

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

APPENDIX 1

**Report to the Strategic Director of Development and Culture in Consultation with Cabinet Member
for Development, Jobs and Skills, October 2012, Emerging Development Plans in areas around
Birmingham: Consultation with Neighbouring Authorities (including appendices)**

Report to:	STRATEGIC DIRECTOR OF DEVELOPMENT AND CULTURE IN CONSULTATION WITH CABINET MEMBER FOR DEVELOPMENT, JOBS AND SKILLS
Report of: Date of Decision:	Director of Planning and Regeneration 24 October 2012
SUBJECT:	EMERGING DEVELOPMENT PLANS IN AREAS AROUND BIRMINGHAM: CONSULTATION WITH NEIGHBOURING AUTHORITIES
Key Decision: No	Relevant Forward Plan Ref:
If not in the Forward Plan:	Chief Executive approved <input type="checkbox"/> O&S Chairman approved <input type="checkbox"/>
Relevant Cabinet Member(s):	Cllr Tahir Ali, Cabinet Member for Development, Jobs and Skills.
Relevant O&S Chairman:	Cllr Ian Cruise, Chair of the Birmingham Economy and Jobs Overview and Scrutiny Committee
Wards affected:	All

1. Purpose of report:
1.1 This report summarises the current position in relation to the preparation of Development Plans in areas neighbouring Birmingham. In particular it identifies the levels of provision for new housing which are being proposed in these plans and considers this in relation to the evidence for future housing requirements in Birmingham.
1.2 Some of these plans are currently at a consultation stage and the report goes on to recommend a City Council response to these plans. A further report outlining the progress of these local development plans will be represented at a later date.

2. Decision(s) recommended:
That :
2.1 the Director of Planning and Regeneration responds to consultations on neighbouring authority development plans on the following basis:
(i) In the case of local authorities within the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and North Warwickshire to raise no objection to the current round of Development Plans on condition there is a recognition by the authorities concerned that an early review may be necessary to consider the need for provision to be made in these areas to accommodate housing requirements generated in Birmingham that cannot be met within the city boundary.
(ii) In the case of Coventry and South Warwickshire to make representations on the grounds that the failure of these plans to provide for sufficient housing to meet locally generated housing requirements will place added pressure on housing markets in and around Birmingham
(iii) To raise no objection to the level of housing proposed for South Worcestershire but to follow through previous concerns over the scale of employment land proposed on the edge of Worcester by way of an objection

Lead Contact Officer(s):	David Carter Head of Planning and Growth Strategy
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3. Consultation

- 3.1 Internal
There has been internal consultation with senior officers responsible for housing, transportation and regeneration issues.
- The Deputy Leader of the Council was briefed on this report on 15/ 10/ 2012
- The Chair of Planning Committee was briefed on this report on 15/ 10/ 2012
- 3.2 External
None relevant

4. Compliance Issues:

- 4.1 Are the recommended decisions consistent with the Council's policies, plans and strategies?
- The approach proposed in this report is consistent with many of the principles established in the Leader's Policy Statement, in particular those relating to housing.
- 4.2 Financial Implications
(Will decisions be carried out within existing finances and Resources?)
- There are no direct financial implications arising from this report.
- 4.3 Legal Implications
- Under the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011, local planning authorities are required to prepare a development plan. The detailed requirements and procedures which must be followed in preparing such plans are set out in the Town and Country Planning (Local Planning) Regulations 2012 and the National Planning Policy Framework. An important aspect of the process is compliance with the 'Duty to Co-operate' under which neighbouring authorities are expected to work together to address issues (such as levels of housing provision) which have implications that go beyond a single local authority boundary.
- 4.4 Public Sector Equality Duty (see separate guidance note)
- The responsibility for addressing equalities issues rests with the individual authorities preparing each emerging plan.

5. Relevant background/chronology of key events:

- 5.1 Prior to the Localism Act 2011 decisions on the overall level of provision to be made for new housing development and the distribution of this between local authority areas were made through regional processes, most recently through the Regional Spatial Strategies (RSS). These arrangements have now been replaced, and individual local authorities are now expected to determine their own levels of housing growth based on an 'objective assessment' of needs. Where there are issues which go beyond a single local authority area, there is an expectation that authorities will work together through the 'Duty to Co-operate' to address these.

- 5.2 The RSS was proposing that 57,500 new dwellings should be provided in Birmingham between 2006 and 2026. This level of growth assumed that some of Birmingham's housing need would be met in adjoining areas. More recent household projections produced by the Office of National Statistics indicate that there will be a greater increase in household numbers than was expected at the time of the RSS work. Birmingham is therefore likely to be even more dependent on adjoining areas to help meet its housing need than the RSS expected. Within this context it is important that appropriate provision is made in the Core Strategies/Local Plans being produced in these adjoining areas.
- 5.3 The appendix to this report summarises the current position in relation to these plans.
- 5.4 The emerging Birmingham Development Plan, (formerly the Core Strategy) is likely to undergo 8 weeks public consultation during the winter of 2012 prior to publication of the publications version in the summer of 2013, followed by its estimated adoption in the summer of 2014.
- 5.5 The **Black Country** already has an adopted Core Strategy. This proposes a level of new housing provision which exceeds the latest projection for household growth in that area. There is therefore potentially available capacity in the Black Country to help meet any shortfall in provision in Birmingham.
- 5.6 Within the **GBSLEP area, and North Warwickshire** authorities are generally planning to keep to the levels of new housing which were being proposed through the RSS process. Overall this means that the level of new housing provision would fall a little below the latest household projections and no provision would be available to meet any potential shortfall in Birmingham. Many of the plans in this area are well-advanced, and it would not be reasonable to expect them to have taken account of this requirement which is only just emerging. However, as this area is closely linked to Birmingham in housing market terms, it is important that Birmingham's needs are taken into account in future development planning. It is therefore recommended that the City Council should make representations on these authorities' plans seeking the recognition of the possible need for an early review of their plans to address this issue.
- 5.7 In **Coventry and South Warwickshire** a substantial shortfall in housing provision against the latest household projections is emerging. This is primarily because Coventry are proposing to reduce their level of new housing provision well below the level proposed in the RSS, without any commitment by adjoining authorities to accommodate the resulting shortfall. The effect of this will be to place significant additional pressure on housing markets in and around Birmingham. It is recommended that representations should be made to these plans on these grounds.
- 5.8 In **South Worcestershire** the emerging level of housing provision is below the proposed RSS level but still in line with the latest household projections. This raises no direct issues in the short term for Birmingham. However, in relation to economic development the City Council has previously raised concerns over the scale of employment land provision on the edge of Worcester. Since these proposals remain unchanged and in the current form and could undermine proposals for development and regeneration at Longbridge. More generally it will be necessary to monitor emerging plans to ensure that proposals for employment are at a scale which does not encourage excessive out-migration of activity. Further discussions with the South Worcestershire council will need to be held to address these issues.

