

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

APPENDIX 7

Lichfield - Package of documentation relating to the Duty to Co-operate

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- Lichfield District Council response to the Birmingham Development Plan 2031 Pre Submission version dated 28/02/14
- Birmingham City Council response to Lichfield Local Plan Proposed Modifications dated 20/03/14
- Action note of meeting held under the Duty to Co-operate on 20/02/14
- Lichfield District Local Plan Strategy – Public Examination – Hearing Statement by Birmingham City Council dated 17/05/13
- Statement of Common Ground between Birmingham City Council and Lichfield District Council (April 2013)
- Birmingham City Council letter to Lichfield District Council on Birmingham’s Future Growth requirements dated 18/01/13
- Lichfield District Council response the Birmingham Development Plan – Planning for Birmingham’s Growing Population Options Consultation dated 11/01/13
- Birmingham City Council letter to Lichfield District Council confirming Cabinet Member approval of the earlier officer response on the emerging local plan dated 06/11/12
- Birmingham City Council response to the Lichfield Local Plan - Pre-Submission Plan Document dated 10/09/12
- West Midlands Joint Committee response to the Lichfield District Council Local Plan dated 10/09/12
- Birmingham City Council letter to Lichfield District Council on Birmingham’s Future Growth requirements dated 08/08/12

Part A

Mr Craig Jordan
Development Executive (Development Plans & Implementation)
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffs WS13 6YZ
01543 308202
craig.jordan@lichfielddc.gov.uk

Part B

B1: The Development Plan as a whole

B2: The District Council does not object to the overall approach in the Pre-Submission Plan and takes the view that it meets the soundness tests. The District Council expects Birmingham City Council to contain as much of its objectively assessed development needs (including housing and employment) within the City's administrative boundaries, ensuring that growth is delivered in the most sustainable way – meeting needs where it arises, achieving a good balance between housing and employment growth and making best use of the good infrastructure provision that is present within the conurbation. It is noted that the Plan proposes to deliver 51,100 homes over the Plan period which is considered less than the objectively assessed need identified for Birmingham City. Lichfield District Council is committed to working with GBSLEP partners and other interested authorities in progressing a Joint Housing Study to consider this strategic issue. Lichfield District Council is currently in the process of consulting on a number of main modifications to our submitted Local Plan Strategy that reaffirms this commitment (MM1).

B3: No changes are being sought.

B4: No

B5: Craig Jordan

Part C

C1: Yes

C2: Birmingham City Council have co-operated with Lichfield District Council constructively, actively and on an ongoing basis. On the strategic issue of housing provision, a joint housing study is being undertaken by all authorities within the GBSLEP area and additional authorities beyond. This is considered an

appropriate mechanism for engagement on this issue that should identify solutions to the problems identified.

C3: No view

C4: Not applicable

C5: Yes

C6: Craig Jordan

20 March 2014

Dear Sir/ Madam

Lichfield Local Plan Proposed Modifications

Thank you for the opportunity to comment on the Proposed Modifications to the Lichfield Local Plan. Proposed Modification MM1 reflects submissions requested from Birmingham City Council (and also the West Midlands Joint Committee) in acknowledgement of emerging evidence that Birmingham may not be able to meet its own requirements and pledges the District Council to review the Lichfield Local Plan if necessary. The Inspector's Interim conclusions have already supported this as an appropriate way forward and precedent has been set via the recent Solihull MBC Local Plan adoption.

It is proposed that this modification is strongly supported as it clearly acknowledges that issues are emerging and pledges to address them through a review of the local plan which by definition would include any further necessary revision(s) to the Green Belt. There will no doubt be some argument that it should figure in a policy rather than text but in the Solihull Local Plan it appears as text, presumably as it is an intention / process.

The City Council has no specific observations to make on the other Proposed Modifications.

Yours faithfully



Waheed Nazir
Director of Planning and Regeneration

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1130, Thursday 20 February 2014, Birmingham City Council Offices, 1 Lancaster Circus

Present:

Craig Jordan – Lichfield District Council

Neil Cox – Lichfield District Council

David Carter – Birmingham City Council

Discussion

DC explained the background to and purpose of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if Lichfield wanted any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

CJ referred to a recent meeting he had had with Staffordshire County Council and the outcome of that would be a representation from the County Council which would refer to Lichfield District Council support.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

Each of the criteria were discussed in-turn. The criteria and wording were agreed subject to the following changes being agreed:

Under item e) CJ to provide some extra text covering the balance between growth across town centres.

Under item g) and j) it was also agreed that CJ would add some additional text explaining Lichfield's views.

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc. This would be sent to CJ for checking and amendment and subsequent signature by both authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

Lichfield District Local Plan Strategy – Public Examination

Hearing Statement by Birmingham City Council

The City Council has concentrated its observations matters relating to the Duty to Co-operate and to record an observation of the level of housing provision proposed. It has no specific comments to record on most of the main matters and issues identified.

MAIN MATTERS AND ISSUES

1. DUTY TO COOPERATE.

(i) Has the Council discharged its duty to cooperate, particularly with regard to the strategic matter of housing provision and meeting the housing requirements of neighbouring councils?

The City Council has jointly prepared and signed a Statement of Common Ground with Lichfield District Council. This statement demonstrates that in the view of Birmingham City Council Lichfield District Council has fully complied with the requirements under the Duty to Co-operate.

Following the creation of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) officers from the two Councils meet on a very frequent basis as the planning work of the LEP is taken forward and there is a continuing commitment to carry through the work under the terms of the GBSLEP Planning Charter and as part of this the progression of work to develop a new Strategic Spatial Framework Plan for the LEP area.

(ii) Has the Council cooperated constructively, actively and on an ongoing basis with East Staffordshire Borough Council on the Brookhay Villages and Twin Rivers Park proposal – a proposal that straddles the boundary between the two councils?

The City Council has not been involved in any discussions or consultations on these proposals.

(iii) Has the Council cooperated constructively, actively and on an ongoing basis with Birmingham City Council which has confirmed that it will not be able to accommodate the whole of its future household growth within its boundaries?

The City Council is satisfied that Lichfield District Council has, and continues to co-operate with the City Council on the question of housing provision to meet Birmingham's needs.

The City Council's Strategic Housing Market Assessment (SHMA) published in late 2012 indicates that the level of housing provision in Birmingham in the period up to 2031 is likely to be in the order of 80,000 net new dwellings whereas the assessment of future capacity suggests that the ability to accommodate growth within Birmingham without incursion into Green Belt over the same period is in the order of 45,000 dwellings.

In November 2012 the City Council published a consultation document which examines options for the release of land sufficient for a maximum of 10,000 dwellings on land currently designated as Green Belt within Birmingham. The 10,000 figure is an upper limit which is felt that the housing market could bear over such a time period and bearing in-mind

that most of the Green Belt within Birmingham is located around Sutton Coldfield. The implication is there could be a substantial shortfall in provision to meet the emerging requirement in Birmingham and the City Council is involved in continuing discussions with neighbouring authorities both collaboratively and bi-laterally in relation to this matter. Through the joint planning work in the GBSLEP there is a proposal for further joint research to be commissioned which will establish the scale of the matter across administrative boundaries and which will lead, through the GBSLEP Strategic Spatial Framework Plan to an agreement on how the shortfall may best be accommodated. Lichfield District Council are full and active partners in taking this work forward. In due course this may lead to a situation where local plans need to be amended to take account of the development needs but until the joint working is complete there is no agreed basis for disaggregating the 'overspill' requirement. In these circumstances the City Council considers that work on Local Plans that is well-advanced should be permitted to proceed and plans adopted subject to a reserve position being built-in to enable early reviews where these might be required.

An agreed position to this effect is built-into the Statement of Common Ground and this is consistent with similar undertakings sought and taken forward in the emerging Solihull Core Strategy and the Cannock Chase Local Plan (Part 1).

In the light of the above the City Council would urge the Inspector to conclude that the Lichfield Local Plan should proceed on the basis that the District Council has constructively and actively engaged with Birmingham City Council on an ongoing basis on the question of the accommodation of the city's future household growth and the likelihood that all of these requirements cannot be met within Birmingham's boundaries.

(iv) Has the Council cooperated constructively, actively and on an ongoing basis with Walsall Metropolitan Borough Council which has raised concern that the aspiration to reduce commuting from Lichfield could backfire and encourage more population decentralisation, especially from the Black Country?

N/A

2. HOUSING NUMBERS.

(i) Does the Plan meet the full and objectively assessed need for market and affordable housing? Will the Plan boost significantly the supply of housing land?

Birmingham City Council has neither made representations nor questioned the soundness of the Lichfield Local Plan in respect of the level of housing provision proposed. Subject to the incorporation of the position set out in the Statement of Common Ground and referred to above the City Council considers that an entirely reasonable approach to dealing with issues relating to its long-term growth will be protected.

NB: The City Council does not wish to make any representations on the remaining matters.

Prepared, 17 May 2013

David Carter
Head of Planning & Growth Strategy
Birmingham City Council

Statement of Common Ground between Birmingham City Council and Lichfield District Council (April 2013)

Introduction

This Statement of Common Ground has been prepared to identify areas of agreement between Birmingham City Council and Lichfield District Council on matters relating to the Lichfield District Local Plan: Strategy.

This statement intends to provide an agreed position following the submission of representations to the proposed submission Local Plan Strategy by representors and the Main Matters and Issues identified by the appointed Inspector examining the Lichfield District Local Plan: Strategy.

General Matters

The following general matters are agreed between the parties:

Lichfield District Council and Birmingham City Council have co-operated constructively, actively and on an ongoing basis in progressing their respective Local Plans. This co-operation includes meetings that have taken place in the last 18 months on the following dates:

- 22nd December 2011
- 31st October 2012

Following these meetings written correspondence and telephone conversations between Lichfield District Council and Birmingham City have provided opportunities to highlight and discuss emerging evidence and policy directions.

In addition Lichfield District Council and Birmingham City Council are members of the Greater Birmingham and Solihull Local Enterprise Partnership. The Planning Sub-Group and the Spatial Planning Group have provided an opportunity to consider duty to co-operate issues and allowed relevant parties to come together to address issues of mutual concern.

The following cross boundary issues have been discussed:

- Housing and employment
- Centres and Town Centre Uses
- Cannock Chase SAC

The two authorities have a history of collaborative working, being members of the following Partnerships which have helped to consider cross boundary issues and influence emerging policy:

- Cannock Chase SAC Partnership
- Greater Birmingham and Solihull Local Enterprise Partnership
- C1 Housing Market Area Project Steering Group

The two authorities have considered the methodologies of their respective Strategic Housing Market Assessments and other aspects of the evidence base, where necessary, to ensure methodologies are consistent and complementary in identifying objectively assessed needs. In addition, the authorities have a history of producing a

range of joint evidence that has informed each authorities emerging Local Plan, including:

- Evidence base relating to Cannock Chase SAC
- C1 Strategic Housing Market Assessment

Common Ground between parties

It is considered that Lichfield District Council has met its legal obligations under the 'Duty to Co-operate' with Birmingham City Council in relation to the Lichfield District Local Plan: Strategy (as submitted).

There are **no specific or agreed** requirements for Lichfield District Council to meet any of Birmingham City Council's housing or employment needs, or for Birmingham City Council to meet any of Lichfield District's housing or employment needs at present.

The housing, retail and employment strategies contained within the Lichfield District Local Plan: Strategy (as submitted) and the emerging Birmingham Development Plan are considered consistent and complementary.

Lichfield District Council recognises that Birmingham City Council has identified an issue that Birmingham may not be able to accommodate the whole of its new housing requirement for 2011 to 2031 within its administrative boundary. Lichfield District Council is committed to undertaking further work with the GBSLEP constituent authorities and other authorities with a strong migratory link to Birmingham to understand and address the scale and distribution of any emerging housing shortfall.

Lichfield District Council and Birmingham City Council are committed to ongoing co-operation and engagement by both officers and members in relation to delivery and in formulating future plans and strategies.

Both authorities agree to the following **significant** change being put forward to the Inspector:

Inclusion of the following new paragraph at 4.6:

'Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011- 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Lichfield District Council will work collaboratively with Birmingham and other authorities and with GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review of the Lichfield District Local Plan will be brought forward to address this.'

This proposed change satisfies the concerns raised by Birmingham City Council in correspondence with Lichfield District Council dated 8 August 2012, 10 September 2012 and 18 January 2013 (copies appended). This approach is also consistent with approach taken by Birmingham City Council on emerging development plans across the GBSLEP and elsewhere and is an approach that has been recently endorsed in

the Inspector's interim conclusions on the Solihull Core Strategy (published 5 April 2013).

Lichfield District Council and Birmingham City Council have and constructively engaged in relation to the Cannock Chase SAC as active members of the Cannock Chase SAC Partnership.

Birmingham City Council is content that the Lichfield District Local Plan: Strategy should progress through its public examination in its current form subject to the inclusion of the significant change set out above.

Signed on behalf of Lichfield District Council



Richard King

Date: 14.05.13.

Position: Strategic Director Democratic, Development and Legal Services

Signed on behalf of Birmingham City Council



Waheed Nazir

Date: 13.05.13

Position: Director of Planning & Regeneration

08th August 2012

Craig Jordan
Head of Planning and Development
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

Dear Craig,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.

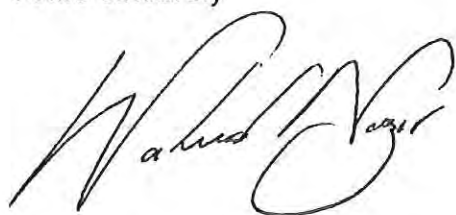
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration

Development Plans Team
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YZ

Date: 10 September 2012

Dear Sir/Madam,

LICHFIELD LOCAL PLAN – PRE-SUBMISSION DEVELOPMENT PLAN DOCUMENT

Birmingham City Council would like to thank you for the opportunity to comment on the above document.

The City Council does not object to the overall approach in the Pre – Submission Plan and takes the view that it meets the soundness tests. However, this is subject to the following note of caution.

Recently published Office of National Statistics (ONS) population projections for Birmingham suggest that the city's population is envisaged to increase significantly by 2031. The projections indicate that household growth within Birmingham will be between 80,000 and 105,000 between 2011 and 2031. Our latest SHLAA review has been able to identify capacity for only about 43,000 new dwellings. We are looking at ways to increase this capacity – but it is clear that it will not be possible to provide for the whole of Birmingham's projected future household growth within the city boundary. As was the case with the previous Regional Spatial Strategy proposals it is clear that some of Birmingham's future housing requirement will need to be accommodated within other authority areas.

The housing requirements proposed in the Lichfield Local Plan take no account of this longer-term requirement. This is understandable given that the issue has only recently emerged and in any event further work is necessary to identify the scale of the need and the approach which should be taken to providing for it. You will recall that I have recently written to you requesting a meeting to begin discussing this in line with the principles of the 'Duty to Co-operate'.

For this reason, the Council's support for the Submission Draft is conditional on the inclusion within the Plan of a recognition that further work will be needed to identify whether any additional housing provision is required in

Lichfield District to meet needs generated in Birmingham, and a commitment to review the Plan at an early stage if it is shown that such a need exists.

I would also like to confirm that in line with the 'Duty to Co-operate' my officers would be happy to discuss any issues with you in relation to progress of the Local Plan and Birmingham's housing requirement. This would be additional to ongoing consideration of the Duty to Co-operate through the GBSLEP Planning Sub-Group.

Finally, please note that this is a provisional response, subject to confirmation by the Council's Cabinet Member for Development, Jobs and Skills.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Waheed Nazir', is written over a light blue circular stamp.

Waheed Nazir
Director of Planning and Regeneration

Craig Jordan
Head of Planning and Development
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

Date: 18 January 2013

Dear Craig,

Birmingham's Future Growth Requirements

I am writing following our recent correspondence and meeting in relation to the likely scale of future growth in Birmingham and how this might be taken forward under the new planning system.

As you will be aware, the recently completed Strategic Housing Market Assessment for Birmingham has concluded that there is likely to be a substantial shortfall in housing provision within the city up to 2031. We are currently completing a consultation on options for increasing the supply of land for development within the city boundary, including a consideration of green belt options – but it is clear that even if we adopt such an option, we will still be facing a significant shortfall.

I am grateful for your recognition of the need to address this challenge and for your support for the development of an agreed response through the collaborative work of the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership.

I would re-emphasise that in addressing this issue we do not wish to put in jeopardy local planning work which is already well-advanced and nearing completion but we do feel that it is necessary for us all to be demonstrating a clear commitment to undertake the joint work which will be required to enable a planned response to be put in place and to bring forward any consequent revisions to our development plans as soon as practicable thereafter.

We also recognise that authorities are in different positions in terms of their individual development planning work. Where Core Strategies have already been put in place, the issue will need to be picked up in future review processes.

Where plans are still in preparation we are looking for an explicit acknowledgement of the issue within the emerging plan. This should:

- Recognise that evidence is emerging that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011 – 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs.
- Include a commitment to work collaboratively with Birmingham and other authorities within the Greater Birmingham and Solihull Local Enterprise Partnership and/or the West Midlands Joint Committee to establish objectively the level of long term growth through joint commissioning of a Strategic Housing Market Assessment and work to establish the scale and distribution of any emerging housing shortfall.
- Recognise that in the event that it is demonstrated that there is a need for further housing provision in your area this will be addressed through a review of the Development Plan.

In some cases the Council has already made representations on emerging plans to this effect.

I hope that we can continue to work collaboratively on these issues – and I am of course always happy to meet with you to discuss any issues arising in more detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration

Craig Jordan
Head of Planning and Development
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

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I am grateful for your recognition of the need to address this challenge and for your support for the development of an agreed response through the collaborative work of the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership.

I would re-emphasise that in addressing this issue we do not wish to put in jeopardy local planning work which is already well-advanced and nearing completion but we do feel that it is necessary for us all to be demonstrating a clear commitment to undertake the joint work which will be required to enable a planned response to be put in place and to bring forward any consequent revisions to our development plans as soon as practicable thereafter.

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- Recognise that in the event that it is demonstrated that there is a need for further housing provision in your area this will be addressed through a review of the Development Plan.

In some cases the Council has already made representations on emerging plans to this effect.

I hope that we can continue to work collaboratively on these issues – and I am of course always happy to meet with you to discuss any issues arising in more detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir'. The signature is fluid and cursive, with the first name 'Waheed' written in a larger, more prominent script than the last name 'Nazir'.

Waheed Nazir
Director of Planning & Regeneration

Your ref DPD/Plan2031/Stat
Our ref
Ask for Craig Jordan
email craig.jordan@lichfielddc.gov.uk

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11th January 2013

Waheed Nazir
Planning & Regeneration
PO Box 28
Birmingham
B1 1TU

Dear Mr Nazir

Birmingham Development Plan – Planning for Birmingham’s Growing Population Options Consultation

Thank you for consulting Lichfield District Council on the above document. The District Council would like to provide the following comments in response to the questions you set out through your Options Consultation:

The overall strategy

Q1 Do you agree with the overall strategy and vision for the City?

Yes, but some concerns are raised below.

Q2 Are there any comments that you would like to make regarding the overall strategy or vision for the City?

Agree with “The Strategy” **but** would query whether the execution of the strategy actually matches the wording of the strategy i.e. query whether Green Belt release is the most sustainable way practicable of reducing the City’s carbon footprint, as most of these Green Belt options are furthest away from the City Centre and often have poor public transport links to jobs and services.

Additionally further information should be provided regarding the statement on p.6 that Birmingham’s current population projections are “based upon recent demographic patterns, which have involved adjoining authorities accommodating a proportion of the City’s growth on the basis of travel to work patterns and wider economic benefits”. It is unclear as to whether the predicted housing figures have already taken account of levels out migration to areas such as Lichfield District. Further details would be welcomed indicating how these demographic patterns will be taken into account in the consideration of selecting any locations for development beyond Birmingham’s administrative boundaries.

The approach of discounting a significant number of Green Belt sites within Birmingham City’s boundary (i.e. E, G, I, J, K, L, M, N) should also be explained in greater detail, before considering adjoining authorities accommodate a proportion of Birmingham City’s growth.

Housing

The latest forecasts indicate that over the next 20 years the increase in Birmingham’s population will require more new homes than can be provided on land currently available within the City’s urban area. In these circumstances, do you think the City Council should...



Q3 Release some land from the Green Belt within Birmingham to provide additional housing?

Yes, some land should be released from the Green Belt within Birmingham to provide additional housing.

Q4 Seek to persuade neighbouring Councils to make land available for housing to meet some of Birmingham's needs?

Further evidence is required. In putting a robust evidence base together, Birmingham should work collaboratively with all adjoining authorities, and through the GB SLEP, to establish the scale and distribution of any emerging housing shortfall, taking into account technical assessments and the results of Sustainability Appraisal. It is important that Birmingham consider **all** reasonable spatial alternatives to housing and employment growth fully.

Options for housing

Q5 Of the options which do you consider to be suitable for housing development?

Unable to determine from the information given.

Q6 Are there any comments that you would like to make regarding the options in relation to housing development?

It is noted that some of the Green Belt options identified adjoin the boundary with Lichfield District and housing of the scale proposed (between 5,000 and 10,000 dwellings) would therefore have implications for infrastructure, services and facilities within the District. Further consideration of these implications is therefore required.

Furthermore the higher figure of 10,000 dwellings is well in excess of the provision set out in the emerging Local Plan for Lichfield District, which makes provision for the delivery of 8,700 homes between 2008 and 2028; equating to a local requirement of 435 dwellings per year. Taking forward such an option for Green Belt release adjacent to Lichfield District's boundary may undermine the viability and thus the deliverability of strategic development sites proposed within the Lichfield District Local Plan.

Lichfield District Council would therefore strongly encourage Birmingham City Council to collaboratively consider the impacts of such development before refining the options further under the Duty to Cooperate, as introduced by the Localism Act 2011.

Alternatives to the housing options

Q7 Are there any alternative ways in which housing provision could be increased?

It is acknowledged that the Options Consultation has undertaken an assessment of available land through the Strategic Housing Land Availability Assessment (SHLAA). However, the shortfall of 30,000 dwellings is considerable, and thus LDC would urge BCC to reassess capacity having regard to the following alternatives:

- Re-using former employment land.
- Bringing vacant properties back into use – the SHLAA estimates that 250 vacant properties could be brought back into use. However, it is noted, that this figure only relates to the City Council's Empty Homes Strategy for 2011/2012. An assessment of impact of bringing vacant dwellings back into use to the end of the plan period (2031) should therefore be undertaken.
- Creating dwellings above shops or other high street uses.

Q8 Are there any alternative Green Belt options which you consider to be suitable for housing development?

It is difficult to determine whether there are any alternative Green Belt options suitable for housing, as greater detail of explanation is necessary regarding the discounting of a significant number of Green Belt sites within Birmingham City's boundary (i.e. E, G, I, J, K, L, M, N).

Employment



The higher population forecasts mean that there will also be a need for more jobs.

Q9 Do you think that the Council should seek to address this by releasing some land from the Green Belt for employment development?

Yes, some land should be released from the Green Belt within Birmingham to provide for necessary employment development.

Options for employment

Q10 Of the options which do you consider to be suitable for employment development?

Unable to determine from the information given.

Q11 Are there any comments that you would like to make regarding the options in relation to employment development?

It is noted that some of the Green Belt options identified adjoin the boundary with Lichfield District and employment of the scale proposed (a site of at least 50 hectares) would therefore have implications for transport infrastructure, services and facilities within the District. Lichfield District Council would therefore strongly encourage Birmingham City Council to collaboratively consider the impacts of such development before refining the options further under the Duty to Cooperate.

Alternatives to the employment options

Q12 Are there any alternative ways in which employment provision could be increased?

It is acknowledged that the Options Consultation has undertaken an assessment of available employment land, supported by the findings of the 2012 Birmingham Employment Land Review. However, greater detail and further assessment would be welcomed in relation to predicated capacity from the following alternatives:

- Re-using former employment land.
- Redevelopment/rationalisation of existing employment sites to provide more jobs.

Q13 Are there any alternative Green Belt options which you consider to be suitable for employment development?

It is difficult to determine whether there are any alternative Green Belt options suitable for an employment site of 50ha, as greater detail of explanation is necessary regarding the discounting of some Green Belt sites within Birmingham City's boundary.

We would welcome the opportunity to discuss your emerging Development Plan in more detail.



Craig Jordan
Development Executive (Policy & Implementation)



06 November 2012

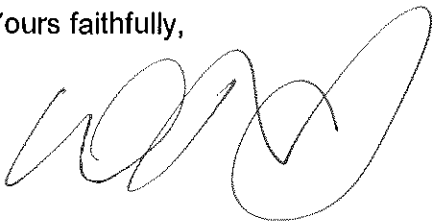
Lichfield District Council
Development Plans Team
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YZ

Dear Sir/ Madam,

Birmingham City Council has submitted written comments to you on your emerging Development Plan in line with the 'Duty to Cooperate'. These comments were subject to agreement from the City Council's Cabinet Member for Development, Jobs and Skills.

I am writing to inform you that on 24th October 2012 the Cabinet Member agreed to sanction the response forwarded to you as the formal response of Birmingham City Council. Should you wish to discuss our response or the progress of your draft Development Plan, my officers would be happy discuss any issues of concern.

Yours faithfully,



Waheed Nazir
Director of Planning and Regeneration

Development Plans Team
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YZ

Date: 10 September 2012

Dear Sir/Madam,

LICHFIELD LOCAL PLAN – PRE-SUBMISSION DEVELOPMENT PLAN DOCUMENT

Birmingham City Council would like to thank you for the opportunity to comment on the above document.

The City Council does not object to the overall approach in the Pre – Submission Plan and takes the view that it meets the soundness tests. However, this is subject to the following note of caution.

Recently published Office of National Statistics (ONS) population projections for Birmingham suggest that the city's population is envisaged to increase significantly by 2031. The projections indicate that household growth within Birmingham will be between 80,000 and 105,000 between 2011 and 2031. Our latest SHLAA review has been able to identify capacity for only about 43,000 new dwellings. We are looking at ways to increase this capacity – but it is clear that it will not be possible to provide for the whole of Birmingham's projected future household growth within the city boundary. As was the case with the previous Regional Spatial Strategy proposals it is clear that some of Birmingham's future housing requirement will need to be accommodated within other authority areas.

The housing requirements proposed in the Lichfield Local Plan take no account of this longer-term requirement. This is understandable given that the issue has only recently emerged and in any event further work is necessary to identify the scale of the need and the approach which should be taken to providing for it. You will recall that I have recently written to you requesting a meeting to begin discussing this in line with the principles of the 'Duty to Co-operate'.

For this reason, the Council's support for the Submission Draft is conditional on the inclusion within the Plan of a recognition that further work will be needed to identify whether any additional housing provision is required in

Lichfield District to meet needs generated in Birmingham, and a commitment to review the Plan at an early stage if it is shown that such a need exists.

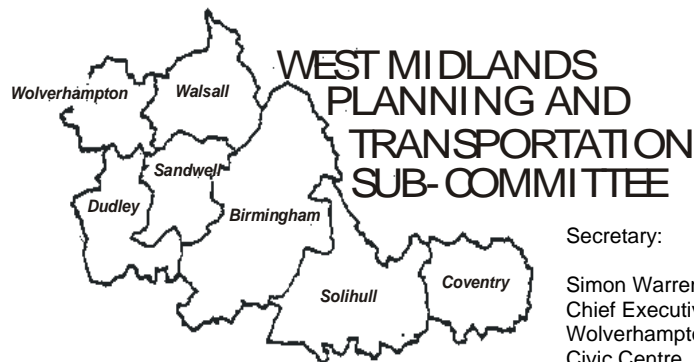
I would also like to confirm that in line with the 'Duty to Co-operate' my officers would be happy to discuss any issues with you in relation to progress of the Local Plan and Birmingham's housing requirement. This would be additional to ongoing consideration of the Duty to Co-operate through the GBSLEP Planning Sub-Group.

Finally, please note that this is a provisional response, subject to confirmation by the Council's Cabinet Member for Development, Jobs and Skills.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Waheed Nazir', is written over a light blue circular stamp.

Waheed Nazir
Director of Planning and Regeneration



Secretary:

Simon Warren
Chief Executive
Wolverhampton City Council
Civic Centre
St Peter's Square
Wolverhampton WV1 1RG

Please ask for: Carl Craney
Direct Line: (01902) 555046
Fax: (01902) 555044
E-mail: carl.craney@wolverhampton.gov.uk

Date: 10 September 2012

Development Plans Team
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YZ

Dear Sir / Madam

Lichfield District Council Local Plan

The West Midlands Joint Committee (WMJC) was established by the District Councils of the County of West Midlands on 24 July 1985, and comprises leaders of the seven local authorities. The Constitution of the WMJC has been updated to reflect changes in law brought about, primarily, by the Local Government Act 2000.

In terms of its functions, the WMJC is responsible for co-ordination and joint action on issues of mutual interest. The WMJC may appoint such sub-committees to consider and deal with its functions of the Committee as may be thought desirable. A long-established example is the West Midlands Planning and Transportation Sub Committee (WMP&TSC), which represents the interests of the seven Metropolitan Authorities and the Integrated Transport Authority / Centro and oversees strategic planning and transportation matters.

In March 2012 WMP&TSC considered Strategic Policy Framework for the West Midlands Metropolitan Area, which was subsequently endorsed by WMJC. This continues to support the established urban renaissance strategy, whereby the Metropolitan Area will seek to meet a greater proportion of its own development needs.

In achieving this, however, paragraph 40 of the Framework, which it is considered is applicable to Lichfield District Council, states that:

Not all needs, particularly from Birmingham, Coventry and Solihull, can be met in their entirety with the collective boundaries of the Metropolitan Area, and there will an ongoing requirement for a reasonable level of migration to some Shire Districts to be accommodated whilst not undermining regeneration of the Black Country. A failure to address this could have adverse implications on housing affordability and the actual

provision of affordable housing and on the local economy, especially as migrants from elsewhere may outbid local people.

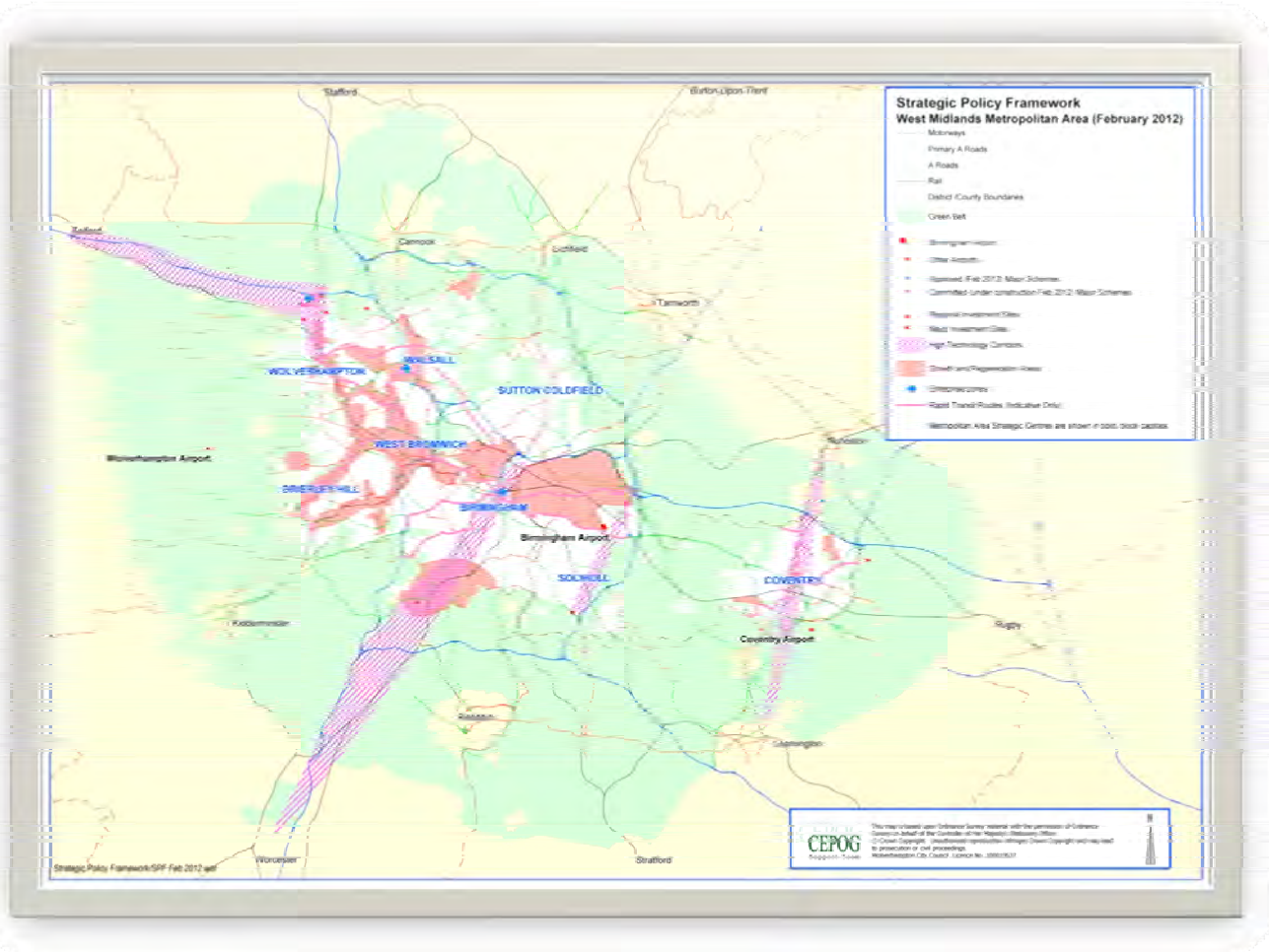
As a consequence of this, further joint working under the requirements of the Duty to Cooperate may be required.

It is understood that Birmingham City Council and Walsall Council may be making more specific representations. If you have any queries regarding the Framework for the West Midlands Metropolitan Area, please contact Andy Donnelly (0121) 214 7338 andrewdonnelly@centro.org.uk in the first instance.

