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20 December 2022

Dear Strategic Planning Team,

South Staffordshire Council Local Plan Review – Regulation 19 Publication November 2022

Thank you for consulting Birmingham City Council on the Publication (Regulation 19) document for the South Staffordshire Council Local Plan Review.

As previously stated, Birmingham City Council continues to welcome the approach being taken in the South Staffordshire Local Plan Review and the particular attention given to the strategic matters of housing and employment land provision. This has come about through continued close working and the role that South Staffordshire Council has played alongside other local authorities as part of Duty to Cooperate arrangements within the Greater Birmingham and Black Country Housing Market Area (HMA).

Chapter 5 – Spatial Strategy.

Unmet housing needs from the wider housing market area and the proposed housing target.

South Staffs Council have been a proactive participant in HMA discussions and in seeking to provide additional housing to meet any shortfalls within Birmingham and the wider the HMA area. This is reflected in the Publication document which specifically attempts to maximise housing provision within South Staffs to provide an additional 4,000 dwellings across the local authority area as a contribution towards meeting shortfalls identified elsewhere within the HMA, effectively doubling the original housing requirement of 4,097.

The justification for this level of housing growth is provided in paragraphs 5.10 - 5.16 of the Publication document. Birmingham City Council fully supports this approach and the continued need for unmet needs from elsewhere within the HMA is evident in shortfalls demonstrated within the Black Country and latest household requirement figures for Birmingham in the Issues and Options consultation for its new Local Plan. Although the new Local Plan is still in the early stages of its production, the City Council has commissioned a Housing and Employment Development Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA) as part of its evidence base for the Local Plan. These two studies, coupled with wider urban capacity work, has shown that there is an initial estimated shortfall of 78,415 homes across the City for the proposed Plan period of 2022-2042. The City Council still has further work to do to identify further potential sources of housing land

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supply but, as you have pointed out in paragraph 5.13 of the document, even if additional land supply can be identified, it is still likely that a significant shortfall from Birmingham will remain. To this end, the City Council will ensure that housing supply within its administrative area will be truly maximised prior to any shortfall being exported to other areas.

It is therefore important that the 14 local authorities that comprise the HMA continue to work together to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. Birmingham City Council will therefore continue to support collaborative working with these local authorities, alongside South Staffs and work towards drafting a HMA-wide Statement of Common Ground to set out a roadmap for this further work as suggested in paragraph 5.16 of the Publication document.

Chapter 5 Spatial Strategy

Gypsies and Travellers (paragraphs 5.51 - 5.53)

The South Staffs Local Plan review Publication Document, indicates that there is an identified need for 121 pitches for Gypsy and Traveller households in South Staffordshire over the local plan period, including 72 pitches within the first 5-year period. However, the Publication document indicates that South Staffs can only deliver 37 pitches within the plan period on sites which would address its unmet pitch needs. This leaves a very significant shortfall, which is a strategic cross-boundary issue to be discussed with adjacent authorities and other authorities within the same housing market area. To this effect, South Staffs has written to Birmingham City Council, along with other local authorities within the HMA, to request if sites could be found for this unmet need.

Birmingham's Local Plan has also identified a requirement to provide additional sites for gypsy and traveller provision within the Local Plan period. Alongside the potential unmet need for wider housing provision within Birmingham, the City Council is unlikely to be able to identify sites for gypsy and traveller provision over and above its own requirements and so, unfortunately, unlikely to be able to help South Staffs with this request.

Chapter 5 Spatial Strategy

Strategic employment sites and West Midlands Interchange (paragraphs 5.54 – 5.63).

Within the South Staffs area, 232ha of Green Belt land has been released to deliver a large-scale strategic rail freight interchange called West Midlands Interchange (WMI). The Economic Development Needs Assessment, carried out on behalf of South Staffs as part of the evidence base for the Local Plan review, indicates that only 18.8ha of WMI is attributable to South Staffordshire's needs, indicating that the rest may be able to contribute to unmet needs in the wider WMI travel to work area. Supporting work by Stantec, commissioned to examine the apportionment of WMI, suggests it can provide additional surplus B8 employment land to a wider travel to work area including the Black Country authorities, equating to 67ha of B8 land to the four Black Country planning authorities and 53ha to Birmingham (taken from the Stantec report).

Birmingham City Council has however recently evidenced a shortfall of 73.64ha of employment land against its identified need to 2042 through its Issues and Options Consultation Document. Birmingham City Council would therefore welcome and support the approach of apportioning land at WMI to help meet some of the shortfall in employment land identified in the Birmingham Local Plan Issues and Options document (October 2022). This is particularly important for Birmingham and the Black Country as the majority of the conurbation does not have the land capacity or the locations to support strategic sites of this size.

Chapter 5 Spatial Strategy

Longer term growth aspirations for a new settlement (Policy DS6).

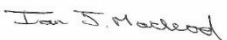
The Publication document has set out a Policy (DS6) for the long-term aspirations of South Staffs Council to explore potential options within the district for a sustainable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district. It is recognised that such a settlement will not provide housing for the current plan period but forms an option for the Council to explore in future plan-making. As previously indicated, this approach is welcomed by the City Council in setting out future strategic growth options at an early stage. This can be supported by further joint working of the local authorities which make up the HMA in updating the Strategic Growth Strategy for the whole of the HMA area. It will also assist in further clarifying whether this would be a viable option for a future Local Plan Review and help towards the continued housing supply issues faced by the West Midlands and the HMA over the longer term.

Summary

In summary, Birmingham City Council continues to be fully supportive of the approach and commitment made by South Staffs in helping to address the long-term strategic housing and employment issues faced by the West Midlands and the HMA. The City Council looks forward to continued engagement with South Staffs through Duty to Cooperate arrangements and in jointly finalising a Statement of Common Ground for the two authorities and the wider HMA which have already made significant progress. The SOCG has been picking up all of the issues highlighted in this response and will, no doubt, assist with the progression of both the South Staffs Local Plan Review and the new Birmingham Local Plan.

If you require any further information or input from Birmingham City Council in formulating your Local Plan Review, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Yours faithfully



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