- 5.9 In order to enable responses to be made to these plans promptly it is recommended that the Director of Planning and Regeneration be authorised to submit responses in line with the approach set out above as the need arises. Consultation with the Cabinet Member will however continue to be required if comments outside these parameters are considered necessary.

6. Evaluation of alternative option(s):

- 6.1 The Council could make no comment on adjoining plans and leave this to neighbouring authorities. However this would risk creating an under-provision of new housing which would make access to appropriate housing more difficult for Birmingham residents. It would also not be consistent with the Duty to Co-operate and could lead to the Birmingham Development Plan being found unsound.
- 6.2 The Council could object to the current round of plans within the GBSLEP area. However at this stage there is no clear evidence as to the scale of additional housing that might be required in each of these adjoining Council areas, and the levels of provision being proposed currently are adequate to meet needs in the next few years, so such an objection would not be justified. It is also to the City's advantage that there should be up-to-date plans in place in adjoining areas, to ensure that housing and other development pressures are directed into appropriate locations in these areas.
- 6.3 These alternatives are not therefore recommended.

7. Reasons for Decision(s):

- 7.1 To ensure that Birmingham's emerging future requirement for new housing is reflected in the development plans currently being prepared by adjoining Councils.

Signatures

Date

Cabinet Member for Development, Jobs & Skills
Cllr Tahir Ali:

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Strategic Director of Development

Mark Barrow:

List of Background Documents used to compile this Report:

ONS 2008-based population and household projections.
RSS Phase 2 Revision Panel Report
Latest Core Strategy/Local Plan documents of neighbouring authorities

List of Appendices accompanying this Report (if any):

1. Proposed Housing Provision in Areas adjoining Birmingham

Report Version	10	Dated	22/10/2012
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APPENDICES 1:

PROPOSED HOUSING PROVISION IN AREAS ADJOINING BIRMINGHAM

Context

This note summarises the position which is emerging in relation to proposed levels of new housing in Birmingham and local authority areas within Birmingham's area of influence.

It compares proposed provision in the latest development plan (either adopted or consultation version) with the numbers proposed in the RSS Phase 2 Revision Panel Report, and with the 2008-based household projections. Because plan periods differ, the numbers are expressed on an annual basis.

Birmingham

Local Authority	Plan Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
Birmingham	Draft Core Strategy 2011	3,880	2,875	2,530

The proposed figure is slightly below the RSS requirement – but more significantly both the RSS and proposed figures fall well short of the household projections.

Growth levels within the plan are now being reviewed – but there appears to be no realistic prospect that all of the requirement can be met within the city boundary.

Black Country

Local Authority	Plan Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
Black Country	Adopted	2,500	3,150	3,150

The Black Country is the only area where the level of projected household growth is below the proposed level of provision. The Black Country is one of the areas which receive outward migrants from Birmingham so it is reasonable to conclude that some of its surplus could meet Birmingham needs not capable of being met within the city boundary.

Greater Birmingham and Solihull

This area includes all the GBSLEP authorities apart from East Staffordshire which in housing market terms has only limited connections to Birmingham. It also includes North Warwickshire which although not in the LEP adjoins Birmingham.

Together with the Black Country, this area includes all the main 'reception' areas for outward migrants from Birmingham.

Local Authority	Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
Cannock	Pre-submission consultation – ends 17/9	280	340	240
Lichfield	Pre-submission consultation – ends 10/9	450	400	420
Tamworth	Pre-submission consultation completed	250	200	205
N Warks	Pre-submission consultation – ends 23/8	185	150	175
Solihull	Submitted	640	525	525
Bromsgrove	Pre-submission consultation expected September	360	200	265
Redditch	Draft consultation completed 2011	215	350	160
Wyre Forest	Adopted 2010	325	200	200

Most authorities in this area are broadly staying with the RSS housing numbers. Only two (Cannock and Redditch) seem to be proposing lower levels. These are both cases where the RSS numbers significantly exceed local household projections, and in the case of Redditch there are also local capacity issues which require resolution between Bromsgrove and Redditch.

None of these authorities are proposing to meet the 2008-based household projections – but in most cases the deficits are small. The more significant deficits are Solihull, Bromsgrove and Wyre Forest. Wyre Forest already has an adopted Core Strategy, and it is reasonable to balance its shortfall against part of the Black Country surplus.

None of these authorities are making provision for needs generated in Birmingham that cannot be met within the city boundary.

Coventry and South Warwickshire

This area covers Coventry and all of Warwickshire apart from North Warwickshire. While this area is not particularly important in terms of direct migration from Birmingham, it does have close links to Solihull and Redditch/Bromsgrove – so a significant shortfall in provision in this area would have an indirect impact on Birmingham.

The majority of authorities are staying with the RSS numbers, but with one very significant exception. This is Coventry, which is now proposing to provide 1,000 dwellings a year less than the RSS requirement.

Coventry's proposed figure is also well below the ONS projection. This problem is compounded by the fact that Warwick and Stratford's figures, although in line with the RSS are also well short of the ONS projections. The cumulative deficit is over 1,300 dwellings a year – or 26,000 over a 20 year period.

Local Authority	Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
Coventry	Pre-submission consultation – ends 10/9	1,210	1,675	670
Warwick	Pre-submission consultation completed	860	550	540
Stratford	Draft Consultation completed March 2012	875	375	400
Nuneaton	Preferred Option expected later in the	425	540	?

	year			
Rugby	Adopted	530	540	540

South Worcestershire

This area covers Worcester, Malvern Hills and Wychavon who are producing a joint Core Strategy. It is not a major reception area for Birmingham migrants.

Local Authority	Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
South Worcester	Revised draft consultation – ends 14/9	985	1275	965

Current proposals are for a reduction in provision from the RSS requirement. However the revised level is still broadly in line with the household projections.

East Staffordshire

This area is included because it is part of the GBSLEP. In terms of the housing market it is not closely related to Birmingham and it is not a significant area for out-migration from Birmingham.

Local Authority	Status	ONS H'hold projection (per annum)	RSS housing requirement (per annum)	New housing proposed (per annum)
E Staffs	Preferred Options Consultation – ends 21/9	480	650	470

Emerging proposals (currently out for consultation) are for a reduction in provision compared to the RSS – but the revised level is still in line with the household projections.