Yours faithfully

Simon Warren
Secretary to the West Midlands Planning and Transportation Sub Committee

STRATEGIC POLICY FRAMEWORK FOR THE WEST MIDLANDS METROPOLITAN AREA



STRATEGIC POLICY FRAMEWORK FOR THE WEST MIDLANDS METROPOLITAN AREA

Purpose of the Strategic Policy Framework

1. A long term Urban Renaissance strategy was put in place through the West Midlands Regional Spatial Strategy (RSS), 2004 and updated in 2008. In short this sought to develop urban areas in such a way that they can increasingly meet their own economic and social needs in order to counter the unsustainable movement of people and jobs facilitated by previous strategies. These previous development patterns were also leading to greater car reliance and longer journeys resulting in congestion, air pollution and limiting the scope to reduce carbon emissions.
2. This approach has been independently examined on three separate occasions, most recently via the RSS Phase II Revision Examination in Public in 2009, and was reaffirmed as the most appropriate way forward. This, however, predated the current economic downturn.
3. As these unsustainable trends had evolved over time, it follows that this approach requires time to bed down and as such the strategy was considered to be a long term one. Monitoring thus far suggests that the strategy is beginning to take effect; further information is set out in the attached appendix.
4. In the light of the Government's early commitment to revoke Regional Spatial Strategies (RSSs), the West Midlands Planning and Transportation Sub Committee (WMP&TSC)¹ approved a Strategic Planning Position Statement its meeting on 21st January 2011, which continued to support the broad Urban Renaissance principles set out in the RSS. This was subsequently endorsed by the West Midlands Joint Committee (WMJC) at its meeting on 26th January 2011.
5. In November 2011, the Localism Act attained Royal Assent. Section 110 sets out the 'duty to cooperate', which Government intends will replace RSS as a basis for strategic / cross boundary planning. Section 109 gives Government the powers to revoke the eight RSSs outside London following completion of an 'environmental assessment' for each; until this time RSS remains part of the statutory development plan. Consequently, WMP&TSC took the opportunity to refresh the statement at its meeting on 2nd March 2012.

¹ The West Midlands Joint Committee (WMJC) was established by the District Councils of the County of West Midlands on 24 July 1985. The Constitution of the WMJC has been updated to reflect changes in law brought about, primarily, by the Local Government Act 2000. All seven Metropolitan leaders sit on WMJC. In terms of its functions; the WMJC is responsible for co-ordination and joint action on issues of mutual interest. The WMJC may appoint such sub-committees to consider and deal with its functions of the Committee as may be thought desirable. A long-established example is the West Midlands Planning and Transportation Sub Committee (WMP&TSC), which is made up of senior elected members from the seven Metropolitan Authorities and the Integrated Transport Authority / Centro. WMP&TSC considers strategic planning and transportation matters as they affect the area as a whole.

6. Strategic planning issues in the West Midlands Metropolitan Area include, inter alia:
 - Cross boundary housing market areas;
 - Cross boundary labour markets and commuting patterns;
 - Promoting urban regeneration through the reuse of previously developed land;
 - The provision of major infrastructure, particularly transport and green infrastructure;
 - Major retail and leisure facilities with cross boundary catchments;
 - The need to retain and enhance environmental quality and prevent urban sprawl through strategically important designations such as the Meriden Gap;
 - Measures to address the causes and consequences of climate change and the need to improve air quality.
7. Once the RSS has been abolished Local Plans² will be sovereign. If, however, Local Plans are not in place then the draft National Planning Policy Framework (NPPF) suggests that there is a 'presumption in favour of sustainable development'; a final NPPF is due to be published by April 2012³.
8. Due to the procedures that must to be followed and the need for independent examination, it is not possible for all local plans to be in place before the proposed abolition of the RSS and publication of the NPPF. Moreover, the Localism Act is now in place and it is a statutory requirement to comply with the Duty to Cooperate.
9. The purpose of this Framework, therefore, is to:
 - Enable a smooth transition between abolition of RSS, and up to date local plans and effective wider Duty to Cooperate mechanisms being in place;
 - Demonstrate commitment to ongoing collaboration in order to meet Duty to Cooperate responsibilities within the Metropolitan Area;
 - Advise those bodies subject to the Duty to Cooperate and other key stakeholders including Local Enterprise Partnerships that Metropolitan Authorities remain committed to urban renaissance and are responding to Government's growth agenda;
 - Be a material consideration in plan preparation and development management decisions; and
 - Continue to provide a coherent strategic spatial context for the third West Midlands Local Transport Plan (LTP3), which covers the administrative areas of the seven Metropolitan Authorities.

² Including saved UDP policies and Local Development Frameworks.

³ NPPF paragraph 214

Urban Renaissance and Government Policy

10. Since taking office, Government has issued several plans, strategies and statements seeking to foster local economic growth to support the national economy and reduce the budget deficit. A summary and chronology of the most salient issues that impact on cities and urban areas, and by inference support Urban Renaissance, is set out below.

White Paper for Growth – Realising every place’s potential

11. The White Paper Local Growth⁴ sets out Government’s ambition to foster prosperity in all parts of the country, harnessing the potential across the range of industries. Previously growth has been concentrated in some areas of the country but not others, and within a limited number of sectors, notably financial services. Instead, the economy must be rebalanced ensuring that growth is spread and prosperity shared.
12. Cities and urban areas have a key role to play in this as there can often be a mutually beneficial economic relationship between larger cities and surrounding urban areas, which the Government wishes to support, for example in the eight core city-regions outside London: Birmingham, Bristol, Leeds, Liverpool, Manchester, Newcastle, Nottingham and Sheffield.
13. Through the Growth White Paper, Government offered Council Leaders and prominent members of the business community to form Local Enterprise Partnerships (LEPs). The White Paper sets out the diverse roles the LEPs can play depending on their local priorities. These could include ensuring that planning and infrastructure investment support business needs, and working with Government to support enterprise, innovation, global trade and inward investment. A combination of strong business leadership with groups of local authorities whose planning, regulatory and public realm roles are critical to growth will help achieve this. The West Midlands Metropolitan Area straddles three LEP areas:
 - Black Country
 - Coventry and Warwickshire
 - Greater Birmingham and Solihull

The Budget Statement and Plan for Growth

14. The Plan for Growth⁵ that accompanied the Budget in March 2011 reiterated this and seeks an increase in private sector employment, especially in regions outside London and the South East. It cites increases in investment and exports as a route to a more balanced economy.

⁴ <http://www.bis.gov.uk/policies/economic-development/local-growth-white-paper>

⁵ http://cdn.hm-treasury.gov.uk/2011budget_growth.pdf

15. The West Midlands Metropolitan Area is well placed to benefit from this agenda, with its manufacturing base contributing to export led growth. The region performs strongly in terms of exports to EU and non EU countries, especially when compared to areas other than London and the South East. The West Midlands is at the heart of the automotive industry, which is one of the largest in terms of the value of its exports.
16. The Plan for Growth also announced that Enterprise Zones would be created, including in Greater Birmingham / Solihull and the Black Country LEP areas. Businesses within these zones would benefit from business rate discounts and a simplified regulatory framework, whilst the LEP would be able to retain business rate growth. These zones are based around Birmingham City Centre, the i54 site to the north of Wolverhampton and the Darlaston Strategic Development Area in Walsall. The i54 site has subsequently attracted a £335 million investment in the form of Jaguar Land Rover's Advanced Engineering facility
17. The Plan for Growth also signaled the need to reform the planning system to make it simpler, easier to navigate and consequently a tool to enable growth. In doing so, however, it stated that:

This policy change does not affect the Government's commitment to maintain the greenbelt, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and other environmental designations.

18. On 23rd March 2011, the Secretary of State for Communities and Local Government issued a complementary Ministerial Statement which advised that:

Councils will be able to identify the most suitable locations for growth in their areas, having regard to the coalition commitment to protecting the environment, including maintaining the Green Belt and other environmental designations

National Infrastructure Plan

19. A revised National Infrastructure Plan⁶ was published in November 2011 to accompany the Autumn Budget Statement, this made further commitments to growth in the West Midlands Metropolitan Area through announcing the below investment:
 - M6 managed motorway scheme between Birmingham and Manchester
 - A45 Westbound Bridge (Solihull) – Replacement bridge over the West Coast Main Line close from Birmingham Airport on the A45 strategic corridor into Birmingham
 - A45/46 Tollbar End improvement scheme
 - A45 Corridor (Damson Parkway to M42 junction 6) diversion

⁶ http://www.hm-treasury.gov.uk/national_infrastructure_plan2011.htm

20. The document also pledged to submit a hybrid Bill to Parliament for the first Phase of High Speed Two (London-West Midlands rail line) in late 2013 subject to the Secretary of State for Transport's announcement. Following consultation, the Secretary of State announced her support for High Speed Two in January 2012.

Department for Transport Major Scheme Announcements

21. Following the Autumn Statement, Government also announced support for further local transport schemes in December 2011, including the following within the Metropolitan Area:
- **Coventry-Nuneaton Rail Upgrade (formerly known as NUCKLE).** Enhanced rail service and two new stations on the Coventry to Nuneaton railway line; total cost of £18.8m).
 - **Darlaston (Walsall).** Various road improvements including new bridges over the canal and railway, junction improvements, modifications to existing roads to open up development area; total cost of £25.9m.
 - **Chester Road (Birmingham).** Widening of Chester Road to a three lane dual carriageway from M6 Jct 5 with bus priority and pedestrian improvements; total cost of £10.5m.
22. These schemes are now in a position to proceed to seek statutory powers and formal tender prices prior to final approval. In February 2012, the Local Transport Minister gave final approval for the £128m extension of the Midland Metro to Birmingham New Street.

Government Response to the Communities and Local Government Committee's report on Regeneration

23. The Communities and Local Government Committee's report on Regeneration⁷ was published in November 2011; the Government published its response on 13th January 2012. In short, it deemed that regeneration is about addressing problems faced by a community, widening opportunities and growing the local economy. It is not a matter for Government to define regeneration beyond this; consequently, there is no requirement for a national regeneration strategy.
24. The response, however, states that Government and the Homes and Communities Agency, however, continue to support housing and regeneration in places that have previously experienced housing market challenges. Its response also expects local plans to identify areas for economic regeneration, supports town centre first and prioritising development of sites of lower environmental quality. It also anticipates that local authorities will want development on previously developed land and, in order to support this, draws attention to retention of Land Remediation Relief for developers.

⁷ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/news/regen-report-publication>

Urban Renaissance Guiding Principles

25. The guiding principles supporting Urban Renaissance can be summarised as follows:

- Stemming the uncontrolled decentralisation of people, jobs and other activities away from the Metropolitan Area by improving the quality of the urban environment as a whole.
- Making the best use of existing urban capacity
- Improving, or where necessary replacing existing infrastructure
- Ensuring that development is directed sequentially with priority given to promoting brownfield development in sustainable locations

Refreshed Shared Policy Priorities

26. Government has powers to abolish RSSs through the Localism Act once environmental assessments have been undertaken, until that time RSS remains part of the statutory development plan.

27. Once RSS has been abolished, it is necessary to ensure a smooth transition until up to date local plans are in place and effective Duty to Cooperate arrangements established. The below shared policy priorities which support Urban Renaissance guiding principles, continue to be collectively supported

Employment Land Supply

- Provision for a rolling five year supply of employment land in each plan area sufficient to meet development needs of the plan period
- Protecting the employment land portfolio to meet the identified range of needs in each plan area
- Promoting development within the Black Country LEP and Greater Birmingham and Solihull LEP Enterprise Zones
- Support for the development at key nodes in the identified High Technology Corridors⁸ to counter structural changes in the manufacturing sector and to fully exploit agglomeration effects. These are:
 - * The Central Technology Belt (Birmingham City Centre – Worcestershire A38 Corridor)
 - * Coventry, Solihull and Warwickshire
 - * Wolverhampton to Telford
- Regional Investment Sites⁹ and Major Investment Sites are large, high quality sites with good access to the strategic highway network and have

⁸ These are shown diagrammatically and do not denote corridor based ribbon development or Green Belt land release for development. It is nodes within these corridors such as research and educational institutions and key sites that will be identified for development

been identified to support growth and diversification of the local economy; their benefits in terms of job creation transgress local authority boundaries. Their retention, implementation, appropriate expansion is supported as is the identification of further sites to meet identified shortfalls

- Support ongoing work to make adequate provision to meet the needs of the logistics industry, including the need for an Regional Logistics Site to support the economic growth and diversification of the Black Country

Housing

- Within the context of Urban Renaissance, enable housing needs to be met, including the full range of market and affordable housing to be provided
- Priority for the reuse of brownfield land and, where appropriate, re-use of existing buildings
- Application of the following criteria at a local level to govern the identification and release of land:
 - * The need to maintain and accelerate Urban Renaissance
 - * Bring forward previously developed land in sustainable locations prior to the phasing of greenfield sites
 - * Prioritise sites where development would support regeneration through opening up further opportunities for mixed use sustainable development

Growth and Regeneration

- Regeneration led growth and investment focussed on bringing forward previously developed land and making the best use of existing infrastructure and resources within the identified Regeneration Zones.¹⁰

Strategic Centres

- The strategic centres of Birmingham, Brierley Hill, Coventry, Solihull, Sutton Coldfield, Walsall, West Bromwich and Wolverhampton should be the focus for new major comparison retail development and large scale leisure and office developments. Their roles as the most accessible locations to serve large catchments should be maintained and enhanced.
- Other important centres should be the subject of local policies to meet more local needs.

⁹ Ansty, Birmingham Business Park, Blythe Valley Park, Hilton Cross, Wolverhampton Business Park, i54 Wobaston Road, Longbridge, East Aston

¹⁰ East Birmingham / North Solihull, North Black Country / South Staffordshire, West Birmingham / South Black Country

Transport

- Implementation of a Rapid Transit Network and the public transport and highway schemes as identified in the LTP3 to support the Urban Renaissance.
- Support for the runway extension of Birmingham Airport and improved access to the Airport and the National Exhibition Centre from all parts of the Metropolitan Area.
- Support for strategic Park and Ride provision at appropriate locations to relieve congestion in the Metropolitan Area subject to impacts on the strategic highway network and other environmental impacts.

Green Belt and Infrastructure

- Strategic adjustments to Green Belt boundaries are not supported where they would encourage selective out migration of population from urban areas and run counter to regeneration objectives.
- Support for cross boundary identification and co-ordination of Green Infrastructure Networks

Current and Emerging Priorities for Spatial Development

28. All of the authorities have saved UDP policies that support the urban renaissance, all have or are working on Core Strategies / Local Plans to update and develop the strategy for the regeneration of their areas and all are working on other development plan documents to plan for growth and regeneration within this framework. Together these plans should deliver at the local level the Urban Renaissance strategy for the wider area.
29. The current status of the main strategic elements of the authorities' local plans and their spatial priorities are set out in summary below:

Birmingham

30. Consultation on the Birmingham draft Core Strategy ended in March 2011, it is anticipated that a publication version will be approved by the Council in October 2012.
31. The draft Core Strategy focuses on growth within the Eastern Corridor, the City Centre, identified Sustainable Urban Neighbourhoods¹¹ (including Longbridge) and the Aston, Newtown and Lozells area. This coincides with growth proposals in the Black Country to the west and Solihull to the east. The Big City Plan outlines specific areas in the City Centre where resources will be focussed along with details of individual projects, schemes and infrastructure; sites within

¹¹ Greater Icknield, Southern Gateway / Highgate, Bordesley Park, Stechford, Meadway, Shard End, Druids Heath, Kings Norton 3 Estates, Longbridge

the City Centre have been designated as the Greater Birmingham and Solihull LEP Enterprise Zone.

Black Country

32. The Black Country Joint Core Strategy, covering the administrative areas of Dudley, Sandwell, Walsall and Wolverhampton, was adopted in February 2011. The majority of growth is directed towards an identified Growth Network, which comprises the strategic centres of Brierley Hill, Walsall, West Bromwich, Wolverhampton and 16 Regeneration Corridors. The Growth Network coincides with growth proposals in Birmingham to the south east. Land to the north of Wolverhampton (i54) and at Darlaston in Walsall comprises the Black Country LEP Regeneration Zone.

Coventry

33. Consultation on a proposed Core Strategy ended in October 2011.
34. This proposes employment led growth focussed in the City Centre and the Strategic Regeneration Areas of Canley, Swanswell and the Wood End, Henley Green and Manor Farm New Deal for Communities Area. Unless already committed Green Belt and Greenfield sites to be protected from development.

Solihull

35. Following consultation on Issues & Options and on an Emerging Core Strategy, the pre-submission draft Local Plan was published in January 2012.
36. It focuses housing growth and new employment opportunities in or near North Solihull including Green Belt adjustments to facilitate local regeneration and growth ambitions with additional development in the urban west and its town centres, especially in areas well served by public transport, and small scale development to meet local needs in rural settlements. The Meriden Gap will be maintained and economic assets such as Birmingham Airport, the National Exhibition Centre and the two Regional Investment Sites in the M42 Gateway will be sustained and further developed to drive the growth of the sub regional economy.

Cross Boundary Issues

37. These plan making areas cannot be considered in isolation, there are cross boundary relationships and opportunities to be exploited. The successful implementation of the Urban Renaissance Strategy, therefore, requires an element of redistribution to direct growth and investment to the most sustainable locations within the Metropolitan Area.
38. Within the conurbation, Birmingham and Solihull cannot meet all of the development needs that are generated. The neighbouring Black Country, however, can meet more than its own needs and a bold growth led Core Strategy is in place which can accommodate some of this growth in a manner

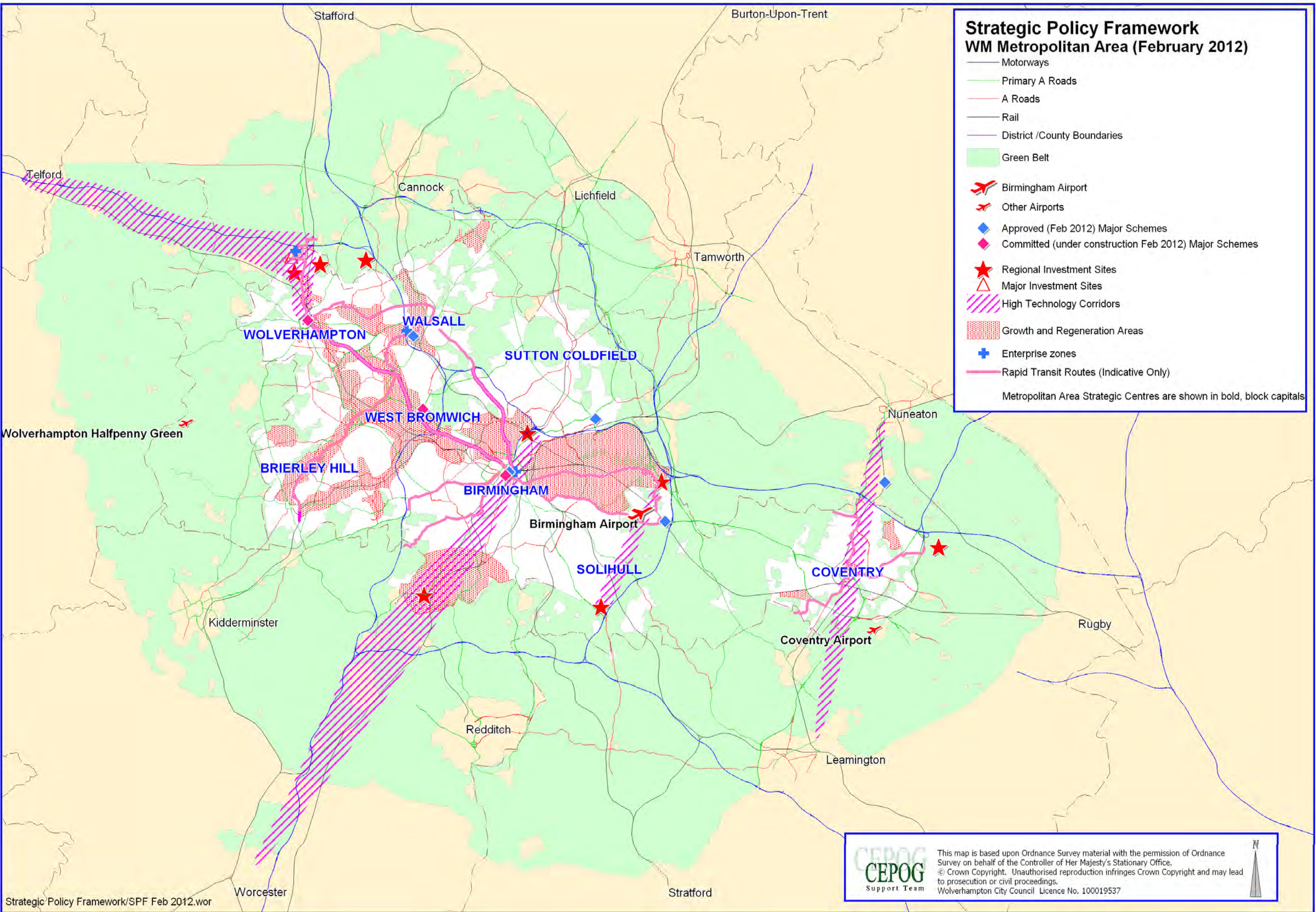
consistent with the BCJCS's objectives. There is considerable evidence that show population movement to the Black Country from other parts of conurbation is an established pattern and this needs to be accelerated. This supports Urban Renaissance through stemming out migration from the Metropolitan Area, encouraging physical regeneration and investment, whilst relieving pressure on more environmentally sensitive areas.

39. Coventry is physically separated from the rest of the conurbation by the strategically important Meriden Gap, encroachment into it is inappropriate as it would undermine urban regeneration and the longstanding commitment to retaining its openness. Coventry's economic geography is closely related to Warwickshire, and the Council is working with Shire districts to refresh the Coventry and Warwickshire Strategy,
40. Not all needs, particularly from Birmingham, Coventry and Solihull, can be met in their entirety with the collective boundaries of the Metropolitan Area, and there will an ongoing requirement for a reasonable level of migration to some Shire Districts to be accommodated whilst not undermining regeneration of the Black Country. A failure to address this could have adverse implications on housing affordability and the actual provision of affordable housing and on the local economy, especially as migrants from elsewhere may outbid local people.

Strategic Policy Framework WM Metropolitan Area (February 2012)

- Motorways
- Primary A Roads
- A Roads
- Rail
- District /County Boundaries
- Green Belt
- Birmingham Airport
- Other Airports
- Approved (Feb 2012) Major Schemes
- Committed (under construction Feb 2012) Major Schemes
- Regional Investment Sites
- Major Investment Sites
- High Technology Corridors
- Growth and Regeneration Areas
- Enterprise zones
- Rapid Transit Routes (Indicative Only)

Metropolitan Area Strategic Centres are shown in bold, block capitals



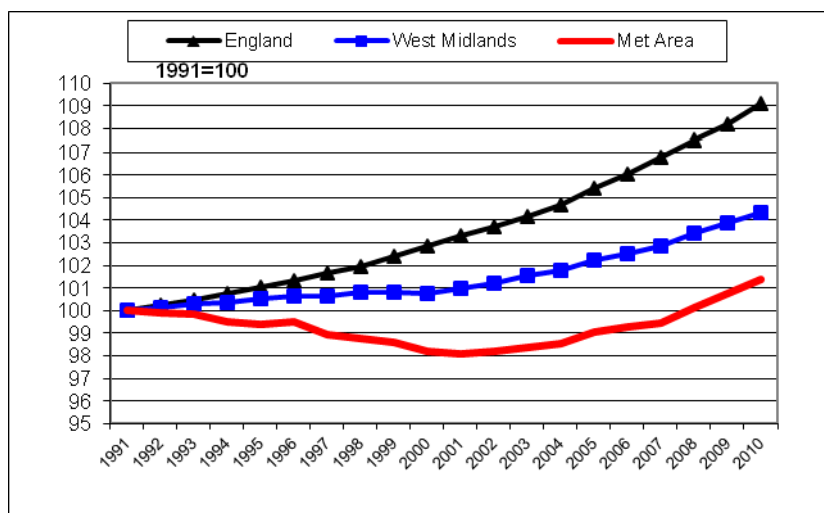
Appendix: Progress towards Urban Renaissance

41. As set out in the main Strategic Policy Framework, the urban renaissance strategy seeks to ensure that the Metropolitan Area can meet more of its own needs through population growth and retention, an increase in the number of jobs available and an accompanying acceleration of development, particularly on previously developed land.
42. This is a long term approach given that decentralisation of activity, population decline and dereliction were deep rooted trends. Progress towards urban renaissance was monitored through Annual Monitoring Reports (AMR) published by the former West Midlands Regional Assembly¹²; the final 2009 AMR was published in February 2010.
43. Headline data from these reports is presented below and augmented by other sources where appropriate. Since the abandonment of the West Midlands RSS AMR key data has been collected from West Midlands authorities on a voluntary basis.

Population and Migration

44. Figure 1 demonstrates the scale of the challenge in terms of delivering urban renaissance through stemming population decline. Between 1991 and 2000, population in the Metropolitan Area declined by over 47,400 (1.8%), whereas it continued to grow steadily elsewhere in the region. Between 2001 and 2010, population within the Metropolitan Area grew by 87,100 (3.4%), whilst the rate of growth elsewhere in the region remained comparable to past rates.

Figure1: Population change in the Metropolitan Area, West Midlands and England 1991–2010

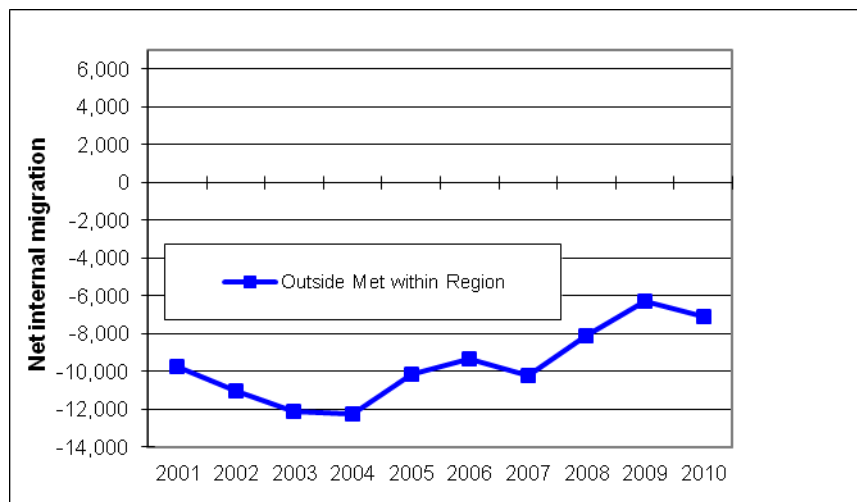


Source: ONS Mid Year Estimates

¹² http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Monitoring_/Monitoring.aspx

45. Table 1 sets out population change for each local plan / core strategy area over the last 20 years. All local authorities experienced population decline between 1991 and 2000 with this being most pronounced in Birmingham and the Black Country witnessed the greatest population decline between 1991 and 2000. Since 2001, population has grown in all local authorities with the highest increases being in Birmingham and Coventry.
46. Much of the growth from 2001 onwards can be accounted for by higher birth rates and particularly in Birmingham's case, international migration¹³. There is, however, evidence of a reduction in the net outflow of people from the Metropolitan Area to surrounding Shire Districts as illustrated in figure 2.

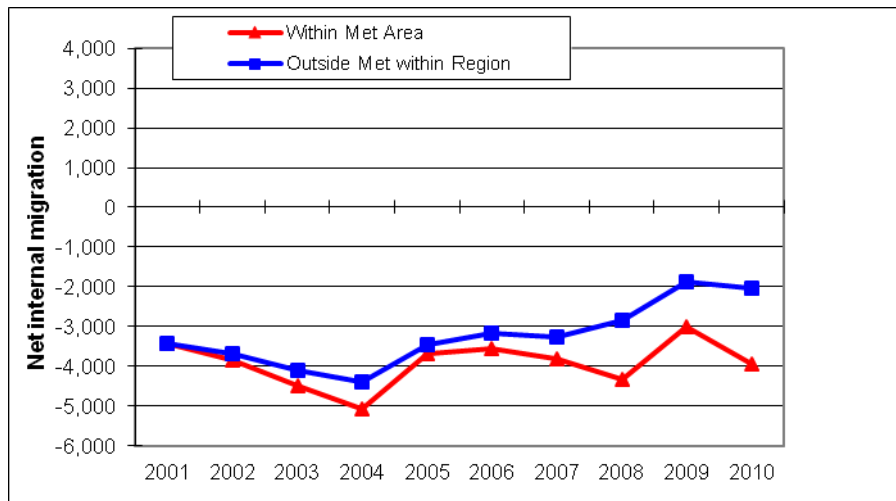
Figure 2: Net migration from Metropolitan Area to elsewhere in region



47. Given its size and physical constraints, Birmingham is the origin of most population movements. In 2001, people relocated from Birmingham to the adjoining Shire Districts and its Metropolitan Authority neighbours in equal proportion, by 2010 two thirds of all intra regional movements were to other Metropolitan Authorities (see figure 3).

¹³ <http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Planning-and-Regeneration%2FPageLayout&cid=1223096353755&pagename=BCC%2FCommon%2FWrapper%2FWrapper>

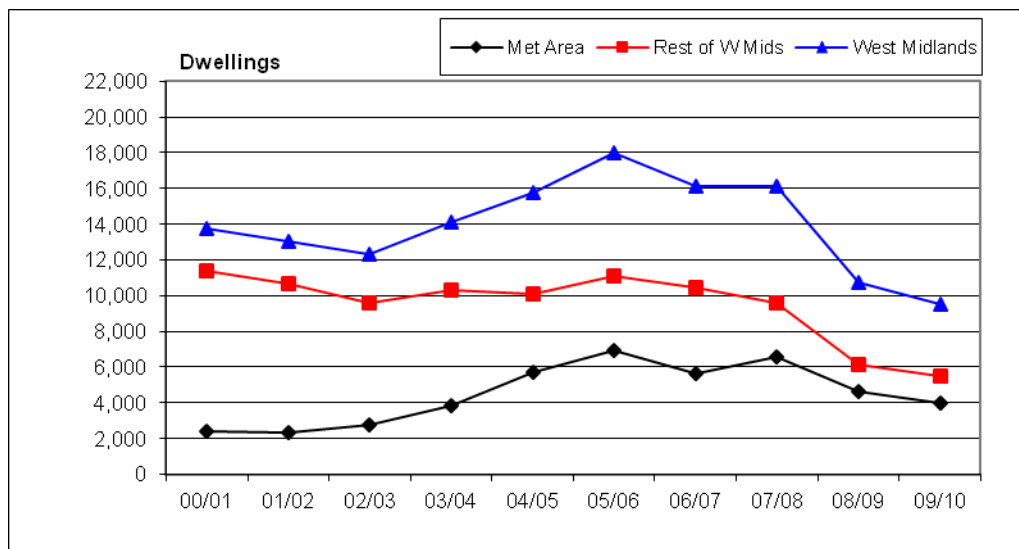
Figure 3: Migration from Birmingham to adjoining Metropolitan Authorities/ elsewhere



Housing

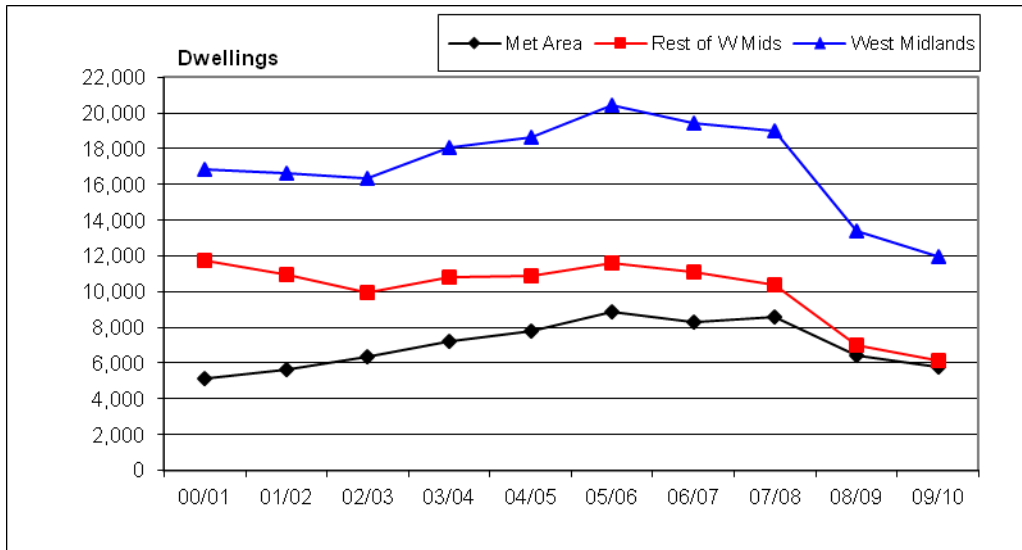
48. Despite the economic downturn net housing completions in the Metropolitan Area were twice their 2000/1 levels in 2019/10; at their peak in 2005/6 they were three times higher. Net housing completions beyond the Metropolitan Area in 2009/10 were only half of their 2000/1 levels (figure 4)

Figure 4: Net housing completions in the West Midlands



49. Gross housing completions in the Metropolitan Area, which take into account demolitions and replacement dwellings increased significantly from 2001/2 before tailing off as a result of the economic downturn whilst remaining stable elsewhere. Since 2002/3, over 90% of housing completions in the Metropolitan Area have taken place on previously developed land.

