

FAO: Sandwell Council Local Plan Team

Sent via email: Sandwell_LocalPlan@Sandwell.gov.uk

4th November 2024

Dear Sandwell Planning Policy Team,

Publication of the Sandwell Local Plan (Regulation 19) September 2024

Thank you for the opportunity for Birmingham City Council to comment on the Publication of the Sandwell Local Plan (Regulation 19).

As previously stated during earlier stages in preparation of the Local Plan, 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 was illustrated by the successful adoption of the Smethwick to Birmingham Corridor Framework SPD in February 2022 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 first emerged following the adoption of the Birmingham Development Plan in 2017.

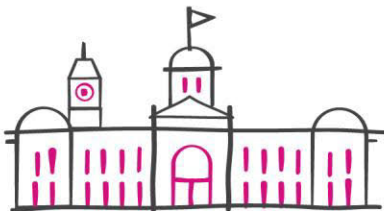
Birmingham is currently progressing its own Local Plan with consultation on the Preferred Options document having taken place in July and August 2024. The consultation document identified significant potential housing land shortfalls for the city. The City Council is currently considering its position following the consultation on the proposed changes to the NPPF and the Standard Methodology for the calculation of housing projections announced by the Government in July 2024. However, even if these proposed changes are taken into account, it is still likely that meeting Birmingham's housing and employment land needs in full will be challenging.

Overall, Birmingham City Council is supportive of the approach taken by Sandwell Council within their Local Plan Publication. Further detailed comments on specific strategic and cross-boundary issues are set out below.

Policy SDS1 – Spatial Strategy for Sandwell

The Sandwell Local Plan identifies that there is a need for land to accommodate 26,350 homes by 2041. However, due to the highly urbanised and constrained nature of Sandwell, the Local Plan is only able to identify sufficient land to supply 10,434 homes. This leaves a significant shortfall and an unmet housing need of 15,916 homes.

Similarly, the Local Plan has also identified 42 hectares of additional employment land compared to its projected need of 211 hectares as set out in its Employment Development Needs Assessment meaning a shortfall of 169 hectares. 18 hectares of this will be met through apportionment of land from the West Midlands Strategic Freight Interchange near J12 of the M6 in accordance with the assessment report produced by Stantec in 2021.



In view of the levels of both housing and employment land needs identified within the Local Plan and the significant shortfalls experienced, options such as densification, development of open and green spaces and development of the green belt were previously explored to reduce this shortfall. However, the Spatial Strategy sets out that further ‘overdevelopment’ would have a detrimental effect on the living environment in Sandwell along with degradation of the natural and built environment including habitats and green and blue infrastructure. We accept that other potential sources of additional supply have been fully explored. Similarly, we accept that there is very little potential for green belt release in Sandwell given that its green belt areas (which fall mainly within or adjacent to the Sandwell Valley) are limited and heavily constrained due to the intersection by the M5/M6 interchange and potential flooding issues.

As mentioned above, the Preferred Options for the Birmingham Local Plan also identified a 46,153 shortfall for housing. Proposed changes to the NPPF and the Standard Methodology for the calculation of housing projections announced by the Government in July 2024 may have a significant effect in reducing this shortfall but this is countered by increases in housing projections elsewhere in the West Midlands conurbation which means that there will likely be continued significant capacity issues in the Greater Birmingham and Black Country HMA going forwards. It is therefore essential for close working to continue between the two authorities and across the HMA to try and address the shortfalls as much as possible across the wider area.

Policy SDS3 – Regeneration in Sandwell

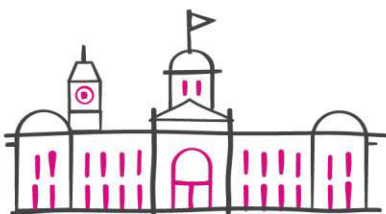
As the two local authorities share a considerable boundary, it is welcomed that the Sandwell Local Plan recognises in paragraph 3.19 the need to *“support its neighbours in bringing forward land for employment and housing that sits adjacent to existing administrative boundaries and will work in partnership to ensure related infrastructure needs are addressed across those boundaries.”*

This has been illustrated in recent years with the successful joint production and adoption of the Smethwick to Birmingham Corridor Framework SPD in February 2022 and this work is further reflected in the Local Plan with the Smethwick section of the corridor being identified as one of the key Regeneration Areas within Policy SDS3. This is welcomed by Birmingham to further assist in successfully securing much needed cross boundary development and regeneration opportunities to this part of the conurbation (with a focus around the development of the recently opened Midland Metropolitan Hospital which will serve communities on either side of the boundary).

Summary

Overall, Birmingham City Council is supportive of the approach being taken by Sandwell in the development of its Local Plan and in meeting the soundness requirements set out in the NPPF. We agree that the Council has worked with neighbouring authorities to provide as much certainty as possible about how and where its full housing and employment land needs will be delivered as part of its Duty to Cooperate obligations.

We also support the commitment to ongoing engagement with its neighbours, building on the partnership approach developed across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). This is particularly important, given the housing land shortfalls experienced by the GBBCHMA under the current Government housing projection methodology



and the likely continuance of shortfalls across the HMA under the proposed new methodology which will likely come into effect during 2025.

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 continued soundness and effectiveness of both Plans. Once Birmingham's position is known, following the forthcoming changes to the NPPF and housing projection methodology, we will continue 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 previously stated, 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 as you proceed towards submission of your local plan, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Yours sincerely

Sarah Scannell

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**Place, Prosperity & Sustainability Directorate
Birmingham City Council**