BIRMINGHAM CITY COUNCIL EXECUTIVE REPORTS CHECKLIST

Report Title: Emerging Development Plans in Areas around Birmingham:
Consultation with Neighbouring Authorities

Report version: 10 Dated 22/10/2012

Cabinet Report: Cabinet Member for Development, Jobs and Skills

Report Author: David Carter – Planning Strategy

To be completed in respect of all Cabinet, District and Ward Committee Reports. This also applies for Chief Officer Reports recording Decisions by them in consultation with Cabinet Members (£200k to £500k (Revenue) or up to £1M (Capital) where the Decision has not been delegated to District Committees).

Democratic Services have been instructed to return any Report which does not have a fully completed Checklist attached. The purpose is for the author to indicate who has been consulted in the preparation of reports and when.

CONSULTATION	Names and dates to be inserted
Has the report been discussed and cleared with:	Director Planning and Regeneration 27/9/2012 Deputy leader briefed on 15/10/2012 Chair Planning Committee briefed on 15/10/2012
(a) Relevant Cabinet Member(s)	Cllr Ali briefed preliminarily on 2/10/2012 Cllr Ali second briefing on 24/10/2012
OR	
(b) Relevant District/Ward Committee Chairman	
COMPLIANCE ISSUES	
(c) Has the report been cleared with relevant Strategic Director?	
(d) Has report been cleared with Directorate Finance Officer? (see back)	Cleared by: Alison Jarrett Date: 25/09/12
(e) Has report been cleared with relevant Chief Solicitor or Head of Law? (see back)	Cleared by: Stuart Evans Date: 13/9/2012
MEDIA CONSIDERATIONS	
(f) Has relevant Media officer been made aware of report and agreed draft press release/statement?	Media officers Sarah Kirby and Carmel Girling made aware of report 18/10/2012.
Any significant comments for the attention of the Leader / Chief Executive?	

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

APPENDIX 2

Bromsgrove - 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 Bromsgrove District Council
- Notes of meetings on the Duty to Co-operate held on 13/09/13 and 18/02/14
- BDC response to the Birmingham Development Plan 2031 Pre Submission version dated 25/02/14
- BCC response on the Bromsgrove District Plan Proposed Submission Version 2011-2030 dated 11/11/13
- BCC letter to BDC re Birmingham's Future Growth requirements dated 29/07/13
- BCC letter to BDC re Redditch Local Plan No 4 and Bromsgrove and Redditch Housing Growth Study dated 14/05/13
- BCC letter to BDC on Birmingham's Future Growth requirements dated 13/03/13
- BCC letter to BDC on Birmingham Future Growth Requirements dated 18/01/13
- BDC response to Birmingham Plan 2031 Options Consultation dated 11/01/13
- BDC response to Birmingham CIL consultation dated 11/01/13
- BCC letter to RBC on Birmingham's Future Growth requirements dated 08/08/12
- BDC response to Birmingham Core Strategy Consultation dated 18/03/11

BIRMINGHAM DEVELOPMENT PLAN

Duty to Co-operate

Local Planning Authorities and other bodies party to this agreement/ understanding:
A. Birmingham City Council (BCC) B. Bromsgrove District Council (BDC)

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 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. *Does not just include authorities sharing common boundaries.</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 employment 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>
g) Appropriate provision made for public and private transport including Park & Ride and commuting patterns	Agreed/ Shared Understanding/ Not Applicable	<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 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>
h) Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure	Agreed/ Shared Understanding/ Not Applicable	<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. Both authorities recognise and accept the need for continuing liaison on the cross-boundary implications for transport networks within Bromsgrove arising from growth within Birmingham. Not aware of other specific current green infrastructure or cross boundary issues.</p>
i) Green Belt matters	Agreed/ Shared Understanding/ Not Applicable	<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 be accommodated that will not undermine</p>

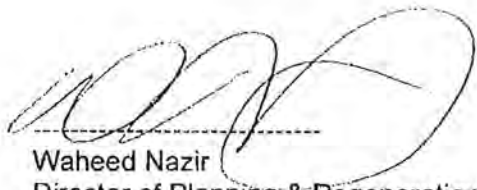
		<p>the essential purposes or integrity of the wider West Midlands Green Belt. The City Council acknowledge that additional land which is currently designated as Green Belt in adjoining areas may need to be identified for development – as a consequence of the process to determine the level and distribution 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 noted by the parties signatory to this document. Bromsgrove would request that the emphasis of policy TP27 in the Birmingham plan is carried forward when also considering land outside of the City Council area.</p>
j) Minerals, waste and water resources including flooding	Agreed/ Shared Understanding/ Not Applicable	<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 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</p>

		<p>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	<p>Agreed/ Shared Understanding/ Not Applicable</p>	<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 Duty to Co-operate held on 2/11/12, 13/09/13 and 18/02/14.
Groups	<p>Regular meetings:</p> <p>(1) GBSLEP Planning Sub-Group</p> <p>(2) GBSLEP Spatial Planning Group</p> <p>(3) Development Management Group</p> <p>(4) West Midlands Planning Officers Group – Worcestershire LPAs connect to the group through the Worcestershire Planning Officers Group</p>
Responses to consultation and correspondence	<p>25/2/14 – BDC response to the Birmingham Development Plan 2031 Pre Submission version</p> <p>11/11/13 – BCC response on the Bromsgrove District Plan Proposed Submission Version 2011-2030</p> <p>29/07/13 – BCC letter to BDC re Birmingham's Future Growth requirements</p> <p>13/03/13 – BCC letter to BDC on Birmingham's Future Growth requirements</p> <p>18/01/13 – BCC letter to BDC on Birmingham Future Growth Requirements</p> <p>11/01/13 – BDC response to Birmingham Plan 2031 Options Consultation</p> <p>11/01/13 – BDC response to Birmingham CIL consultation</p> <p>08/08/12 – BCC letter to RBC on Birmingham's Future Growth requirements</p> <p>18/03/11 – BDC response to Birmingham Core Strategy Consultation</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*



Kevin Dicks
Chief Executive
Bromsgrove District Council*

* 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.

Duty to Co-operate meeting

Birmingham City Council and Bromsgrove District Council

13th September 2013

3 pm

HMS Daring Room, Council House, Birmingham

Present:

Dave Carter (BCC)

Paul Williams (BCC)

Ruth Bamford (BDC)

Mike Dunphy (BDC)

Rosemary Williams (BDC)

Birmingham has a problem in terms of accommodating its housing needs. It recognises that other authorities plans are progressing but has asked surrounding authorities to help by building flexibility into their plans. Birmingham does not consider this flexibility necessarily needs to be incorporated in policy but acknowledgement that Birmingham has a problem could be mentioned in surrounding text and that the outcome of the (LEP) Housing Study may mean that Plans will need to be reviewed.

(Not for minuting! BCC plan to go to Cabinet in October and Council in December regarding release of land from green belt in Sutton Coldfield totalling 5000 dwellings plus employment land. Considered that there will be no completions on these GB sites for the first 5 years)

Estimate that 45000 can be accommodated in the urban area. This leaves a shortfall of 30,000 to be met cross boundary, location not yet determined. Currently have a 5 year land supply but will start to struggle in about 3 years time.