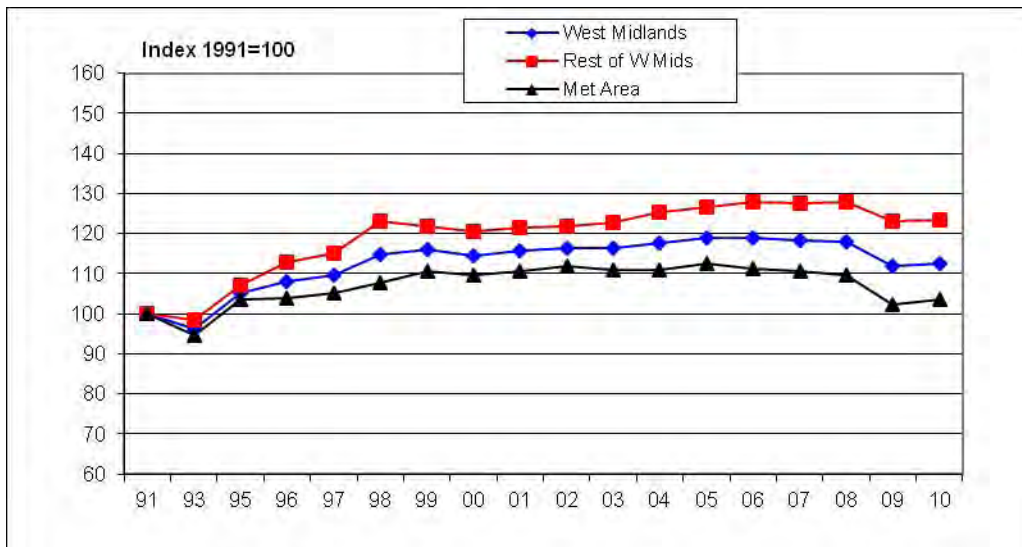
Figure 5: Gross housing completions in the West Midlands



Employment

50. Total employment in the Metropolitan Area grew steadily throughout the 1990s and levelled off during the last decade before returning to near 1991 levels as a result of the recession. The rest of the West Midlands followed a similar pattern albeit job growth was higher (figure 6).

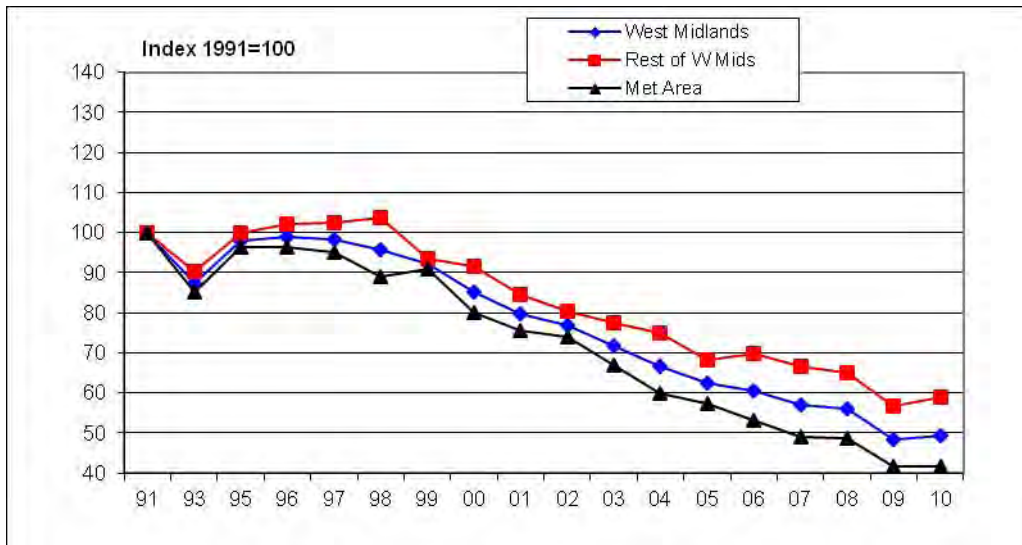
Figure 6: Total Employees in the West Midlands by Workplace, 1991-2010



Source: ONS (Annual Employment Survey, Annual Business Inquiry and Business Register & Employment Survey). Note that ABI has been rescaled in line with BRES.

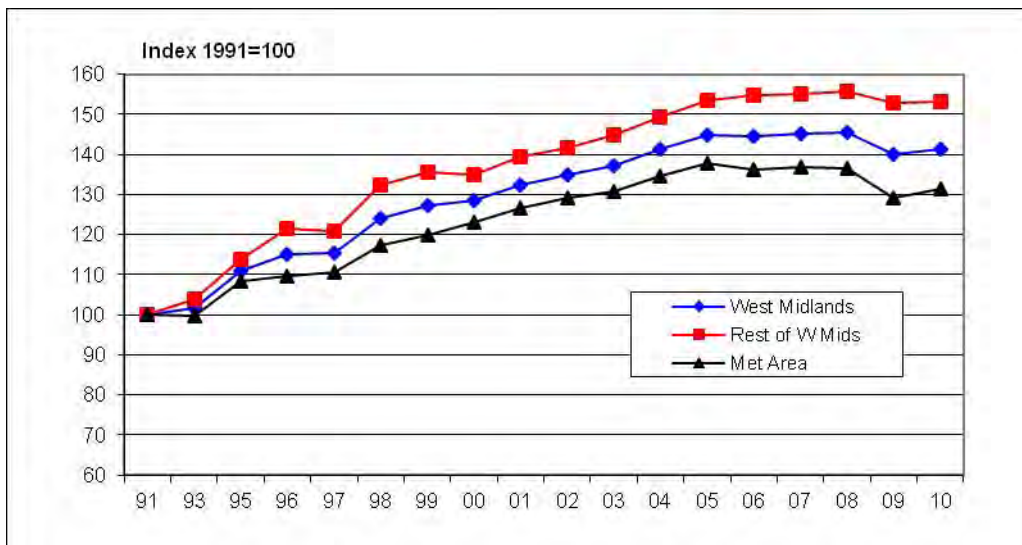
51. There is a familiar pattern across the West Midlands in terms of a reduction in manufacturing based employment and a growth in jobs in the service sector. Jobs have been lost at a greater rate and created at a lower rate in the Metropolitan Area compared to elsewhere.

Figure 7: Manufacturing Employees in the West Midlands by Workplace, 1991-2010



Source: ONS (Annual Employment Survey, Annual Business Inquiry and Business Register & Employment Survey). Note that ABI has been rescaled in line with BRES.

Figure 8: Service Employees in the West Midlands by Workplace, 1991-2010



Conclusions

52. The above trends relating to housing and population suggest that urban renaissance may have been beginning to have an effect on people's decisions about where to live. However, it is not clear what impact the recession and the related fall in house prices from their peak has had on people's desire or capacity to move.

- Following decline through the 1990's population growth, particular in terms of stemming out flows is welcomed and supports urban renaissance.

- An increasing number of people who leave Birmingham move elsewhere in the Metropolitan Area, movements to the Black Country are particularly welcomed given that it has capacity to meet more than its own requirements through its growth led Core Strategy
- There is evidence of a relationship between population growth and acceleration in housing completions in the Metropolitan Area.
- High proportions of housing development on previously developed land and provision of new dwellings through replacement / renewal of dwellings (gross completions), is consistent with urban renaissance in terms of improving the urban environment and preventing environmental degradation elsewhere.
- The economic downturn appears to have had a less pronounced impact in terms of a tail off in housing completions in the Metropolitan Area compared to elsewhere in the region.
- There is an urgent need to create new jobs in the Metropolitan Area to match the growth in population and reduce worklessness, LEPs and their designated enterprise zones and growth strategies are in a position to assist.

Table 1: Population change in the West Midlands 2001 – 2010

	Population				Population			
	1991	2000	Absolute Change	% change	2001	2010	Absolute Change	% change
Birmingham	1,004,500	985,100	-19,400	-1.9	984,600	1,036,900	52,300	5.3
Black Country	1,110,100	1,084,200	-25,900	-2	1,081,000	1,096,500	15,500	1.4
Coventry	303,900	303,100	-800	-0.3	302,800	315,700	12,900	4.3
Solihull	200,400	199,000	-1,400	-0.7	199,600	206,100	6,500	3.3
Metropolitan Area	2,618,800	2,571,400	-47,400	-1.8	2,568,000	2,655,100	87,100	3.4
Elsewhere in West Midlands	2,610,900	2,698,200	87,300	3.3	2,712,700	2,800,100	87,400	3.2

Source: Office for National Statistics

08th August 2012

Craig Jordan
Head of Planning and Development
Lichfield District Council
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

Dear Craig,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.

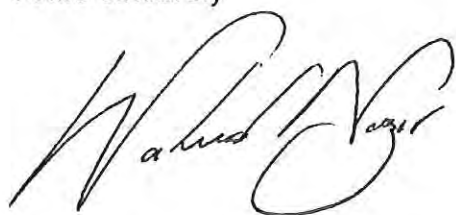
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

APPENDIX 8

North Warwickshire - Package of documentation relating to the Duty to Co-operate

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- Duty to Co-operate Agreement between Birmingham City Council and North Warwickshire Borough Council
- North Warwickshire Borough Council response to the Birmingham Development Plan 2031 Pre Submission version dated 28/02/14
- Action note of meeting held under the Duty to Co-operate on 25/02/14
- Email dated 20/12/13 to Amanda Willis, Programme Officer re North Warwickshire Local Plan - Core Strategy DPD – Reopened Hearings
- Birmingham City Council letter to NWBC on Birmingham’s Future Growth Requirements dated 29/07/13
- Statement of Common Ground agreed between North Warwickshire Borough Council and Birmingham City Council dated 04/06/13
- Birmingham City Council letter to North Warwickshire Borough Council on Birmingham’s Future Growth requirements dated 18/01/13
- Birmingham City Council response to North Warwickshire Borough Council: Core Strategy Pre-Submission Consultation 2012 dated 07/12/12
- Birmingham City Council letter to North Warwickshire Borough Council confirming Cabinet Member approval of the earlier officer response on the emerging local plan dated 06/11/12
- Birmingham City Council response to North Warwickshire Borough Council: Core Strategy Pre-Submission Consultation 2012 dated 23/08/12
- Birmingham City Council letter to North Warwickshire Borough Council on Birmingham’s Future Growth requirements dated 08/08/12

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

BIRMINGHAM DEVELOPMENT PLAN

Duty to Co-operate

Local Planning Authorities and other bodies party to this agreement/ understanding:
A. Birmingham City Council (BCC)
B. North Warwickshire Borough Council (NWBC)

Development Plan Document(s) covered by this agreement / understanding:
Birmingham Development Plan (as at March 2014)

Stage in the process forming part of this agreement:
Pre-Submission* *NB: In the event of any changes to the plan prior to submission and/or as part of modifications proposed during the Examination process then updated versions of this document may be prepared.

Checklist criteria NB: this is a starting point, list to be mutually agreed between the parties to this agreement. Checklist discussed and agreed: Yes/ No	Summary status E.g.: Full or partial agreement, / Shared understanding on area(s) of disagreement, or/ Not applicable Delete as appropriate	1. Summary of the approach in the plan 2. Summary of agreed position and any outstanding concerns or other comments NB: Refer to attachments and appendices if required
a) Overall approach incl. relationship to urban and rural renaissance	Agreed	<p>1. The vision, strategic objectives and approach set out in the BDP envisages that by 2031 Birmingham will be renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.</p> <p>Following around half a century of decline in the latter half of the C20 the city's population is expected to grow rapidly extending and building on the success of the strategy for urban renaissance that has been the hallmark of planning in the city since the 1980's.</p> <p>2. Following abolition of the Regional Spatial Strategy the City Council has worked and continues to work with adjoining authorities in the GBSLEP and West Midlands Metropolitan Area and beyond not only to ensure the continuing success of urban renaissance but also, through the GBSLEP Strategic Spatial</p>

		<p>framework Plan, the Strategic Policy Framework for the West Midlands Metropolitan Area and local plans, to ensure that there remains an appropriate balance between growth and development to meet needs in both urban and rural areas. There are no outstanding issues in relation to the strategy set out in the BDP between the parties signatory to this document.</p>
<p>b) Estimation of housing requirements and the level and distribution of housing provision</p>	<p>Agreed</p>	<p>1. The Birmingham SHMA which underpins the BDP estimates a housing requirement of c80,000 net new dwellings in the period up to 2031. The 2012 SHLAA's best estimate of likely capacity without incursion into Green Belt (except at the site of the former Yardley Sewage Works) and including an allowance for c700 on land at Longbridge within Bromsgrove District is c45,000 dwellings, including allowance for windfalls. The Pre-submission version of the BDP proposes that 51,100 net new dwellings - should be provided including the removal of land from the Green Belt to increase capacity within Birmingham leaving a balance to be found outside the city's boundary of c29,000 dwellings.</p> <p>2. The major issues concern the scale of the housing requirement, the extent to which capacity exists or can be identified within Birmingham's boundary and then the scale and distribution of any resultant shortfall. The BDP sets out Birmingham City Council's position in respect of these matters and it is envisaged by the parties signatory to this document that the satisfactory resolution of these issues will be achieved through (1) completion of the GBSLEP Strategic Housing Needs Study (2) Distribution of the overall housing need and the resultant 'overspill' housing through the Second Iteration of the GBSLEP Strategic Spatial Framework Plan and, if necessary, through arrangements negotiated with other identified strategic housing market areas beyond the GBSLEP as justified by the evidence and (3) Subsequent accommodation of the 'overspill' growth in the review of Local Plans in relevant areas reflecting both the urban and rural renaissance agendas. This approach is accepted by the parties signatory to this document.</p>
<p>c) Appropriate provision made for migration</p>	<p>Agreed</p>	<p>1. The Birmingham SHMA takes account of migration in establishing the overall housing requirement and, broadly speaking, the effects of migration trends are then taken into account in the estimation of housing requirements in adjoining areas through the preparation of local</p>

		<p>plans.</p> <p>2. The identification of a housing shortfall or 'overspill' requirement refers to potential additional housing over and above that included in population and household projections that is needed outside Birmingham's boundary in order that housing needs can be met. The process for resolution of this matter is as set out in b)2 above. This approach is accepted by the parties signatory to this document.</p>
d) Level and distribution of employment land provision	Agreed	<p>1. The BDP identifies a serious emerging shortfall of land to accommodate future employment growth and investment. The plan addresses this issue by protecting the city's core employment areas from competing uses so they offer a continuing supply of recycled land supplemented by the release of a major new employment site (80ha) at Peddimore. Proposals for six economic zones are primarily focussed within the existing employment areas and include two Regional Investment Sites. The possible longer-term need for further strategic employment sites is to be addressed by the GBSLEP Spatial Plan for Recovery and Growth and associated technical work with adjoining LEPs. This will be informed by the joint commissioning of a Review into the West Midlands-wide need and provision of very large employment development opportunities. Proposals for a potential major employment site at Dunton Island and discussion of the possible relationship to the Peddimore allocation in Birmingham should only be considered in this strategic context and not in the current round of local plans.</p> <p>2. This approach is accepted by the parties' signatory to this document.</p>
e) Hierarchy of centres and the level and distribution of retail provision	Agreed	<p>1. The BDP defines a retail hierarchy of centres in Birmingham. The approach in the BDP is to make provision for a net increase of 270,000 m² in comparison retail floorspace concentrated in the City Centre, Sutton Coldfield town centre and three District Growth Points. Growth elsewhere will be small scale.</p> <p>2. This approach is accepted by the parties' signatory to this document.</p>
f) Level and distribution of	Agreed	<p>1. The approach in the BDP is to encourage 745,000 m² gross of new office development in</p>

office provision		<p>the network of centres primarily focussed in the city centre including a substantial proportion of the new office floorspace expected to be provided within the Enterprise Zone.</p> <p>2. This approach is accepted by the parties' signatory to this document.</p>
g) Appropriate provision made for public and private transport including Park & Ride and commuting patterns	Agreed	<p>1. The BDP incorporates a range of transport policies and proposals across all modes. These are consistent with the extant Local Transport Plan and emerging Birmingham Mobility Action Plan (BMAP). There are proposals to improve networks both within and beyond the boundary which will impact, for example, on modal choice for commuters. Major development proposals close to the city boundary have impacts that can extend across the administrative boundary. Close cross-boundary co-operation on transportation matters continues through both West Midlands Shadow ITA and the associated Local Transport Boards (LTB).</p> <p>2. There is no desire to increase the levels of in-commuting across the city boundary so there is an expectation that where possible there will be a broad balance, having regard to local circumstances, between the levels of housing and employment growth taking place in areas beyond the city boundary which is a matter to be addressed in the relevant local plans.</p> <p>North Warwickshire, a rural Borough already has levels of both in and out-commuting to Birmingham due to the location of regional sites within the area.</p> <p>This approach is accepted by the parties' signatory to this document.</p>
h) Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure	Agreed	<p>1. To be identified and discussed as appropriate across common boundaries but would include matters such as landscape, designations of natural areas, river basin management and transport networks.</p> <p>2.</p>
i) Green Belt matters	Agreed	<p>1. Significant changes to the Green Belt are proposed in association with major development proposals at Langley and Peddimore to the north-east of Birmingham and at the site of the former Yardley sewage works. The changes to</p>

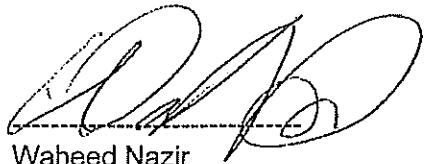
		<p>the Green Belt boundary have been made in such a way as to identify new boundaries that will endure in the long-term and allow for development to be accommodated that will not undermine the essential purposes or integrity of the wider West Midlands Green Belt. The City Council acknowledge that additional land which is currently designated as Green Belt in adjoining areas may need to be considered for development – as a consequence of the process to the determine the level and distribution of future growth set out under b)2 above - but the responsibility for those proposals, should they arise, will lie with the respective local planning authority (working collaboratively with other relevant authorities) to be determined through a review of the relevant local plan(s) and in accordance with local areas' Core Strategy principles.</p> <p>2. This approach is accepted by the parties' signatory to this document.</p>
<p>j) Minerals, waste and water resources including flooding</p>	<p>Not Applicable</p>	<p>1. As a major city Birmingham is reliant on minerals predominantly produced in adjoining shire areas to help facilitate its growth and development. The City Council recognises that it can reduce the demand for mineral extraction through effective recycling and reuse of building materials and aggregates. Similarly the City Council recognises that its 'footprint' can be reduced through self-sufficiency and vigorous adoption of the waste hierarchy. The City Council is an active member of both the West Midlands Aggregates Working Party (AWP) and the Regional Technical Advisory Body (RTAB) covering waste. Both groupings help ensure discharge of the DtC. In respect of water resources and flooding the City Council is fully aware of its responsibilities and will vigorously pursue the principles of sustainable drainage to reduce the risks of flooding both within the city and beyond it boundaries.</p> <p>2. Warwickshire County Council is the mineral planning authority covering North Warwickshire.</p>
<p>k) Air quality matters</p>	<p>Agreed</p>	<p>1. The City Council is committed to the improvement of air quality for its residents and those in surrounding areas. It is, and will remain an active participant in initiatives to address these matters jointly with adjoining authorities and other agencies subject to the nature of actions being consistent with the city's aspirations for growth. Detailed policies on air</p>

		<p>quality and noise matters will be set out in a separate Development Management DPD.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
l) Any other matters that might reasonably be identified under the Duty to Co-operate	Agreed	No other matters identified.

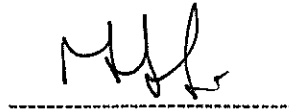
Log of meetings, reports and other records to substantiate the collaborative working:

	Details:
Meetings	<p>Meetings on the Birmingham Development Plan/ NWDC Core Strategy held on 22/01/13, 17/05/13, 24/07/13 and 25/02/14</p> <p>Both Councils in attendance of a meeting of CWSAPO on 03/05/13.</p> <p>BCC present at inception meeting of the Coventry & Warwickshire SHMA held in Rugby Borough Council offices on 28/02/13.</p>
Groups	<p>Regular meetings:</p> <p>(1) West Midlands Planning Officers Group – Both BCC and Warwickshire authorities are represented on this group.</p> <p>Feedback to Districts not attending meetings via CSWAPO.</p>
Responses to consultation and correspondence	<p>28/02/14 – NWDC response to the Birmingham Development Plan 2031 Pre Submission version</p> <p>20/12/13 – Email to Amanda Willis, Programme Officer re North Warwickshire Local Plan - Core Strategy DPD – Reopened Hearings</p> <p>23/08/13 - 23/08/12 - BCC response to NWBC: Core Strategy Pre-Submission Consultation 2012</p> <p>29/07/13 – BCC letter to NWBC on Birmingham's Future Growth Requirements</p> <p>04/06/13 – Statement of Common Ground agreed between NWBC and BCC</p> <p>18/01/13 – BCC letter to NWBC on Birmingham's Future Growth Requirements</p> <p>07/12/12 - BCC response to NWBC: Core Strategy Pre-Submission Consultation 2012</p> <p>08/08/12 – BCC letter to NWBC on Birmingham's Future Growth requirements</p> <p>17/03/11 – CSWAPO response to Birmingham Core Strategy 2026 – Consultation Draft</p>
Additional points	

We, the undersigned, agree that the above statements and information truly represent the joint working that has and will continue to take place under the 'Duty to Co-operate'.



Waheed Nazir
Director of Planning & Regeneration
Birmingham City Council*

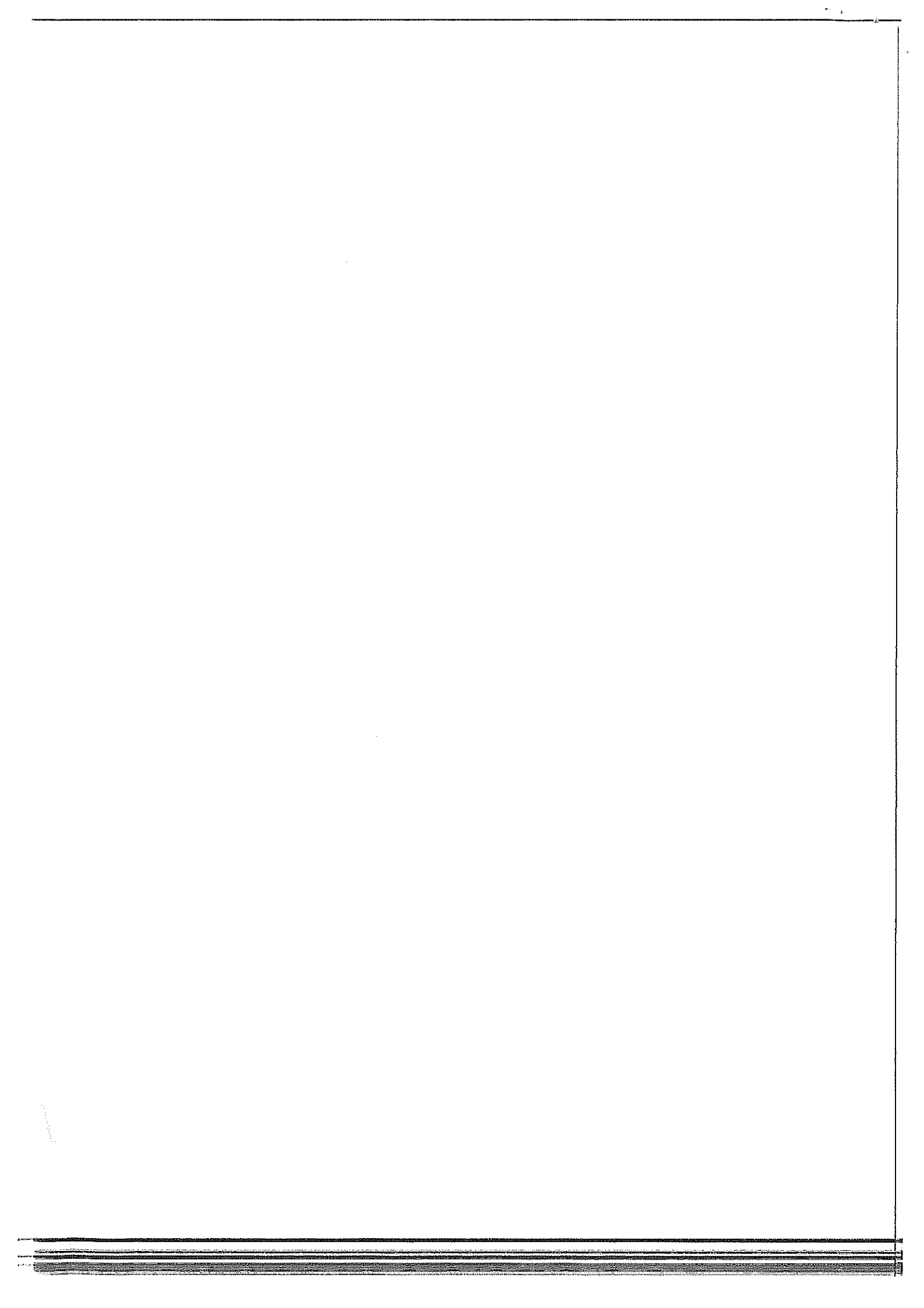


North Warwickshire
Borough Council*

Date:

Date:

* Must be signed by either Council Leader or responsible Cabinet Member or responsible Chief Executive or Chief Officer only. For non-local authority organisations signatory should be at equivalent level.





North Warwickshire
Borough Council

Steve Maxey BA (Hons) Dip LG Solicitor
**Assistant Chief Executive
and Solicitor to the Council**

The Council House
South Street
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Warwickshire
CV9 1DE

Switchboard : (01827) 715341

Fax : (01827) 719225

E Mail :
dorothybarratt@northwarks.gov.uk

Website : www.northwarks.gov.uk

This matter is being dealt with by
: Dorothy Barratt

Direct Dial : (01827) 719250

Your ref : |

Our ref : |

Emailed to planningstrategy@birmingham.gov.uk

Date : 28th February 2014

Dear Sir

**Representations by North Warwickshire Borough Council on the Birmingham
Development Plan 2031**

The Borough Council has been involved in a number of discussions with officers from the City Council. It has an agreed Memorandum of Understanding (2013) to indicate the continuing and on-going discussions between the two local authorities. The Borough Council will continue working with BCC and the wider GBSLEP area to consider the development and infrastructure needs of the City.

The Borough Council is willing, if required, to appear at the Inquiry. This is particularly in relation to representations made / issues highlighted that may directly impact on the Borough.

As work is currently being undertaken with the local authorities from and adjoining the GBSLEP area and this information is not yet available the Borough Council would like to reserve its position in terms of commenting on the outcome of this work and the implications on the Birmingham Plan and its background evidence

Yours sincerely

Steve Maxey

Steve Maxey
Assistant Chief Executive & Solicitor to the Council

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1600, Tuesday 25 February 2014, North Warwickshire Borough Council Offices

Present:

Dorothy Barratt - North Warwickshire Borough Council (DB)

Steve Maxey – North Warwickshire Borough Council (SM)

David Carter – Birmingham City Council (DC)

Discussion

The meeting focussed around three matters, the current position on GBSLEP Strategic Housing Study, (2) The Birmingham Development Plan and the DtC and (3) the current position on the North Warwickshire Local Plan covering the housing requirement. These were discussed in-turn.

GBSLEP Strategic Housing Study

DC explained to current position on the GBSLEP Strategic Housing Study and the inclusion of the Black Country in the work which would lead to two reports with a lot of common content. DC also explained that three other Districts had been identified as being part of the Birmingham and Black Country HMAs and these included North Warwickshire and Stratford. A separate meeting with North Warwickshire in relation to this was proposed in about three/four weeks with the consultants (PBA) and other interested parties, such as Solihull MBC. DC agreed to diary this meeting as soon as practicable.

There was a discussion about the accommodation of housing needs to meet needs of both the GBSLEP and in Coventry and Warwickshire and DM stressed that the evidence provided must be robust to convince Members in North Warwickshire that their area could be part of the solution. Reference was made to the matter not just being focussed on the conurbation alone since Tamworth also had problems accommodating their growth needs which had been discussed at the recent Local Plan public examination.

Birmingham Development Plan

DC explained the background to and purpose of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if North Warwickshire wanted any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

Each of the criteria were discussed in-turn. The criteria and wording were agreed subject to further consideration by NWDC. In particular DB agreed to look at the possible amendment or addition of comments to the wording under points b) and g). DC agreed to send a copy of recent correspondence on housing needs sent to DC from Robert Mitchell at Richborough Estates.

In relation to point d) there was reference to an earlier meeting held on proposals for a potential major employment site at Dunton Island and discussion of the possible relationship to the Peddimore allocation in Birmingham. It was agreed this was a significant long term proposal that would form part of discussions on the next cycle of local plans possibly in the context of the GBSLEP Spatial Plan for Recovery and growth (Note: a representation from Ashford Developments to the Birmingham Development Plan making reference to the Peddimore/Dunton area has been subsequently received and has been forwarded to NWBC).

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc. This would be sent to DB for checking and amendment and subsequent signature by both authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

Sent by email on 20 December 2013

Amanda Willis, Programme Officer
programme.officer@sstaffs.gov.uk

Dear Amanda

North Warwickshire Local Plan - Core Strategy DPD – Reopened Hearings

The City Council has liaised with North Warwickshire Borough Council and concluded there is no need for the City Council to attend the reopened hearings into the Core Strategy. I would be grateful, however, if you could bring this email to the Inspector's attention.

The City Council thought it would assist the Examination to advise the Inspector of the latest position in relation to the Birmingham Development Plan and related matters.

The City Council will be publishing the Birmingham Development Plan for Pre-submission consultation starting on 6 January 2014. This plan makes provision for 51,100 net new dwellings over the period up to 2031 whilst recognising that the requirement for new housing to meet the needs arising in Birmingham is c80,000 dwellings. This means there is a substantial shortfall and the City Council will be working with neighbouring authorities to accommodate this provision.

This further work is principally being undertaken through the GBSLEP Spatial Plan for Recovery and Growth and associated technical work including a strategic housing needs study which is being undertaken by Peter Brett Associates. This study will take account of relevant authorities which can be considered part of the Birmingham Housing Market Area. One of the authorities in this category is North Warwickshire Borough Council. Clearly although North Warwickshire has been considered as part of the Coventry-Warwickshire SHMA there are areas of overlapping Housing Market Areas which is a point recognised in that study. In line with the spirit of close working North Warwickshire Borough Council is co-operating with the GBSLEP study.

Birmingham City Council's position on the North Warwickshire Core Strategy therefore remains unchanged from that set out in the Statement of Common Ground between North Warwickshire Borough Council and Birmingham City Council (DC9/9). The City Council considers there is no reason that the North Warwickshire plan should not be adopted subject to inclusion in the plan of the suggested reference set out in paragraph 4.4 of the Statement of Common Ground including the possible need for an early review of the local plan which is an approach supported by Inspectors elsewhere in the West Midlands.

Yours sincerely

David Carter
Head of Planning & Growth Strategy
Birmingham City Council



Steve Maxey
Assistant Chief Executive
North Warwickshire Borough Council
Council House
South St
Atherstone
Warwickshire
CV9 1DE

Date: 29.07.13

Dear Steve,

Birmingham's Future Growth Requirements

It is now almost a year since I first wrote to you to draw attention to the challenge that Birmingham faces in meeting its future requirements for new housing.

I believe that we have made significant progress over the past 12 months in developing an approach which will enable this challenge to be addressed in a planned way, and I am grateful for your support in taking this forward

You will recall that at the end of last year the City Council undertook a further round of consultation on options for increasing the supply of land for housing and employment development within the city boundary, including a consideration of green belt options. This consultation generated a substantial number of comments, and we have subsequently commissioned additional technical work in response to this.

This work is now nearing completion, and the next step in the process will be the publication of the pre-submission version of the Birmingham Development Plan. We expect to secure Council authorisation for this in the autumn.

We are, of course, already taking into account any comments that your Council made at earlier stages in the process – but I would like to provide you with a further opportunity to raise with us any issues that you feel that we need to take into consideration in finalising the Plan. In this respect I am conscious that our focus over the past 12 months has been very much on the housing challenge, and that there may be other issues of importance that we also need to consider. I have attached a checklist of matters that may be of common concern and if there are any outstanding concerns I would be grateful if you could identify them.

As ever, we would be happy to meet with you to discuss any issues or concerns that you may have. If you would like to meet in the first instance please liaise with David Carter, Head of Planning and Growth Strategy (email: david.r.carter@birmingham.gov.uk tel: 0121 303 4041)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration



Birmingham City Council

Checklist of matters which you may be of common interest and which reasonably might be covered by the Duty to Co-operate.

1. Overall approach including the relationship to urban and rural renaissance
2. Estimation of housing requirements and the level and distribution of housing provision
3. Appropriate provision made for migration
4. Level and distribution of employment land provision
5. Level and distribution of office provision
6. Level and distribution of retail provision
7. Appropriate provision made for public and private transport including Park & Ride and commuting patterns
8. Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure
9. Green Belt matters
10. Minerals, waste and water resources including flooding
11. Air quality matters
12. Any other matters that might reasonably identified.

**Statement of Common Ground between
Birmingham City Council and North Warwickshire Borough Council
May 2013**

1 Introduction

1.1 This Statement of Common Ground has been prepared to identify areas of agreement between Birmingham City Council and North Warwickshire Borough Council on matters relating to the North Warwickshire Borough Core Strategy. This statement intends to provide an agreed position following the submission of representations to the proposed submission Core Strategy by representors and the issues identified by the appointed Inspector examining the North Warwickshire Borough Core Strategy.

2 General Matters

2.1 The following general matters are agreed between North Warwickshire Borough Council and Birmingham City Council who have co-operated constructively, actively and on an ongoing basis in progressing their respective Plans.

2.2 This co-operation includes meetings that have taken place on the following dates:

- 22 January 2013
- 17 May 2013

2.3 These meetings provided an opportunity to highlight and discuss emerging evidence and policy directions. Housing and employment were the two cross boundary issues discussed. This discussion included progress on the work of both LEP's GBLEP & CWLEP in terms of housing, employment and the general growth agendas.

3 Common Ground between parties

3.1 It is considered that North Warwickshire Borough Council has met its legal obligations under the 'Duty to Co-operate' with Birmingham City Council in relation to the North Warwickshire Borough Core Strategy (as submitted).

3.2 There are **no specific or agreed** requirements for North Warwickshire Borough Council to meet any of Birmingham City Council's housing or employment needs, or for Birmingham City Council to meet any of North Warwickshire Borough's housing or employment needs at present.

3.3 The strategies contained within the North Warwickshire Borough Core Strategy (as submitted) and the emerging Birmingham Development Plan are considered consistent and complementary.

