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Dear Sir / Madam

Sandwell Local Plan Preferred Options Consultation Response by Folkes

Harris Lamb Planning Consultancy are instructed by Folkes to submit representations to the Sandwell Local Plan Preferred Options and welcome the opportunity to comment at this time. Folkes are currently promoting sites in the Housing Market Area (HMA) and whilst these are not all in Sandwell, the Sandwell Plan as drafted will have repercussions on the identification and delivering of housing across the wider HMA. It is for these reasons that Folkes now wish to submit representations to the Plan and our comments should be read with these objectives in mind.

A substantial shortfall and need to find a definitive solution.

The strategy as presented leaves a shortfall of 18,606 dwellings that cannot be accommodated in the Council's administrative area. This is a substantial number of homes and represents a substantial number of people and families that will go without homes should a definitive solution not be found.

Folkes would like to implore Sandwell Council to engage with the other authorities within the HMA to find a location to secure the delivery of these 18,606 dwellings. As will be demonstrated below, the housing shortfall has reached critical levels across the HMA and the onus is on the authorities where the housing need cannot be met to secure the support of the authorities with land available, including Green Belt land, to assist.

Meeting the needs of all part of the population

The pressure to find a definitive solution to address the housing shortfall, is only further emphasised by the fact that the delivery of affordable housing on those sites within the Sandwell administrative area will fall woefully short of the affordable housing need identified. The Black Country Housing Market Assessment Report (March 2021) identified a need for 4,605 social rented properties and 1,913 shared ownership dwellings (accounting for nearly 24% of the total housing requirement). The release of Green Belt sites in the HMA to meet the overspill from both Sandwell and Dudley will deliver not only market, but much need affordable homes for those parts of the population that most need it.

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Supporting Economic Growth

Delivering the right number of homes, in the right location is an important component in fostering economic growth. For Sandwell, this means securing the delivery of homes as close to and /or in locations well connected to Sandwell as possible. The obvious locations being Bromsgrove to the south and South Staffordshire to the west, when you account for the adjoining authorities not having the capacity to assist with meeting Sandwell's need. It is Folkes consider that the starting point should be sites on the edge of the conurbation to provide homes close to where the demand arises and that can provide a range of homes, including more executive homes for the owners of new businesses.

Shortfall in housing land across the HMA

The shortfall of land for housing is not unique to Sandwell and is a long-established concern within the HMA.

Birmingham Development Plan

The Birmingham Development Plan ("BDP") was adopted in January 2017 and was the first authority in the HMA to conclude it could not meet its housing need within its administrative area. Policy PG1 – Overall Levels of Growth, advised that 89,000 dwellings are required during the course of the plan period (2011 to 2031) to meet the growth requirements of the City. However, only 51,100 additional dwellings can be accommodated within the City's administrative area. This leaves a shortfall of 37,900 homes including 14,400 affordable homes (that will need to be delivered elsewhere within the Greater Birmingham Housing Market Area). The BDP stipulated that Birmingham's unmet need was to be met by other authorities in the HMA as and when they produced individual Local Plans. This has not happened.

Birmingham City Council has now commenced a review of its Local Plan and consulted on Issues and Options for a draft Plan concluding in December 2022. The Issues and Options document advised that the Standard Method housing requirement for the period 2020 to 2042 is 149,286 dwellings. The Issues and Options consultation document suggests that the total capacity for development within the built up area of the City is 70,871 dwellings. This relies upon all SHLAA sites coming forward for development and the provision of a significant number of windfalls (the windfall sum is 11,675 dwellings). This would result in a housing shortfall of 78,415 dwellings.

Black Country Core Strategy Review

Previously, the four Black Country authorities had been preparing a joint Plan although this has now subsequently been abandoned in favour of the preparation of individual Plans for each authority. Notwithstanding the above, the Preferred Options Black Country Plan proposed a housing requirement based upon the Standard Method which was the sum of the four individual authority housing requirements. The housing requirement for the four authorities was 76,076 dwellings, however, there was only an identified capacity of 47,837 dwellings leaving a shortfall of 28,239 dwellings to be directed to other authorities. Now, each authority will calculate its own housing requirement using the standard method calculation. The requirement in Dudley is 11,954 dwellings however, Dudley claims it only has capacity to accommodate 10,876 of these leaving a shortfall of 1,076. The positions in Wolverhampton and Walsall have not yet been published although it is anticipated that there will be a further shortfall in what is required against the capacity within these two authorities, which will broadly align with the shortfall previously identified in the Black Country Core Strategy review when added to the shortfall from Dudley and Sandwell.

Total shortfall

If the housing shortfall figure identified in Policy PG1 of the BDP and the emerging shortfalls in both the Dudley and Sandwell Preferred Options are added together it totals 57,582 dwellings. If the shortfall arising in Dudley and Sandwell is added to the emerging shortfall

identified in the Birmingham Issues and Options this increases to 98,097 dwellings. As noted above, this has the potential to increase even further when any shortfall arising in Wolverhampton and Walsall is added.