(BCC has issue with para 1.14 which states that Birmingham's housing need may require the identification of potential sites in Bromsgrove in the later stages of the Plan period but DC said to minute this more vaguely)

Reasoning is that the housing study may need land to be released sooner than 2023 when Bromsgrove states a GB Review will be undertaken

BCC cannot tactically put in an objection (nor does it want to intentionally derail adjoining authorities Plans) as Bromsgrove is seeking to support Birmingham's unmet need. However anticipates private sector will attack this aspect of the Plan. Ie Pegasus and Solihull Plan, Tony Bateman JR threat.

Housing- 700 dwellings allocated at Longbridge for Birmingham's needs so therefore Bromsgrove already helping BCC with shortfall. PW unaware of this figure so will now include in SHLAA??

Will send reps informally on Plan by 11/11/13 and arrange another informal meeting to discuss way forward more fully as required. May be able to deal with 2023 date as pre-inquiry changes. Employment- Not specifically seeking employment land provision. Longbridge deals with issue to a certain extent Regional Investment site

Office and retail- aren't proposing anything that will undermine Longbridge.

No park and ride issues?

Transport links and GI- outlined proposals for Bromsgrove and Alvechurch stations

Air quality- not AQMAS close to border

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1200, Tuesday 18 February 2014, Bromsgrove District Council Offices

Present:

Mike Dunphy – Bromsgrove BC

Rose Williams – Bromsgrove 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 Bromsgrove 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 Bromsgrove.

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. A footnote was also agreed to reflect that adjoining authorities also included circumstances where there were not necessarily common boundaries.

Under item h) it was agreed that reference should be made to the need for continuing liaison on cross boundary transport networks and that apart from this there were no other specific current issues.

In relation to point i) it was agreed that Mike Dunphy would add a point of clarification drawn from their emerging response to the BDP consultation.

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 BDC 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.

There was then a short discussion on the South Worcestershire Plan and proposals to increase the level of housing provision and a shared view that there was potential for a substantial part of the increase to potentially help meet the emerging housing shortfall in Birmingham.

Bromsgrove District Council Representations on the Birmingham Plan 2031

Bromsgrove District Council (BDC) would like to echo the comments made by Birmingham City Council (BCC) in response to the Bromsgrove District Plan. The Council agrees that collaboration between the authorities has been both intense and fruitful, particularly on the preparation of the Longbridge Area Action plan, and more recently in connection to the establishing and development of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

The Council in general supports the policies of the Birmingham Plan 2031 and would commend BCC on a making such a succinct plan which covers such a vast array of planning issues. BDC does have some concerns on a number on specific elements and would welcome the opportunity to continue to engage with the city council in progressing towards a successful planning outcome which maximises the benefits to both authority areas.

Page 28 - Policy PG1 Overall levels of growth.

The Council acknowledges the levels of growth required for the future needs of the City and understand this represents a problem for BCC in plan making terms. BDC would urge BCC to maximise and commit to, via the granting of planning permission to the use of all available land within the city before options for growth elsewhere are considered. We welcome the references at para 5.9 and other areas within the plan that the focus for growth will be on re using existing urban land though regeneration, this intention is fully supported by BDC.

BDC is committed to working with BCC under the duty to cooperate and within the context of the GBSLEP and other studies that have been commissioned, to establish if any of the additional development the city requires can be provided for sustainably in and around settlements across north Worcestershire or beyond. Whilst acknowledging this plan is only for the City Council area, BDC questions why the additional development of around 33,000 houses is not mentioned specifically in this policy. BDC considers that to give it the status it should have in the context of the overall levels of growth BCC is suggesting it requires, this policy should make explicit reference to it, and the fact that it may need to be provided in other local planning authority areas. This feature of the plan where this additional growth remains consistently understated throughout gives BDC some concerns over the overall deliverability of the Birmingham Plan and also means the council is unsure of any future the implications for the Bromsgrove Plan which is shortly to be submitted to the Secretary of State. It should be noted that BDC have included a policy (BDP Policy 4 - Green Belt) in the Bromsgrove Plan to allow for some of the future development needs of the conurbation to be met in Bromsgrove should the evidence suggest so.

Page 45 - Policy GA5 Langley Sustainable Urban Extension

BDC welcomes the inclusion of a major new residential site to help accommodate the needs of the city

BDC acknowledge that work has been undertaken to establish the most sustainable option for expansion of the City within the confines of the City Council area. The Council would urge against the assumption that Sustainable Urban Extensions (SUE) are the best approach for delivering growth in other areas adjacent to the city. A range of options to deliver growth needs to be considered in detail, in all scales and in all potential locations for growth. It is hoped the GBSLEP housing study will begin this process and BDC once again reaffirm commitment to progressing this study in line with the published brief.

The evidence prepared to support this allocation does give cause for concern. The report prepared on behalf of the City Council suggests that only 5000 houses will be able to come forward over the plan period in this area, the allocation in GA5 is for 6000 houses. This element of overprovision and flexibility is welcomed, although clarity on the implications for overall housing supply if the BCC commissioned report is correct and only 5000 is delivered would be welcomed. In addition to the report prepared on behalf of the BCC, BDC is aware of a report prepared by Savills on behalf of house builders / developers which also looks at this area. This report concludes that delivery could be significantly higher in the range of 9360 - 11700 conservatively, and even as high as 15600 certain circumstances allow.

BDC would question why 6000 has been allocated in the Green Belt, when BCC evidence only suggests 5000 is deliverable. Particularly as other evidence produced by the house building sector suggest a much larger number in the region of up to 15600 could be delivered. Whilst BDC forms no view on the accuracy of one study over another, clearly as such a large range of housing delivery exists, there is a significant different of opinion which clearly needs to be explored further, and if necessary changes to the allocations made to allow for more development in this area.

With this in mind BDC would request that more flexibility is added to the BDP so that any divergence away from the claimed delivery rates in the BCC study can be accommodated on other land within the BCC green belt.

BDC requests that BCC allocate more of the land identified in the Birmingham Green Belt options assessment in addition to the Langley SUE. This land could be taken out of the green belt and safeguarded for future development need. Should progress on developing out the SUE diverge from the expected rate identified by the BCC study, this land could be released in order to provide additional sites should the market allow for it. Or if issues arise which are particular to the Langley site which is preventing it coming forward at the desired rate, this additional allocation could be brought on stream to pick up the under delivery. This would not only demonstrate

Birmingham's commitment to meeting its own housing needs within the city, but would also introduce the much needed flexibility the plan is required to have in accordance with para 14, 153, of the NPPF.