**Statement of Common Ground between
Birmingham City Council and North Warwickshire Borough Council
May 2013**

4 Agreement for Future Working

- 4.1 North Warwickshire Borough Council recognises that Birmingham City Council has identified an issue that Birmingham may not be able to accommodate the whole of its new housing requirement for 2011 to 2031 within its administrative boundary.
- 4.2 North Warwickshire Borough Council will work with the GBSLEP constituent authorities and other authorities with a strong migratory link to Birmingham to understand and address the scale and distribution of any emerging housing shortfall.
- 4.3 North Warwickshire Borough Council and Birmingham City Council are committed to ongoing cooperation and engagement by both officers and members in relation to delivery and in formulating future plans and strategies.
- 4.4 Birmingham City Council is content that the North Warwickshire Borough Core Strategy should progress through its public examination subject to an appropriate reference, on the lines set out below, being incorporated into the plan. A new paragraph after paragraph 1.13 of the plan would seem the most logical place:

'Following discussions falling under the Duty to Cooperate North Warwickshire Borough Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011- 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. North Warwickshire Borough Council will work collaboratively with Birmingham and other authorities within the GBSLEP to establish, objectively, the level of long term growth and the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in North Warwickshire, an early review of the North Warwickshire Local Plan will be brought forward to address this.'

- 4.6 This is slight update to the wording in the City Council's representation dated 7 December 2012 which takes account of North Warwickshire Borough Council's decision to join the Coventry and Warwickshire Joint Strategic Housing Market Assessment.
- 4.7 North Warwickshire Borough Council considers that an alternative version of the above wording would be appropriate, as follows:

"North Warwickshire Borough Council will work collaboratively with Birmingham and other authorities within the GBSLEP to

**Statement of Common Ground between
Birmingham City Council and North Warwickshire Borough Council
May 2013**

establish, objectively, the level of long term growth and the scale and distribution of any emerging housing shortfall. As a consequence North Warwickshire Borough Council would work with all the authorities to explore all options and alternatives to accommodate Birmingham's requirements."

Signed on behalf of North Warwickshire Borough Council



Steve Maxey

Date: 4/6/13

Position: Assistant Chief Executive & Solicitor to the Council

Signed on behalf of Birmingham City Council



Waheed Nazir

Date: 04.06.2013

Position: Director of Planning & Regeneration

Steve Maxey
Assistant Chief Executive
North Warwickshire Borough Council
Council House
South St
Atherstone
Warwickshire
CV9 1DE

Date: 18 January 2013

Dear Steve,

Birmingham's Future Growth Requirements

I am writing following our recent correspondence and meeting in relation to the likely scale of future growth in Birmingham and how this might be taken forward under the new planning system.

As you will be aware, the recently completed Strategic Housing Market Assessment for Birmingham has concluded that there is likely to be a substantial shortfall in housing provision within the city up to 2031. We are currently completing a consultation on options for increasing the supply of land for development within the city boundary, including a consideration of green belt options – but it is clear that even if we adopt such an option, we will still be facing a significant shortfall.

I am grateful for your recognition of the need to address this challenge and for your support for the development of an agreed response through the collaborative work of the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership.

I would re-emphasise that in addressing this issue we do not wish to put in jeopardy local planning work which is already well-advanced and nearing completion but we do feel that it is necessary for us all to be demonstrating a clear commitment to undertake the joint work which will be required to enable a planned response to be put in place and to bring forward any consequent revisions to our development plans as soon as practicable thereafter.

We also recognise that authorities are in different positions in terms of their individual development planning work. Where Core Strategies have already been put in place, the issue will need to be picked up in future review processes.

Where plans are still in preparation we are looking for an explicit acknowledgement of the issue within the emerging plan. This should:

- Recognise that evidence is emerging that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011 – 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs.
- Include a commitment to work collaboratively with Birmingham and other authorities within the Greater Birmingham and Solihull Local Enterprise Partnership and/or the West Midlands Joint Committee to establish objectively the level of long term growth through joint commissioning of a Strategic Housing Market Assessment and work to establish the scale and distribution of any emerging housing shortfall.
- Recognise that in the event that it is demonstrated that there is a need for further housing provision in your area this will be addressed through a review of the Development Plan.

In some cases the Council has already made representations on emerging plans to this effect.

I hope that we can continue to work collaboratively on these issues – and I am of course always happy to meet with you to discuss any issues arising in more detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration

Forward Planning Team
North Warwickshire Borough Council
The Council House
South Street,
Atherstone,
CV9 1DE

Date: 07 December 2012

Dear Sir/Madam,

NORTH WARWICKSHIRE BOROUGH COUNCIL: CORE STRATEGY PRE – SUBMISSION CONSULTATION 2012

Birmingham City Council would like thank you again for the further opportunity to comment on the draft Pre – Submission Core Strategy prior to its submission to the Secretary of State.

As you will recall the Council has previously voiced its concerns in a written response in relation to the need for recognition in the draft North Warwickshire Core Strategy of the potential need for an early review of the Strategy to take account of possible additional housing needs arising within Birmingham which cannot be satisfied inside the city boundary.

The Council notes that amendments have been made to the draft Core Strategy to recognise the general point that an early review may be needed if new evidence arises (paragraph 1.13). However the Council is disappointed that this makes no specific reference to Birmingham's circumstances – particularly as evidence has already been published which indicates that this issue may arise (the Birmingham Strategic Housing Market Assessment 2012).

The Council recognises that at this stage it is not possible to conclude that provision will be needed in North Warwickshire, and if so what scale of provision is required. For this reason it is accepted that it would not be reasonable to delay the progress of the current Strategy. However it is strongly felt by the City Council that the Strategy should be further amended to include reference to Birmingham's specific circumstances. The City Council would suggest that para 1.13 should be amended as follows:

Delete final sentence and add, "Following discussions falling under the Duty to Co-operate the Borough Council recognise that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011 – 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. The Borough Council will work collaboratively with Birmingham and other authorities, including joint commissioning of a Strategic Housing Market Assessment and Green Belt Review which would assess the emerging housing shortfall and the scale and distribution of any such requirement. In the event that the additional work identifies that further provision is needed in North Warwickshire, an early review of this Strategy will be brought forward to address this."

Should you wish to discuss further any issues relating to Birmingham's housing requirement and progress of the North Warwickshire Core Strategy my officers would be happy to do this inline with the Duty to Co-operate.

Yours faithfully,



Waheed Nazir
Director of Planning and Regeneration



06 November 2012

Forward Planning Team
North Warwickshire Borough Council
The Council House
South Street,
Atherstone,
CV9 1DE

Dear Sir/ Madam,

Birmingham City Council has submitted written comments to you on your emerging Development Plan in line with the 'Duty to Cooperate'. These comments were subject to agreement from the City Council's Cabinet Member for Development, Jobs and Skills.

I am writing to inform you that on 24th October 2012 the Cabinet Member agreed to sanction the response forwarded to you as the formal response of Birmingham City Council. Should you wish to discuss our response or the progress of your draft Development Plan, my officers would be happy to discuss any issues of concern.

Yours faithfully,

Waheed Nazir
Director of Planning and Regeneration

Forward Planning Team
North Warwickshire Borough Council
The Council House
South Street,
Atherstone,
CV9 1DE

Date: 23 August 2012

Dear Sir/Madam,

**NORTH WARWICKSHIRE BOROUGH COUNCIL: CORE STRATEGY PRE
– SUBMISSION CONSULTATION 2012**

Birmingham City Council would like to thank you for the opportunity to comment on the above document.

The City Council does not object to the overall approach in the Pre – Submission Draft 2012 and takes the view that it meets the soundness tests. However, this is subject to the following note of caution.

Recently published Office of National Statistics (ONS) population projections for Birmingham suggest that the city's population is envisaged to increase significantly by 2031. The projections indicate that household growth within Birmingham will be between 80,000 and 105,000 between 2011 and 2031. Our latest SHLAA review has been able to identify capacity for only about 43,000 new dwellings. We are looking at ways to increase this capacity – but it is clear that it will not be possible to provide for the whole of Birmingham's projected future household growth within the city boundary. As was the case with the previous Regional Spatial Strategy proposals it is clear that some of Birmingham's future housing requirement will need to be accommodated within other authority areas.

The housing requirements proposed in the North Warwickshire Core Strategy take no account of this longer-term requirement. This is understandable given that the issue has only recently emerged and in any event further work is necessary to identify the scale of the need and the approach which should be taken to providing for it. You will recall that I have recently written to you requesting a meeting to begin discussing this in line with the principles of the 'Duty to Co-operate'.

For this reason, the Council's support for the Submission Draft is conditional on the inclusion within the Strategy of a recognition that further work will be needed to identify whether any additional housing provision is required in North Warwickshire to meet needs generated in Birmingham, and a

commitment to review the Strategy at an early stage if it is shown that such a need exists.

I would also like to confirm that in line with the 'Duty to Co-operate' my officers would be happy to discuss any issues with you in relation to progress of the North Warwickshire Core Strategy and Birmingham's housing requirement.

Finally, please note that this is a provisional response, subject to confirmation by the Council's Cabinet Member for Development, Jobs and Skills.

Yours faithfully,

A handwritten signature in blue ink, consisting of several overlapping loops and curves, positioned above the printed name.

Waheed Nazir
Director of Planning and Regeneration

08th August 2012

Steve Maxey
Assistant Chief Executive
North Warwickshire Borough Council
Council House
South St
Atherstone
Warwickshire
CV9 1DE

Dear Steve,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares

to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.

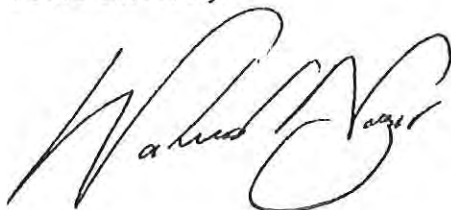
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration

Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT

APPENDIX 9

Redditch - Package of documentation relating to the Duty to Co-operate

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- Duty to Co-operate Agreement between Birmingham City Council and Redditch Borough Council
- Action note of meeting held under the Duty to Co-operate on 18/02/14
- Birmingham City Council Response to Borough of Redditch Local Plan No.4 Proposed Submission dated 11/11/13
- Birmingham City Council letter to Redditch Borough Council confirming the Duty to Co-operate has been met in relation to the Borough of Redditch Local Plan No.4 dated 04/10/13
- Redditch Borough Council letter to BCC re Duty to Cooperate dated 09/09/13
- Redditch Borough Council letter re Borough of Redditch Local Plan No.4 dated 27/08/13
- Birmingham City Council letter to Redditch Borough Council on Birmingham's Future Growth Requirements dated 23/07/13
- Birmingham City Council letter to Redditch Borough Council on Birmingham's Future Growth Requirements dated 29/07/13
- Birmingham City Council letter to Redditch Borough Council and Bromsgrove District Council re the Redditch Local Plan No.4 and Redditch Housing Growth Study dated 14/05/13
- Birmingham City Council letter to Redditch Borough Council on Birmingham's Future Growth requirements dated 18/01/13
- Birmingham City Council letter to Redditch Borough Council confirming Cabinet Member approval of the earlier officer response on the emerging local plan dated 06/11/12
- Birmingham City Council letter to Redditch Borough Council on Birmingham's Future Growth requirements dated 08/08/12

BIRMINGHAM DEVELOPMENT PLAN

Duty to Co-operate

Local Planning Authorities and other bodies party to this agreement/ understanding:
A. Birmingham City Council (BCC) B. Redditch Borough Council (RBC)

Development Plan Document(s) covered by this agreement / understanding:
Birmingham Development Plan

Stage in the process forming part of this agreement:
Pre-Submission* *NB: In the event of any changes to the plan prior to submission and/or as part of modifications proposed during the Examination process then updated versions of this document may be prepared.

Checklist criteria NB: this is a starting point, list to be mutually agreed between the parties to this agreement. Checklist discussed and agreed: Yes/ No	Summary status E.g.: Full or partial agreement, / Shared understanding on area(s) of disagreement, or/ Not applicable Delete as appropriate	1. Summary of the approach in the plan 2. Summary of agreed position and any outstanding concerns or other comments NB: Refer to attachments and appendices if required
a) Overall approach incl. relationship to urban and rural renaissance	Agreed/ Shared Understanding/ Not-Applicable	<p>1. The vision, strategic objectives and approach set out in the BDP envisages that by 2031 Birmingham will be renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.</p> <p>Following around half a century of decline in the latter half of the C20 the city's population is expected to grow rapidly extending and building on the success of the strategy for urban renaissance that has been the hallmark of planning in the city since the 1980's.</p> <p>2. Following abolition of the Regional Spatial Strategy the City Council has worked and continues to work with adjoining authorities in the GBSLEP and West Midlands Metropolitan Area and beyond not only to ensure the continuing success of urban renaissance but also, through the GBSLEP</p>

		<p>Strategic Spatial framework Plan, the Strategic Policy Framework for the West Midlands Metropolitan Area and local plans, to ensure that there remains an appropriate balance between growth and development to meet needs in both urban and rural areas. There are no outstanding issues in relation to the strategy set out in the BDP between the parties signatory to this document.</p>
<p>b) Estimation of housing requirements and the level and distribution of housing provision</p>	<p>Agreed/ Shared Understanding/ Not Applicable</p>	<p>1. The Birmingham SHMA which underpins the BDP estimates a housing requirement of c80,000 net new dwellings in the period up to 2031. The 2012 SHLAA's best estimate of likely capacity without incursion into Green Belt (except at the site of the former Yardley Sewage Works) and including an allowance for c700 on land at Longbridge within Bromsgrove District is c45,000 dwellings, including allowance for windfalls. The Pre-submission version of the BDP proposes that 51,100 net new dwellings - should be provided including the removal of land from the Green Belt to increase capacity within Birmingham leaving a balance to be found outside the city's boundary of c29,000 dwellings.</p> <p>2. The major issues concern the scale of the housing requirement, the extent to which capacity exists or can be identified within Birmingham's boundary and then the scale and distribution of any resultant shortfall. The BDP sets out Birmingham City Council's position in respect of these matters and it is envisaged by the parties signatory to this document that the satisfactory resolution of these issues will strive to be achieved through (1) completion of the GBSLEP Strategic Housing Needs Study (2) Distribution of the overall housing need and the resultant 'overspill' housing through the Second Iteration of the GBSLEP Strategic Spatial Framework Plan and through arrangements negotiated with other authorities beyond the GBSLEP as justified by the evidence and (3) Subsequent accommodation of the 'overspill' growth in the review of Local Plans in adjoining areas. This approach is accepted by the parties signatory to this document.</p>
<p>c) Appropriate provision made for migration</p>	<p>Agreed/ Shared Understanding/</p>	<p>1. The Birmingham SHMA takes account of migration in establishing the overall housing requirement and, broadly speaking, the</p>

	Not Applicable	<p>effects of migration trends are then taken into account in the estimation of housing requirements in adjoining areas through the preparation of local plans.</p> <p>2. The identification of a housing shortfall or 'overspill' requirement refers to potential additional housing over and above that included in population and household projections that is needed outside Birmingham's boundary in order that housing needs can be met. The process for resolution of this matter is as set out in b)2 above. This approach is accepted by the parties signatory to this document.</p>
d) Level and distribution of employment land provision	Agreed/ Shared Understanding/ Not Applicable	<p>1. The BDP identifies a serious emerging shortfall of land to accommodate future employment growth and investment. The plan addresses this issue by protecting the city's core employment areas from competing uses so they offer a continuing supply of recycled land supplemented by the release of a major new employment site (80ha) at Peddimore. Proposals for six economic zones are primarily focussed within the existing employment areas and include two Regional Investment Sites. The possible longer-term need for further strategic employments sites is to be addressed by the GBSLEP Spatial Plan for Recovery and Growth and associated technical work with adjoining LEPs.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
e) Hierarchy of centres and the level and distribution of retail provision	Agreed/ Shared Understanding/ Not Applicable	<p>1. The BDP defines a retail hierarchy of centres in Birmingham. The approach in the BDP is to make provision for a net increase of 270,000 m² in comparison retail floorspace concentrated in the City Centre, Sutton Coldfield town centre and three District Growth Points. Growth elsewhere will be small scale.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
f) Level and distribution of office provision	Agreed/ Shared Understanding/ Not Applicable	<p>1. The approach in the BDP is to encourage 745,000 m² gross of new office development in the network of centres primarily focussed in the city centre including a substantial proportion of the new office floorspace</p>

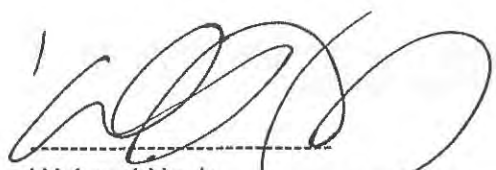
		<p>expected to be provided within the Enterprise Zone.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
<p>g) Appropriate provision made for public and private transport including Park & Ride and commuting patterns</p>	<p>Agreed/ Shared Understanding/ Not Applicable</p>	<p>1. The BDP incorporates a range of transport polices and proposals across all modes. These are consistent with the extant Local Transport Plan and emerging Birmingham Mobility Action Plan (BMAP). There are proposals to improve networks both within and beyond the boundary which will impact, for example, on modal choice for commuters including a scheme for enhancements to increase the frequency of service on the Redditch branch of the Cross-City line. Major development proposals close to the city boundary have impacts that can extend across the administrative boundary. Close cross-boundary co-operation on transportation matters continues through both West Midlands Shadow Integrated Transport Authority and the associated Local Transport Boards (LTB).</p> <p>2. There is no desire to increase the levels of in-commuting across the city boundary so there is an expectation that there will be a broad balance between the levels of housing and employment growth taking place in areas beyond the city boundary which is a matter to be addressed in the relevant local plans. This approach is accepted by the parties signatory to this document.</p>
<p>h) Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure</p>	<p>Agreed/ Shared Understanding/ Not Applicable</p>	<p>1. There is no common boundary between Redditch and Birmingham.</p> <p>2.</p>
<p>i) Green Belt matters</p>	<p>Agreed/ Shared Understanding/ Not Applicable</p>	<p>1. Significant changes to the Green Belt are proposed in association with major development proposals at Langley and Peddimore to the north-east of Birmingham and at the site of the former Yardley sewage works. The changes to the Green Belt boundary have been made in such a way as to identify new boundaries that will endure in the long-term and allow for development to</p>

		<p>be accommodated that will not undermine the essential purposes or integrity of the wider West Midlands Green Belt. The City Council acknowledge that additional land which is currently designated as Green Belt in adjoining areas may need to be identified for development – as a consequence of the process to determine the level and distribution of future growth set out under b)2 above - but the responsibility for those proposals, should they arise, will lie with the respective local planning authority (working collaboratively with other relevant authorities) to be determined through a review of the relevant local plan(s).</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
j) Minerals, waste and water resources including flooding	Agreed/ Shared Understanding/ Not-Applicable	<p>1. Redditch BC is not a minerals or waste planning authority. In respect of water resources and flooding the City Council is fully aware of its responsibilities and will vigorously pursue the principles of sustainable drainage to reduce the risks of flooding both within the city and beyond its boundaries.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
k) Air quality matters	Agreed/ Shared Understanding/ Not-Applicable	<p>1. The City Council is committed to the improvement of air quality for its residents and those in surrounding areas. It is, and will remain an active participant in initiatives to address these matters jointly with adjoining authorities and other agencies subject to the nature of actions being consistent with the city's aspirations for growth. Detailed policies on air quality and noise matters will be set out in a separate Development Management DPD.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
l) Any other matters that might reasonably be identified under the Duty to Co-operate	Agreed/ Shared Understanding/ Not-Applicable	<p>1. No other matters identified.</p> <p>2.</p>

Log of meetings, reports and other records to substantiate the collaborative working:

	Details:
Meetings	Meetings on the Birmingham Development Plan held on 2/11/12 and 18/02/14.
Groups	Regular meetings: (1) GBSLEP Planning Sub-Group (2) GBSLEP Spatial Planning Group (3) Development Management Group (4) West Midlands Planning Officers Group – Worcestershire LPAs connect to the group through the Worcestershire Planning Officers Group
Responses to consultation and correspondence	TBD – RBC response to the Birmingham Development Plan 2031 Pre Submission version 11/11/13 – BCC Response to Borough of Redditch Local Plan No.4 Proposed Submission 04/10/13 – BCC letter to RBC confirming the DtC met in relation to the Borough of Redditch Local Plan No.4 09/09/13 – RBC letter to BCC re Duty to Cooperate 27/08/13 – RBC letter to BCC re Borough of Redditch Local Plan No.4 29/07/13 – BCC letter to RBC on Birmingham’s Future Growth Requirements 14/05/13 BCC letter to RBC and Bromsgrove District Council re the Redditch Local Plan No.4 and Redditch Housing Growth Study 12/02/13 – RBC letter to BCC on Birmingham’s Future Growth requirements 18/01/13 – BCC letter to RBC on Birmingham’s Future Growth requirements 08/08/12 – BCC letter to RBC on Birmingham’s Future Growth requirements
Additional points	

We, the undersigned, agree that the above statements and information truly represent the joint working that has and will continue to take place under the ‘Duty to Co-operate’.



Waheed Nazir
Director of Planning & Regeneration
Birmingham City Council*

Date:



Redditch Borough Council*

Date: 10-4-2014

* Must be signed by either Council Leader or responsible Cabinet Member or responsible Chief Executive or Chief Officer only. For non-local authority organisations signatory should be at equivalent level.

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1000, Tuesday 18 February 2014, Redditch Borough Council Offices

Present:

Emma Baker – Redditch BC

Stacey Green – Redditch BC

David Carter – Birmingham City Council

Discussion

DC explained the background to and purpose of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if Redditch to any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

Each of the criteria were discussed in-turn. The criteria and wording were agreed subject to the following changes being agreed:

Under item b) two changes were agreed to reflect the relationship of the GBSLEP Strategic Housing Needs Study with the BDP and other Local Plans.

Under item g) an addition was agreed to reflect improvements to rail services on the Redditch branch.

It was agreed that item h) did not apply since there was no common boundary between Birmingham and Redditch.

Under item j) it was agreed to remove reference to minerals as Redditch BC was not the responsible authority for this topic.

It was agreed that DC would provide an amended version of the document, taking account of the agreed changes and adding the detail on correspondence etc. This would be sent to RBC for checking and subsequent signature by both authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

11th November 2013

Emma Baker
Development Plans
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8AH

Dear Sir/ Madam

Borough of Redditch Local Plan No.4 Proposed Submission

At the outset of this response the City Council wishes to place on record its view that collaboration both collectively and bi-laterally between the respective Councils in recent years has been very effective and there is every reason to believe this will continue to be the case.

Currently both Councils are working jointly with the seven other local authorities in the GBSLEP in the preparation of an innovative strategic spatial plan for the GBSLEP area which will help inform the future scale and pattern of future growth, setting a context for the review of local plans where this is found to be necessary and appropriate. As an integral part of the work on the spatial plan all nine local authorities within the GBSLEP have commissioned a Strategic Housing Needs Study which will look at growth over the next 20 years.

The City Council first notified adjoining authorities of an emerging housing shortfall in Birmingham in August 2012 and has been working hard to ensure this issue is shared with our neighbours and that a collaborative solution be sought. The joint working that is taking place is directed to achieving this outcome and until this is completed the City Council has not been able to determine the extent and distribution of any housing shortfall which it could request be taken forward by local plans. The City Council's reading of Government policy is that collaborative working is the way in which these matters should be addressed and the engagement should be continuous and on-going. This is the approach being taken within the GBSLEP but in a way which does not delay progress on taking forward emerging plans to adoption.

In responding to the earlier consultation on the pre-submission version of the local plan in May 2013 the City Council sought a strengthening of the references to the collaborative working:

"In respect of the Redditch No4 Local Plan, the City Council has no specific comments to make on the policies and proposals in the emerging plan save for a request that a reference be made in the emerging local plan referring to the active participation by Redditch Borough Councils in the commissioning of research into the strategic housing needs study and towards the resolution of longer term growth issues within the wider Birmingham housing market through ongoing work within the GBSLEP.

It is pleasing to report that ongoing discussions have led to agreement between the two Councils on the wording of paragraph 4 of the section under the Duty to Co-operate to which respond to, and satisfy the Council's concerns.

The City Council is also mindful of the progress being made between Bromsgrove and Redditch Councils to resolve the longstanding issue of housing growth to meet Redditch's needs that cannot be met within Redditch's administrative area and has separately made representations to Bromsgrove District Council supporting this approach.

In relation to provision of land for employment the City Council is supportive of the modest proposals in both Bromsgrove and emerging through the Stratford Local Plan to help meet the employment needs of Redditch. These proposals are supported since they address Redditch's tightly drawn administrative boundary.

Against this context the City Council would wish to express its support for the broad approach taken in relation to scale and pattern of growth included in both the Redditch Local Plan and those emerging for Bromsgrove and Stratford.

Yours faithfully



Waheed Nazir
Director of Planning and Regeneration
0121 464 7735

Date 04.10.2013

Emma Baker
Acting Development Plans Manager
Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
B98 8AH

Dear Emma

Duty to Co-operate

I refer to your letter dated 9 September 2013 regarding the Duty to Cooperate.

I would like to confirm my view that both of our authorities have and continue to be engaged in a positive and constructive fashion both bi-laterally and collaboratively through the work of the GBSLEP. The consultation draft of the Redditch Local Plan No 4 contains an agreed form of wording as set out in your letter of 27 August 2013 which responds to the emerging shortfall in housing provision emerging in Birmingham. I have no comments to make on the text of your letter of 9 September other than to point out that the dates in relation to the GBSLEP Housing Study have been updated in the final housing brief being used for procurement.

We will respond formally to your consultation in due course.

Yours sincerely



Waheed Nazir

Director of Planning and Regeneration
Birmingham City Council

mat/dave

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Waheed Nazir
Director of Planning & Regeneration
Planning and Regeneration
PO Box 28
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B1 1TU



9th September 2013

Dear Mr Nazir,

Duty to Cooperate

Redditch Borough Council and Birmingham City Council have been in close communication during the preparation of both Authorities' Plans and have had discussions regarding the Duty to Cooperate. In particular, our discussions and previous correspondence have focused on how the emerging Redditch Local Plan can assist in addressing the strategic housing issue facing your Authority.

In light of this and in order to prepare a sound evidence base to support both plans, a Duty to Cooperate Paper has been prepared which attempts to set out the strategic matter between our Authorities.

A copy of the issue between our Authorities has been included below. I would be grateful if you could consider this information and get back to me with any comments as soon as possible and ideally before the 20th September so that it can be available for public comment at the anticipated start of Redditch's Proposed Submission Consultation which is September 30th.

This letter is also responds to your letter of 29.7.13 to Ruth Bamford regarding Birmingham's Future Growth Requirements and what common issues there may be between the two Authorities. I accept that the checklist is broadly what would need to be considered in order for the strategic issues to be resolved.

Background to the Issue of meeting un-met housing needs from Birmingham

It is widely acknowledged that Birmingham has a significant unmet housing need that it cannot accommodate within its own boundaries. This was first identified in the West Midlands Regional Spatial Strategy Phase II Revision and subsequently from Birmingham's own evidence base. Birmingham has sought to find a solution to meeting their unmet housing needs across the conurbation area (and wider) through using the Duty to Cooperate legal requirement. However more recently the main mechanism for seeking a solution to identifying locations for meeting Birmingham's unmet housing need is through the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

Duty to Cooperate and Local Plans

With regard to the Duty to Cooperate, correspondence has been exchanged between Birmingham and Redditch, with Birmingham seeking assistance from many adjoining authorities to meet their unmet need. For context, clear evidence exists in the Redditch Local Plan Evidence Base and in the WMRSS Phase II Revision Panel Report, that Redditch has limited capacity to even meet its own development needs for both housing and employment. Redditch is only capable of meeting its own development needs through cross-border developments within neighbouring authorities. Therefore, this demonstrates that Redditch are unable to meet development needs of a wider area such as Birmingham, directly.

However, with regard to assisting Birmingham in seeking a resolution to the issue, Redditch have been preparing Local Plan No.4 with this issue in mind. Correspondences have been exchanged between Birmingham and Redditch to ensure that there is appropriate content within the Local Plan regarding this issue. It has been clearly acknowledged through locally produced evidence and the Panel Report to the WMRSS that Redditch does not have capacity. The Local Plan does acknowledge this issue may need to be dealt with during the preparation of the next Redditch Local Plan (i.e. the next plan period or when further allocations for Redditch are required), or when a review of the development plan may be needed to consider these cross boundary matters when more information is known about the exact requirements.

At this stage it is too early to prepare an effective policy to address this matter as too little information is known. However an agreement on a joint approach is currently considered to be the most suitable way forward. Therefore, the wording within the emerging Redditch Local Plan has been prepared in consultation with Birmingham. Initially this was based on wording that was agreed with other Local Authorities (such as Cannock and Solihull) but with a view to seeking agreement on the exact content of the plan with Birmingham.

Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)

As well as the Duty to Cooperate the GBSLEP are assisting in providing a solution to meeting the unmet housing needs of Birmingham. The GBSLEP was set up in October 2010 to help strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The Partnership is formed of Birmingham, Solihull, East Staffordshire, Lichfield, Tamworth, Bromsgrove, Cannock Chase, Wyre Forest and Redditch.

In order to address the significant housing land supply issues facing Birmingham, the GBSLEP have commissioned a piece of work. It will consider the options for increasing the supply of land for housing and employment development within the city boundary and will also include a consideration of Green Belt options.

As a member of the GBSLEP, Redditch has been involved in this work. Redditch alongside all other Authorities involved were involved within adapting and refining to brief so that it was fit for purpose. In particular some authorities raised concerns about the first brief and its confusion at being a full Strategic Housing Market Assessment, a Housing Growth Study focusing on Birmingham needs, or a Green Belt Review. It was felt that if the study comprised a Green Belt

review, then the scope needed extensive detail. Since then the remit of the study has been agreed and work is progressing on this study. This study is due for completion in November 2013. It will be for the GBSLEP to decide on next steps will regard to implementing any recommendations that may come through this study.

It is considered that until further detail is known resulting from the emerging Housing Study no further detail can be added into the Redditch Local Plan, as this could quickly become factually inaccurate. However, Officers from both Authorities (as stated above) are working closely together to ensure that an appropriate solution for Birmingham's housing land supply is addressed and the appropriate wording contained with the plan.

West Midlands Regional Spatial Strategy (WMRSS) Phase II Review

By way of background to Redditch's status in the Region, the West Midlands Regional Spatial Strategy (WMRSS) Phase II Review Examination in Public (EiP) and subsequent Panel Report explored the spatial implications of housing in the region. This included the distribution of growth between Major Urban Area's (MUA's), Settlements of Significant Development and other large settlements.

Historically migration has been an issue in the Region, particularly the continuing decline in the MUAs, extensive development outside them and out-migration from the MUAs to the shire areas.

The "step change" sought by the WMRSS was to reverse these trends by placing a new emphasis on urban renaissance, focussing development and regeneration in the MUAs and stemming the loss of population and jobs to the shire areas. The key features of the spatial strategy were to concentrate development on the MUAs, including focussing development in and adjacent to towns which are most capable of balanced and sustainable growth. In line with this the West Midlands Regional Assembly (WMRA) and local authorities (both within the MUAs and in the shires), made representations to the Panel, that providing more housing in areas of high demand outside the MUAs would encourage out-migration. This would undermine the urban renaissance strategy.

Ten towns were identified as 'Settlements of Significant Development' (SSDs) (towns which are regarded as most capable of balanced and sustainable growth to complement the role of the MUAs). The needs of the MUAs were acknowledged and it was recognised that the region would not be able to channel all its economic growth and development needs solely into the MUAs. The large parts of the Metropolitan area (i.e. Birmingham and Solihull) simply do not have the physical capacity to accommodate all the needs they generate. It must also be recognised that many towns outside the MUAs are substantial urban areas in their own right, with their own housing and economic development needs.

The WMRA defended their reasoning as they suggested that the designation of SSDs recognised the reality that sufficient capacity could not be found solely within the MUAs. Therefore the SSDs were selected for additional growth as they are much further from the MUA than most of the former crescent towns to which overspill had been encouraged in the past.

With regard to Redditch, there was general opposition to Redditch being designated as a SSD. This was acknowledged by the WMRSS Inspector. Firstly, Redditch is a former New Town where overspill was acceptable and the SSD designation could be seen as having connotations of continued migration. This is contrary to the spatial strategy of securing urban renaissance within the MUAs. Secondly, Redditch can only meet its own local development needs through cross-border developments within neighbouring authorities. Therefore it should not be given a designation that implies an expectation of meeting development needs of a wider area. Accordingly Redditch was omitted from the list of SSDs (WMRSS Panel Report Recommendation R2.10) as it was not appropriate for Redditch to perform any other role than meeting its own natural growth.

In addition, the Panel Report stated that it would be perverse to make such provision on the edge of Redditch as that would entail longer distance commuting (paragraph 8.80 of the Panel Report). However, with regard to locations that may serve commuters to Birmingham, it is considered that

north Redditch would be most obviously located to serve car-borne commuters to Birmingham and the Black Country.

Network Rail has recently completed the Examination in Public into the Redditch Branch Enhancement Scheme, which seeks to increase the train service from Redditch to Birmingham (and vice versa) to three trains per hour instead of two. Therefore, there are new investments in public transport provision in this area, which may support commuting to the conurbation by more sustainable modes.

Options and outcome for dealing with the Issue of meeting un-met needs from Birmingham

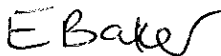
Various capacity work has been completed which considers how Redditch can address its own local housing need. It is clear from this evidence there are no options within Redditch to meet some of Birmingham's unmet housing need. However, Redditch has continued to work alongside Birmingham to complete the housing study being prepared by the GBSLEP and to progress the Redditch Local Plan. The Local Plan will contain an appropriate acknowledgement that seeks to consider this issue further in the future, if it is deemed Redditch is able to assist in providing a solution.

Summary

The unmet housing need from Birmingham is an issue that has been recognised and dealt with appropriately at this stage in the Redditch Local Plan although the actual location for this is not yet resolved. Through the progression of the Redditch Borough Local Plan No.4 and as an active member of the GBSLEP it is felt that at this stage Redditch is actively working with Birmingham to seek as solution to this problem. The Local Plan contains a commitment to assisting with the issue once the evidence is available and therefore it is felt that the Borough Councils Duty to Cooperate with Birmingham is being fully met and the solution is effective.

