

# **BIRMINGHAM DEVELOPMENT PLAN EXAMINATION**

## **City Council Response to Comments on the PBA OAN Report**

- 1.1 The PBA Objectively Assessed Housing Need Supplementary Report (EXAM 145) was published in March 2015, in response to the Inspector's Interim Findings (EXAM 131) which requested some additional work on this issue. Interested parties were given an opportunity to comment on the Supplementary Report and nine responses were made. This brief note sets out the Council's further comments on these responses, many of which were strongly supportive of the Council's conclusions.
- 1.2 The majority of the responses repeat arguments and points that have already been made, and which are fully discussed in the earlier PBA reports and in the Supplementary Report. The Council is satisfied that its position is fully explained in these reports and does not wish to add anything further apart from in relation to two specific issues which are addressed below.
- 1.3 Barton Wilmore (EXAM145E) draw attention to the district level household formation rates published by DCLG on March 10<sup>th</sup> 2015. They continue to argue that these suppress household formation within Birmingham and that overall housing need should be adjusted upwards to reflect this. This is not accepted. The 2012-based projections, unlike the 2011 –based figures, are not labelled as 'interim', and are endorsed in the PPG, giving them more weight than the old ones. It is acknowledged that they are a starting point but taking account of the analysis set out in the PBA Supplementary Report, the Council does not consider that there is any clear evidence that would justify a significant departure from them in this case. For clarification, PBA were aware of this data prior to finalising the Supplementary Report.
- 1.4 Wardell Armstrong (EXAM 145A) criticise the Supplementary Report on the grounds that it does not include East Staffordshire and Wyre Forest. This reflects the conclusion in paragraph 8 of the Inspector's Interim Findings that these areas do not lie within Birmingham's HMA. The Strategic Housing Needs Study, which is a separate piece of work, continues to include East Staffordshire and Wyre Forest.