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Dear Sir / Madam

**Sandwell Local Plan 2024 – 2041 Publication Version Consultation
 Response by Bloor Homes Western**

Harris Lamb Planning Consultancy are instructed by Bloor Homes Western (“**Bloor**”) to submit representations to the Sandwell Local Plan Publication Version and welcome the opportunity to comment at this time. We have previously submitted representations to the Preferred Options consultation version and these comments build on our previous representations. Bloor 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 Bloor now wish to submit representations to the Plan and our comments should be read with these objectives in mind.

Policy SDS1 – Spatial Strategy for Sandwell

The strategy as presented proposes to allocate 10,434 new homes in Sandwell leaving a shortfall of 15,916 dwellings that are needed but which 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.

Bloor consider that in the absence of any formal agreement with the other authorities within the HMA to find a location to secure the delivery of these 15,916 dwellings the plan is unsound and object to the plan on this basis. 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 those with Green Belt land, to assist.

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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.

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 Bloor's view that the starting point should be sites on the edge of the conurbation to provide homes close to where the demand arises which can provide a range of homes for the existing and future workforce; supporting indigenous economic growth and inward investment opportunities..

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 commenced a review of its Local Plan and consulted on Preferred Options concluding in August 2024. The Preferred Options Local Plan advised that the Standard Method housing requirement for the period 2020 to 2042 is 149,180 dwellings. The plan stated that a supply of 103,027 dwellings had been identified leaving a shortfall of 46,153 dwellings. The supply is made up of reuse of employment sites along with a number of SHLAA sites. The shortfall of 46,053 dwellings relies upon all SHLAA sites coming forward for development and the provision of a significant number of windfalls. Bloor have submitted representations to the Birmingham plan querying whether the identified supply is robust.

Black Country Core Strategy Review

Previously, the four Black Country authorities had been preparing a joint Plan although this has been subsequently abandoned in late 2022 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. Dudley has recently published a Publication Draft of its Local Plan that confirms that its housing need is 11,169 dwellings but that it only has capacity to deliver 10,470 dwellings leaving a shortfall of 699 homes. Wolverhampton also carried out Preferred Options consultation earlier in the year and they had identified a shortfall of just under 12,000 homes. Walsall is yet to publish a plan although it is anticipated that there will be a further shortfall in what is required against their capacity to meet these needs.

Total shortfall

If the housing shortfall figures in the emerging Birmingham and Wolverhampton Preferred Option plans and the shortfalls in the Dudley and Sandwell Publication Plans are added together it totals 74,768 dwellings. As noted above, this has the potential to increase even further when the shortfall arising in Walsall is added.

Objection

Bloor object to Policy SDS1 on the basis that it is not positively prepared, not effective and not consistent with national policy. The policy and approach to meeting housing needs within Sandwell will result in significant housing need going unmet leaving those in need of housing having to incur increasing costs of housing be that through purchase or renting costs, increased overcrowding and a greater number of people living in housing that is not suitable for their needs. As well as the social cost of not providing enough housing the economic impacts of not meeting the needs of the population are potentially as significant, if not more so, if those of working age population cannot find somewhere to live in the Borough they will leave and work elsewhere. This outward migration could lead to an ageing population being left with a smaller working age population present which could impact on the delivery and provision of services. The impacts are significant and as such, the approach set out in the plan is unsound.

In order to address our concerns the Council need to establish and agree with other authorities in the HMA how and where its unmet needs are going to be met. This needs to be a tangible and workable solution as opposed to the mere suggestion of working together. Without a signed memorandum of understanding between the HMA authorities with each setting out what proportion of unmet need each is due to take there is no realistic prospect that Sandwell's housing needs are going to be met in full.

Duty to Cooperate

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 the 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, Wolverhampton and Sandwell this effectively leaves 10 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 Walsall when it comes 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 from the Sandwell. 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 previously proposed to contribute approximately 2,000 dwellings to meet the needs of Birmingham although the Council has subsequently withdrawn the plan from Examination.

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 although this was subsequently reduced to just under 700 homes when the council re consulted on a Pre-Submission draft Plan in April 2024. Lichfield were proposing around 2,000 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 just under 700 homes that are currently being made available to meet the unmet needs of the HMA (this may increase if Bromsgrove propose to meet some unmet need) which 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, Wolverhampton and Sandwell, with Walsall also 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. Bloor contend that these un-met 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.

Objection

In light of the Council's need and the significant shortfall that the Council is faced with, Bloor do not consider that the Council has met its duty to cooperate. We urge the Council to enter into constructive and productive discussions with the other HMA authorities, including Bromsgrove, 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. Bromsgrove and South Staffordshire are the closest authorities with a meaningful ability to address the shortfall and with land available adjacent to the conurbation. The Bromsgrove plan review is still at an early stage and there is still plenty of 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 faithfully

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