If you do have any comments on the above text to be included within the 'Borough of Redditch Statement of Compliance with the Duty to Cooperate' please could you let me have them by the 20th September.

Kind regards



Emma Baker
Acting Development Plans Manager

Redditch Borough Council

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Waheed Nazir
Director of Planning & Regeneration
Planning and Regeneration
PO Box 28
Birmingham
B1 1TU



27th August 2013

Dear Mr Nazir,

RE: Redditch – Draft Local Plan No.4

Thank you for your letter sent 8th August 2013. Your concern within the letter was regarding the text within the previous draft of Redditch Local Plan No.4. You felt the wording was not unequivocal in its commitment to the joint technical work and requested further clarification within the plan. Following your request I can confirm that the text within the plan has been amended to:

Duty to Cooperate

[Paragraph 4]

“In addition, Redditch has worked with other Local Authorities, which although are not directly adjacent to Redditch may have strategic matters that have implications for the preparation of the Local Plan. In particular, Redditch Borough Council and Birmingham City Council have jointly acknowledged there is strategic planning matter with regard to Birmingham being unable to accommodate all of its own housing needs. This issue may will need to be dealt with during the preparation stage of the next Redditch Local Plan (i.e. the next plan period), or when a review of the development plan may be needed to consider these cross boundary matters. *This will be dependent on the outcome of recently commissioned work to understand the issues, and further work on allocations for Birmingham’s growth.* The mechanism for dealing with this would be through the Greater Birmingham and Solihull Local Enterprise Partnership (LEP).”

I would also like to remind you that subject to Council approval on 9th September, the Proposed Submission version of Redditch Local Plan No.4 will be available for comment from the 30th September until the 11th November.

Kind regards

Emma Baker
Acting Development Plans Manager



Ruth Bamford
Head of Planning and Regeneration
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8HA

Date: 29.07.13

Dear Ruth,

Birmingham's Future Growth Requirements

It is now almost a year since I first wrote to you to draw attention to the challenge that Birmingham faces in meeting its future requirements for new housing.

I believe that we have made significant progress over the past 12 months in developing an approach which will enable this challenge to be addressed in a planned way, and I am grateful for your support in taking this forward

You will recall that at the end of last year the City Council undertook a further round of consultation on options for increasing the supply of land for housing and employment development within the city boundary, including a consideration of green belt options. This consultation generated a substantial number of comments, and we have subsequently commissioned additional technical work in response to this.

This work is now nearing completion, and the next step in the process will be the publication of the pre-submission version of the Birmingham Development Plan. We expect to secure Council authorisation for this in the autumn.

We are, of course, already taking into account any comments that your Council made at earlier stages in the process – but I would like to provide you with a further opportunity to raise with us any issues that you feel that we need to take into consideration in finalising the Plan. In this respect I am conscious that our focus over the past 12 months has been very much on the housing challenge, and that there may be other issues of importance that we also need to consider. I have attached a checklist of matters that may be of common concern and if there are any outstanding concerns I would be grateful if you could identify them.

As ever, we would be happy to meet with you to discuss any issues or concerns that you may have. If you would like to meet in the first instance please liaise with David Carter, Head of Planning and Growth Strategy (email: david.r.carter@birmingham.gov.uk tel: 0121 303 4041)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration



Birmingham City Council

Checklist of matters which you may be of common interest and which reasonably might be covered by the Duty to Co-operate.

1. Overall approach including the relationship to urban and rural renaissance
2. Estimation of housing requirements and the level and distribution of housing provision
3. Appropriate provision made for migration
4. Level and distribution of employment land provision
5. Level and distribution of office provision
6. Level and distribution of retail provision
7. Appropriate provision made for public and private transport including Park & Ride and commuting patterns
8. Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure
9. Green Belt matters
10. Minerals, waste and water resources including flooding
11. Air quality matters
12. Any other matters that might reasonably identified.

Planning and Regeneration
Bromsgrove Borough Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Development Plans,
Redditch Borough Council,
Walter Stranz Square,
Redditch
B98 8AH

14 May 2013

Dear Sir/Madam

Redditch Local Plan No 4 and Bromsgrove and Redditch Housing Growth Study

The City Council would like to thank you for the opportunity to comment on the above documents.

In respect of the Redditch No4 Local Plan, the City Council has no specific comments to make on the policies and proposals in the emerging plan save for a request that a reference be made in the emerging local plan referring to the active participation by Redditch Borough Councils in the commissioning of research into the strategic housing needs study and towards the resolution of longer term growth issues within the wider Birmingham housing market through ongoing work within the GBSLEP.

In relation to the Bromsgrove and Redditch Housing Growth Study the City Council notes that this report is, in effect, a technical report analysing Green Belt sites on the edge of Redditch and resulting in a preferred option to meet Redditch's needs up to 2030. The City Council notes that this report addresses longstanding issues on the direction of Redditch's future growth that cannot be met with the administrative area of Redditch. The fact that this issue has been addressed is to be welcomed but the choice of sites is not something in itself that we would want to take a view on. It is assumed that the outcome of the consultation will be to incorporate proposals for the appropriate level of growth in due course within the Bromsgrove Local Plan.

In relation to the Bromsgrove Local Plan the City Council's principle interest will be in examining how land within Bromsgrove might contribute to meet the housing shortfall emerging in Birmingham to meet needs up to 2031 and beyond. In this respect it is noted that the Worcestershire Strategic Housing Market Assessment did not consider these wider growth issues. It is important that this observation should not be taken as a criticism of that study but rather as a matter of fact which needs to be dealt with in an appropriate fashion.

At the present time the scale and future distribution of any shortfall in housing provision to meet Birmingham's needs has yet to be determined and to this end Bromsgrove District Council is also pro-actively involved in the commissioning of collaborative work to establish the scope to which land in Bromsgrove may be required to address this issue. On the assumption that this collaborative working continues then the City Council will be looking at the Bromsgrove Local Plan when it emerges to ensure the Birmingham's long term development requirements have been protected.

In the event it is not possible for the Bromsgrove Plan to fully reflect the scale of development required up to 2031 – including that which might be required to meet needs arising outside of Bromsgrove and Redditch - then the City Council will be anticipating that the Plan will follow the approach in the Solihull Core Strategy and include an unequivocal commitment to see the collaborative working completed and to agree to reflect its conclusions in an early review of the plan and to recognise that this may require a review of the Green Belt in the areas additional to those already examined in the vicinity of Redditch.

I hope that our authorities will continue to work collaboratively on these issues in the months ahead and we will be happy to meet with you jointly and bi-laterally for further discussions on our respective emerging plans and the associated evidence base.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration

Ruth Bamford
Head of Planning and Regeneration
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8HA

Date: 18 January 2013

Dear Ruth,

Birmingham's Future Growth Requirements

I am writing following our recent correspondence and meeting in relation to the likely scale of future growth in Birmingham and how this might be taken forward under the new planning system.

As you will be aware, the recently completed Strategic Housing Market Assessment for Birmingham has concluded that there is likely to be a substantial shortfall in housing provision within the city up to 2031. We are currently completing a consultation on options for increasing the supply of land for development within the city boundary, including a consideration of green belt options – but it is clear that even if we adopt such an option, we will still be facing a significant shortfall.

I am grateful for your recognition of the need to address this challenge and for your support for the development of an agreed response through the collaborative work of the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership.

I would re-emphasise that in addressing this issue we do not wish to put in jeopardy local planning work which is already well-advanced and nearing completion but we do feel that it is necessary for us all to be demonstrating a clear commitment to undertake the joint work which will be required to enable a planned response to be put in place and to bring forward any consequent revisions to our development plans as soon as practicable thereafter.

We also recognise that authorities are in different positions in terms of their individual development planning work. Where Core Strategies have already been put in place, the issue will need to be picked up in future review processes.

Where plans are still in preparation we are looking for an explicit acknowledgement of the issue within the emerging plan. This should:

- Recognise that evidence is emerging that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011 – 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs.
- Include a commitment to work collaboratively with Birmingham and other authorities within the Greater Birmingham and Solihull Local Enterprise Partnership and/or the West Midlands Joint Committee to establish objectively the level of long term growth through joint commissioning of a Strategic Housing Market Assessment and work to establish the scale and distribution of any emerging housing shortfall.
- Recognise that in the event that it is demonstrated that there is a need for further housing provision in your area this will be addressed through a review of the Development Plan.

In some cases the Council has already made representations on emerging plans to this effect.

I hope that we can continue to work collaboratively on these issues – and I am of course always happy to meet with you to discuss any issues arising in more detail.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration

11th November 2013

Emma Baker
Development Plans
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8AH

Dear Sir/ Madam

Borough of Redditch Local Plan No.4 Proposed Submission

At the outset of this response the City Council wishes to place on record its view that collaboration both collectively and bi-laterally between the respective Councils in recent years has been very effective and there is every reason to believe this will continue to be the case.

Currently both Councils are working jointly with the seven other local authorities in the GBSLEP in the preparation of an innovative strategic spatial plan for the GBSLEP area which will help inform the future scale and pattern of future growth, setting a context for the review of local plans where this is found to be necessary and appropriate. As an integral part of the work on the spatial plan all nine local authorities within the GBSLEP have commissioned a Strategic Housing Needs Study which will look at growth over the next 20 years.

The City Council first notified adjoining authorities of an emerging housing shortfall in Birmingham in August 2012 and has been working hard to ensure this issue is shared with our neighbours and that a collaborative solution be sought. The joint working that is taking place is directed to achieving this outcome and until this is completed the City Council has not been able to determine the extent and distribution of any housing shortfall which it could request be taken forward by local plans. The City Council's reading of Government policy is that collaborative working is the way in which these matters should be addressed and the engagement should be continuous and on-going. This is the approach being taken within the GBSLEP but in a way which does not delay progress on taking forward emerging plans to adoption.

In responding to the earlier consultation on the pre-submission version of the local plan in May 2013 the City Council sought a strengthening of the references to the collaborative working:

"In respect of the Redditch No4 Local Plan, the City Council has no specific comments to make on the policies and proposals in the emerging plan save for a request that a reference be made in the emerging local plan referring to the active participation by Redditch Borough Councils in the commissioning of research into the strategic housing needs study and towards the resolution of longer term growth issues within the wider Birmingham housing market through ongoing work within the GBSLEP.

It is pleasing to report that ongoing discussions have led to agreement between the two Councils on the wording of paragraph 4 of the section under the Duty to Co-operate to which respond to, and satisfy the Council's concerns.

The City Council is also mindful of the progress being made between Bromsgrove and Redditch Councils to resolve the longstanding issue of housing growth to meet Redditch's needs that cannot be met within Redditch's administrative area and has separately made representations to Bromsgrove District Council supporting this approach.

In relation to provision of land for employment the City Council is supportive of the modest proposals in both Bromsgrove and emerging through the Stratford Local Plan to help meet the employment needs of Redditch. These proposals are supported since they address Redditch's tightly drawn administrative boundary.

Against this context the City Council would wish to express its support for the broad approach taken in relation to scale and pattern of growth included in both the Redditch Local Plan and those emerging for Bromsgrove and Stratford.

Yours faithfully



Waheed Nazir
Director of Planning and Regeneration
0121 464 7735

08th August 2012

Ruth Bamford
Head of Planning and Regeneration
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8HA

Dear Ruth,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.

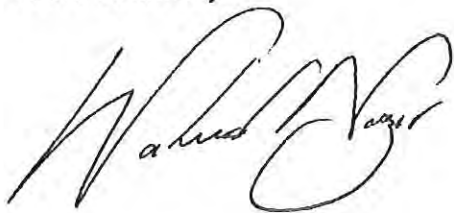
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

APPENDIX 10

Solihull - Package of documentation relating to the Duty to Co-operate

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- Solihull MBC response to the Birmingham Development Plan 2031 Pre Submission version submitted online 03/03/14
- Action note of meeting held under the Duty to Co-operate on 27/02/14
- Birmingham City Council response to Solihull Draft Local Plan - Shaping a Sustainable Future - Local Development Framework - Examination - Main Modifications July 2013 dated 22/08/13
- Birmingham City Council letter to Solihull MBC on Birmingham's Future Growth Requirements dated 29/07/13
- Solihull MBC response to Birmingham Development Plan – Planning for Birmingham's Growing Population Options Consultation dated 11/01/13
- Birmingham City Council letter to Solihull MBC on Birmingham's Future Growth Requirements & the Solihull Local Plan dated 13/12/12
- Birmingham City Council letter to Solihull MBC on Birmingham's Future Growth Requirements & the Solihull Local Plan dated 07/12/12
- Birmingham City Council letter to Solihull MBC on Birmingham's Future Growth requirements dated 08/08/12
- Solihull MBC response to Birmingham City Council on Birmingham's Future Growth requirements dated 24/10/12
- Solihull MBC response to Birmingham Core Strategy 2026 – Consultation Draft dated 17/03/11
- Solihull MBC response to Birmingham Core Strategy 2026 – Issues and Options dated 24/10/08

Solihull MBC comments on the BDP Submission versions 03 March 2014

Duty to Co-operate

The Council is content that the City Council has met the Duty to Cooperate as far as Solihull is concerned

The City Council has already informed the Council of the likely shortfall in housing land supply through joint working for the GBSLEP and Metropolitan Authorities areas in accordance with the Duty to Cooperate. Discussions have also been held bilaterally with City Council officers. As a result, the Solihull Local Plan, which the Council adopted in December 2013, makes clear that the outcome of the Strategic Housing Needs work and the growth strategy for the GBSLEP area will provide a high level context for reassessing the Solihull Strategic Housing Market Area Assessment. In the event that further housing provision is needed in Solihull, the Local Plan indicates that a review of the green belt in relevant locations may be required, and that a review of the Local Plan will be brought forward to address the housing need

Legal Compliance

The Council is content that the Birmingham Development Plan is legally compliant and sound.

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1630, Thursday 27 February 2014, Birmingham City Council Offices, 1 Lancaster Circus

Present:

Ken Harrison – Solihull MBC

Maurice Barlow – Solihull MBC

David Carter – Birmingham City Council

Discussion

DC explained the background to and purpose of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if Solihull wanted any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

Each of the criteria were discussed in-turn and it was agreed. The criteria and wording were discussed and the following agreed:

Under item c) KH to consider the use of the expression 'broadly speaking'.

Under item g) KH to liaise with Dave Strang.

Under item h) KH to check the relationship of cross boundary initiatives such as the Cole Valley Cycleway.

Under item j) MB to consider.

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc. This would be sent to KH/MB for checking and amendment and subsequent signature by both authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

Date: 22 August 2013

Policy and Spatial Planning
Solihull Council
Council House
Manor Square
Solihull
B91 9QB

Dear Sir/Madam,

Solihull Draft Local Plan – Shaping a Sustainable Future – Local Development Framework – Examination- Main Modifications July 2013

Thank you for consulting Birmingham City Council on modifications to the above document. We welcome the opportunity to comment.


The City Council supported the overall approach in the Solihull Local Plan – Shaping a Sustainable Future, but has raised issues regarding the inclusion of an acknowledgement in the Plan of the potential need for a Review should work being undertaken through the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) conclude that there is a requirement for housing provision to be made in Solihull to meet requirements generated within Birmingham.

The City Council notes that in his Interim Conclusions (para 18) the inspector has recognised and supported this approach and that this is taken forward in Proposed Modification number 20. This Modification satisfies the Council's concerns.

Significant progress is being within the GBSLEP area in taking forward a new Spatial Plan for Recovery and Growth. This Spatial Plan will provide the context for the review of the Solihull Local Plan and will be informed by a new strategic housing study which is being procured by Solihull Council on behalf of the GBSLEP authorities.

The City Council would therefore like to put on record its support for the Main Modifications made as a result of the Inspector's Interim Conclusions.

Yours faithfully,


Waheed Nazir
Director of Planning and Regeneration



Paul Watson
Strategic Director
Places Directorate
Council House
Solihull
West Midlands
B91 3QT

Date: 29.07.13

Dear Paul

Birmingham's Future Growth Requirements

It is now almost a year since I first wrote to you to draw attention to the challenge that Birmingham faces in meeting its future requirements for new housing.

I believe that we have made significant progress over the past 12 months in developing an approach which will enable this challenge to be addressed in a planned way, and I am grateful for your support in taking this forward

You will recall that at the end of last year the City Council undertook a further round of consultation on options for increasing the supply of land for housing and employment development within the city boundary, including a consideration of green belt options. This consultation generated a substantial number of comments, and we have subsequently commissioned additional technical work in response to this.

This work is now nearing completion, and the next step in the process will be the publication of the pre-submission version of the Birmingham Development Plan. We expect to secure Council authorisation for this in the autumn.

We are, of course, already taking into account any comments that your Council made at earlier stages in the process – but I would like to provide you with a further opportunity to raise with us any issues that you feel that we need to take into consideration in finalising the Plan. In this respect I am conscious that our focus over the past 12 months has been very much on the housing challenge, and that there may be other issues of importance that we also need to consider. I have attached a checklist of matters that may be of common concern and if there are any outstanding concerns I would be grateful if you could identify them including any issues in relation to minerals, waste management and transportation that you feel we should be addressing.

As ever, we would be happy to meet with you to discuss any issues or concerns that you may have. If you would like to meet in the first instance please liaise with David Carter, Head of Planning and Growth Strategy (email: david.r.carter@birmingham.gov.uk tel: 0121 303 4041)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning & Regeneration



Birmingham City Council

Checklist of matters which you may be of common interest and which reasonably might be covered by the Duty to Co-operate.

1. Overall approach including the relationship to urban and rural renaissance
2. Estimation of housing requirements and the level and distribution of housing provision
3. Appropriate provision made for migration
4. Level and distribution of employment land provision
5. Level and distribution of office provision
6. Level and distribution of retail provision
7. Appropriate provision made for public and private transport including Park & Ride and commuting patterns
8. Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure
9. Green Belt matters
10. Minerals, waste and water resources including flooding
11. Air quality matters
12. Any other matters that might reasonably identified.



Director for Planning and Regeneration
Development Directorate
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

PLACES DIRECTORATE

Policy & Spatial Planning
Council House, Manor Square
Solihull West Midlands B91 3QB
Tel: 0121 704 6394
Fax:
Email: dsimpson@solihull.gov.uk
www.solihull.gov.uk

Please ask for: Dave Simpson

Date: 11th January 2013

Dear Sir or Madam

Draft Birmingham Development Plan – Options Consultation

Solihull Council has considered your options consultation on the Birmingham Draft Local Plan and would make the following comments.

Within the consultation document the most significant issue is one of housing requirement. Birmingham has identified a potential shortfall of land to meet its future housing needs within the authority's boundaries. This would inevitably have implications for Solihull and other neighbouring authorities. Although reference is made in the document to working with neighbouring authorities to share some of their housing requirement, no further detail is provided.

This Council has already identified its housing requirement in the draft Local Plan which is currently under examination by an Independent Inspector and would not wish to change its position or delay the adoption of the submitted Solihull Local Plan which is essential to the proper and effective delivery in the short term of objectively assessed levels of growth and development.

The shortfall identified cannot be looked at in isolation and the scale of the issue needs to be better understood as well as what options might be considered for the long term. Birmingham has already contacted neighbouring authorities to consider the way forward. It should be emphasised that this isn't just a Birmingham Solihull issue but a broader issue across the West Midlands.

Further, the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) is seeking to establish objectively, through the preparation and approval of a Spatial Framework, the scale of long term growth required to meet the LEP's needs and aspirations, the potential directions and broad locations for future growth before settling on a preferred strategy following appropriate stakeholder and partner engagement. A timetable has been agreed by the GBSLEP which anticipates an agreed spatial framework being formally in place by 2014. This work is maintaining and gathering momentum.

Continued

Once completed, actions as a consequence of the provisions of the approved GBSLEP spatial framework could be taken forward through the development plan process. Until this process has been completed, there is insufficient information on the scale and broad location of growth that will be required to enable the Council to respond in detail and it would be wrong to prejudge its outcome.

It is recognised that this is a matter that will need to be dealt with as part of a subsequent review of the Local Plan and through the work carried out by the GBSLEP which should be supported and endorsed by this Council.

It was agreed therefore in response to the consultation that any shortfall in housing identified by Birmingham City Council projecting forward to 2031 should not be considered in isolation or in the short term but as part of the wider sub region and through the work of the GBSLEP in preparing and approving a spatial framework to promote and guide development across the LEP area and beyond.

I have attached a copy of the report.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D Simpson', written in a cursive style.

Dave Simpson
Policy & Spatial Planning Manager
Places Directorate
Solihull MBC

SOLIHULL METROPOLITAN BOROUGH COUNCIL

Report to:	Full Cabinet
Meeting date:	20 December 2012
Report from:	Cabinet Member for Economic Development and Regeneration
Report Author/Lead Contact Officer:	Dave Simpson
Wards affected:	All Wards
Public/Private report:	Public
Exempt by virtue of Paragraph:	N/A of Schedule 12A of the Local Government Act 1972.

Subject/Report Title:

DRAFT BIRMINGHAM DEVELOPMENT PLAN - OPTIONS CONSULTATION

1. Purpose of Report

1.1 To advise Cabinet of the publication of the Draft Birmingham Development Plan Options consultation and to agree a response

2. Decision(s) Recommended

2.1 The Cabinet is asked to

- (a) Note the content of the consultation and the possible implications of a shortfall in housing in Birmingham,
- (b) Agree in response to the consultation that any shortfall in housing identified by Birmingham City Council projecting forward to 2031 should not be considered in isolation or in the short term but as part of the wider sub region and through the work of the GBSLEP in preparing and approving a spatial framework to promote and guide development across the LEP area,
- (c) Agree paragraphs 4.1 to 4.6 as the basis for our response to the consultation.

3. Background

3.1 At the same time that this Council has been preparing its own Development Plan, the Solihull LDF Draft Local Plan, Birmingham City Council has been carrying out a similar process and over a similar time frame. The last iteration of their emerging development plan The Birmingham LDF Core Strategy was reported to the Cabinet Member for Economic Development and Regeneration on the 15 March 2011

- 3.2 Once adopted, the Birmingham Development Plan will set out the statutory planning Framework to guide decisions on development and regeneration in Birmingham until 2031. It will set out how and where the homes, jobs, services and infrastructure will be delivered and the type of places and environment Birmingham wish to create.
- 3.3 The publication of the Office of National Statistics revised population projections suggest that Birmingham's population will grow by up to 150,000 between 2011 and 2031. On the basis of these latest population and household projections Birmingham's Strategic Housing Market Assessment concluded that the number of households in the City would need to increase by around 80,000 over the period to 2031. This level of need goes beyond that which was proposed and planned for by the Birmingham LDF Draft Core Strategy 2010 (50,600 new homes).
- 3.4 These future projections for the City's population coupled with the increase in population from the Census results have led Birmingham City Council to reconsider how they can Plan for the future and deliver the homes and jobs that they need in the most sustainable way. This significant challenge has led to the production of this consultation document which considers ways of increasing the supply of land for new housing and employment. The key points of the document are identified in the following paragraphs.
- 3.5 Birmingham's proposed strategy for housing is to provide as much new housing as possible in the urban area (43,000 dwellings) with the potential for an additional 2,000 to 3,000 dwellings on other land currently in the urban area that no longer performs its original function including some open space. As a result there is likely to be a shortfall of land to accommodate in the region of 35,000 dwellings to meet Birmingham's needs.
- 3.6 To meet this shortfall Birmingham are considering the potential for development on the edge of the City on land currently in the Green Belt and more specifically to the north east of the City, east of Sutton Coldfield and well to the north of the M6 and the Solihull boundary and where a series of site options have been put forward. Birmingham are suggesting an anticipated range of between 5,000 to 10,000 dwellings could be accommodated there. This would still leave a shortfall of up to 25,000
- 3.7 In addition to considering options within Birmingham the options document also makes reference to working proactively with neighbouring authorities, including Solihull, to share the distribution of its housing requirements. The document confirms this would be done through the Duty to Cooperate, a statutory requirement of the National Planning Policy Framework (NPPF) to work together to address planning issues which go beyond individual authority boundaries,.
- 3.8 Also ,in order to ensure a suitable supply of employment land an assessment of the existing offer and the land needed to meet the needs of investors in the growth sector recommended that a large strategic site of at least 50 hectares should be identified. Options again were limited to Green Belt land to the north east of Birmingham east of Sutton Coldfield within the same green belt locations as the housing options As per the housing debate this might be expected to be a matter for consideration through the GBSLEP Spatial Framework and to be informed through associated evidence including the M42 Gateway study.
- 3.9 Also within the document Birmingham are highlighting that a thriving network of centres will be a significant driver for growth and central to delivering new office and retail development to support communities. Within the network of centres the priority

is to promote retail and office development within the defined centres and resist development that would undermine the strength of the network. This network comprises the City centre, Sutton Coldfield Town Centre the centres of Perry Barr, Selly Oak and Meadway along with a network of some 70 other district and neighbourhood centres.

- 3.10 The options consultation also makes reference to improving connectivity by providing the necessary infrastructure and includes references to the redevelopment of New Street Station, the continued expansion of Birmingham Airport and the expected development of HS2, improvements to the rail network and the light rapid transport system, investment to help reduce car dependency and encourage the use of public transport and the availability throughout the City of digital networks.
- 3.11 The consultation documents are available for viewing on the Birmingham City Council website at www.birmingham.gov.uk/plan2031 Paper copies are available in the Members resource area
- 3.12 The closing date of the consultation is the 14 January 2013.
- 3.13 The outcome of the consultation along with previous work and comments made during past consultations will inform the final version of the Birmingham Development plan which will be consulted on in 2013 prior to submission to the Secretary of State for a formal examination in 2014.

4. Implications for Solihull

- 4.1 Within the consultation document the most significant issue is one of housing requirement. Birmingham has identified a potential shortfall of land to meet its future housing needs within the authority's boundaries. This would inevitably have implications for Solihull and other neighbouring authorities. Although reference is made in the document to working with neighbouring authorities to share some of their housing requirement, no further detail is provided.
- 4.2 This Council has already identified its housing requirement in the draft Local Plan which is currently under examination by an Independent Inspector and would not wish to change its position or delay the adoption of the submitted Solihull Local Plan which is essential to the proper and effective delivery in the short term of objectively assessed levels of growth and development.
- 4.3 The shortfall identified cannot be looked at in isolation and the scale of the issue needs to be better understood as well as what options might be considered for the long term. Birmingham has already contacted neighbouring authorities to consider the way forward. It should be emphasised that this isn't just a Birmingham Solihull issue but a broader issue across the West Midlands.
- 4.4 Further, the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) is seeking to establish objectively, through the preparation and approval of a Spatial Framework, the scale of long term growth required to meet the LEP's needs and aspirations, the potential directions and broad locations for future growth before settling on a preferred strategy following appropriate stakeholder and partner engagement. A timetable has been agreed by the GBSLEP which anticipates an agreed spatial framework being formally in place by 2014. This work is maintaining and gathering momentum.
- 4.5 Once completed, actions as a consequence of the provisions of the approve

GBSLEP spatial framework could be taken forward through the development plan process. Until this process has been completed, there is insufficient information on the scale and broad location of growth that will be required to enable the Council to respond in detail and it would be wrong to prejudge its outcome.

- 4.6 It is recognised that this is a matter that will need to be dealt with as part of a subsequent review of the Local Plan and through the work carried out by the GBSLEP which should be supported and endorsed by this Council.

5. Scrutiny

- 5.1 The Draft would be scrutinised by the Overview and Scrutiny Management Board

6. Implications

- 6.1 **Policy/Strategy Implications** – any possible implications for the Local Plan would be addressed through the duty to cooperate and the ongoing work of the GBSLEP
- 6.2 **Meeting the duty to involve** - Duty to cooperate would be exercised as part of the ongoing LEP work
- 6.3 **Financial Implications** – none as a direct result of this report
- 6.4 **Legal implications** – none as a direct result of this report
- 6.5 **Risk Implications** - The corporate risk management approach has been complied with to identify and assess the significant risk associated with this decision. This includes political, legislation and reputation risk
- The approach is not intended to eliminate all risks and not all risks identified can be managed all of the time. Also risks will still exist that have not been identified
- This assessment identified that there are no net red risks that need to be reported
- 6.6 **Fair Treatment Assessment** – not applicable
- 6.7 **Carbon Management/Environmental** – not applicable
- 6.8 **Partner Organisations** – Partners in the GBSLEP would be involved as part of the Duty to Cooperate
- 6.9 **Safeguarding/Corporate Parenting Implications** – not applicable
- 6.10 **Customer Impact** – none as a direct result of this report
- 6.11 **Other implications** – non identified

7. List of Appendices Referred to

- 7.1 None

8. Background Papers Used to Compile this Report

- 8.1 Birmingham Development Plan – Options Consultation December
- 8.2 Birmingham LDF Core Strategy Consultation Draft December 2010

Paul Watson
Strategic Director
Places Directorate
Council House
Solihull
West Midlands
B91 3QT

Date: 13 December 2012

Dear Paul

Birmingham's Future Growth Requirements & the Solihull Local Plan

I am writing following our recent correspondence and meeting in relation to the likely scale of future growth and how this might be taken forward under the new planning system. As you will be aware the recently completed Strategic Housing Market Assessment for Birmingham has concluded that there is likely to be a substantial shortfall in housing provision in Birmingham up to 2031. That position remains the case even if a substantial incursion of up to 10,000 dwellings, on which consultation is currently taking place, were to be made into designated green belt within the city's administrative area. Apart from continuing work on our respective development plans both authorities are centrally involved in the collaborative work of both the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

While the nature and expectations on the planning system continue to be the focus of much attention, I am content that through our collaborative working we have come to a pragmatic and common sense position which both enables existing development planning work in Solihull to be progressed through to early adoption while at the same time puts in-place arrangements to enable the longer term challenge of both the scale and distribution of growth.

In light of the above I would like to see a reference within your current plan to cover this point and I would like to propose the following paragraph to be added either as an addition to the end of existing paragraph 1.4.2 or alternatively as a new paragraph 1.4.6.

"Following discussions falling under the Duty to Cooperate Solihull MBC recognise that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Solihull MBC will work collaboratively with Birmingham and other authorities and with GBS LEP to establish objectively the level of long term growth through a joint commissioning of a Strategic Housing Market Assessment and work to establish the scale and distribution of any emerging housing shortfall. This may require a review of the Green Belt in relevant locations. In the event that the work identifies that further provision is needed in Solihull, a review of the Solihull Local Plan will be brought forward to address this."

Both Solihull and Birmingham have a legacy of close working and the discussions on the level of future growth will continue at the heart of future liaison. It is on the above shared understanding that Birmingham City Council is content that the Solihull Development Plan should progress through its public examination in its current form.

Yours sincerely



Waheed Nazir
Director of Planning & Regeneration



Paul Watson
Strategic Director
Places Directorate
Council House
Solihull
West Midlands
B91 3QT

Date: 07 December 2012

Dear Paul

Birmingham's Future Growth Requirements & the Solihull Local Plan

I am writing following our recent correspondence and meeting in relation to the likely scale of future growth and how this might be taken forward under the new planning system. As you will be aware the recently completed Strategic Housing Market Assessment for Birmingham has concluded that there is likely to be a substantial shortfall in housing provision in Birmingham up to 2031. That position remains the case even if a substantial incursion of up to 10,000 dwellings, on which consultation is currently taking place, were to be made into designated green belt within the city's administrative area. Apart from continuing work on our respective development plans both authorities are centrally involved in the collaborative work of both the West Midlands Joint Committee and the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

While the nature and expectations on the planning system continue to be the focus of much attention, I am content that through our collaborative working we have come to a pragmatic and common sense position which both enables existing development planning work in Solihull to be progressed through to early adoption while at the same time puts in-place arrangements to enable the longer term challenge of both the scale and distribution of growth.

In light of the above I would like to see a reference within your current plan to cover this point and I would like to propose the following paragraph to be added either as an addition to the end of existing paragraph 1.4.2 or alternatively as a new paragraph 1.4.6.

"Following discussions falling under the Duty to Co-operate Solihull MBC recognise that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011 – 31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. Solihull MBC will work collaboratively with Birmingham and other authorities, including joint commissioning of a Strategic Housing Market Assessment and Green Belt Review which would assess the emerging housing shortfall and the scale and distribution of any such requirement. In the event that the additional work identifies that further provision is needed in Solihull, an early review of the Solihull Local Plan will be brought forward to address this."

Both Solihull and Birmingham have a legacy of close working and the discussions on the level of future growth will continue at the heart of future liaison. It is on the above shared understanding that Birmingham City Council is content that the Solihull Development Plan should progress through its public examination in its current form.

Yours sincerely

Waheed Nazir
Director of Planning & Regeneration

08th August 2012

Paul Watson
Strategic Director Community and Economic Regeneration
Solihull Metropolitan Borough Council
Council House
Manor Square
Solihull
West Midlands
B91 3QB

Dear Paul,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares

to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.

Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration



Solihull
METROPOLITAN
BOROUGH COUNCIL

Waheed Nasir
Director of Planning & Regeneration
Birmingham City Council
Victoria Square
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B1 1BB

PLACES DIRECTORATE

Council House
Solihull
West Midlands B91 3QT
Tel: 0121 704 8361
Fax: 0121704 6404
Email: cskelly@solihull.gov.uk
www.solihull.gov.uk

Please ask for: Chris Skelly

Date: 24th October 2012

Dear Waheed,

Birmingham's Future Growth Requirements

I refer to your letter dated 8 August 2012 and to our subsequent meeting held 3 September 2012. Our meeting was I feel very useful & productive but I have delayed responding formally until now so we may be more certain of the programme for the preparation of a Spatial Framework by the Greater Birmingham & Solihull Local Enterprise Partnership (GBS LEP) which I am pleased to say is maintaining & gathering further momentum.