Page 64 - Policy GA10 Longbridge

BDC supports the inclusion of the Longbridge site as an important development location, and remains committed to bring it forward over the coming years in line with the policies in the adopted Area Action Plan (AAP).

BDC would like to stress that Development at Longbridge needs to remain in accordance with the proposals in the AAP unless material considerations indicate otherwise. As BCC are aware the plan went through significant stages in its production to ensure that the mix of development on site would not only regenerate the local area, but also compliment other surrounding locations ensuring their continued viability and vitality, particularly those close by in Rubery and Bromsgrove. Should development move away from that which is planned, and particularly if retail uses become more prominent then there is a serious risk that development at Longbridge could undermine the success or regeneration of other areas both in and outside the City. BDC is aware and understand though its continued engagement with BCC over Longbridge that flexibility is required in the context of some of the AAP policies, as has been demonstrated by a number of the schemes which have been granted permission, and in some case completed at Longbridge.

Of particular concern are what appears to be the current aspirations of the developers to move away from an employment and housing led regeneration scheme, to more of a housing and retail led scheme.

New retail proposals over and above agreed levels should be refused. They do not present a more traditional and sustainable town centre with a mix of outlets providing a range of goods and prices. This type of centre was envisaged as part of the regenerating a new sustainable community for Longbridge. The scale and type of comparison retail floor space currently being proposed are significantly in excess of the policies in the AAP, with little or no real justification as to their suitability, and certainly not as the developers claim in conformity with the AAP. The table below shows in simple terms the levels of over provision against the AAP targets.

	AAP requirements	Permissions granted	Further Proposed	Total proposed development	Overprovision compared to AAP	Total % Overprovision
Convenience	7500 m ²	8192 m ²		8192 m ²	692 m ²	9.2%
Comparison	6000 m ²	6800 m ²	13935 m ²	20735 m ²	14735 m ²	245%
Total	13500 m ²	14992 m ²		28927 m ²	15427 m ²	114%

If this scale and type of retail floorspace is deemed acceptable particularly in the form of the current proposals it would represent a vast over provision of retail, doing little to create a new centre in either built form or as a vibrant and viable town centre. These proposals create an out of town/destinational shopping centre which does very little to support the local economy and harms surrounding centres by drawing excessive trade from them. BDC would request that BCC commit the policies of the AAP and ensure that the focus for Longbridge remains on creating a sustainable mixed use location where 10000 jobs are created and not one that is dominated by large floor space comparison retailers. As a bare minimum more detail should be provided in the form of a full retail impact assessment and sequential test to at least attempt to justify the scheme.

BDC note the inclusion of the housing capacity at Longbridge counting towards development needs of Birmingham. We would expect the residential element of this development including the east works in Bromsgrove to be completed before consideration is given to any greenfield development in or around this location.

Page 92 - Policy TP16 Portfolio of employment land and premises

BDC supports maintaining an employment land portfolio including Regional investment Sites (RIS) including the one as part of the Longbridge AAP. BDC acknowledge the strong employment links between the two districts which we would look the further strengthen with the ongoing involvement of the GBSLEP.

Page 109 - Policy TP27 The location of new housing

The policy requires that housing development should not conflict with policies for protection of Core Employment, Open Spaces, and Green Belt. No assessment has been carried out of adjoining districts to see if any development in these areas will also be able to meet with this criteria. These objectives should be carried forward when consideration is given to accommodating Birmingham's additional growth needs.

Para 8.10

BDC believe this paragraph is incorrect and misleading, the claim that over 80% of all the new homes during the plan period will be built on previously developed land cannot be correct when the location of 39% of the city's future housing requirement remains unresolved. Whilst it is assumed that this paragraph is referring to the development within the city boundaries, the reference *'80% of all the new homes to be built over the plan period'* would also mean the as yet unaccounted for additional growth. This paragraph should be amended to represent the position more clearly.

Page 110 - Policy TP28 the housing trajectory

The evidence shows that more than 1,000 vacant properties have been bought back into effective use in the past 5 years, however this does not necessarily mean it is appropriate to include this figure in land supply calculations. The South Worcestershire Authorities proposed to add 550 dwellings to their supply to account for long term vacant properties coming back into effective use, this was not supported by the South Worcestershire Development Plan Examination in Public Inspector. BDC welcomes the bringing of empty properties into use and supports the ongoing effort made by the various schemes the City Council is involved in to rejuvenate the housing stock within the city, including the policy proposals in TP34, but would question how robust the housing trajectory is with this element included.

Point of note is that the trajectory within the proposed submission plan does not tally with table 3 on page 6 of the 2012 SHLAA. The SHLAA highlights that the amount of development in the period beyond year 10 is expected to be lower than the period of years 6-10, whereas the trajectory suggests that completions will continue to rise throughout the plan period. It must therefore be assumed that the Green Belt release around Sutton Coldfield is planned for the later part of the plan period, clarification on this point would be welcomed.

Page 122 – Policy TP37 A sustainable transport network

The City clearly has growth aspirations as an international City. Required to support this and also many of the aspirations of the GBSLEP is the need to connect people and places. To do this a sustainable transport network which operates across the region and beyond is essential. BDC supports the intention of the City to continue to improve all modes of transport and connectivity, and would request the continual support of BCC in extending key corridors such as the electrified cross city line into Bromsgrove Town. BDC would also stress that many of the road transport links which are vital to the cities continued success extend into the surrounding districts. This fact must not be overlooked when investing on upgrades to key routes. Continual discussion between the relevant authorities both within the city and outside is needed to take place to ensure the correct investment decisions are made to link the city to the wider network beyond. BDC are happy to instigate these discussions if proposals for upgrades routes which enter the district are brought forward.

Duty to Cooperate Statement Page 6 Bromsgrove

BDC support the statement in connection with Bromsgrove, although would like a few minor changes made which are shown on the version reproduced below. BDC feels these changes would represent a more accurate picture of the level of cooperation between the authorities. If these are changes that BCC does not feel it is able to make we would welcome the opportunity to discuss them further.

