

**FAO: South Staffs District Council
Strategic Planning Team**

Sent via email: localplans@sstaffs.gov.uk

6 June 2024

Dear Strategic Planning Team,

South Staffordshire Council Local Plan Review – Regulation 19 Publication April 2024

Thank you for consulting Birmingham City Council on the Publication (Regulation 19) document for the South Staffordshire Council Local Plan Review and make the following comments in response to specific strategic and cross-boundary issues arising from this consultation.

The City Council has had a strong working relationship with the local authorities which make up the Greater Birmingham and Black Country Housing Market Area (HMA) including South Staffs, which has successfully led to identifying ways in which strategic housing and employment land needs can be better met across the wider HMA since shortfalls first emerged following the adoption of the Birmingham Development Plan in 2017. This work has also included a Strategic Growth Study in 2018 which provided evidence for South Staffs to take a bold approach in the Local Plan Review to provide an additional 4,000 dwellings as a contribution towards meeting shortfalls identified elsewhere within the HMA, effectively doubling the original housing requirement of 4,097. This level of housing was set out in the consultation on the original Regulation 19 Publication in November 2022. However, it is recognised that since that time, the District Council has reappraised its position and approach due to changes to national policy, particularly around the requirement to review or change green belt boundaries which emerged and were subsequently adopted in the intervening period.

Birmingham is currently progressing its own Local Plan with consultation on the Preferred Options document due to be carried out during Summer 2024. Previous consultation at the Issues and Options stage identified a further significant potential housing shortfall (78,415 shortfall) and a significant employment land shortfall (73.64 hectares shortfall). Although additional work since then has reduced the likely shortfall for both housing and employment, it is anticipated that a significant shortfall will still exist in the Preferred Options document, particularly for housing. Significant shortfalls of housing and employment land are also anticipated across Dudley, Wolverhampton and Sandwell within their local plans, which have also reached a similar stage, and so the issues of significant land shortfalls across the West Midlands conurbation are likely to continue further into the future.

Chapter 5 – Development Strategy.

Unmet housing needs from the wider housing market area and the spatial strategy for housing.

In consideration of changes to the NPPF which first emerged in December 2022 and adopted in December 2023, and the fact that the Strategic Growth Study (2018) is now out of date, options for housing growth have now been reappraised within the South Staffs Local Plan and



set out in Chapter 5. The change in circumstances has meant the District Council has tested further spatial strategy options which have considered different levels of growth based upon capacity-led approaches limiting Green Belt release and focusing growth on the district's most sustainable locations. The chosen approach (Spatial Option I) focuses growth on sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. This option still includes Green Belt release but limits it to areas well served by public transport and where these links offer sustainable commuting patterns into Birmingham and the Black Country. This is viewed by the District Council as an exceptional circumstance to release green belt land consistent with the provisions of the new NPPF to best balance the district's growth opportunities with its constraints.

This approach (Spatial Option I) has resulted in the identification of sufficient land to meet South Staffs' own housing need plus a contribution of 640 dwellings towards any unmet needs of the GBBCHMA representing more than a 15% increase on the District Council's own housing needs. It is appreciated that the Local Plan Review is still seeking to contribute towards the unmet needs of the GBBCHMA through a sustainable and balanced approach which continues to support the growth of the West Midlands Conurbation which is supported. This includes release of Green Belt land, and we welcome the recognition in the Local Plan that this situation constitutes exceptional circumstances to do this, consistent with the provisions of the NPPF. However, it is disappointing that this contribution is significantly reduced compared to the previous 4,000 dwelling figure, meaning that opportunities to help meet housing shortfalls elsewhere in the HMA have been lost.