May I confirm that my Council is committed to working with GBS LEP in the preparation & approval of a Spatial Framework to promote & guide growth & development across the LEP area. This work will first look to establish objectively the level of long term growth needed to meet the LEP's needs & aspirations and then examine possible directions & broad locations for such growth before settling on a preferred strategy following engagement with relevant stakeholders & partners. The timetable agreed by GBS LEP Board anticipates an agreed spatial framework being formally in place by 2014. My Council is also committed to taking forward any actions that may be necessary consequent to the provisions of the approved GBS LEP Spatial Framework through the development plan process in due course.

However we agreed that there is no reason to delay the adoption of the submitted Solihull Local Plan on this basis as the Local Plan is essential to the proper & effective delivery in the short term of objectively assessed levels of growth & development: and that it would be wrong to pre judge the outcome of the GBS LEP Spatial Framework process.

I look forward to our two Council's continuing cooperation in this matter. If you need any further information in this matter, please do not hesitate to contact me.

Yours sincerely

Paul Watson
Strategic Director



INVESTOR IN PEOPLE



REPORT TO CABINET MEMBER FOR ECONOMIC DEVELOPMENT & REGENERATION

15 MARCH 2011

REPORT OF DIRECTOR FOR PLACES

THE BIRMINGHAM LOCAL DEVELOPMENT FRAMEWORK – CORE STRATEGY CONSULTATION DRAFT – DECEMBER 2010

1. Purpose of Report

1.1 To agree the Council's response to the above consultation document.

1.2 Background

1.2.1 The first key stage in producing Birmingham's Draft LDF was the consultation on issues and options in autumn 2008 which was reported to the Economic Development and Regeneration Cabinet Member Session on 22nd October 2008. In responding, this Council supported:

- The strong focus on the regeneration zone in east Birmingham,
- Strong urban design principles in areas of high density development,
- Protection of employment land from alternative uses,
- Provision for a sufficient quantity of housing in line with the Regional Spatial Strategy Review.

1.2.2 The Draft Core Strategy was published in December 2010 and representations invited by 18th March 2011.

1.2.3 The full text of Birmingham's Draft Core Strategy can be found at www.birmingham.gov.uk/corestrategy. In brief, the Core Strategy plans for the following levels of growth 2006-2026:

- 50,600 additional dwellings,
- About 100,000 new jobs,
- 2 new Regional Investment Sites (RIS) of 20ha and 25ha at Aston and Longbridge,
- A minimum reservoir of 130ha of employment land,
- About 270,000 sqm (gross) of comparison retail floorspace by 2012 and a further 190,000 sqm by 2026,
- A minimum of 610,000 sqm (gross) of office floorspace in Birmingham's network of centres,
- New waste facilities to increase recycling and disposal capacity and minimise landfill waste.

1.2.4 The Core Strategy acknowledges that recent ONS projections indicate that Birmingham's population will rise to 1.5M by 2026, an increase of 87,000 households, and that this is above the level of growth planned for in the Core Strategy, reflecting that land supply in the City is limited and that some net migration to adjoining areas will occur.

- 1.2.5 A hierarchy of centres is set out that will be the preferred location for retail and office development. In the City Centre 315,000 sqm (gross) of comparison retail development is planned for 2008-2026 and 590,000 sqm (gross) of offices 2006-2026. Sutton Coldfield, Perry Barr/Birchfield Rd, Meadway and Selly Oak will take 116,000 sqm (gross) comparison retail and 65,000 sqm (gross) of offices between them. Leisure uses will be encouraged within the hierarchy.
- 1.2.6 About 20,000 of the 50,600 dwellings will be provided in the City Centre 2006-2026 and where 13,100 remain to be developed 2010-2026 (p65). Most of the housing provision will be on previously developed land with a minimum of 90% to be on brownfield land within the urban area. Minimum density of housing is given as 100 per hectare in the City Centre, 50/ha in other centres and 40/ha elsewhere, unless particular circumstances favour lower densities. Development on greenfield land will only be permitted in exceptional circumstances, whether in green belt or not (p67).
- 1.2.7 Provision for gypsies and travellers is to be made in sustainable locations and a criteria based policy will guide planning applications and allocation of sites. The criteria include that there is a need identified in a regional, sub-regional or local need assessment. The assessment undertaken jointly with Coventry and Solihull identified a need for an additional 19 permanent pitches, 16 of which are needed before 2012. The City Council intend to meet the need identified in the assessment. A need for 10 transit pitches will be accommodated on an existing site that will be refurbished for the purpose. The City currently has 1 site for Travelling Showpeople (p72).
- 1.2.8 A number of main highway corridors are identified (p79) including the A34 south/A41, A45 and the A47 Heartlands Spine Road. The aim is to provide an essential means of connectivity within the City and to develop accessibility. Many of the network centres are in transport corridors. This approach has resonance with Solihull's Emerging Core Strategy that also seeks higher density development in transport corridors (and at nodes) well served by public transport.
- 1.2.9 Reference is made to important 'particularly significant' links with adjoining areas. Within Solihull, Birmingham Airport is described as the main international gateway and that together with the NEC the airport locality is a major source of employment. Links between this locality and the City Centre are acknowledged to be a key issue.
- 1.2.10 The close links between East Birmingham and North Solihull are also acknowledged both being regeneration priorities that need a consistent approach and that improving access to jobs is important. The plan also describes the significant levels of commuting to Birmingham from adjoining areas, including Solihull, and that it is important to ensure high quality public transport links, particularly by rail, to these areas (p14).

1.3 Matters for Consideration

- 1.3.1 The Draft Birmingham Core Strategy should be welcomed for its commitment to regeneration and growth, particularly in east Birmingham where it will complement and support regeneration in North Solihull. It should also be welcomed for seeking to retain population within the city, stem outmigration and resist development in the Green Belt.
- 1.3.2 The number of dwellings to be planned for in the Draft Core Strategy is based on the figures given in the RSSR i.e. 50,600 (net) 2006-2026. The panel report (September 2009) to the subsequent Examination in Public (EIP) recommended that the figure should be increased to 57,500 i.e. an additional 6,900 dwellings.

- 1.3.3 The Core Strategy should clarify why provision for new housing is based upon the RSSR target housing figures rather than the figure recommended by the September 2009 EIP panel report recommendations that increased the RSSR figure for Birmingham by 6,900 dwellings. A significant shortfall in the number of dwellings planned for to 2026 could have implications for adjoining local authorities especially Solihull.

1.4 Financial Implications

- 1.4.1 None arising from this report.

1.5 Risk Implications

- 1.5.1 The Corporate Risk Management Approach has been complied with to identify and assess the significant risks associated with this decision / project. This includes (but is not limited to) political, legislation and reputation risks.
- 1.5.2 The Approach is not intended to eliminate all risks and not all the risks identified can be managed all of the time. Also, risks will still exist that have not been identified.
- 1.5.3 This assessment identified there are no net "red" risks that need to be reported.

1.6 Consultation Undertaken

Category B:

Seeking Views

e.g. seeking general opinions before making a decision

1.7 Equality and Diversity Implications

- 1.7.1 There are no direct equality or diversity implications.

1.8 Background Papers

- 1.8.1 Birmingham Core Strategy 2026 – Consultation Draft – December 2010.

FOR DECISION

The Cabinet Portfolio Holder for Economic Development & Regeneration is asked to:-

- (i) Receive the above document; and
- (ii) Agree paragraphs 1.3.1 to 1.3.3 as the Council's response to the consultation.

Birmingham Core Strategy 2026 Consultation Draft

Event Name	Birmingham Core Strategy 2026 Consultation Draft
Comment by	Solihull Council (MR Mark Rogers)
Comment ID	csd377
Response Date	17/03/11 15:07
Consultation Point	S2 A456 Hagley Road Corridor including Edgbaston Centre (View)
Status	Processed
Submission Type	Letter
Version	0.11
Files	SolihullBirmDraftCS.pdf

Please give your reason for commenting on this part of the document. A general observation

Please add your comments on this part of the document here.

See attachment Provides general support for the Core Strategy approach, subject to a request for clarification of the justification for the housing numbers proposed. "The Core Strategy should clarify why provision for new housing is based upon the RSSR target housing figures rather than the figure recommended by the September 2009 EIP panel report recommendations that increased the RSS figure for Birmingham by 6,900 dwellings. A significant shortfall in the number of dwellings planned for to 2026 could have implications for adjoining local authorities especially Solihull."

Core Strategy Issues and Options Consultation

Event Name	Core Strategy Issues and Options Consultation
Comment by	Solihull Council (MR Mark Rogers)
Comment ID	csioc229
Response Date	01/12/08 09:44
Status	Processed
Submission Type	Letter
Version	0.13
Files	solihullmbccsioc229.pdf

1b) Does it provide a clear spatial vision for the future of the City? If not, how could the vision be improved?

There is an attachment to this file

4a) Option 1

Option 1 continues with current policies but is not flexible enough to meet higher growth requirements that are emerging through the Regional Spatial Strategy Review. It is also acknowledged that this option is unlikely to promote regeneration in the eastern corridor that runs from the city centre to the boundary with North Solihull. Regeneration of the corridor should be a priority shared by Birmingham and Solihull LDFs. All three options propose 'Sustainable Urban Neighbourhoods' (developments built on eco-town principles) and the difficulties of bringing forward such developments in urban areas is acknowledged. The development of the preferred option/core strategy should provide further explanation of why developments of this nature are needed in a city context and how it will impact on bringing housing development forward.

4b) Option 2

Option 2 is a variation of option 1. Its greater focus on regeneration in the east of Birmingham should be welcomed. Higher density development of the existing urban areas mooted in the option would need to be accompanied by strong urban design measures to ensure that the greater density of development that is implied does not harm the important characteristics of mature suburbs that encourage people to live in Birmingham and make the city and region attractive. It would also be important not to allow too much employment land to be developed for alternative uses, particularly as the vision of Birmingham as a 'global city' is based on economic prosperity and investment in industry. All three options propose 'Sustainable Urban Neighbourhoods' (developments built on eco-town principles) and the difficulties of bringing forward such developments in urban areas is acknowledged. The development of the preferred option/core strategy should provide further explanation of why developments of this nature are needed in a city context and how it will impact on bringing housing development forward. The Government has expressed concern that the Regional Spatial Strategy Review does not make sufficient provision for housing and has commissioned technical work which puts forward scenarios for the possibility of another 10,000 dwellings in Birmingham. Options 2 and 3 meet this figure.

4c) Option 3

Option 3 involves growth into the green belt around Sutton Coldfield and into Lichfield and/or Bromsgrove. All three options propose 'Sustainable Urban Neighbourhoods' (developments built on eco-town principles) and the difficulties of bringing forward such developments in urban areas is acknowledged. The development of the preferred option/core strategy should provide further explanation of why developments of this nature are needed in a city context and how it will impact on bringing housing development forward. The Government has expressed concern that the Regional Spatial Strategy Review does not make sufficient provision for housing and has commissioned technical work which puts forward scenarios for the possibility of another 10,000 dwellings in Birmingham. Options 2 and 3 meet this figure.

Summary of Non-Form Response. (Further details can be found in the attached documents)

For more information see attached.

Comment

Consultee	Mr Martin Fletcher (219676)
Email Address	mletcher@solihull.gov.uk
Company / Organisation	Solihull Metropolitan Borough Council
Address	PO Box 18 Solihull B91 9QS
Event Name	Core Strategy Issues and Options Consultation
Comment by	Solihull Metropolitan Borough Council (Mr Martin Fletcher)
Comment ID	csioc229
Response Date	01/12/08 09:44
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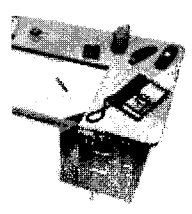
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Summary of Non-Form Response. (Further details can be found in the attached documents)

For more information see attached.

②? che



Carol Grove/DevStrategy/BCC
27/10/2008 09:33

To "Fletcher, Martin \ (Strategic Services - Solihull MBC)"
<mffletcher@solihull.gov.uk>
cc
bcc
Subject Re: Core Strategy - Birmingham Issues and Options Paper

Thank you for writing to us with your views on the above.

Following the end of the consultation period on 24 October we will be carefully considering the responses we have received. We will then produce a 'Preferred Option', which will also be subject to consultation. We hope to reach this stage in the middle of next year, and we will write to you again at that time.

For further information about the Core Strategy process please contact Carol Grove in Planning Strategy on (0121) 303 3734 or e-mail carol.grove@birmingham.gov.uk.

"Fletcher, Martin \ (Strategic Services - Solihull MBC)" <mffletcher@solihull.gov.uk>



"Fletcher, Martin \ (Strategic Services - Solihull MBC)"
<mffletcher@solihull.gov.uk>
>
24/10/2008 16:20

To <Carol_Grove@birmingham.gov.uk>
cc "Simpson, David \ (Strategic Services - Solihull MBC)"
<dsimpson@solihull.gov.uk>
Subject Core Strategy - Birmingham Issues and Options Paper

Hello Carol,

Here is Solihull's formal response to the above Issues and Options document. I understand today is the closing date for the consultation.

<<BhamIssuesOptions.doc>>

Thanks

Martin Fletcher
Forward Planning Team
Planning Services Group
Strategic Services Directorate

Tel: 0121-704-6646
E-mail mffletcher@solihull.gov.uk

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- BhamIssuesOptions.doc

**REPORT TO CABINET MEMBER FOR ECONOMIC DEVELOPMENT AND
REGENERATION**

22 OCTOBER 2008

**REPORT OF THE STRATEGIC DIRECTOR FOR COMMUNITY AND ECONOMIC
REGENERATION**

**1. THE BIRMINGHAM LOCAL DEVELOPMENT FRAMEWORK, CORE STRATEGY,
ISSUES AND OPTIONS PAPER – CONSULTATION FROM BIRMINGHAM CITY
COUNCIL**

1.1 Purpose of Report

1.1.1 To agree the Council's response to the above Issues and Options paper.

1.2 Background

1.2.1 The Issues and Options paper is the first stage in the preparation of the Core Strategy for Birmingham that will shape the direction of development in Birmingham over the next 20 years. The Core Strategy is the key policy document of the Local Development Framework (LDF) that aims to achieve Birmingham's growth agenda to increase the City's population by up to 100,000 by 2026.

1.2.2 In accordance with the requirements of the new planning system options have been developed offering suggestions for city growth. These are centred on North-West Birmingham, The Eastern Growth Corridor and South-West Birmingham. The options paper offers three alternative ways of achieving different levels of growth.

1.2.3 The options paper provides a vision that incorporates a high quality of life for 'everyone' in a safe, inclusive environment. It also embraces Birmingham's aspiration to be a 'world-class global city' through economic prosperity and investment for major industries over the next 20 years and beyond. To achieve the vision a set of objectives are provided together with key issues. The objectives focus upon promoting Birmingham as a 'global city', achieving development that is sustainable, improving the urban environment, meeting Regional Spatial Strategy Review development requirements, creating a prosperous economy, promoting accessibility and meeting transport needs and improving health and well being.

1.2.4 Key issues focus upon attracting appropriate facilities to support global city aspirations, tackling sustainable design and waste recycling, levels and nature of housing growth to plan for, providing an adequate and appropriate employment land supply, making provision for transport infrastructure and its management, facilities needed for education and training and providing appropriate facilities for recreation, improved health and protecting green spaces and wildlife habitats.

1.2.5 The paper seeks views on the vision, objectives and issues and on 3 spatial options that have been developed. The options take into consideration the emerging Regional Spatial Strategy Review and are designed to progressively accommodate higher amounts of growth i.e. options 2 and 3 build upon elements of option 1. In summary, the main features of the options are as follows:

Option 1

1.2.6 This would meet the 50,600 minimum housing target in the submitted Regional Spatial Strategy Review without significant change to current policy. There would be no changes to the green belt boundary and open space and mature suburbs would

continue to be protected. Other main features would be:

- Significant development focussed in the City Centre, including high-density apartments, family housing, retailing and offices. New Street Station redevelopment and city centre metro would be supported.
- Housing regeneration focussed on existing estates such as Kings Norton, Newtown and East Aston and also in the 'Western Growth Corridor'.
- Redevelopment of the Longbridge car plant to create a 'sustainable urban neighbourhood' with at least 1,450 homes, a local centre and major employment including a Regional Investment Site (25ha minimum).
- Existing important employment areas would be protected but on other employment sites alternative uses would be encouraged. Over 250 ha of employment land would be reserved for employment use over the 'short and medium term'.
- Birmingham Airport expansion would continue to be supported (as it would in all 3 options).

Option 2

1.2.7 This option could accommodate up to 60,000 new dwellings without urban expansion of the city. A key feature would be the development of improved high volume public transport links through the Eastern Corridor. Other main features, in summary, are as follows:

- Significant housing redevelopment in the east and south parts of the city (in addition to the Western Growth Corridor). An Eastern Corridor Study would be undertaken to bring together housing need, transport and employment considerations.
- Creation of 3 Sustainable Urban Neighbourhoods in the Eastern Corridor and Western Growth Corridor (i.e. an eco-town concept in an urban setting).
- Maximised provision for housing in the City Centre by accelerated redevelopment of older industrial areas. Continued protection of main employment areas. New employment sites would be created in the Eastern Corridor and in sustainable urban neighbourhoods. Less protection of employment land and mature suburbs in some areas to facilitate more housing growth.
- Centres at Perry Barr, Selly Oak and Meadway (east Birmingham) would be foci for new development including high density housing, offices, retail provision and improved public transport.

Option 3

1.2.8 This option could accommodate up to 65,000 dwellings. The further increase in dwellings would be achieved partly through urban extension into the green. Main features are as follows:

- New communities in the North/North East and/or South of the City. This could involve expansion into Lichfield District and or expansion into Bromsgrove. The aim would be 'balanced new communities' with a range of facilities. Possible locations include: south-east of Longbridge, South of Maypole, North of Minworth and East of Warmley (and others north of Warmley).
- Phased growth to ensure continued brownfield site development.
- Less pressure to relax protection of mature suburbs, open space and employment sites (because of green belt releases)

- Option 1 and 2 employment proposals would be incorporated into this option.

1.3 Matters for Consideration

1.3.1 The vision, objectives and the key issues are very broad and all embracing and are appropriately reflective of Birmingham's aims to become a city of global standing and the need to grow and evolve to this end.

1.3.2 In terms of the options, option 1 continues with current policies but is not flexible enough to meet higher growth requirements that are emerging through the Regional Spatial Strategy Review. It is also acknowledged that this option is unlikely to promote regeneration in the eastern corridor that runs from the city centre to the boundary with North Solihull. Regeneration of the corridor should be a priority shared by Birmingham and Solihull LDFs.

1.3.3 Option 2 is a variation of option 1. Its greater focus on regeneration in the east of Birmingham should be welcomed. Higher density development of the existing urban areas mooted in the option would need to be accompanied by strong urban design measures to ensure that the greater density of development that is implied does not harm the important characteristics of mature suburbs that encourage people to live in Birmingham and make the city and region attractive. It would also be important not to allow too much employment land to be developed for alternative uses, particularly as the vision of Birmingham as a 'global city' is based on economic prosperity and investment in industry.

1.3.4 Option 3 involves growth into the green belt around Sutton Coldfield and into Lichfield and/or Bromsgrove.

1.3.5 All 3 options propose 'Sustainable Urban Neighbourhoods' (developments built on eco-town principles) and the difficulties of bringing forward such developments in urban areas is acknowledged. The development of the preferred option/core strategy should provide further explanation of why developments of this nature are needed in a city context and how it will impact on bringing housing development forward.

1.3.6 The Government has expressed concern that the Regional Spatial Strategy Review does not make sufficient provision for housing and has commissioned technical work which puts forward scenarios for the possibility of another 10,000 dwellings in Birmingham. Options 2 and 3 meet this figure.

1.3.7 The issues and options summary leaflet is appended to this report and the main issues and options document is in the Members resource area.

1.4 Financial Implications

1.4.1 No direct implications from this report.

1.5 Risk Implications

1.5.1 The Corporate Risk Management Approach has been complied with to identify and assess the significant risks associated with this decision / project. This includes (but is not limited to) political, legislation and reputation risks.

1.5.2 This assessment identified that there are no net "red" risks that need to be reported.

1.6 Consultation Undertaken

1.6.1 No consultation undertaken or required.

1.7 Quality and Diversity Implications

1.7.1 No significant impacts

1.8 Sustainability

1.8.1 The Issues and Options paper embraces the need to accommodate growth in a way that supports sustainable development principles. It is not clear whether or not the document has been guided by a sustainability appraisal.

1.9 Background Papers

1.9.1 The Birmingham Local Development Framework, Core Strategy, Issues and Options Paper.

FOR DECISION

THE CABINET MEMBER FOR ECONOMIC DEVELOPMENT AND REGENERATION IS ASKED TO: -

Agree paragraphs 1.3.1 to 1.3.6 of this report as the Council's response to the consultation.

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

APPENDIX 11

South Staffordshire - Package of documentation relating to the Duty to Co-operate

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- Action note of meeting held under the Duty to Co-operate on 05/03/14
- South Staffordshire District Council Duty to Co-operate proforma re potential strategic issues affecting their Site Allocations document (December 2013)

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1600, Thursday 20 February 2014, South Staffordshire Council Offices

Present:

Andy Johnson – South Staffordshire Council

David Carter – Birmingham City Council

Discussion

AJ explained that he had sent back the DtC document with comments added the day before but this had not been picked up by DC in advance of the meeting.

The discussion focussed around three issues, the GBSLEP Strategic Housing Study, the Birmingham Development Plan and the South Staffordshire Local Plan.

Strategic Housing Study

DC explained to current position on the GBSLEP Strategic Housing Study and the inclusion of the Black Country in the work which would lead to two reports with a lot of common content. DC also explained that three other Districts had been identified as being part of the Birmingham and Black Country HMAs and these were North Warwickshire, Stratford and South Staffordshire. A separate meeting, in South Staffordshire's co-ordinated by the Black Country Districts with in relation to this was proposed in about one month's time with the consultants (PBA) and other interested parties. DC agreed to speak to Philippa Smith at Sandwell to diary this meeting as soon as practicable.

DC also referred to his earlier meeting at Telford where the indications were that potentially up to 8,000 dwellings capacity could potentially be made available to meet any shortfall in housing in the conurbation.

Birmingham Development Plan

DC explained the background to and purpose of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if South Staffordshire Council wanted any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

Each of the criteria were discussed in-turn. The criteria and wording were agreed subject to the following changes being agreed:

DC to respond to AJ's comments sent through the day earlier, taking account of the discussion which centred on housing and Green Belt matters. On most issues there was a broad understanding of the situation from both authorities perspectives.

Under item d) It was agreed to add a reference to the proposed strategic employment land study.

It was also agreed that item h) was not applicable.

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc and responding to AJ's written comments. This would be sent back to AJ for further consideration and subsequent signature by both authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

South Staffordshire Local Plan

AJ explained the adoption of the Core Strategy about two years ago and the focus on the production of the Site Allocations documents due for a nine week consultation starting 17 March. There was a discussion on the relationship of growth levels in Core Strategies and subsequent SADs. DC expressed the view that he could see no reason for the South Staffordshire SAD not to proceed on the same lines as the other local plans in the West Midlands and that any potential increase in the level of growth that might come from the strategic housing and employment studies could be deferred for the subsequent local plan review. In the other local plans DC explained how references to dealing with longer term growth had been inserted as a reference in the plan.

Duty to Cooperate

As detailed in paragraphs 178-181 of the National Planning Policy Framework, public bodies have a Duty to Cooperate on strategic planning issues that cross administrative boundaries. The Council therefore invites you to complete the table below and welcomes comments on which issues will need to be addressed.

Strategic Issues identified by South Staffordshire Council	Do you agree this is a strategic issue?	Do you have matters to raise on this point?	Is a meeting required?
Identifying future housing need	Yes	Yes – GBSLEP has commissioned a strategic housing needs study which will address Birmingham’s housing shortfall. This could have implications for neighbouring areas.	Possibly – a meeting would help explain the context.
Strategic Employment Sites	Yes	Discussions continuing on the possible need for further strategic employment sites have been held under the West Midlands Planning Officer Group/ WM Chief	Meetings held with S. Winterflood, CX of SSDC
Regional Logistics	Yes	The former WMRSS raised the possible requirement for a Regional Logistics Site to be provided to the north of the Black Country. The need to identify further opportunities for this category of development remains.	Ditto
Cannock Chase SAC	Yes	Birmingham’s HRA has determined there are no significant outstanding issues for the City.	No

Green Belt	Yes	Reference to work under future housing needs and the related work on the production of a Spatial Plan for Recovery and Growth in the GBSLEP could have implications for the west Midlands Green Belt, both within and outside the GBSLEP area.	Possibly – a meeting would help explain the context.
Open Space, Sport Recreation/Green Infrastructure	Yes	There are no obvious matters of common concern.	No
Forest of Mercia	Yes	There are no obvious matters of common concern.	
Hatherton Branch Canal	Yes	There are no obvious matters of common concern.	
Education	Yes	It is assumed that any matters that might exist would already be covered by liaison with Staff County Council.	
Transport	Yes	It is assumed that any matters that might exist would already be covered by liaison with Staff County Council.	
Waste and Minerals	Yes	It is assumed that any matters that might exist would already be covered by liaison with Staff County Council.	

Water Issues, i.e. flooding/ infrastructure	Yes	It is assumed that any matters that might exist would already be covered by liaison with Severn Trent/ South Staffs Water.	
Other (please suggest any further issues as appropriate).		No further matters to raise.	

If you believe there are some cross boundary issues that need addressing, what measures do you feel are required to address these and what would you consider to be the estimated timescales?

A meeting between representatives of our two authorities would enable the above issues to be discussed and any possible consequences to be identified and dealt with. Such a meeting could also consider any similar matters that SSDC might have in relation to the emerging Birmingham Development Plan.

**Birmingham Development Plan
DUTY TO CO-OPERATE STATEMENT**

APPENDIX 12

**South Worcestershire (i.e. Malvern Hills, Worcester and Wychavon Districts) - Package of
documentation relating to the Duty to Co-operate**

Contents

Documents are reproduced in the order set out below. There is no page numbering of this appendix.

- South Worcestershire Councils' joint response to the Birmingham Development Plan Pre-Submission consultation dated 03/03/14
- South Worcestershire Development Plan Examination, Birmingham City Council – Re-opened Hearing Statement Matter 1: The housing requirement (February 2014)
- Action note of meeting held under the Duty to Co-operate on 24/02/14
- South Worcestershire Development Plan Examination, Birmingham City Council – Hearing Statement Matter 1: The housing requirement dated 06/09/13
- South Worcestershire Development Plan Examination, Birmingham City Council – Hearing Statement Matter 2: The Duty to Co-operate (September 2013)
- South Worcestershire Development Plan Examination, Birmingham City Council – Hearing Statement Matter 3: The Employment Land Requirement (September 2013)
- Note of discussions between South Staffordshire Councils and Birmingham and Black Country Councils re South Worcestershire Development Plan representations dated 09/04/13
- Birmingham City Council response to the South Worcestershire Development Plan (SWDP) - Submission Draft Consultation dated 22/02/13
- South Worcestershire Councils' joint response to the Birmingham Development Plan Options consultation dated 11/01/14
- Birmingham City Council response to the South Worcestershire Development Plan (SWDP) - Public Consultation 2012, dated 14/09/12
- Birmingham City Council response to the South Worcestershire Joint Core Strategy – Preferred Options Consultation dated 29/10/08

Director of Planning and Regeneration,
Development and Culture Directorate,
Birmingham City Council,
PO Box 28,
Birmingham
B1 1TU

3 March 2014

Dear Sir

The Birmingham Development Plan – Pre-Submission Consultation

I write on behalf of the three south Worcestershire authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council) in respect of the above strategy. I enclose below the south Worcestershire authorities' comments about the proposed Plan for your consideration.

On the basis of the current iteration and co-operation to date, the south Worcestershire councils are broadly content that the duty to co-operate is being exercised appropriately on an on-going basis. It should be noted that the south Worcestershire Councils and the City Council are currently working towards developing a statement of common ground on issues relevant to both the emerging Birmingham Development Plan (SWDP) and the South Worcestershire Development Plan. Should circumstances change the three councils reserve their right to revisit this conclusion.

These comments on the Birmingham Development Plan are officer comments which will be formally considered by the South Worcestershire Councils. If there is any subsequent variation to these comments as a result of this process the City Council will be advised at the earliest opportunity.

T: 01905 722233

E: contact@swdevelopmentplan.org

www.swdevelopmentplan.org

South Worcestershire Development Plan,
Orchard House, Farrier Street, Worcester WR1 3BB



In commenting upon the emerging Birmingham Development Plan the south Worcestershire councils wish to support the overall Vision and approach for the Plan but consider that consideration of the Plan has been significantly skewed by the issue of potential unmet housing need arising from within the City. It is clear that the Birmingham Development Plan will link to a significant degree with the development plan intentions of other authorities within the GBSLEP area and those other authorities which have a direct / primary relationship with the Birmingham housing market area. The south Worcestershire councils therefore suggest it becomes difficult to understand and comment upon the effectiveness and appropriateness of the proposed strategy without seeing and understanding how issues such as unmet housing need, the relationship between proposed housing and employment provision, communications and potential Green Belt review will be implemented across the wider GBSLEP wider area. The south Worcestershire councils suspect that these aspects of the strategy may become clearer as the emerging GBSLEP Housing Study progresses.

Having regard to the foregoing comments and in addition to the attached detailed comments the south Worcestershire councils would draw attention to the fact that the SWDP Inspector has requested that they look again at levels of housing provision intended to meet local needs and support the ongoing economic activity of the area. The most up-to-date evidence available produced by the south Worcestershire councils suggests that a higher level of housing provision to meet locally derived need may be justified in the SWDP area.

However, the appropriate level of housing to be provided across south Worcestershire will be tested at the reconvened hearing into the SWDP later this month. The south Worcestershire councils cannot prejudge what the eventual increase in the housing requirement will be. However, we do not consider that an increase in housing requirement under the SWDP would make it either appropriate or represent the most sustainable option for the south Worcestershire districts to directly accommodate any housing overspill demand from Birmingham or the wider conurbation. Indeed, this would only serve to draw population away from the major urban areas and thus impact adversely both on the potential renaissance of the city itself and on the potential to focus growth within the GBSLEP area.

Furthermore, attempting to directly attribute housing provision with South Worcestershire to meet the unmet housing needs of Birmingham would potentially prejudge the consideration of spatial options for meeting unmet housing requirements associated with Birmingham within the GBSLEP area and within those local authority areas with a direct / primary relationship with the Birmingham Housing Market area as currently being tested under the GBSLEP Housing Study (due to report later this year).

This stance has been reiterated by the SWDP Inspector, who in his Interim Conclusions has stated clearly that there is no evidence that any land in South Worcestershire will be required to meet any part of Birmingham's housing need.

The south Worcestershire councils welcome the opportunity to comment on the Birmingham Development Plan will be following the progress of the Birmingham Development Plan with

interest. The south Worcestershire councils do not intend to appear at the forthcoming inquiry, unless changed circumstances require them to be represented.

Yours faithfully,

P Bayliss

Paul Bayliss
SWDP Project Manager

Paul Bayliss

Project Manager

On behalf of the South Worcestershire Councils

A. The South Worcestershire Development Plan (SWDP)

Context

1. The SWDP provides a long-term vision (to 2030) for south Worcestershire, with an emphasis on boosting the local economy and delivering sustainable housing development.
2. It is based on extensive evidence and previous consultations and has been jointly prepared by the three partner councils – Malvern Hills District, Worcester City and Wychavon District.
3. The SWDP includes draft policies covering four broad areas:
 - Creating jobs and economic prosperity
 - Meeting housing needs (including that generated by in-migration)
 - Transportation
 - The environment
4. Details of the SWDP are available at: <http://www.swdevelopmentplan.org/examination>.
5. The SWDP is currently at examination. As a result of the first phase of this process, further technical work has been undertaken (January – February 2014) to refine aspects of the SWDP's approach to housing need / provision as it relates to employment growth. This latest focused technical appraisal looked at whether and how housing numbers in the area covered by the SWDP could be increased to meet higher demand and support a growth in economic activity over the plan period.
6. The results of this technical work have been passed to the inquiry Inspector for his consideration. A forecast dwelling requirement over the period 2006 -2030 of between 26,700 and 27,300 has now been identified, which will be the subject of further discussion at the reconvened SWDP Inquiry in March 2014.
7. As a result of discussions at an earlier stage in the process, changes were made to the SWDP housing provision that met the concerns of the metropolitan authorities (including Birmingham). Paragraph 4.5 of the SWDP Duty to Co-operate Report states,

... strong representations were made by the metropolitan authorities that the SWDP's proposed housing allocations at that time (21,600 – based on the 2007 SHMA) did not adequately meet the needs expressed by the WM RSS Phase 2 proposals and would not sufficiently support the metropolitan authorities' migration requirements into the South Worcestershire area, thereby working against the West Midland strategy of urban renaissance. The concerns lodged with the South Worcestershire authorities at that stage ... coupled with the revised housing requirements as defined by the 2012 SHMA, was a significant factor in the elevation of the proposed housing requirements at the Proposed Significant Changes stage in August 2012 to that now proposed (23,200).

Apart from this, there has been no subsequent or ongoing suggestion that additional housing allocations to meet the needs of Birmingham or the wider conurbation are required.

8. Following the first stage of the examination into the SWDP, the Inspector issued his interim conclusions into (among other issues) the Duty to Co-operate. Paragraph 6 and 7 of his conclusions dated 28th October 2013 refer:

"...their representative made it clear at the Matter 2 hearing that BCC have no objection to the housing requirement figure in the submitted Plan (paragraph 6). ...At this time, therefore, there is no clear evidence that any land in South Worcestershire will be required to meet part of Birmingham's housing need (paragraph 7)".

The requirement for additional housing provision in the SWDP area to meet local need and encourage economic growth means that it will not be feasible for the three authorities to accommodate any requests from Birmingham to provide land to help meet its overspill housing requirements.