Duty to Cooperate and who can assist in meeting the housing shortfall arising from Sandwell

Paragraph 24 of the Framework confirms that Local Planning Authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. Paragraph 26 goes on to state that joint working should help to determine where additional infrastructure is necessary and where development needs that cannot be met wholly within a particular area could be met elsewhere. The level of unmet need arising within HMA is one such area where the Duty to Cooperate should be employed in order to determine where this unmet need should be directed.

Having regard to the Greater Birmingham Housing Market Area there are 14 authorities within it which include Birmingham, the four Black Country authorities and 9 other surrounding authorities. In light of the shortfall arising in Birmingham, Dudley and Sandwell this effectively leaves 11 remaining authorities where the need could be distributed.

Turning to each of the remaining authorities it is highlighted above that there is potentially a shortfall that will arise in both Wolverhampton and Walsall when they come to publish their Preferred Options Local Plan. Redditch Borough is effectively built up to its boundary and already has to look to its adjoining neighbour, Bromsgrove, in order to accommodate its housing need. It would be unable to accommodate any further unmet. Similarly, Tamworth had to look to its adjoining neighbours of Lichfield and North Warwickshire in order to meet its current housing requirement in its adopted Local Plan. It too would be unlikely to be able to accommodate any unmet need arise. Cannock Chase's capacity is restricted due to environmental constraints including the Cannock Chase's SAC and AONB. A small part of Stratford-upon-Avon District falls within the Housing Market Area whilst North Warwickshire have previously committed to delivering 3,790 dwellings to meeting Birmingham's needs up to 2031 in its adopted Local Plan (2021). Solihull's Local Plan is currently at examination and is on hold awaiting publication of the updated Framework and currently proposes approximately 2,000 dwellings to meet the needs of Birmingham. If the Plan progress towards adoption in its current form there would be no scope to seek any increase in the size of the contribution from Solihull until such time as they commenced a further review.

This effectively leaves Lichfield, South Staffordshire and Bromsgrove as the three remaining authorities that would be able to make any meaningful contribution to meeting housing needs arising in the wider HMA. However, a review of what these local authorities has been proposing to help meet the housing shortfall across the HMA falls woefully short of what is needed.

South Staffordshire have previously proposed to accommodate 4,000 dwellings to meet the needs arising in the Black Country. Lichfield were proposing around 2000 homes before withdrawing their plan. Bromsgrove has yet to publish a draft plan and so it is yet to state how many dwellings it may be prepared to accommodate. Collectively this equates to less than 12,000 (plus the homes that Bromsgrove may provide) and on the face of it will fall woefully short of addressing the housing need of local people and families across the HMA.

The outcome of the above is that there is a significant unmet housing need arising principally from Birmingham and Sandwell, with Walsall and Wolverhampton likely to add to this, and at the current time there is no agreement or clear strategy between the 14 HMA authorities as to where or how this unmet need is to be met. Furthermore, in the few authorities that have the

ability to assist in meeting the overspill, full opportunity of the land available around the conurbation to assist with meeting the housing overspill is not being taken.

It is clear from the above that the emerging position across the HMA is one where there is a significant housing need that exists, but where certain authorities, such as Sandwell, cannot currently meet its needs in full. Folkes contend that these needs must be met by the HMA authorities in the next round of plans that are now being prepared. If this need is not met in full, it risks giving rise to a number of significant knock on effects on the delivery and provision of housing across the greater Birmingham area. These impacts include:

- worsening affordability as demand outstrips supply,
- worsening delivery and provision of affordable housing,
- economic impacts on the working age population as those adults who are able to work may not have suitable accommodation to live in thus resulting in increased commuting distances, worsening impacts on congestion and air quality, and
- the inability to attract workers into the HMA could have significant repercussions for the wider economy if the right type of houses are not available for those wanting to live and work in the conurbation.

Next Steps

In light of the Council's need and the significant shortfall that the Council is faced with, Folkes urge the Council to enter into constructive and productive discussions with the other HMA authorities, including South Staffordshire, to seek agreement on how and where this unmet housing need is going to be delivered. Meeting the housing needs of the HMA cannot be achieved on an authority by authority basis and that a joined up approach that crosses administrative boundaries will be required if there is to be any chance of meeting the HMA's housing needs both in terms of quantum and the required mix, including affordable homes.

It is our view that the focus for addressing the shortfall in Sandwell should be those authorities closest to them. South Staffordshire and Bromsgrove are the closest authorities with a meaningful ability to address the shortfall and with land available adjacent to the conurbation. South Staffordshire is still to submit its plan for examination and there is still scope to hold meaningful discussions to provide land to meet the needs arising in Sandwell.

We trust you take our comments into consideration and we look forward to being notified of further stages of consultation on the Local Plan. If you have any questions or need to discuss please do not hesitate to contact me.

Yours sincerely



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Director

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