

7th December 2023

Sent via email: Sandwell_LocalPlan@Sandwell.gov.uk

Dear Sandwell Planning Policy Team,

Re: Sandwell Local Plan – Consultation on the Draft Local Plan (Regulation 18) November 2023

Thank you for consulting with Birmingham City Council on your Draft Local Plan (Regulation 18). Overall, Birmingham City Council is supportive of the approach taken within the Draft Local Plan and the following points provide further comment and detail on specific strategic and cross-boundary issues. As previously stated, the City Council has had a strong working relationship with Sandwell alongside the other Black Country Authorities regarding planning matters for many years, particularly as the two authorities share a considerable joint boundary. This has been recently illustrated by the successful adoption of the Smethwick to Birmingham Corridor Framework SPD which will help to maximise mutually beneficial development opportunities across the boundary along that corridor. In addition, the two local planning authorities continue to work closely alongside the other local authorities which make up the Greater Birmingham and Black Country Housing Market Area (HMA), to identify ways in which housing and employment land shortfalls can be met across the wider HMA since such shortfalls emerged (following the adoption of the Birmingham Development Plan in 2017).

Birmingham is currently progressing its own Local Plan with consultation on the Preferred Options document due to be carried out during Summer 2024. Consultation on the Issues and Options for the Birmingham Local Plan identified further significant potential housing and employment land shortfalls for the City, and this is likely to continue to be reflected when consultation on the Preferred Options is carried out.

Chapter 2 – Spatial Strategy

The Standard Methodology for calculating housing needs for Sandwell identifies that land for 29,773 homes is required by 2041. The Spatial Strategy chapter sets out the context of how the development choices for Sandwell have been made. These choices, and the finite land constraints experienced in a predominantly urban Borough such as Sandwell, means that only land for 11,167 homes can be identified, leaving a significant shortfall and unmet housing need of 18,606 homes. Similarly, Sandwell's draft plan has also identified a shortfall of 189 hectares of employment land compared to its projected need as set out in its Employment Development Needs Assessment.

The Spatial Strategy sets out the options explored (paras 2.19-2.30) to minimise the shortfalls experienced including consideration green belt and greenfield sites. The Borough has very few large open spaces and very little green belt land (mainly in Sandwell Valley) and, due to its built-up nature, these areas are important to biodiversity, health and wellbeing. The City Council therefore agrees with the development choices being made within the draft Plan, and the constraints experienced within Sandwell, which has resulted in this significant shortfall.

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Through evidence provided for its new Local Plan, Birmingham City Council has also identified 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 supply and will ensure that opportunities within its administrative area will be truly maximised prior to any shortfall being exported to other areas. It is also important that Sandwell, like Birmingham, continues to strive to accommodate as much housing and employment as possible to meet its own needs by making effective use of land and maximising densities.

However, even with proactive measures to increase supply in place, it is still highly likely that shortfalls will remain in both local authority areas going forward. It is therefore essential for close working to continue between the two authorities and across the Greater Birmingham and Black Country HMA to try and address the shortfalls as much as possible across the wider HMA area.

Chapter 3 – Development Strategy

The Development Strategy includes a section on how Sandwell has carried out its Duty to Co-operate obligations in the preparation of the Local Plan so far (Paras. 3.12-3.19). Given the development pressures and the housing and employment land shortfalls being experienced in the Borough (and those within Birmingham), it is crucial that Sandwell continues to work closely with the City Council as well as the other surrounding local authorities which make up the HMA, to identify and implement an agreed approach to tackle how such shortfalls are to be accommodated to ensure the soundness of both Local Plans.

The City Council agrees that Sandwell has worked openly and constructively with neighbouring authorities to help provide as much certainty as possible about how and where its full housing and employment land needs will be delivered as set out within this section. It supports the commitment to ongoing engagement with its neighbours, building on the partnership approach developed across the Greater Birmingham and Black Country Housing Market Area.

This commitment also extends to working with neighbours to bring forward land for employment and housing that sits adjacent to existing administrative boundaries and working in partnership to ensure infrastructure needs are met in full across administrative boundaries. As mentioned above, given that Sandwell shares a considerable joint boundary with Birmingham and the successful adoption of the joint SPD for the Smethwick to Birmingham Regeneration Corridor, this commitment is particularly welcomed to bring forward much need development and regeneration opportunities to this part of the conurbation. In relation to this point, the City Council is therefore also supportive of the inclusion of Smethwick as one of five Regeneration Areas as part of the Development Strategy within the Draft Local Plan (Policy SDS2). This will help to promote and cement the development and regeneration opportunities on the boundary with Birmingham which will have mutual regeneration benefits for both authorities with a focus around the development of the new Midland Metropolitan Hospital (which will serve communities on either side of the boundary).

Summary

In summary, Birmingham City Council is supportive of the approach being taken by Sandwell in developing its Local Plan and will also continue to support on-going collaborative working across the HMA and economic market area in addressing wider housing and employment needs. Given that Sandwell and Birmingham are both anticipating potentially large shortfalls in housing and employment land in their Local Plans, it is therefore important that the two local authorities continue to work closely, as well as with surrounding local authorities in the HMA, to identify and implement an agreed approach to tackle how such shortfalls are to be accommodated to ensure the soundness of both Plans. In addition, it will be necessary to promote and encourage further work across these wider market areas to provide a strategic approach to the supply and delivery of housing and employment needs in future years to mitigate for the potential unmet needs across the conurbation. As stated in previous correspondence but worth repeating, this may require and include further studies across the wider West Midlands area as well as Statements of Common Ground with, and between, relevant local authorities as a roadmap for meeting shortfalls through potential local plan allocations elsewhere.

We look forward to continued engagement with you through Duty to Cooperate arrangements as both Local Plans progress towards adoption. 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 sincerely



Ian MacLeod
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