B. The Birmingham Plan

Summary

1. Birmingham is short of land for both housing growth and high quality employment purposes. The supply of suitable and deliverable land available for housing development within the existing urban area and the amount of housing which could be delivered during the plan period on land released from the Green Belt, the City's housing target has been set at 51,100 dwellings. This figure is based on the sustainable and deliverable capacity identified above (rounded up from 51,085 dwellings).
2. The proposed housing target is only 61% of the minimum need as assessed in the SHMA. The current emerging evidence suggests that it is not possible to deliver more than this within the city's boundary.
3. A Green Belt Review is being considered to help meet some of this shortfall. The capacity of extant and other sites within the conurbation is also being reassessed.
4. There is a shortfall in the amount of high quality employment land available to meet the needs of the expanding market for advanced manufacturing in the city. It is acknowledged however that the employment offer of the City is being considered in the light of the economic and employment potential and offer of the wider GBSLEP area.
5. The largest employment allocation in the city (54ha at Washwood Heath) has now been identified / safeguarded for HS2 use and is no longer available for employment purposes.
6. At present there is no suggestion in the emerging Birmingham Development Plan that land to meet Birmingham's further needs would be sought in the south Worcestershire area. However, the south Worcestershire councils have commented upon this matter given that the consideration of both general migration trends from the City to south

Worcestershire and the potential unmet housing needs of the City were raised and discussed in the context of the SWDP hearing.

C. Birmingham Development Plan

Duty to Co-operate Statement - October 2013

1. The SWDP authorities note from the above document that because of the identified shortfall in housing land and provision, Birmingham took the opportunity to write to adjacent authorities advising them of the fact and “... *highlighting the possible need for higher levels of housing in their areas to address an emerging shortfall in Birmingham*” (paragraph 12). It was subsequently decided to commission a Strategic Housing Needs Study covering the GBSLEP area, which is expected to report in February 2014. The study is intended to “...*consider the scale of future housing requirements that cannot be met within the local authority area within which they arise, and to identify options regarding where additional development land could be provided to meet any such requirements*” (paragraph 14).
2. The SWDP authorities have not been contacted in this regard to provide additional land to help meet Birmingham’s shortfall.

D. Birmingham Development Plan background papers - October 2013

Green Belt Review

1. The SWDP authorities note Birmingham’s intention to undertake a further green belt review, driven by the emerging evidence of a shortfall in housing and employment land across the authority. The SWDP authorities acknowledge that the current emerging evidence suggests there is a demonstrable deficit of land to meet identified needs within the City for the plan period, which potentially represents exceptional circumstances under which a review of current green belt boundaries may be an appropriate solution in part.
2. The south Worcestershire authorities would, however, urge Birmingham to ensure that any such review recognises the importance of retaining sufficient green belt provision to meet the five purposes of green belt set out in paragraph 80 of the NPPF. Paragraph 84 emphasises the need for the review of green belt boundaries to take into account the need to maintain sustainable development patterns (including by implication transportation and traffic movements) by focusing any subsequent development opportunities on areas where development currently exists, such as the major urban areas, settlements, towns or inset areas within the adopted green belt.
3. Advice is given in paragraph 85 on the most appropriate means of establishing new green belt boundaries, including the use of safeguarded land between the current development boundary and the wider green belt, to allow for longer-term development over the plan period without requiring a further change to adopted boundaries. Any

changes that may be proposed by the city at this stage should also reflect the importance of ensuring the wider West Midlands Green Belt, including areas pertaining to the south Worcestershire area, is not put under undue pressure by the release of land elsewhere for development.

E. The Birmingham Plan

1. The south Worcestershire authorities welcome Birmingham's commitment to developing and maintaining a strong degree of connectivity to local, national and international markets and would also support its wider role as an international city. This will have associated benefits (economic, social, cultural and educational) for the south Worcestershire area.
2. Paragraph 3.27 of the Birmingham Plan states,
"... Alongside the BDP a wider growth strategy for the LEP area and other adjoining authorities will set out how and where the remaining housing could be delivered. This will take account of historic trends where adjoining authorities have accommodated a proportion of the City's growth."
3. The role of the LEP in shaping the direction of growth of the conurbation is noted; the LEP itself has no formal planning powers and it should be made clear that any proposals that are made within this context are subordinate to the aims and objectives of the statutory planning process. Further, to both identify and understand the effectiveness of the spatial strategy to be employed under the Birmingham Development Plan, it will be essential to also see and understand how the economic, social, infrastructure and environmental needs of the City are being directly addressed as necessary across the GBSLEP area and those authority areas immediately adjacent to the City. The GBSLEP Spatial Strategy currently in preparation may well go some way to providing this overall context and strategy. However, its implementation will require these issues to be picked up by other Development Plans within the GBSLEP area.
4. The SWDP authorities would also strongly support the city council's wish to explore further development options within the city itself, including the redevelopment of brownfield land, the selective development of open space (where this can be compensated for appropriately) and the use of vacant employment land for housing purposes. The further intensification of development on allocated sites could also be explored as proposals come forward.
5. In addition, the city council has identified a need for a large site of around 50ha to meet the needs of manufacturing and associated economic development activities. The SWDP authorities support this aim, as it will be important to maintain a wide portfolio of available sites across the region. The SWDP itself is predicated on the provision of sufficient high-quality employment land to attract and retain high value businesses and companies,

which in turn will help to support economic activity in the wider area and maintain Worcester's role as the sub-regional focus for growth.

6. The south Worcestershire authorities welcome the opportunities the Birmingham Plan represents for the wider region and will continue to work with Birmingham to achieve a co-ordinated approach to the planning of the wider area as part of the duty to co-operate. The south Worcestershire Councils would invite the City Council to consider the foregoing comments in the light of their previous detailed comments on the emerging Plan and the associated the evidence base.

Paul Bayliss (SWDP Project Manager)

3rd March 2014

SOUTH WORCESTERSHIRE DEVELOPMENT PLAN EXAMINATION

Birmingham City Council – Hearing Statement

Matter 1: The housing requirement

Main issue:

Whether or not the report South Worcestershire Development Plan: Objective Assessment of Housing Need (January 2014), produced by AMION Consulting Ltd for the South Worcestershire Councils, constitutes a sound, objective assessment of the need for housing in the Plan area over the Plan period.

Questions:

- 1) Is the overall forecast housing requirement of 26,700 to 27,300 dwellings for the period 2006-2030 based on a sound analysis of the available and relevant evidence, and does it reflect the full, objectively-assessed need for housing over the Plan period? In particular:
 - (a) Can the three sets of employment projections reviewed in chapter 2 of the AMION report be considered to provide representative and realistic scenarios for planning purposes?
 - (b) Do paragraphs 2.13 to 2.23, and Figures 5 & 6, of the Edge Analytics report *South Worcestershire Demographic Forecasts* (January 2014 – Appendix B to the AMION report) provide a sound analysis of the components of population change 2001-2012?
 - (c) Do the Core Scenarios presented in chapter 4 of the Edge Analytics report accurately reflect the base data and the demographic and economic forecasts from which they are derived?
 - (d) Were reasonable demographic and economic assumptions made, where necessary, in producing the Core Scenarios?*
 - (e) Were justified assumptions made about the future participation of older people in the workforce when producing *Sensitivity Scenarios 2 & 3*?*
 - (f) Were justified assumptions made about future changes in unemployment and economic activity rates when producing *Sensitivity Scenarios 2 & 3*?*
 - (g) Is the AMION report justified in concluding (para 4.7) that *Sensitivity Scenario 3 provides the most robust basis for future population and household numbers* and should therefore *be considered as the best estimate of housing need for the South Worcestershire Local Authorities to consider when setting their housing targets*? **Would it also be appropriate to use the Sensitivity Scenario 3 figures as the basis for assessing the five-year housing land supply in the three South Worcestershire Districts until such time as the SWDP is adopted?**
 - (h) If not, what alternative estimate of housing need should be used **for these purposes**?

* See paragraphs 3.18 to 3.28 and Section 6 (Appendix) of the Edge Analytics report, and also Appendix C to the AMION report.

2) What is the intent of and rationale for sub-paragraphs (i) & (ii) of policy SWDP3 I, as set out in the South Worcestershire Councils' *Draft First Schedule of proposed post-hearings main modifications* [EX/411]? Are their provisions justified and consistent with national policy?

3) Have the windfall allowances set out in Table 4e now been appropriately recalculated on the basis indicated in paragraphs 10 to 12 of my letter to the Councils dated 16 December 2013 regarding Draft Proposed Modifications [EX/413]?

4) Has the feasibility of redistributing the LPA area windfall allowances set out in Table 4e to provide windfall allowances corresponding to policy sub-areas been considered, as suggested in paragraph

13 of my letter to the Councils dated 16 December 2013 [EX/413]? What was the outcome of that consideration?

Introduction

In this statement the City Council has provided an update to the position set out at the hearing in October 2013. The observations are set out under the following headings:

1. The current position on the Birmingham Development Plan
2. The GBSLEP Spatial Plan – Current Position
3. The GBSLEP Strategic Housing Study – Current Position
4. Observations - Housing Requirement

1. Birmingham Development Plan – Current Position

The pre-submission version of the Birmingham Development Plan (BDP) was published for a period of public consultation commencing on 6 January 2014 and ending on 3 March 2014.

In the pre-submission plan the level of housing provision has been set at 51,100 net new dwellings in the period 2011 to 2031. The City Council considers this to be the maximum deliverable level of new housing within Birmingham's administrative boundary over the plan period. This includes the identification of a sustainable urban extension at Langley to the East of Sutton Coldfield with a capacity of c6,000 dwellings of which c5,000 dwellings are deliverable within the plan period. In addition a major employment site is designated at Peddimore. Both these proposals are on land which would be removed from Green Belt.

Given that the estimated housing requirement is in excess of 80,000 dwellings this means there is a shortfall of around 30,000 dwellings that will need to be met in neighbouring authorities. The City Council has not made a specific request to any other local authority with regard to the scale and distribution of any shortfall in housing provision. This is because any such request will need to be substantiated by the necessary joint evidence which will be provided by ongoing work on a Strategic Spatial Plan for the GBSLEP and additional technical evidence commissioned to underpin this, The position on these matters is dealt with in the following sections of this submission.

2. The GBSLEP Spatial Plan – Current Position

An explanation on the background to the GBSLEP Spatial Plan for Recovery and Growth (SPRG) was set out in the City Council's statement on Matter 1 to the initial hearing.

The plan was published for consultation in October 2013 with a deadline set for the receipt of comments by the end of January 2014. The consultation included a series of public consultation events which included a 'planning for real' exercise designed to investigate the different ways in which future growth might be accommodated. The responses are currently being assessed. The consultation response coupled with the further evidence to produce a second version of the SPRG. It is anticipated that this version of the plan should come to broad conclusions on the future scale and distribution of long-term growth to provide a context for statutory development plans.

The documentation on the SPRG is available on the GBSLEP website at the following url:

<http://centrefenterprise.com/strategic-spatial-framework-plan>

3. The GBSLEP Strategic Housing Study – Current Position

The GBSLEP Strategic Housing Study has been commissioned and is currently underway. Peter Brett Associates are the contractors. There are a small number of important points to draw out:

- The Black Country has joined the study. This will result in two reports being prepared with much of the technical material being common to both.
- The initial analysis of housing market areas has identified several Districts outside the GBSLEP and Black Country that can be considered as part of their housing markets. These areas will need to be taken into account as part of the Study. None of the South Worcestershire authorities are directly affected by this. This does not necessarily mean, however, that other areas including South Worcestershire could not help form part of the solution to the emerging housing shortfall in Birmingham, especially as the Housing Market Area extends into North Worcestershire.
- The PBA study will be re-examining the housing needs across the study areas including Birmingham so it is possible that the shortfall identified in the pre-submission version of the BDP might change.

Observations – Housing Requirement

In its representations at the initial hearing the City Council stated that it was satisfied with the level of housing provision proposed and that there was no specific ask of the South Worcestershire authorities to help meet the housing shortfall in Birmingham. It also pointed out that the economic-led strategy tended to lead to an imbalance between the housing and employment proposals.

The increase in the level of housing provision now proposed suggests an improvement in this imbalance. Given the economic focus of the plan and the underlying demography the City Council's understanding is that the increase in housing provision will be substantially met by in-migration into South Worcestershire.

In these circumstances, and while not requested by the City Council in its earlier representations, it follows that a substantial proportion of the increase might be considered as appropriate to help offset Birmingham's emerging housing shortfall either by accommodating migrants moving from Birmingham or rippling out through North Worcestershire. Any further increase in housing provision that might result from the SWDP could also impact in a similar fashion. There is evidence to support this view in the Worcestershire Migration Report 2003 – 2008 (2010)¹.

David Carter
Head of Planning & Growth Strategy
Birmingham City Council
February 2014

¹ http://www.swdevelopmentplan.org/wp-content/uploads/2012/02/worcs_migration_report_2003-08.pdf

DRAFT

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1000, Monday 20 February 2014, Wychavon District Council Offices, Pershore

Present:

Paul Bayliss - Project Manager South Worcestershire Development Plan (PB)

Sam Holder – Wychavon District Council (SH)

Gary Williams – Malvern Hills District Council (GW)

David Carter – Birmingham City Council (DC)

Discussion

The meeting focussed around three matters, the current position on the GBSLEP Strategic Housing Study, (2) the current position on the South Worcestershire Development Plan especially the reconvened hearing, and (3) The Birmingham Development Plan and the DtC. These matters were discussed in-turn.

GBSLEP Housing Study

DC explained to current position on the GBSLEP Strategic Housing Study and the inclusion of the Black Country in the work which would lead to two reports with a lot of common content. DC also explained that three other Districts had been identified as being part of the Birmingham and Black Country HMAs and these included North Warwickshire and Stratford. From this there was not a suggestion that the authorities in the SWDP area form part of the Birmingham or Black Country Housing Market Areas although clearly there is a relationship, especially in relation to the North Worcestershire Districts.

South Worcestershire Development Plan

PB explained the position on the SWDP with the reconvening of the public hearings on 13/14 March with the deadline for submissions set as 28 February. It was hoped that the Inspector's feedback would be received around two weeks later and that this would set out his guidance on the approach to Stage II which was likely to involve site allocations and time for consultation. DC indicated that it was his intention to prepare a further statement on behalf of the City Council which would update the Inspector on the progress on the GBSLEP Housing Study, the BDP and also suggest that the increase in the level of housing provision on the cards in South Worcestershire might help contribute to the shortfall in housing in Birmingham. While the City Council has not specifically sought this, it appeared a logical consequence of the imbalance between the levels of housing and employment growth it had identified at the original hearing. PB confirmed that the desire to balance the housing and employment growth although GW pointed out that employment levels in local plans often are on the high side to reflect aspirations and to give choice.

DC confirmed that it was not the intention of the City Council to seek further increases in the level of housing provision in South Worcestershire over and above the levels proposed by the LPAs.

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GW suggested that the City Council's DtC document might usefully be extended so it covered both the SWDP as well as the BDP. DC indicated he would be happy for this to happen and agreed to send the document across as soon as possible to enable the South Worcestershire authorities to consider making additions to it.

Birmingham Development Plan

DC explained the background to and purpose of this part of the meeting. He explained that the WMPOG had initially suggested a DtC checklist and agreement to record discussions and the level of agreement and difference around two years ago. This had been taken up by Stafford BC on their Local Plan and a similar activity had taken place in Leeds.

In devising the criteria these other examples had been drawn upon as had the requirements in the NPPF. The draft document was not fixed and if the South Worcestershire authorities have any changes or additions to the criteria then this would not be an issue. DC also explained how the first paragraph under each criteria set out the City Council's position and it was likely that most discussion would focus on the second paragraph.

The section at the end of the document was to enable a record of all relevant correspondence, groups and meetings held to be recorded.

DC mentioned that at an earlier meeting with Emma Baker at Redditch he had agreed several changes which he would like to raise to establish if they would also be agreeable to Stratford.

Each of the criteria were briefly discussed in-turn. The criteria and wording were broadly agreed subject to the following changes and to the South Worcestershire authorities considering changes so the documentation would also cover the SWDP.

In relation to item d) there was a discussion about the statement of Statement of Common Ground that had been prepared and which the Inspector had asked to become an Examination document although, in fact, this had not occurred. It was agreed that this could be dealt with by adding the agreed document as an Appendix to the DtC document and that this would help show the narrow difference in views that had been misrepresented in the press reporting.

Under item h) it was agreed that this was not applicable since there were no common boundaries.

It was agreed that DC would provide an electronic version of the document to enable the South Worcestershire authorities to add to it. Subsequent emails or telephone calls would allow for the document to be checked and signed by all authorities.

In the event that the City Council were to make changes to the BDP prior to submission then the opportunity would be given to enable the DtC document to be updated as appropriate.

**SOUTH WORCESTERSHIRE DEVELOPMENT PLAN
EXAMINATION**

Birmingham City Council – Hearing Statement

Matter 1: The housing requirement

This statement focuses on those issues identified by the Inspector reproduced below which are of direct relevance to the City Council (and wider conurbation) and seek to amplify the representations already made.

“Matter 1: The housing requirement

Main issues:

Whether or not the housing requirement set out in the Local Plan reflects an objective assessment of the need for market and affordable housing over the Plan period.

Whether the housing requirement should be increased or reduced.

Whether or not the proposed phasing of the housing requirement is justified.

1) Is the proposed housing requirement of 23,200 dwellings based on a sound analysis of the available and relevant evidence, and does it reflect the full, objectively-assessed need for housing over the Plan period?

(f) Does the proposed housing requirement take adequate account of the likely level of migration into the Plan area, including from the West Midlands conurbation?

(i) Does the proposed housing requirement take adequate account of future employment growth in the Plan area? (NB: the City Council’s on this matter are covered by the statement on employment)

2) Should the Plan make provision for a higher or lower housing requirement, and if so, what is the justification for an alternative figure?

6) Does the Plan place unjustified reliance on a review in 2019 in order to meet the full housing requirement for the Plan area?”

The City Councils observations are set out under the following headings:

1. The current position on the Birmingham Development Plan
2. The GBSLEP Spatial Plan – Current Position
3. The GBSLEP Strategic Housing Study – Current Position
4. Migration
5. Birmingham City Council position on Local Plans of other adjoining authorities
6. The Metropolitan Area Statement
7. Conclusions - Housing Requirement

1. Birmingham Development Plan – Current Position

In December 2010 the City Council published a draft Core Strategy for consultation. This took as its starting point the growth levels proposed in the Phase 2 Revision of the West

Midlands Regional Spatial Strategy, and proposed an additional 50,600 dwellings in the period 2006 – 26. These new dwellings were to be provided within the existing built-up area of the city largely on brownfield sites.

Following the introduction of the Localism Act and the National Planning Policy Framework, and the publication of new ONS population projections which show higher rates of population growth for Birmingham, the Council took the view that it would not be realistic to proceed on the basis of the RSS requirements. Additional work was commissioned in relation to both housing and employment land needs.

In relation to housing this took the form of a new Strategic Housing Market Assessment which was published in October 2012. This indicates that Birmingham's housing requirement for 2011 – 31 is at least 80,000. Alongside this the Council's latest Strategic Housing Land Availability Assessment identifies capacity for only around 43,000 dwellings on sites within the urban area, leaving a significant shortfall to be found elsewhere.

In relation to employment, a new Employment Land Study for Economic Zones and Key Sectors also identified a shortfall in the availability of employment land.

In view of this In November 2012 the Council undertook further consultation on the Birmingham Development Plan (as the Core Strategy is now being called). This looks specifically at options for increasing housing and employment land provision, and in so doing it puts forwards options for developing up to 10,000 new dwellings on land currently within the green belt, within Birmingham, to the north and east of Sutton Coldfield. This consultation ended on 14th January 2013.

The Council is now in the process of considering the consultation response, and the results of additional technical work commissioned in the light of that response. This includes studies in relation to transport, landscape, ecology, archaeology and the market capacity of the green belt option locations.

The current expectation is that the pre-submission version of the Plan will be approved by the City Council in December 2013, which will require approval by Cabinet in October. The statutory consultation period would then begin after the Christmas holiday.

It will be clear from the above that at this stage the City Council has made no definite decision to identify green belt land in the Sutton Coldfield area for development – nor has it come to a view on which of the option locations would be most suitable for development should green belt development be considered appropriate.

It should also be pointed out that the City Council has not made a specific request to any adjoining local authority with regard to the scale and distribution of any shortfall in housing provision. This is because any such request will need to be substantiated by the necessary joint evidence which it is envisaged will be provided by ongoing work on a Strategic Spatial Plan for the GBSLEP and additional technical evidence commissioned to underpin this, The position on these matters is dealt with in the following sections of this submission.

2. The GBSLEP Spatial Plan – Current Position

In anticipation of the revocation of the Regional Spatial Strategy for the West Midlands (WMRSS) the Board of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) resolved in late 2011 that a 'Strategic Spatial Framework Plan' should be prepared for the LEP area. The first iteration of the Spatial Plan has been agreed by the Board (in June 2013) as a basis for public consultation. The documentation is being prepared for publication and will be available on the GBSLEP website at the following url:
<http://centreofenterprise.com/strategic-spatial-framework-plan/>

From the outset this spatial plan was seen to be different from the types of strategic plan previously seen in the UK. A number of guiding principles have provided a focus for the plan. There are that the spatial plan should:

- Sit alongside and will provide the spatial expression of the GBSLEP's Strategy for Growth
- The Plan would be informal, prepared through voluntary collaborative working amongst the LEP local planning authorities aided and assisted with pro-active contributions from partners.
- The plan would be strategic providing a helpful context for individual local plans and core strategies - working alongside existing and emerging plans and helping inform subsequent reviews.
- The collaborative work on the Plan would help all local planning authorities satisfy the Duty to Cooperate.
- The documentation would be short, easy to read and be accompanied by appropriate illustrations.
- The plan should take a long term perspective, looking ahead at least 20 years and consider the broad scale and distribution of growth.
- Provide a focus for relationships with adjoining LEPS.
- Finally, the plan would be subject to annual review and update and in this sense should be seen as an evolving plan, with a recognition that not all matters neither can nor need to be resolved at the same time. This should help ensure a flexible but robust approach.

Further detail on all these matters can be found in the published documentation.

3. The GBSLEP Strategic Housing Study – Current Position

The implication from the work on the Birmingham Development Plan and the technical evidence underpinning it is there could be a substantial shortfall in provision to meet the emerging housing requirement in Birmingham and the City Council is involved in continuing discussions with neighbouring authorities both collaboratively and bi-laterally in relation to this matter.

Through the joint planning work in the GBSLEP a brief for the commissioning of joint research to be funded through the Growing Places Fund has been agreed (Solihull MBC are handling the procurement process) which will establish the scale of the matter across administrative boundaries and which will ultimately lead, through the GBSLEP Strategic Spatial Plan to an agreement on how the shortfall may best be accommodated.

The three North Worcestershire authorities are full and active partners in taking this work forward. In due course this may lead to a situation where local plans may need to be amended to take account of the additional development needs but until the joint working is complete there is no agreed basis for disaggregating any 'overspill' requirement.

It is anticipated that the three North Worcestershire authorities will work closely with the South Worcestershire authorities.

4. Migration

As migration movements are in the main short range, a much greater proportion of the Birmingham and the wider conurbation's movements are to the northern part of Worcestershire rather than South Worcestershire. As the County Council Demographic Report 2005 – 10 (2011) states there is evidence of a 'ripple effect' whereby a smaller number of people move from areas bordering urban areas to more remote locations. Although the highest number of net moves into Wychavon is from Birmingham, this is by no means Birmingham's largest outflow. By means of context, about half as many people move to Wychavon from Bromsgrove as move from Birmingham, despite Birmingham having over ten times Bromsgrove's population.

Table 1: Migration patterns between Birmingham, the Conurbation and Worcestershire

Origin	Destination	Ten-year outflow persons (2001 – 2011)	% of total outflow to West Midlands Region
Birmingham	North Worcestershire	25,590	11.3%
Birmingham	South Worcestershire	7,890	3.3%
Conurbation	North Worcestershire	45, 750	20.1%
Conurbation	South Worcestershire	15,800	7.0%

Source: National Health Service Central Register (NHSCR)

The plan accommodates the annualised level of household growth over its selected time period compared to the 2008 based CLG household projections, which include observed migration over the last five years. These are considered more reliable than subsequent projections as they cover a time period comparable to the plan. It is also noted that a Scenario 3 (Migration led) was considered in the SHMA, which reduced migration based on reduced mobility since 2008 yet this was not pursued, this approach is supported.

It is noted that this requirement is lower than the 2006 based household projections and also the RSS2 Panel Report but as previous representations submitted confirm, Birmingham City Council has no basis upon which to challenge this. Indeed, the City Council and other Metropolitan Authorities welcome the fact that the housing requirement has been increased when compared to the Preferred Option.

5. Birmingham City Council position on the emerging Local Plans of other adjoining authorities

Taking account of the circumstances above, the City Council, working in liaison with the other local authorities in the GBSLEP area (and in some cases authorities outside the GBSLEP area) have been looking to enable on-going work on Local Plans that is well-advanced to proceed and plans adopted subject to a reserve position being built-in – and clearly identified in the body of the plan - to enable early reviews where these might be required. However, given the relatively low levels of direct migration from Birmingham into South Worcestershire the City Council has not made any such request of the South Worcestershire

Development Plan but in its representations has referred to the need for ongoing liaison under the Duty to Cooperate.

Dependent on the outcome of the GBSLEP Strategic Housing Study, some Local Plans, or elements of them, may need to be reviewed. The National Planning Policy Framework (paragraph 182) requires local planning authorities to take a strategic approach in their Local Plans. And the recently published National Planning Policy Guidance states that:

“Therefore if a local planning authority preparing a Local Plan provides robust evidence of an unmet requirement, such as unmet housing need, other local planning authorities in the housing market area will be required to consider the implications, including the need to review their housing policies.”

Since the Duty to Cooperate is a continuous not a one-off process it seems unnecessary for the South Worcestershire Development Plan to put a specific time scale on review dates in relation to housing provision (i.e. 2019) as the evidence should dictate when this becomes necessary.

6. The Metropolitan Area Statement

In anticipation of the revocation of the WMRSS in June 2012 the West Midlands Joint Committee comprising the Leaders of the seven Metropolitan Authorities acting in the strategic interests of the Metropolitan Area endorsed a Strategic Policy Framework. This continues to support the established urban renaissance strategy, whereby the Metropolitan Area will seek to meet a greater proportion of its own development needs.

In achieving this, however, paragraph 40 of the Framework, states that:

“Not all needs, particularly from Birmingham, Coventry and Solihull, can be met in their entirety with the collective boundaries of the Metropolitan Area, and there will be an ongoing requirement for a reasonable level of migration to some Shire Districts to be accommodated whilst not undermining regeneration of the Black Country. A failure to address this could have adverse implications on housing affordability and the actual provision of affordable housing and on the local economy, especially as migrants from elsewhere may outbid local people.”

This Metropolitan Area Statement provides a platform from which the collaborative working in the GBSLEP is being progressed.

7. Conclusions - Housing Requirements

For clarity, Birmingham City Council representations have not questioned the soundness of the South Worcestershire Development Plan in respect of the level of housing provision proposed.

The City Council considers that the SHMA underpinning the South Worcestershire Development Plan is up-to-date. The document does not, however, take account of an emerging housing shortfall in Birmingham but this is a matter for a subsequent review of the plan.

David Carter
Head of Planning & Growth Strategy
Birmingham City Council
06 September 2013

**SOUTH WORCESTERSHIRE DEVELOPMENT PLAN
EXAMINATION**

Birmingham City Council – Hearing Statement

Matter 2: The Duty to Co-operate

This statement focuses on the issue and questions identified by the Inspector reproduced below which are of direct relevance to the City Council (and wider conurbation) and seek to amplify the representations already made.

*“Matter 2: The duty to co-operate in the planning of sustainable development
Main issue: Whether or not the legal requirements imposed by S33A of the Planning and Compulsory Purchase Act 2004 (as amended) have been met in the preparation of the Plan.*

Questions:

1) Is there clear evidence that, in the preparation of the Plan, the Councils have engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts?

2) Does the Plan taken adequate account of development requirements that cannot be wholly met in neighbouring areas”

In relation to the Duty to Co-operate the City Council considers that the South Worcestershire Authorities have met the legal test imposed by S33A.

The City Council has engaged with the South Worcestershire Authorities bi-laterally in relation to matters of shared concern. There is also engagement through the West Midlands Planning Officers Group (the surviving network of planners across the West Midlands Region) and through the arrangements for strategic planning within the Greater Birmingham and Solihull Local Enterprise Partnership (where Bromsgrove, Redditch and Wyre Forest Councils from North Worcestershire and Worcestershire County Council are represented).

For clarity the City Council has submitted statements on Matters 1 and 3 (the latter jointly with the Black Country authorities). On housing the City Council has not raised objections on the level of housing proposed although ongoing technical work on the emerging housing shortfall in Birmingham could have implications for a subsequent review of the South Worcestershire Plan. In relation to employment possible concerns over the balance between the levels of housing and employment growth would be addressed by incorporation of an amendment to policy SWDP45/5. This matter, however, is a question of soundness not a matter pertaining to the Duty to Co-operate.

SOUTH WORCESTERSHIRE DEVELOPMENT PLAN EXAMINATION

**Birmingham City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council
– Joint Hearing Statement**

Matter 3: The Employment Land Requirement

This evidence is submitted on behalf of the Metropolitan District Councils of Birmingham and the Black Country (Dudley, Sandwell, Walsall and Wolverhampton). It amplifies previous representations made from the Preferred Option stage onwards and responds to the specific issues set out above.

“Main issue: Is there adequate justification for the employment land requirement contained in the Plan?”

Questions:

1) Does the evidence base provide adequate justification for the employment land requirement of 280ha set out in the Plan?

2) Would the proposed level of employment land provision threaten employment development and urban regeneration in the Black Country and the West Midlands conurbation?

3) Does the proposed level of employment land provision ensure adequate flexibility to accommodate unanticipated needs and rapid economic change? “

Matters of Common Ground between the Birmingham and the Black Country and Worcestershire Authorities

Birmingham and the Black Country Authorities have consistently made the case in relation to the proposed Worcester Technology Park (Policy SWDP45/5) that the release of the first, northern phase is dependant on its occupation by a Worcester-based company consistent with the extant planning consent, which was tailored to meet the needs of Worcester Bosch. This would require an amendment to the policy as set out in the submitted version of the plan.

Birmingham and the Black Country Authorities have submitted suggested revisions to the proposed policy as set out in Appendix 1 to this statement. It is our understanding that all of these amendments are acceptable to the South Worcestershire Authorities with one exception.

The exception is that the South Worcestershire Authorities do not agree to the suggested change to part i of policy SWDP45/5. The basis for the Conurbation Authorities suggesting this clarification is because the land was released on the basis of exceptional circumstances and unless this clarification is built into the policy then the use of the land could become unrestricted, effectively adding a significant amount of employment land to the portfolio. Such a course of action would not appear to be justified by the published evidence base and therefore it is appropriate to adopt a cautious approach because of the potential impact on the regeneration of the conurbation.

The remainder of this statement is intended to provide justification for the suggested changes to the policy SWDP45/5 and supporting material including that to part i.

Context

Forecasting future employment land requirements is far from an exact science, particularly as the economy is unpredictable and cyclical. In determining requirements, however, the following issues are usually taken into account.

- Demand side issues: Using sector based forecasts and past rates of take up
- Labour supply side issues: Referring to demographic projections, economic activity rates and labour mobility
- Local market intelligence

Demand Side Issues

South Worcestershire has prepared an Economic Prosperity Background paper to accompany the Plan pulling together evidence from a variety of sources most notably the:

- South Worcestershire Employment Land Review – Roger Tym (2011)
- Employment Land Review – GVA Grimley (2008)

These and other sources suggest a range of employment land requirements. As the timeframes are not comparable requirements are summarised and shown as annualised rates in Table 1.

Table 1: Employment Land Requirements in South Worcestershire

Source	Requirement per annum (ha)
GVA Grimley (2001 – 2026)	6.36
RSS Phase 2 (2006 – 26)	12.2
Economic Prosperity Background Paper (2006 – 30)	6.2
SWDP Submission (2006 - 30)	11.6
Roger Tym (past take up 2006 – 11)	12

Whilst it was not the remit of the most recent Roger Tym study to suggest an employment land requirement, it did draw some broad conclusions which at times appear contradictory:

- That quantitatively South Worcestershire was promoting enough new land there remains a qualitative issue but recommended more modest provision rather than large scale releases.
- Freed of the RSS suggestions that a new target is likely to be lower than the RSS.
- There is currently 120 ha of land committed and 60 ha has been taken up in the last 5 years implying only ten years supply.
- Five year targets based on past take up does not reflect the cyclical nature of the market.
- Does not suggest attempting to more finely balance the employment land supply.

- From a *market* perspective there is demand to provide more land than the RSS, but it suggests that this is for warehousing.

It is of note that since the most recent Roger Tym Study, Worcester Bosch has cancelled its plans to relocate to the northern part of the Worcester Technology Park.

From a demand side there appears to be no clear explanation as to how the 280 ha requirement has been arrived at given that it is almost twice the amount suggested in the Economic Prosperity Background Paper. There is some evidence in the form of past take up rates but this is limited to a five year period and as such is not on its own a reliable basis for future forecasting.

Labour Supply Issues

The Worcestershire Demographic Report, South Worcestershire Appendix (2011) analyses the 2008 based population projections. It is assumed these will have influenced the household projections that broadly align with the housing requirement in the submitted plan. The population aged 65+ years is projected to increase by 35,000 between 2008 and 2030. This compares to a total population increase of 25,000 which suggests a decline in the number of people in all other age groups including those of working age.

It is noted that whilst the housing requirement relative to the RSS requirement has been reduced by approximately 20%, the employment land supply has increased by 16%. The recently published National Planning Guidance states that plan makers should make an assessment of the likely growth in job numbers based on past trends and/or economic forecasts and also having regard to the growth of the working age population and is explicit that where the working age population is less than job growth, *then this will result in unsustainable commuting patterns.*

The Roger Tym Study indicates that the South Worcestershire Labour Market is relatively self contained and that despite good road and rail links to Birmingham, the most obvious commuting city, commuting rates are low. According to the 2001 Census, only 3% of the Worcester workforce, for example, commuted to Birmingham. Unemployment in South Worcestershire is also below the West Midlands and national averages.

