

Director of Planning and Regeneration
Development Directorate
Birmingham City Council
PO BOX 28
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12/12/2012

RE: BIRMINGHAM DEVELOPMENT PLAN – OPTIONS CONSULTATION AND GREEN BELT OPTIONS APPENDIX

Dear Dave,

Thank you for the opportunity to comment on Birmingham's Development Plan Options Consultation.

We acknowledge that the urban area of Birmingham has a finite capacity for new housing and employment land, and that land will need to be released from the Green Belt to meet your identified needs.

Tamworth's response will aim to follow the questions set out in your consultation response form.

Q1 Do you agree with the overall strategy and vision for the City? In general yes, but with concerns.

Q2 Are there any comments that you would like to make regarding the overall strategy or vision for the City? Further detail and information should be given for page 6, specifically the paragraph which starts "*The fact that our current population projections are based upon...*" How will this be factored into locating areas within and outside of your administrative boundary, what weight will this have in an assessment?

Green Belt assessment approach: Options; E, G, I, J, K, L, M, N, more information needs to be released on these sites. How does the size of the Green Belt release render it too small to be an urban extension? Considering there is a shortfall of housing numbers even with the release of some Green Belt, surely these smaller Green Belt options should be fully explored before looking to adjoining local authorities for suitable sites.

Q3 Do you think that the City Council should release some land from the Green Belt within Birmingham to provide additional housing? Yes Birmingham should release land from the Green Belt for additional housing

Q4 Do you think that the City Council should seek to persuade neighbouring Councils to make land available for housing to meet some of Birmingham's needs? Birmingham should prepare an evidence base on all possible options in adjoining local authorities, this should take into account standard technical assessments and SA, but also consider the strategic implications.

Q5 Of the options which do you consider to be suitable for housing development? None of these Green Belt Options are suitable for housing development.

Q6 Are there any comments that you would like to make regarding the options in relation to housing development? Tamworth has not been consulted on a technical basis prior to this consultation. Assessing the Strategic Implications and working with adjoining local authorities is a key element to the National Planning Policy Framework, more importantly it is a legal requirement under the Localism Act 2011.

All the Green Belt options but in particular B, C and D would have a strategic implication for Tamworth. The impact upon strategic and local highways, access to retail, leisure and employment sites in Tamworth from the proposed housing needs to be assessed, also of great importance is the impact that 10,000 new homes would have on the deliverability of new housing development in Tamworth. These 10,000 proposed new homes dwarf the level of growth in Tamworth and South East Staffordshire as a whole, these proposals would have an impact on the viability of Tamworth's Local Plan and impact on the viability of specific sites. All of these strategic impacts need to be fully considered and assessed.

Until this has been carried out, it is not possible to fully consider any of the options.

Q9 Do you think that the Council should seek to address this by releasing some land from the Green Belt for employment development? & Q10 Of the options which do you consider to be suitable for employment development – please see responses to Q3 & Q4.

Further comments

The Duty to Co-operate is a statutory requirement of the Localism Act 2011, the National Planning Policy Framework does not have the benefit of statute: but as one of the four tests of soundness it requires Local Plans to be 'Positively Prepared', in that local authorities should work together on strategic issues. Page 6 of the Options consultation report needs amending to reflect this.

We hope these comments assist you preparing the next stage of your plan. Please do not hesitate to contact Alex Roberts, Development Plans Manager, if you have any further queries in regards to this.

Yours Sincerely,

Robert Mitchell
Director Communities Planning and Partnerships