and in other plans such as the Big City Plan.

We think that for the plan to contribute to strategic objectives the council should:

Identify any housing shortfall as early as possible, and identify all councils with potential to meet that shortfall

Include specific policy on overall connectivity to ensure that the strategic links are planned for rather than waiting for individual sites to contribute to the cumulative impact – This kind of strategic thinking also assist key delivery agencies greatly in their future budgeting. This in turn helps demonstrate deliverability

Consider how formal your arrangements need to be. If a new plan works best, set up the necessary structures to make this happen – Plans need not be statutory, but consider the pros and cons, in terms of time taken versus statutory weight.

Be ambitious, but remember the council does not operate in isolation. What strategy will work for the wider area? How can this in turn work for the council? – Understand the strengths and weaknesses and match these to the opportunities for the whole area.

A Final Thought

Achieving a balance between housing and employment sites is critical to a sound plan. This is perhaps amplified because of the regional role Birmingham plays. Where there is a shortage of available land, the relationship between the two uses becomes even more crucial. It may have been tempting to elevate the importance of housing over other uses, such is the pressure to deliver OAHN. This would have had the impact of dispersing employment around the surrounding districts. Employment is perhaps more sensitive than housing to location. The strength of the region depends on a strong Birmingham economy. Demonstrating there is a good supply of available sites for employment within Birmingham is arguably more important to the success of the region than providing as much housing within the Birmingham City Council area.

Thoughts and reflections from Birmingham City Council

Duty to Co-operate

The City Council has sought from an early stage to address the duty to co-operate (DtC) in a pro-active and collaborative way, working closely with neighbouring areas. The BDP Inspector endorsed Birmingham's approach and the process being followed in order to arrive at an agreed distribution of the shortfall to other authorities in the Housing Market Area (HMA).

Objector's to Birmingham 's approach argued that for the BDP to be found sound it would have to set out specifically where the shortfall of housing provision would be met, by reference to specific apportionments in other LPA areas. The Inspector took a pragmatic view and agreed with our approach, as to wait for an agreed distribution of the shortfall would delay necessary housing development coming forward within the City and conflict with the NPPF by not having an up-to-date plan in place. Adoption of the BDP has provided certainty by confirming the scale of the housing shortfall to be met by other authorities in the HMA and means that the City can press ahead with delivering our own challenging housing targets.

In terms of working together as a HMA to address the housing shortfall, Peter Brett Associates were commissioned by the Greater Birmingham and Solihull LEP and the Black Country Authorities to undertake a three phase Strategic Housing Needs Study. Publication of this report in 2015 was a major step forward as it provided a common evidence base across the entire HMA, which will inform local plan reviews. A considerable amount of work has been done in reconciling the Strategic Housing Needs Study with local plans that have already been adopted or are in the system as methodologies are not fixed, processes evolve and new data is released.

The DtC mechanism has severe limitations and the process of co-operation has not been easy. It should be remembered that the DtC is not a duty to agree and therefore becomes quickly ineffective where fundamental disagreement between parties exist.

Nevertheless, co-operation has continued with Birmingham City Council working collaboratively with the other authorities in the HMA to build upon the Strategic Housing Needs Study. In February 2017 the HMA authorities commissioned a Strategic Growth Study to identify more specific options and broad locations for addressing the shortfall, which can be delivered by the market. In addition, a HMA officer working group has been established to monitor housing requirements, supply and delivery and to enable adjustments to be made at the HMA level. All HMA authorities are actively involved in this process.

Government has admitted that the DtC has not been effective in all parts of the country. It was hoped that the Housing White Paper (HWP) would strengthen the duty and provide more support for strategic planning, but that has not materialised.

The HWP states that Government will consult on changes to the NPPF so that authorities 'are expected to prepare a Statement of Common Ground setting out how they will work together to meet housing requirements and other issues that cut across authority boundaries.' It will also 'allow neighbouring local authorities to act together to produce a single Local Plan for their combined area.' This is not anything new, and in fact, reflects current practice in many places.

The production of a statement of common ground is unlikely to help authorities where there is major disagreement on issues, particularly in relation to housing allocations. The big issues – that of delivering strategic levels of housing/ employment growth and the fundamental problem of land supply in cities with high housing/ employment need – have not been adequately addressed by the HWP.

Green Belt

The Government continues to re-state protection of the Green Belt through the HWP and will require that authorities only amend Green Belt boundaries when they can demonstrate that all other reasonable options for meeting their identified development requirements have been fully examined.

Reflecting on Birmingham's approach to our Green Belt review, the alternative options listed in the HWP are exactly those that Birmingham exhausted. We examined all other reasonable options for meeting our identified need on brownfield sites before looking at the Green Belt, which included an extensive trawl for sites as part of the SHLAA process to maximise provision in the City. We also examined all vacant and unused employment land and buildings, explored land in open space within the built-up area, looked at under-used Council owned land and have optimised density of development. Every reasonable way of maximizing development in the urban area was explored before the Council concluded that a Green Belt review was necessary.

The results of the review concluded that it would be acceptable to allocate a site of 273 hectares, to the east of Walmley, Sutton Coldfield as a Sustainable Urban Extension providing approximately 6,000 dwellings and a site of 80 hectares at Peddimore to provide an employment development.

There was strong and emotive local opposition to the housing and employment allocations, mainly from local residents living nearby, despite the compelling arguments for meeting the City's housing and employment needs, which was ultimately supported by the Planning Inspector. This stems partly from a general prevailing misunderstanding of the role of Green Belt, in that it is viewed as sacrosanct and a total 'no go' area for development. Whereas, it is within the scope of LPAs to consider the need for a review of Green Belt boundaries through their Local Plans and undertake such a review in very special circumstances – which would include the need to accommodate development requirements which could not be accommodated elsewhere.

It is important to note at this point that the strategy of the Birmingham Development Plan prioritises brownfield development and regeneration, with the identification of eight growth areas within the urban area of the City including the City Centre, Aston, Perry Barr, Bordesley, Selly Oak and Greater Icknield for example. All the comparison retail and office development, up to 90% of the new housing and about 80% of the employment land will be on brownfield sites.

The Green Belt, however, is another area where Government could have taken the opportunity through the HWP to help authorities where housing requirements far exceed capacity within their boundary, and where the Green Belt imposes a significant constraint on sustainable development by recognising (through the NPPF) that in some areas, Green Belt reviews may be needed if housing requirements are to be met.