Additions to text in Blue underlined

Deletions to text in ~~Red Strikethrough~~

Local Authority	Meeting(s) held	Current Position
Bromsgrove	<ul style="list-style-type: none"> * Bi-lateral meetings held * GBSLEP Planning Group and Spatial Planning Group * Steering group meetings for the GBSLEP Strategic Housing Needs Study * Meeting of Worcestershire Planning Officers Group 	<p>Bromsgrove have expressed concerns over the possibility of some of Birmingham's housing requirement being satisfied outside the City boundary.</p> <p>Bromsgrove is part of the GSLEP and will be covered by the GBSLEP Housing Needs Study which will <u>begin to</u> address this issue.</p> <p>The City Council has requested <u>that</u> Bromsgrove to include in their emerging <u>District Local</u> Plan a commitment to an early review, in the event that it is concluded that provision to help meet Birmingham's needs should be made in Bromsgrove. <u>This request has been met by Bromsgrove</u></p> <p>Further discussions may need to take place in the context of Bromsgrove's Pre-submission Plan which has just been published.</p>

Duty to Cooperate Statement Page 8-9 Redditch

BDC do not feel that the statement as it stands represents the issues surrounding Redditch correctly. We have suggested changes below which again we feel represents the picture more accurately. We understand that Redditch Borough Council (RBC) agree with the statement as it is currently written by BCC, although in BDCs view this does not mirror the statement on page 5 of the Borough of Redditch Local Plan No.4 Proposed Submission (September 2013). We would wish to work with both BCC and RBC to rectify this issue, and ensure consistency is reached on the duty to cooperate and its implications for plan making.

Additions to text in Blue underlined

Deletions to text in ~~Red Strikethrough~~

Local Authority	Meeting(s) held	Current Position
Redditch	<ul style="list-style-type: none"> * Bi-lateral meetings held * GBSLEP Planning Group and Spatial Planning Group 	<p>No representations made to date on the Birmingham Development Plan</p> <p>There is a shortage of land within Redditch to meet housing needs arising within Redditch due to its tightly drawn boundary and therefore no potential for it to contribute to meeting Birmingham's needs. An exchange of correspondence on the Birmingham growth issue has led to an agreed wording on this issue for inclusion in the Redditch Local Plan No 4. The Pre-submission version of this plan has just been published.</p> <p>The options for the future distribution of housing across the Birmingham housing market which includes Redditch area will be covered by the GBSLEP Housing Needs Study.</p>

11th November 2013

The Strategic Planning Team,
Planning and Regeneration,
The Council House,
Burcot Lane,
Bromsgrove,
Worcestershire,
B60 1AA

Dear Sir/ Madam

BROMSGROVE DISTRICT PLAN - Proposed Submission Version 2011-2030

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

This collaboration includes the adoption of a cross-boundary Area Action Plan for Longbridge prepared in the aftermath of the collapse of MG Rover.

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 of any specific housing shortfall which it could request be taken forward by Bromsgrove (or for that matter any other local authority) in their Local Plan. The evidence base underpinning the emerging Birmingham Development Plan suggests, however, that the overall housing shortfall in Birmingham is likely to be around 30,000 dwellings in the period up to 2031. 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.

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.

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 the plan and more specifically has the following observations:

Duty to Cooperate

Paras 1.13 to 1.16

The City Councils supports the summary of extensive discussions held with Bromsgrove District Council under the Duty to Co-operate. The reference to, and Bromsgrove's full commitment to participation on the GBSLEP Housing Needs Study is especially welcome.

Local Enterprise Partnership

Paras 1.17 to 1.20

The City Council supports the reference to Bromsgrove's membership of the GBSLEP and the importance of the commitment to the visions, aims and objectives of the LEP.

Policy BDP3 Policy Future Housing and Employment Growth

The City Council supports the overall levels of growth for both housing and employment subject to its observations in relation to the Green Belt Review which are covered in substance under Policy BDP4. The level of housing proposed is broadly consistent with the 2008-based household projections and until such time as the GBSLEP Strategic Housing Study is completed there is no basis for an alternative figure. Given the scale of the emerging housing shortfall in Birmingham, however, there are likely to be pressures for further housing development within Bromsgrove during the plan period.

Policy BDP2 Policy Settlement Hierarchy Policy

The city council supports this policy subject to the suggested deletion of sub para BDP 2.6 since this unnecessarily constrains and pre-empts the Green Belt Review and would, for example, preclude the provision of a Sustainable Urban Extension of Birmingham as a means to address the emerging housing shortfall as currently drafted.

Policy BDP4 Policy Green Belt

The City Council supports the proposed Green Belt Review in respect of the potential housing shortfall emerging in Birmingham but wishes to propose two minor changes:

1. The first is to replace under BDP4.2 "advance of 2023" by "to reflect the outcome of the GBSLEP Strategic Housing Needs Study" This change is suggested since the GBSLEP Strategic Needs Study will establish the extent and timescales affecting future housing needs.
2. In relation to BDP4.2 the City Council suggests that the words "follow the approach in BDP2 Settlement Hierarchy and" should be deleted for consistency with the City Council's suggested amendment above to Policy BDP2.6.

Development Sites

The City Council is of the view that the definition of individual sites is a matter for the District Council to determine but welcomes the commitment to carry forward the proposals as set out in the Longbridge Area Action Plan which includes specific provision towards helping to meet Birmingham's housing needs.

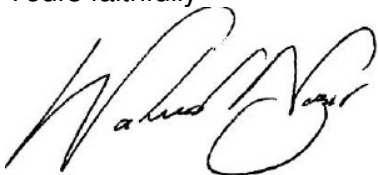
Possible Future Direction of Growth

The City Council wishes to notify Bromsgrove District Council of land in its ownership within Bromsgrove's administrative area and to request that the proposed Green Belt Review should take full account of the potential of this land which is of a scale that could enable the provision of a Sustainable Urban Extension should the GBSLEP Strategic Housing Needs Study conclude that further land for housing to meet Birmingham's needs is required in Bromsgrove District.

Sustainable Travel

The City Councils supports the extensive references in the plan to improvement of sustainable travel and in particular upgraded rail connections with Birmingham.

Yours faithfully



Waheed Nazir
Director of Planning and Regeneration
0121 464 7735



Ruth Bamford
Head of Planning and Regeneration
Bromsgrove Borough Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

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', with a stylized, cursive script.

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', with a stylized, flowing script.

Waheed Nazir
Director of Planning & Regeneration

John Staniland
Executive Director
Planning and Regeneration, Regulatory and Housing Services
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Date: 13 March 2013

Dear John

Birmingham's Future Growth Requirements

Thank you for your letter of 1st March.

I welcome your Council's acknowledgement of the challenge that Birmingham faces in providing new housing to meet the projected future growth of the city's population, and the need for some additional housing provision to be made outside Birmingham's boundary to help with this.

I agree that further work is needed to identify the scale and general location of this provision and I welcome your recognition that a GBSLEP-level SHMA is a mechanism for undertaking this. As you will be aware, the GBSLEP Board has agreed in principle to commission this work in support of the development of the LEP Spatial Framework and we look forward to working with your authority in taking this forward. We are currently working to produce a draft brief for discussion. I would emphasise that this work is not intended to replace existing up-to-date SHMAs, but to address the issue of cross-boundary needs between Birmingham and adjoining areas which is not reflected in recent SHMAs.

