



Sent by EMAIL ONLY to [CityCentreDevelopmentPlanning@birmingham.gov.uk](mailto:CityCentreDevelopmentPlanning@birmingham.gov.uk)

11/7/2023

Dear Sir/ Madam

**Response by the Home Builders Federation to the Birmingham Central Framework Consultation, May- July 2023.**

1. Please find below the Home Builders Federation (HBF) response to the Birmingham Central Framework Consultation. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. House building is an important part of the Local Economy and the benefits of good housing to life chances is well recognised.
3. HBF welcomes Birmingham Council's commitment to progress with plan-making. An adopted Local Plan and clear and consistent policies are essential for the effective functioning of a plan-led system.
4. HBF welcomes the acknowledgement of the role of new housing in regeneration within the central area of Birmingham. A range of housing will be required to meet housing need and demand. The inclusion of a recognition of the need for more family housing, and not just apartments within the document is welcomed.
5. HBF would encourage the Council to fully consider the opportunities of allocating housing sites, including small sites within the Birmingham Central Framework. The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission.
6. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. Indeed, the HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in

a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.

7. HBF would encourage the Council to fully explore what further support it can give to small and medium house builders.
8. HBF is also supportive of measures to increase the supply of specialist older people's housing and supports the view of the Retirement Housing Group (RHG) that the planning system can do more to reflect the aging population. A recent RHG report may provide a useful point of reference for the Council  
<https://retirementhousinggroup.com/how-better-use-of-the-planning-system-can-increase-provision-of-specialist-housing-for-older-people/>

### **Future Engagement**

9. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would be helpful.
10. HBF would like to be kept informed of the progress of the Birmingham Central Framework, the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully



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Home Builders Federation

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