Gypsies and Travellers

The Publication document indicates that there is an identified need for 162 pitches for Gypsy and Traveller households in South Staffordshire over the plan period, whilst currently the District Council can only deliver 37 pitches. This leaves a significant shortfall which is to be explored through continuing Duty to Cooperate engagement with neighbouring authorities. To this effect, South Staffs has previously written to Birmingham City Council, along with other local authorities within the HMA, to request if sites could be found for this unmet need. The City Council responded in September 2022 to say that Birmingham also has an identified a requirement to provide additional sites for gypsy and traveller provision and, alongside the significant potential unmet need for wider housing provision within Birmingham, is unlikely to be able to identify sites for gypsy and traveller provision over and above its own requirements. This position remains and the City Council continues to be unable to help South Staffs in this matter for the foreseeable future.

Employment land needs.

South Staffs is not in the same Functional Economic Market Area as Birmingham but is with other parts of the GBBCHMA area, namely Cannock, Dudley, Stafford, Walsall and Wolverhampton. The Economic Development Needs Assessment (EDNA), carried out on behalf of South Staffs as part of the evidence base for the Local Plan review, suggests that South Staffs has an objectively assessed employment land need of 62.4 hectares. However, a minimum of 107.45 hectares of employment land has been identified over the plan period and so the District Council is therefore able to make available a potential contribution of 45.2 hectares towards shortfalls experienced in Dudley, Walsall and Wolverhampton. This is welcome in helping to reduce potential employment land shortfalls and pressures within the conurbation.



In addition, 232ha of Green Belt land has been released in South Staffs to deliver a large-scale strategic rail freight interchange - West Midlands Interchange (WMI) which is of regional significance. The EDNA 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). Again, this is welcome and fully supported by the City Council in directly supporting employment land shortages in Birmingham as well as alleviating pressures elsewhere in the West Midlands as the conurbation does not have the land capacity or the locations to support strategic sites of this size.

Longer term growth aspirations for South Staffs.

In the previous Publication version of the South Staffs Local Plan (November 2022), the document set out a Policy (DS6) for the long-term aspirations of the Council to explore potential options within the district for a sustainable independent new settlement to accommodate some of its future housing and economic needs. It was recognised that such a settlement would not provide housing for the current plan period but would form an option for the Council to explore in future plan-making. Again, it is disappointing that this has now been removed from the new version of the Publication document given that the potential for such a settlement could be part of a long-term sustainable solution to alleviate development pressures on the western side of the West Midlands conurbation.

Summary

In summary, Birmingham City Council welcomes and supports the contribution made by land allocations in South Staffs which contribute towards housing and employment land shortfalls being experienced in the West Midlands conurbation, particularly Birmingham and the Black Country. The high levels of potential unmet housing and employment land needs being experienced across the conurbation, (currently estimated to be approximately 110,000 dwellings and around 388 hectares of employment land just for Wolverhampton, Birmingham, Dudley and Sandwell combined), is considered in our view, as an exceptional circumstance to justify taking sites out of the Green Belt. To that extent, South Staffs have also taken this view in releasing sites from the Green Belt in contributing 640 dwellings to the wider GBBCHMA as well as significant releases for employment land.

However, we are disappointed that the levels of housing contributions have been significantly reduced from the 4,000 dwellings previously proposed. The significant reduction in housing numbers means that such opportunities will, either have to be exported to other parts of the HMA (possibly further away from where the housing need is derived) or lost altogether. It is also disappointing that references to exploring the possibility of a new settlement have also been removed due to the importance of finding long term solutions to land distribution and shortfalls across the West Midlands and its surrounding local planning authorities. This is why it is important that the 14 local authorities that comprise the HMA, continue to work together and build on the considerable work already undertaken, to identify possible solutions to any housing and employment land shortfalls across the HMA area and ensure that all plans have been positively prepared in accordance with the Duty to Cooperate. In this respect, the City Council will always continue to support collaborative working across the HMA and look forward to continued engagement with you through Duty to Cooperate arrangements as both South Staffs and Birmingham Local Plans progress towards submission and adoption.



We will be happy to have separate discussions with officers from South Staffs on the issues raised and ways forward on reaching an agreed Statement of Common Ground prior to submission. Please therefore, do not hesitate to contact us at planningstrategy@birmingham.gov.uk

Yours sincerely



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