I also agree with you that it would not be helpful for land to meet these needs in Bromsgrove (or anywhere else) to come forward through speculative planning applications. As you rightly emphasise, what is needed is a robust green belt review process feeding into the development plan. The City Council would welcome the opportunity to work collaboratively with you on this in relation to the critical area on the southern boundary of Birmingham.

I understand your Council's reluctance to delay your current development plan process while this green belt review is undertaken. However I must also emphasise that from the City Council's point of view it is important that this issue is not simply put to one side for future consideration, but that we are seen to be making real efforts to address the situation now and there is a clear timescale for taking matters forward as quickly as practicable. It also seems to

me that this is essential if we are to minimise the risk of speculative planning applications.

My understanding is that at the 22nd February meeting, you indicated that your intention was to progress the technical work involved in undertaking a green belt review in parallel with your current development plan process, so that the formal process of reviewing the plan could be started as soon as it is adopted (which you currently expect to be mid-2014). It would be helpful if you could confirm this and the City Council will be looking to see a commitment along these lines included in your current development plan.

Clearly the way forward in addressing these issues is through collaborative working, and I agree that it would be helpful to establish regular officer-level meetings to ensure that this is progressed.

Yours faithfully,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above the printed name.

Waheed Nazir
Director of Planning and Regeneration

Ruth Bamford
Head of Planning and Regeneration
Bromsgrove Borough Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

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', with a large, stylized flourish at the end.

Waheed Nazir
Director of Planning & Regeneration

Waheed Nazir
Birmingham City Council
Planning and Regeneration
PO Box 28
Birmingham
B1 1TU

Your Ref: DPD/Plan2031/Stat
Our Ref: 6-18.5

11th January 2013

Dear Waheed

Birmingham Plan 2031 Options Consultation

Thank you for consulting Bromsgrove District Council on the Birmingham Plan 2031 options consultation.

The District Council broadly agrees with the overall strategy being put forward by the City Council, particularly the focus for both new housing and employment development to be prioritised towards brownfield land in the first instance.

The housing figures contained within the document are noted and we welcome the proposals for the efficient use of land by requiring development to be a minimum density of 40 dwelling per hectare.

It is also recognised that there is a shortfall of available land for approximately 30,000 new houses, which requires development to take place on land that is currently green belt. However what is not clear is how the 30,000 shortfall is to be made up, if only 5000 -10,000 houses are to be provided on Green belt sites within the City boundary. The document refers to the possibility of providing land for the development needs of the city outside of the City boundary, but offers no clear indication of where, when, and how the City Council envisages this development taking place. More clarity on the element will be essential if Districts such as Bromsgrove are to fully engage in the plan making process the City Council is undertaking, and to ensure the requirements of the duty to cooperate are met. It is acknowledged that early discussions have taken place between the two authorities and we welcome the opportunity for continued constructive dialogue in the future.

We would like to take this opportunity to reinforce the fact that Bromsgrove District Council are currently in the advanced stages of preparing its District plan with the publication and submission versions due for release later this year. Due to the advanced nature of our plan it is difficult for new issues to be incorporated without introducing significant delays into the process, which as you are aware is contrary to the wishes of the Government for all local authorities to have an up to date plan in place as soon as possible.



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District Council

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The Green Belt sites proposed are supported by the District Council as suitable locations for urban extensions. We do have concerns about the self imposed limit of only suggesting that 5000 - 10,000 houses or 50 hectares of employment land is the maximum amounts these sites can accommodate in the plan period. It is accepted that it is a challenging market for development at the moment, but over the lifetime of the plan it is expected that this will change. Specific market analysis for this location will be required to support the assumption that 10,000 houses and or 50 hectares of employment is the upper limit of growth that can be sustained in this area of the city over the plan period. The District Council will be keen to see the City utilise all its own options fully before any expansion beyond the City boundaries is considered.

In relation to the previous point made, the ruling out of a number of green belt sites because they are too small to fit into the sustainable urban extension category is short sighted and not supported. It is important that the City Council make the most of every opportunity available to them. These sites could make a valuable contribution to the overall housing supply and help to support local facilities in these areas, it is essential that these sites are considered more fully as the plan progresses.

The Council are pleased to see Longbridge maintained as a key focus for the City Council and support its continued inclusion in the plan making process. The inclusion of an element of the land covered by the Longbridge Area Action Plan (AAP) as an ITEC park is acknowledged. However it is important to the District Council that the proposals contained in the AAP continue to be the starting point for considering development in this location. The Aims of the AAP in securing a sustainable community for the future with 10,000 new jobs created in a range of different sectors must not be lost. The over reliance on one business sector for jobs must be resisted, and the opportunities for providing a range of employment at Longbridge must continue to be explored.

It should be noted that these are officer comments only and do not have any formal political endorsement from Bromsgrove District Council.

Please feel free to contact me should you have any queries with the content of this letter, and we look forward to continuing working together on plan making activities for both authorities.

Yours Sincerely



Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council

Waheed Nazir
Birmingham City Council
Planning and Regeneration
PO Box 28
Birmingham
B1 1TU

Your Ref: CIL
Our Ref: 6-18.5



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11th January 2013

Dear Waheed

Birmingham Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule.

Thank you for consulting Bromsgrove District Council on the Birmingham Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule.

The Council offers no comment on the specific rates chosen by the City Council for the different types of development it is intending to charge a levy against, although we would like to raise a number of concerns with the future operation of the CIL, and the relationship to the Longbridge Area Action Plan (AAP).

As you are aware within the adopted AAP jointly produced between Bromsgrove District Council and Birmingham City Council for the Longbridge site an Infrastructure Tariff (LIT) was developed, ensuring that the impacts of the development can be mitigated across a wider area than just the authority that the development happens to take place in. This approach and the joint working required to support it, which the Councils have continued to maintain throughout the early years of implementing the AAP is something Bromsgrove District Council is keen to see continue. It is acknowledged that the LIT is unlikely to remain as the mechanism for collecting contributions associated with Longbridge. The Council would like continue to see the policies contained within the AAP as key factor in determining both the development proposals, and as a result what infrastructure is provided by CIL in this location regardless of which side of the local authority border development is taking place. The exact mechanism for doing this is unclear at the moment, although we hope that it is something which can be managed by the regulation 123 list the City Council will be require to produce.

We envisage that the close working relationship the two councils have had on the Longbridge project and will continue into the future and we would welcome the opportunity to engage in further and more detailed discussion about how the benefits of development at Longbridge can continue to be shared throughout the wider community in and around Longbridge.

The development of a CIL in Bromsgrove District is not as advanced with current efforts being concentrated solely on the Bromsgrove District Plan. It is envisaged that should a suitable mechanism be included within the Birmingham CIL for the CIL proceeds to be distributed across the Longbridge area a similar mechanism will also be included in any CIL that Bromsgrove District Council produces.