Although it is not the role of the planning system to eliminate competition and the NPPF gives significant weight to supporting economic growth, policies need to be based on evidence. This is clear in both the NPPF and the National Planning Guidance, which explicitly warn against oversupply of employment land.

Worcester Science Park

Previously Phase One of this site was identified to enable the relocation of Worcester Bosch, with a subsequent phase accommodate a technology park. Metropolitan Authorities clearly supported proposals to ensure that an important manufacturer remained within the West Midlands, but remained to be convinced about the justification for the second phase. In 2012, however, Worcester Bosch announced that it would not be relocating. The site benefits from planning permission, but due to the very exceptional circumstances of its release, it is restricted to its first occupant being a Worcestershire-based company.

Both sites continue to be promoted through the development plan as Worcester Science Park North and South. The plan states that despite the Worcester Bosch decision, there is still demand for a technology park and it is a key priority for the Worcestershire LEP.

The Roger Tym Study examined the high technology sector with particular relevance to the Malvern Hills Science Park and noted that very few high tech occupiers have come from outside of the region and that the facility does a great deal to keep those occupiers within the region; indeed most occupiers came from new businesses which originated on the QinetiQ Malvern Technology Centre.

For the reasons set out above, the demand for unrestricted uses, particularly on the northern first phase of the site is queried.

Implications for Birmingham and the Black Country

It is acknowledged that Local Plans are required to support the growth aspirations of LEPs but it is considered that these still need to be evidence-led. As mentioned, it is not the role of the planning system to prevent competition but equally local authorities will naturally seek to protect their own interests. It is not the intention of Birmingham and the Black Country Authorities to unduly undermine or restrict the potential success of the Worcester Technology Park but to ensure that it is managed and delivered in a way which does not undermine initiatives and developments in Birmingham and the Black Country including the nearby Longbridge redevelopment. These concerns were acknowledged by Worcester City Council in their response to the planning application dated 20 May 2010 where they reported that the nature of:

“any permission should ensure that development on the site can satisfy the principles of the RSS, WMRES and WES and would not compromise the future of Longbridge which is a key regional site”.

Independent advice has been sought from local surveyors Bulley’s which addresses the issues of competitiveness between employment land in the conurbation and in South Worcestershire and this is attached by means of further supporting evidence.

It should be noted that when compared to South Worcestershire the West Midlands Conurbation has much higher unemployment rates, a growing working age population and lower economic activity rates; in short it does not exhibit labour supply-side constraints. The conurbation also continues to support the urban renaissance strategy, whereby growth and investment is directed to areas of greatest need and past decentralisation trends are reversed. The bottom line is that there is a concern that a potential oversupply of employment land with unrestricted use of the Worcester Technology Park could detract from this, leading to unsustainable commuting and/or jobs being created in areas inaccessible to those in greatest need.

Conclusion

There is a high degree of common ground between the Birmingham and the Black Country and South Worcestershire Authorities. The outstanding issue is whether a more cautious

approach should be included in the policy SWDP45/5 for Worcester Technology Park. Both sides have 'agreed to disagree' on this point and are content this point of contention should be resolved by the Inspector on the basis of the evidence put before him.

E. SWDP45/5 Worcester Technology Park:

i. Phased delivery of a sustainable, well-designed technology park (Worcester Technology Park) for research and development and manufacturing related to environmental and new technologies or associated businesses, to be integrated with the land to the north that is already permitted for business uses [and restricted to occupation by a Worcestershire-based company.](#)

ii. Off-site highway works to support access to the site and contributions to improvements to the strategic highway network.

iii. Landscaping that contributes to the local Green Infrastructure network and the setting of existing and altered public routes through the site.

iv. Measures to improve accessibility by non-car modes to Worcester city centre and other local employment areas.

v. Contributions to improvements to the strategic highway network.

vi. The safeguarding of pedestrian and cycle access through the allocation through the retention or relocation of public rights of way.

Worcester Technology Park (SWDP45/5)

26. Although provision has been made for local employment opportunities within the city and the urban extensions, there is evidence to support a 70ha (gross) sub-regional employment site providing opportunities for existing manufacturing companies in the area to consolidate and expand by relocating to this site. The land is located immediately south-east of Junction 6 of the M5, a key gateway to the city. It lies within Wychavon District but as the site abuts the city boundary it will provide serviced employment land to meet the growth of Worcester.

27. The North Phase of Technology Park development (previously referred to as Phase 1) has outline planning approval and a Section 106 agreement for a mix of business uses (B1, B2 and B8). This is counted as a commitment for SWDP 3 purposes. Within the North Phase, development will occupy up to 140,000 square metres on 27ha (net) next to J6 and could potentially provide for new headquarters, manufacturing, distribution and research and development facilities [for a Worcestershire-based company.](#)

28. Site allocation SWDP45/5 is the South Phase on the remainder of the Technology Park, providing space for a cluster of other commercial companies, potentially involved in environmental and other high-technology sectors. Within the gross site allocation delineated on the Proposals Map, about 16ha (net) are identified for SWDP 3 purposes.

29. The completed development will be designed and landscaped as a single Technology Park and will include public open space, primary highway improvements and an ecological corridor. It is anticipated that two points of access will be provided. The current permission includes access to the Technology Park directly on to Crowle Lane at a point between Crowle Lane / Pershore Lane roundabout and Trotshill Lane. This route provides access to Warndon Villages and the city centre via the Trotshill motorway bridge. Development proposals will be tested through the Worcester Transport Models and the developer will fund any mitigation works, along with improvements to public transport, walking and cycling links.

30. Worcestershire County Council and Advantage West Midlands, as the Regional Development Agency, originally led the project development, feasibility and co-ordination of the public sector partners, resulting in a successful bid for £17.5m of Regional Growth Fund. Worcestershire County Council, having taken on a direct role in the project implementation, is responsible for completion of the detailed design work of infrastructure, planning and public sector co-ordination and construction of highway, service and environmental infrastructure.

31. The treatment of the site boundaries will also be key to assimilating the development into its countryside location, being sympathetically designed using natural features where possible and bolstered by new planting, particularly when acting as a buffer to the M5. The Barbourne Brook will create a strong environmental connection between the on-site proposals and the existing natural environment. The planning approval addresses issues related to the functional flood plain and water management. It also provides for compensatory woodland planting on land north of Warndon Wood to mitigate for the loss of residual woodland east of the M5.

32. A high-level Project Board of senior councillors and officers is in place to ensure that Worcester Technology Park as a whole is successful for both first and second phases.

33. In September 2012, the Worcester Bosch Group announced formally that they would not be progressing with their planned relocation to the Worcester Technology Park site. In response the County Council and wider partners are committed to continuing with development of the site and the establishment of Worcester Technology Park to meet market demand and future economic growth opportunity. The emerging vision for the site envisages a group of technology and technology-rich companies establishing and developing over the plan period in buildings that meet design quality and sustainability standards.

34. The partners are continuing with the delivery of infrastructure improvements for the North Phase of the development, which will ultimately be funded by the Regional Growth Fund. In September 2012 the County Council went out to commission the work to produce a due diligence report on Worcester Technology Park, which will be completed by early 2013.

35. A revised masterplan has been developed for the Worcester Technology Park and a new scheme is being delivered. The Project Board are confident that this will fit with the existing planning permission on the North Phase, ~~though the planning conditions may need to be revised.~~

36. The existing landowner in partnership with the County Council will continue to promote the development of the site to support the Technology Park vision. The ~~current~~ development programme (Table 18) ~~proposes~~ ~~suggests~~ that ~~an outline application for~~ the South Phase (formerly phase 2) site could come forward no earlier than 2019 ~~early in 2013~~ to support the County Council's intention to commence construction of the offsite service and highway infrastructure that support both elements of the scheme in spring 2013. In addition, several key technology companies have been identified by the Project Board that are known to have an interest in the area at this stage. *(NB: It is understood that the South Worcestershire authorities will be introducing a further factual change with regard to infrastructure delivery).*

Table 18 Development Phasing Plan

SWDP-Phase 2

2013 -2019

Broomhall Community and Norton Barracks Community (Worcester South Urban Extension)

Time period

SWDP-Phase 3

2019-2030

Employment generating uses	12	8
(ha)		
Neighbourhood centre A1 retail (sq.m.)	2,000	
Market Housing	525	945
Affordable Housing	345	635
Temple Laughern (Worcester West Urban Extension)		
Employment generating uses	3	2
(ha)		
Market Housing	205	380
Affordable Housing	140	250
Kilbury Drive (Worcester East Urban Extension)		
Market Housing	150	
Affordable Housing	100	
Gwillam's Farm (Worcester North Urban Extension)		
Market Housing	150	
Affordable Housing	100	
Worcester Technology Park (south)		
Employment generating uses	10 0	6 16
(ha)		

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SDP/RAF
4th September 2013

By email only

Mr I Culley
Section Leader
Education Enterprise
Wolverhampton City Council
Civic Centre
St Peter's Square
Wolverhampton
WV1 1RP

Dear Ian

Re: Worcester Technology Park

I refer to our recent telephone conversation concerning the above employment site which I understand is 71 hectares in size.

I note that you require a market prospective as to what impact bringing an employment site of this size and quality is likely to have on the investment decisions in the Black Country and Birmingham area based on our work for the City Deal.

We were instructed by Black Country Consortium Ltd who required us to undertake a market overview of the priority sites in the Black Country for high value manufacturing development that have been put forward by the Black Country Local Authorities and to review previous market demand work provided by DTZ and the Black Country Local Brownfield Strategy undertaken by Thomas Lister. The aim was to identify market sentiment and demand with regards to the industrial land offering available in the Black Country and to prioritise sites which can be brought into a 'shovel ready' state to local, national and inward investors for high value manufacturing uses within an acceptable and cost effective timeframe. As part of our advice, we have reviewed the currently available sites where development is being actively promoted and also other sites not actively on the market or where land assembly opportunities may bring further development opportunities. The advice was provided to support an application for city deal funding with the primary objectives to fully realise the demand for sites and new facilities from high value manufactures, particularly in the automotive and aerospace supply chains by investing in land assembly and remediation of sites to bring them forward for development and make them 'shovel ready'. A unique opportunity exists from the suppliers to Jaguar Land Rover's factories including the new engine plant at i54, Wolverhampton who need new buildings to produce more output volume to Jaguar Land Rover.

As a practice of independent Chartered Surveyors that have been trading for nearly 50 years, specifically in the Black Country and Shropshire market, specialising in commercial property, we are ideally placed to comment upon the Black Country market.

It is clear that the Worcester Technology Park at Junction 6 of the M5 is a quality development opportunity for Worcestershire as already seen from a significant local employer Worcestershire Bosch. It does however have potential repercussions for the Black Country and Birmingham area and could undermine the initiatives being undertaken as part of the city deal funding application.

Whilst Junction 6 of the M5 can be seen as a different local market compared to the Black Country or Birmingham, larger occupiers seeking development opportunities may be lost to Worcestershire Technology Park purely on the basis of land availability. The availability of commercial 'shovel ready' sites in Birmingham and the Black Country is very limited at the present time. There is an aim to maintain the concentration of suppliers in the Black Country and Birmingham markets, particularly in the aerospace and automotive business as having these suppliers in close proximity to each other helps the viability and success of the sector as a whole which is seen as critical to this area.

The release of such a large area of quality employment land could compromise this and undermine the city deal initiatives to bring forward 'shovel ready' commercial employment sites within the Black Country and Birmingham conurbation, which currently suffers from viability and availability problems.

Worcester Technology Park will be in direct competition for employment occupiers for the Longbridge Site, Birmingham as the A38, M5 corridor attracts the same local companies.

It is not the intention to unduly restrict or undermine the potential success of the Worcester Technology Park, however, there is the potential for Worcester Technology Park by its sheer size and availability to undermine initiatives in the Black Country and Birmingham areas which are currently underway.

A solution may be to position the Worcester Technology Park for Worcestershire based companies as was previously provided for under the planning permission on the northern site for example.

A further alternative that may be worth considering is some form of market test (as have previously been used, for example with out of town retail), which would also hopefully achieve the same aims as above.

I hope my thoughts are of assistance but if you require any further clarification or further input, please let me know.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Perriton', with a stylized flourish at the end.

S D PERRITON MRICS

Partner

Email - steve.perriton@bulleys.co.uk

Telephone - 0121 544 2121

Enc.

DISCUSSION BETWEEN SOUTH WORCESTERSHIRE COUNCILS AND BIRMINGHAM & BLACK COUNTRY COUNCILS RE SOUTH WORCESTERSHIRE DEVELOPMENT PLAN REPRESENTATIONS.

Date Tuesday 9th April 2013

Present Paul Bayliss (SWDP Project Manager)
David Blake (Worcester City Council)
Anne Bonsor (Worcester City Council)
David Carter (Birmingham City Council)
Ann Cooper (Worcester City Council)
Ian Culley (Wolverhampton City Council)
Fred Davies (Wychavon District Council)
Andrew Donnelly (CEPOG Secretariat)
Annette Roberts (Dudley MBC)
Gary Williams (Malvern Hills District Council)

Background to discussion

- As part of the Preferred Options Stage of the SWDP (Sept 2011) Birmingham and the Black Country (B&BC) LPAs raised a number of issues primarily around levels of housing and employment land proposed. At the South Worcestershire Councils (SWC) invitation a round-table conversation took place at Wychavon DC on 8th December 2011 between SWCs and B&BC..
- At the Proposed Significant Changes Stage (Sept 2012) B&BC accepted the evidence and the consequent increase in proposed housing but reiterated their concerns in respect of employment land .
- At Regulation 18 stage of the South Worcestershire Development Plan representations were received from B&BC LPAs expressing concerns primarily in respect of the level of employment land proposed and the role of the Worcester Technology Park. Consequent to these representations B&BC LPAs were invited by SWCs to discuss their representations. This note is a record of that discussion.

Notes of meeting

South Worcestershire briefly reiterated the anticipated key milestones (utilising PINS timetable advice – assumes no delays):

- Anticipated Submission – end April 2013
- Anticipated preliminary meeting – mid-June 2013
- Anticipated EiP – end July – August 2013
- Anticipated Inspectors Report – Christmas 2013
- Anticipated Adoption – Feb/March 2014

B&BC confirmed that they were, at this stage, content with the SWDP housing proposals (though they reserved the right to reconsider once the GB&SLEP area SHLA is completed) but that they had concerns on the employment side. These concerns focused around:

- The Worcester Technology Park

- The timing of the different phases of the Worcester Technology Park
- The overall quantum of employment land was stated to still be too high.

SWCs gave some background to the Worcester Technology Park (WTP) and more general employment land proposals:

- WTP arose from the original RIS proposals to enable Bosch to relocate within the Worcester area
- The planning consent for Part 1 (the larger element to the south) was granted for 5 years of which 4 are outstanding. Part 1 is not shown as an allocation in the SWDP but is included in the numbers as a commitment. Business Uses specified are limited to R&D and ancillary.
- One of the conditions restricts usage of part 1 to locally relocating companies. As such not intended to attract footloose investment (a key B&BC concern) though the permission is not personalised to Bosch.
- Part two of WTP is the smaller element to the south of the committed employment land and is intended for smaller businesses.
- WTP is now being actively promoted by three agents (Harris Lamb, DTZ and Stretton Parker) on behalf of the County-led project board. Interest has been shown in both part 1 and 2.
- The overall proposals provide for the full range of employment land requirements depending on
- There is a masterplan for the entire scheme.
- It is anticipated that by May 2013 there will be a decision made by HA on Junction 6 (a major constraint currently).
- There are a range of other sites within Worcester City and in the other settlements in S. Worcs. which together provide a flexible portfolio intended to retain investment and attract complementary investment consistent with the growth-led strategy of Worcestershire.
- Evidence for these proposals is provided by the prosperity background paper along with the GVA (2007), AWM (date?) and Roger Tym (2010) studies. The plan is capable of accommodating the range of requirements expressed by these studies.
- The 280 ha of employment land quoted by the plan includes the southern (Bosch) element of WTP, completions and allocations.
- The supply of 297ha includes commitments at April 2012, allocations and completions.
- It was noted by SWCs that Worcestershire LEP are very supportive of the employment proposals as contained within the proposed plan.

Detailed conversation

- B&BC representatives requested from SWC a timeline showing how the employment land proposals had evolved and the influences. ***ACTION SWC***
- SWC representatives requested from B&BC direct links to their evidence base which underpin and provide a technical basis for their responses. ***ACTION B&BC***
- B&BC confirmed that their main concerns were:
 - proximity of WTP to Birmingham (particularly Longbridge) and some of the smaller employment schemes typically within in the Black Country and their concern that WTP could strip investment from the metropolitan West Midlands.

- Proximity (and therefore accessibility) of WTP to Jn 6 of the M5.
- B&BC requested confirmation that in view of the range of employment forecast (GVA 25000, AWM 11500) whether there was sufficient flexibility within the housing numbers to accommodate this range. SWC highlighted that the housing proposals are consistent with the SHMA and the monitoring and early review potential which is intended (in part) to enable SWC to respond to changes in the wider economic and employment situation.
- B&BC confirmed that the Black Country representation was an officer representation on behalf of the Association of Black Country Authorities. Birmingham confirmed that their representation was prepared by officers under delegated powers.
- B&BC proposed a two-fold solution:
 - That the WTP Part 1 stays “as is”
 - That WTP Part 2 is phased to post-2019 (this would be a Main Modification)
- B&BC asked whether SWC would be willing to change the SWDP in order to facilitate the removal of objection.
- Birmingham confirmed that a collaborative GBSLEP area SHMA was in the process of being commissioned with view to publication in late 2013.

Agreement

- It was agreed by B&BC and SWC that they would go away from the meeting and further consider each others’ perspective and evidence
- SWC would consider the revision proposed by B&BC
- It was agreed that B&BC and SWC would continue to constructively engage in on-going dialogue in the run up to the EiP hearings. This would be with view to the preparation of a statement of common ground.
- It was agreed that SWC and B&BC would meet again once this work has taken place to further assess the situation.

PB

10/4/13

Our Ref: DC1/SWDP

Date: 22 February, 2013

South Worcestershire Development Plan
Orchard House
Farrier Street
Worcester
WR1 3BB
Email: contact@swdevelopmentplan.org

Dear Sir/Madam,

South Worcestershire Development Plan (SWDP) – Submission Draft Consultation 2013.

Birmingham City Council would like to thank Malvern Hills, Worcester City and Wychavon Councils for the opportunity to comment on the above emerging plan.

The City Council would like to make the following comments.

In Birmingham's City Council's previous representations made on the SWDP in 2011 (on the Preferred Options) and in 2012 (on the Significant Changes consultation document) concerns were raised regarding the levels of housing and employment land provision outlined in the plan.

Whilst Birmingham City Council is satisfied genuine attempts have been made to address the additional housing needs inside the SWDP area with an increase of housing provision from 20,361 (Preferred Options) to 23,200 dwellings (Significant Changes document, and Submission version). This is broadly at a level consistent with the ONS 2008-based household projections. The City Council remains of the view, however, of the need for further dialogue in relation to the emerging shortfall of housing in Birmingham which was highlighted in the response to the Significant Changes document.

It appears that the plan fails to address concerns the City Council raised in our previous responses regarding the provision of additional employment land.

There appears to be no clear justification for the levels of employment land proposed. The City Council understands that Worcester Bosch have made it clear that they will not now be relocating from their existing site. However, the SWDP fails to clarify that the land previously earmarked for Worcester Bosch was released on the premise that the land was required for a major relocation of a Worcester-based company. The City Council is not aware of any further evidence that would justify a change to this approach yet this is not reflected in the policies of the development plan.
The City

Council has also previously questioned the basis of the additional employment land to the south of the Worcester Bosch site which could have potential adverse impacts the development of strategic employment land at Longbridge. This continues to be a cause for concern and the allocation of additional land for employment to the west of the M5 motorway in the current version of the plan exacerbates this position. It is for these reasons that the City Council is regrettably querying the soundness of the employment land proposals in the SWDP.

Finally, Birmingham City Council wishes to re-iterate its desire for further dialogue with Malvern Hills, Worcester City and Wychavon Councils inline with the Duty to Co-operate regarding the issues outlined above (please arrange to meet either myself or David Carter on 0121 303 4041).

Yours sincerely



Waheed Nazir
Director of Planning and Regeneration
Birmingham City Council

Telephone 0121 464 7735

Planning Strategy
Sent by: Nichola Shandley
11/01/2013 16:28

To Planning Office Manager@BCCE10K
cc Martin Eade/DevStrategy/BCC@BCCE10K
bcc
Subject Re: Birmingham Development Plan - Options Consultation -
ACTIONED SR

History: This message has been replied to.

David Clarke ---11/01/2013 15:04:43---David Clarke <david.clarke@malvern hills.gov.uk>



David Clarke
<david.clarke@malvern hills.gov.uk>
11/01/2013 15:05

To "planningstrategy@birmingham.gov.uk"
<planningstrategy@birmingham.gov.uk>
cc

Subject Birmingham Development Plan - Options Consultation

Dear Sir / Madam,
Please find attached the response of the South Worcestershire Authorities – Malvern Hills District Council, Worcester City Council and Wychavon District Council - to the Birmingham Development Plan Options Consultation.
We trust that our comments are helpful and will be taken into account in the preparation of the Birmingham Development Plan.

If you require clarification on any issues raised in the response or wish to discuss the issues further with South Worcestershire officers, please contact myself at Malvern Hills District Council on 01684 862370.

Yours sincerely,

David Clarke

David Clarke
Malvern Hills District Council
The Council House
Avenue Road
Malvern
Worcestershire WR14 2AF

Telephone: 01684 862370

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Please also note that the author of this email is not authorised to conclude any contract on behalf of Malvern Hills District Council by email unless accompanied by an official order form.

Thank you.



South Worcestershire Authority Response to Birmingham Development
Plan.pdf

Director of Planning and Regeneration
Development Directorate
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

11th January 2013

Dear Sir / Madam

Birmingham Development Plan – Options Consultation

The South Worcestershire Authorities – Malvern Hills District Council, Worcester City Council and Wychavon District Council – welcome the opportunity to comment on the Options for the Birmingham Development Plan.

As background, the South Worcestershire Authorities are currently preparing the South Worcestershire Development Plan (SWDP) and will be submitting the draft Plan to the Secretary of State in April 2013.

Our responses to Questions 1, 2, 3, 4, 6, 7, 8, 9 and 11 on your Consultation Response Form are attached.

We trust that our comments will be helpful and can be taken into account in the preparation of the Birmingham Development Plan.

If you require clarification on any issues raised in this response or wish to discuss the issues further with South Worcestershire officers, please contact David Clarke at Malvern Hills District Council on 01684 862370.

Yours faithfully,



Gary Williams
Head of Planning, Economy and Housing Services
Malvern Hills District Council



Ann Cooper
Planning Policy Team Leader, Worcester City Council



Giorgio Framalico
Head of Planning Services, Wychavon District Council

T: 01905 722233

E: contact@swdevelopmentplan.org

www.swdevelopmentplan.org

South Worcestershire Development Plan,
Orchard House, Farrier Street, Worcester WR1 3BB

Birmingham Development Plan – Planning for Birmingham’s Growing Population
Response of South Worcestershire Authorities

Question 1 – Do you agree with the overall strategy and vision for the City?

and

Question 2 – Are there any comments that you would like to make regarding the overall strategy or vision for the City?

The South Worcestershire Authorities support the vision and particularly the statements that Birmingham will "... meet the needs of its population", "...local jobs and services will be accessible through a range of sustainable transport choices" and "the network of thriving local centres will reflect the diversity of the city and the needs of local people".

The South Worcestershire Authorities also support the objectives, particularly the objective "to make provision for a significant increase in the city's population". It is suggested, however, that this objective could be strengthened to "maximise the supply of new homes within the city to meet identified housing needs".

The South Worcestershire Authorities note that the Options consultation document says very little about the need for new transport infrastructure to maintain or improve connectivity within Birmingham and beyond. Birmingham is in an important position at the crossroads of the national road and rail network and we would be concerned if the scale and/or distribution of Birmingham's housing growth were to reduce future infrastructure capacity as this could affect the ability of other areas (including Worcestershire) to meet their housing and employment needs. In developing the preferred options we would request that regard is given to achieving the objective of "providing high quality connections throughout the City and with other places ..."

Question 3 – Release some land from the Green Belt within Birmingham to provide additional housing?

The South Worcestershire Authorities recognise that it will be necessary to explore the release of Green Belt land within the wider Metropolitan Area to meet Birmingham's housing needs. This work will inform future decisions regarding the relative merits and potential for housing growth on the edge of Birmingham.

It is considered that any review of Green Belt should be consistent with guidance in the National Planning Policy Framework and should be undertaken in collaboration with any neighbouring planning authorities that share the Green Belt boundary.

Question 4 – Seek to persuade neighbouring Councils to make land available for housing to meet some of Birmingham's needs?

South Worcestershire does not share any boundaries with Birmingham and is not a major reception area for migration from Birmingham as acknowledged in Birmingham's response to the recent South Worcestershire Development Plan (SWDP) Proposed Significant Changes consultation. Birmingham's response also did not seek any specific increase in the level of housing provision proposed by the South Worcestershire Authorities.

Nevertheless, it is understood that under the Duty to Cooperate Birmingham may wish to explore options for whether South Worcestershire could meet some of Birmingham's needs.

The key issues for South Worcestershire in accommodating any shortfall in housing provision from within Birmingham would be as follows:

- The South Worcestershire Authorities have been preparing the South Worcestershire Development Plan (SWDP) over the last 5 years and will be submitting the draft Plan to the Secretary of State in April 2013.
- In the preparation of the SWDP the South Worcestershire Authorities have considered cross-boundary housing requirements and collaborated with adjoining authorities and other authorities, including Birmingham.
- The SWDP housing requirement has been informed by national projections and a number of evidence bases including the Strategic Housing Market Assessment (SHMA), published in February 2012. The SHMA makes allowance for in-migration (including that from Birmingham) based on past migration flows.
- The SWDP makes provision for in-migration. Indeed, over half of the 23,200 increase in housing provision proposed for South Worcestershire to 2030 is to accommodate net in-migration.
- The SWDP seeks to balance housing requirements with employment needs and is considered to provide a sustainable approach to growth. Further housing allocations in South Worcestershire would create an imbalance with employment needs.
- Displacing Birmingham's housing requirement to South Worcestershire would effectively leapfrog the West Midlands Green Belt and the Districts in North Worcestershire. Given that a significant proportion of those displaced households would continue to need to access jobs in the West Midlands Metropolitan Area, this would generate longer distance commuting and significantly increase travel movement. This would be contrary to the National Planning Policy Framework which states (paragraph 34) that plans "should ensure developments that generate significant movement are located where the need to travel will be minimised". It would also be contrary to the Birmingham Development Plan objective to minimise Birmingham's carbon footprint.

In light of the above factors, any notion of South Worcestershire making land available to meet some of Birmingham's needs would be considered unsustainable and undesirable.

Question 6 – Are there any comments that you would like to make regarding the options in relation to housing development?

The South Worcestershire Authorities support Birmingham's proposed approach of providing housing for as much of the City's growing population within the urban area as possible, with the focus on maximising the use of brownfield or other available sites within the existing built-up area.

As indicated in our responses to Questions 3 and 4, the South Worcestershire Authorities recognise that Birmingham will need to explore the release of Green Belt land and explore whether neighbouring Councils could make land available to accommodate some of Birmingham's population growth.

As indicated in our response to Question 7, the South Worcestershire Authorities would also like to suggest some alternative ways in which housing provision might be increased in Birmingham.

We do, however, recognise that any options for housing provision may need to be revisited if the household formation projections, due to be published by the Office of National Statistics later in 2013, show a significant increase in the housing requirement for Birmingham.

Question 7 – Are there any alternative ways in which housing provision could be increased?

As alternative or additional ways in which housing provision could be increased in Birmingham, the South Worcestershire Authorities would like to suggest that consideration is given to the following measures:

- Increased housing density in City Centre and transport corridors. It is noted that in order to ensure an effective and efficient use of land a minimum density of 40 dwellings per hectare is expected in the suburbs with higher densities in the City Centre, other centres and along transport corridors. This is broadly consistent with the approach being taken in South Worcestershire, although it should be noted that the emerging South Worcestershire Development Plan (SWDP) proposes an average net density of 75 dwellings per hectare (dph) within the city of Worcester and larger town centres. It is noted, however, that the Birmingham SHLAA assumed a minimum 100 dph in the City Centre and 50 dph along transport corridors. It is suggested that these densities could be adopted as policy in the Birmingham Development Plan.
- Bringing long-term empty homes back into use. It is noted that the Birmingham SHLAA assumes that only 250 empty homes will be brought back into use over the next 20 years. It is suggested that this could be an under-estimate and that the re-use of empty homes may be able to make a slightly larger contribution to meeting Birmingham's housing need over the plan period.
- Reassessment of urban capacity. The South Worcestershire Authorities note that several London Boroughs have designated opportunity zones to provide new high density sustainable communities through mixed-use redevelopments on sites currently occupied by low intensity land uses. It is suggested that Birmingham could similarly consider sites currently in non-residential use with a view to reassessing the urban capacity.

Question 8 – Are there any alternative Green Belt options which you consider to be suitable for housing development?

The South Worcestershire Authorities note that in the preliminary analysis of the City's Green Belt some areas were discounted on the basis that they were too small to accommodate a sustainable urban extension. We would suggest that the ability to accommodate a sustainable urban extension should not be the sole factor in determining

whether an area of Green Belt is capable of contributing towards the future housing land supply in Birmingham.

It is therefore suggested that all areas of the Green Belt in Birmingham should be assessed taking full account of guidance outlined in the National Planning Policy Framework. Any Green Belt review should also be undertaken in collaboration with neighbouring planning authorities that share the Green Belt boundary.

Question 9 – Do you think that the Council should address this (employment) by releasing some land from the Green Belt for employment development?

and

Question 11 – Are there any other comments that you would like to make regarding the options in relation to employment development?

The South Worcestershire Authorities note that the Options consultation document does not include any specific figures or targets for the number of new jobs to be created or hectares of new employment land required. Without such targets it is difficult for the South Worcestershire Authorities to comment on the options for new provision.

Date: 14th September, 2012

South Worcestershire Development Plan
Orchard House
Farrier Street
Worcester
WR1 3BB
Email: contact@swdevelopmentplan.org

Dear Sir/Madam,

Public Consultation 2012 - South Worcestershire Development Plan (SWDP).

Birmingham City Council would like to thank Malvern Hills, Worcester City and Wychavon Councils for the opportunity to comment on the above emerging plan.

The City Council would like to make the following observations at this stage.

It has been noted that the level of housing provision in the emerging plan falls below that published in the West Midlands Regional Spatial Strategy Phase Two Revision. Notwithstanding this the draft SWDP does establish a level of housing provision at around the level of the 2008-based ONS household projections. At this stage, therefore the City Council is not specifically seeking an increase in the level of housing provision from that proposed.

It is important, however, that this situation is subject to review in the context of new analysis likely to be published over the coming months following publication of the 2011 Census results and also a significant potential shortfall arising in Birmingham and this could have implications for adjoining authorities. While the City Council recognises that South Worcestershire is not a major reception area for Birmingham migrants and the SWDP is unlikely to assist significantly in meeting the shortfall in its own provision, it would welcome a dialogue under the 'duty to cooperate' with authorities. It is noted that you are proposing some further work on the implications for sustainability arising from higher levels of housing development and we would welcome involvement in such considerations.

Finally, although not specifically part of the consultation the City Council would like to voice its continuing concerns in relation to the allocation of additional employment land on the edge of Worcester additional to the land specifically required for the relocation of Worcester Bosch. Birmingham City Council is of the view that such development has potential to undermine employment prospects in the adjoining Metropolitan Authorities and specifically the future redevelopment and investment at the Longbridge site in Birmingham.

On the matters identified the City Council will look forward to a continuing dialogue with you in relation to the draft SWDP.

Yours faithfully,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, likely representing the name Waheed Nazir.

Waheed Nazir
Director of Planning & Regeneration

DATE 29th October 2008

Freepost RLTS-XRLK-AKGK

**Fred Davies
SWJCS Acting Project Officer
The South Worcestershire Joint Core Strategy Team,
Urban Environment,
Orchard House,
Farrier Street,
Worcester
WR1 3BB**

Dear Mr Davis,

**SOUTH WORCESTERSHIRE JOINT CORE STRATEGY - PREFERRED
OPTIONS CONSULTATION**

The South Worcestershire Joint Core Strategy - Preferred Options Consultation was considered by the Council's Cabinet Member for Regeneration on 29th October, and the City Council's views are as follows.

The Preferred Options propose a Regional Investment Site (RIS) in the vicinity of junction 6 on the M5 Motorway in Worcester. The Regional Spatial Strategy requires at least one RIS to be available within or linked by public transport to each of the Regeneration Zones and High-Technology Corridors. The Central Technology Belt is not currently served by a RIS but the emerging Longbridge Area Action Plan proposes a 25 hectare RIS which would serve this Corridor. The emergence of the Longbridge RIS is supported in the Preferred Option of the Phase 2 Revision of the Regional Spatial Strategy.

The successful regeneration of the former MG Rover site is of vital importance to the economy of Birmingham and the Greater Midlands area. The RIS at Longbridge will play a key role in diversifying the Region's economic base through attracting high-technology companies. The Longbridge RIS is in a highly sustainable location being located within the urban area on brownfield land, with good access to public transport and a range of local services. Worcestershire County Council, Advantage West Midlands and the Central Technology Belt support the provision of an RIS at Longbridge.

It is considered that the identification of an additional RIS in Worcester may deflect from the implementation of the RIS proposal at Longbridge. It is likely that the Worcester RIS would act as a direct competitor to the Longbridge proposal.

Investment, which would otherwise be directed to Longbridge may instead prefer a greenfield site located by a motorway. In these circumstances it is unclear how the proposed RIS in Worcester would complement the Longbridge development or how it would contribute to the objectives of the Central Technology Belt.

The City Council therefore expresses significant concern over the Worcester RIS proposal and requests a meeting with the South Worcestershire Authorities, Advantage West Midlands and the Central Technology Belt to discuss the above issues.

Yours sincerely

Martin Eade
Team Leader
Planning Strategy

Telephone calls to 0121 303 3430