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11 December 2019

Dear Kelly,

South Staffordshire Council Local Plan - Spatial Housing Strategy and Infrastructure Delivery (October 2019)

Thank you for consulting Birmingham City Council on the South Staffordshire Council Local Plan - Spatial Housing Strategy and Infrastructure Delivery document.

Birmingham City Council welcomes the contents of the document and the opportunity for continued constructive and positive engagement with South Staffordshire through the Duty to Co-operate. The document continues to recognise the relevant strategic matters which need to be addressed between our authorities, particularly the need to meet unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area (referred to below as the HMA).

As you will be aware, adoption of the Birmingham Development Plan in January 2017 confirmed the housing shortfall to be met by other authorities in the HMA at 37,900 dwellings. The HMA authorities subsequently commissioned the Strategic Growth Study (by GL Hearn/ Wood), published in February 2018, which built upon the PBA work and other evidence to identify more specific options and broad locations for addressing the housing shortfall.

The latest formal position published by the HMA authorities in the HMA Housing Need and Land Supply Position (September 2018) updated the housing need and supply data and showed that the housing shortfall had fallen by 5,629 dwellings to 10,696 dwellings (unadjusted) to 2031.

The Position Statement is currently under review and is expected to show further progress in reducing the shortfall. Nevertheless, a shortfall is expected to remain as a result of the Black Country Authorities' Local Plan Review.

Within the HMA, the strongest functional relationship exists between South Staffordshire and the Black Country. The Black Country Local Plan Issues and Options Document (2017) identified a potential shortfall of 22,000 homes and 300ha of employment land up to 2036. Whilst the Black Country has yet to establish how much of that potential shortfall it can accommodate itself, there is still likely to be significant unmet need which cannot be accommodated within the conurbation, particularly post 2031.

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Birmingham City Council is therefore fully supportive of the approach taken by South Staffordshire in the Local Plan Review documents published so far. The City Council believes it is essential for local authorities such as South Staffordshire to test housing options which not only meet its own needs, but also can contribute towards meeting the unmet needs of neighbouring authorities within the HMA as stipulated in the National Planning Policy Framework (NPPF).

To this effect, the City Council supports South Staffordshire in their preference to pursue Spatial Option G, as stipulated within the document (Question 6), as the most robust, sound and sustainable strategy for accommodating its own needs as well as contributing towards unmet needs within the HMA. This will enable South Staffordshire to test an option which could provide up to 4,000 dwellings to meet unmet need within the HMA.

Options to consider the location of a new settlement within South Staffordshire beyond the Plan Period for the current Local Plan Review are also welcomed (Question 7) and are also in line with the findings of the Strategic Growth Study. This would depend on further evidence to establish future requirements and possible further unmet need for the wider HMA beyond 2037.

I trust that these comments are useful and constructive. If you require any further information or input from Birmingham City Council in support of your approach to your Local Plan Review, please do not hesitate to contact us.

Yours sincerely



Ian MacLeod
Interim Director, Inclusive Growth