



Planning & Development
Birmingham City Council
1 Lancaster Circus
Birmingham
B1 1TU

Date: 7 February 2020

Our Ref: LS M5/0505-14

By email only:

planningstrategy@birmingham.gov.uk

Dear Sir/Madam

RE: DEVELOPMENT MANAGEMENT IN BIRMINGHAM PUBLICATION VERSION CONSULTATION

We represent the **West Midlands Housing Association Planning Consortium** which includes all the leading Housing Associations (HAs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HAPCs are well placed to contribute to local plan objectives and act as long-term partners in the community. We welcome the opportunity to make comments on this document.

Policy DM10 Standards for Residential Development

We are concerned that the Council has applied the Nationally Described Space Standard (NDSS) across all tenures through Part 1 of Policy DM10. Doing so will undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered. In addition, many households may not desire, or require housing that meets these standards, as it will result in for example, higher rental and heating costs. There will be occasions where it is neither practical nor necessary to achieve the NDSS.

In order for the Council to implement the NDSS across all residential development, it must be demonstrated that it is being done to address a *clearly evidenced need*, as set out in the Planning Practice Guidance. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard, therefore it is not essential for all dwellings to achieve the standard in order to provide a good quality of living.

We are pleased to see that the requirement for all dwellings to meet, as a minimum, Building Regulation Part M4(2) has been amended to a more realistic standard. The Council now seek an ambitious yet much more achievable standard of 30% Part M4(2) on housing developments of 15 or more dwellings and have sensibly included wording on the viability aspects of development.

Policy DM13 Self and Custom Build Housing

We would like the opportunity to state that any requirement to deliver affordable housing should be separate to the delivery of self and custom-build plots. This is because affordable, self and custom-build plots have very different requirements for funding and delivery. Given the very substantial need for affordable housing across Birmingham, the affordable housing requirement should not be off-set by self and custom-build delivery.

Policy DM15 Parking and Servicing

We ask that the Council considers the wider implications of requiring all new developments to provide infrastructure for the use of low emission vehicles. In our experience, the requirements for low emission vehicle infrastructure requires significant upfront planning for matters including installation, charging to the consumer, other management, and maintenance. This can include monthly and annual consumer unit testing, agreement on liability for and adoption of individual units.

We suggest that the Council undertakes a separate assessment of the need and expectations for low emission vehicle infrastructure and seek to publish guidance on this before adopting this requirement in policy.

We would like to be notified of further consultations on the Local Plan Review by email only to consultation@tetlow-king.co.uk. Please ensure that the **West Midlands Housing Association Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agent.

Yours faithfully

A handwritten signature in black ink, appearing to read 'L Stoa'.

**LEONIE STOATE BSc (HONS) MSc
ASSISTANT PLANNER**

For and On Behalf Of
TETLOW KING PLANNING

leonie.stoa@tetlow-king.co.uk

Cc: Accord Housing Association
Bromford Housing Group
Citizen Housing Group
Platform Housing Group
Walsall Housing Group

Clive French – Housing Enabling Officer