It should be noted that these are officer comments only and do not have any formal political endorsement from Bromsgrove District Council.

Please feel free to contact me should you have any queries with the content of this letter, and we look forward to continuing working together on implementing the Longbridge AAP

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Mike Dunphy', with a stylized, cursive script.

Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council

08th August 2012

Ruth Bamford
Head of Planning and Regeneration
Bromsgrove Borough Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

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

Your Ref SPD/RGC/Core Strategy/Stat
My Ref 6.23.06
Please ask for Mike Dunphy
Telephone 01527 881325
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18th March 2011

Dear Dave

Bromsgrove District Council officer response to Birmingham Core Strategy

Thank you for consulting us on your Draft Core Strategy, the following comments are officer only comments at the moment and maybe subject to change at a later date.

It is clear that Birmingham has a number of important links with adjoining areas, and Bromsgrove District Council (BDC) is pleased to see the acknowledgement of the links between two districts on page 14. There are important cross boundary links with Bromsgrove in terms of Longbridge and the jointly prepared Area Action Plan, many links via communities in Rubery, Cofton Hackett and Wythall and on the strategic road and rail networks, as well as important outdoor recreational resources in the form of Lickey Hills Country Park.

The Green Belt around the Birmingham conurbation is vital for preventing urban sprawl and the Council fully supports its acknowledgement on page 30. The Green Belt boundaries around south Birmingham in particular are long standing and have successfully prevented the sprawl of the city into the surrounding rural landscapes. The District Council welcomes the importance the City places on the Green Belt and will look to ensure the strong boundaries to the south of the city are maintained

BDC supports the policies SP14 Central Technology Belt (CTB) and SP13 Regional Investment Sites (RIS), particularly the Longbridge Regional Investment Site. This site is needed to diversify the area's economic base and provide opportunities for new and existing businesses. The acknowledgement of the adopted Longbridge Area Action Plan is also fully endorsed. The Council will also welcome the opportunity to work with the city on ensuring the Bromsgrove Technology Park which also forms part of the CTB is an important part of the whole CTB strategy.

BDC supports the development principles established within policy SP25 "The Location of New Housing". The emphasis of new residential development being predominately located on previously developed land (PDL) and a high figure of a minimum of 90% of new dwellings throughout the plan period being built on PDL is welcomed. As stated above BDC also supports the protection of the Green Belt as part of this policy.

With regards to the key infrastructure proposals as part of policy SP33 "The Transport Network", BDC fully supports the short term proposals requiring highway improvements and a public transport hub in Longbridge. These proposals are essential for the successful regeneration of

Longbridge and to link it to the wider area. The Council also fully endorses the proposals for the extension of the electrification of the railway line to Bromsgrove, and the expansion of the Cross City service. The Council is fully committed to working with the City and other authorities such as Worcestershire County Council and Centro to ensure both these developments take place within the next 5 years as indicated in SP33 of the Core Strategy.

The most relevant part of Core Strategy in terms of Bromsgrove is the South Birmingham chapter, particularly the policies involving major regeneration opportunities on the border with Bromsgrove at Druids Heath, Kings Norton three estates, and Longbridge. BDC supports the proposed housing growth figures, which includes 700 new units at Longbridge, within the Bromsgrove boundary which is planned as part of the AAP. The Council is in agreement with the sustainable initiatives for growth and recognises the importance of regenerating these areas, and in general supports these policies but not at the expense of the green belt to the south. We believe that stronger wording should be included to ensure that any development in these areas is contained by the current boundaries and that these boundaries are strengthened by any new development rather than weakened possibly paving the way for the green belt status in these locations to be threatened.

The council is aware of some limited developer interest in the vicinity of these areas and will not be supporting any growth which is proposed in the green belt. The majority of the land adjacent to the Birmingham boundary has been defined as being of high landscape sensitivity by Worcestershire County Council. Other than the green belt issue identified above developing these areas would cause significant harm to these high quality rural landscapes and the biodiversity they contain, these are a defining feature of the district and one which the council will look to protect.

In conclusion Bromsgrove District Council supports Birmingham's Core Strategy and the growth options suggested as they will enable Birmingham to fulfil its role as a global city and facilitate urban renaissance. However, BDC would like to stress the importance of the Green Belt around the strategic allocations close to the Bromsgrove District boundary. The strong continuing policy support for Longbridge throughout the Core Strategy is vital for the successful regeneration of the area and welcomed by the Council, these joint objectives are also reflected in Bromsgrove's Draft Core Strategy 2 which we are currently consulting on.

I hope you find these comments useful, please do not hesitate to contact me should you need any further information.

Yours Sincerely



Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council

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

APPENDIX 3

Cannock Chase - 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 from meeting to discuss the Birmingham Development Plan held on 24/02/14
- Examination of the Cannock Chase Local Plan Birmingham City Council – Hearing Statement dated 30/08/13
- BCC letter to CCC on Birmingham’s Future Growth Requirements dated 29/07/13
- BCC response to the Cannock Chase Local Plan (Part 1) Proposed Submission 2013 dated 22/03/13
- BCC letter to CCC on Birmingham’s Future Growth Requirements and the Cannock Chase Local Plan (No 1) dated 07/12/12
- Note of meeting held under the Duty to Co-operate held on 04/12/12
- BCC letter to LDC confirming Cabinet Member approval of the earlier officer response on the emerging local plan dated 06/11/12
- BCC response to Public Consultation 2012 - Draft (Part 1) Cannock Chase Local Plan dated 17/09/12
- BCC letter to CCC on Birmingham’s Future Growth requirements dated 08/08/12

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1600, Monday 24 February 2014, Cannock Chase Council Offices

Present:

Antony Lancaster – Cannock Chase Council (AL)

David Carter – Birmingham City Council (DC)

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 Cannock 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:

Under item b) AL to provide some extra text to cover the context of regeneration in the Cannock area.

In relation to item g) AL to add comment about the balance of housing and employment growth in Cannock and the relationship to neighbouring areas in Staffordshire.

In relation to point h) it was agreed that that there were no matters to raise except AL to check the position on the Cannock Chase to Sutton Park Enhancement Area.

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc. This would be sent to AL 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.

**CANNOCK CHASE LOCAL DEVELOPMENT FRAMEWORK
EXAMINATION OF CANNOCK CHASE LOCAL PLAN (PART 1)**

Birmingham City Council – Hearing Statement

The City Council submissions concentrates on matters generally relating to the Duty to Co-operate covered by the Matters and Issues identified by the Inspector. The observations are structured as follows:

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. Birmingham City Council position on the Cannock Chase Local Plan No 1 and Local Plans of other adjoining authorities
5. Revocation of the Regional Spatial Strategy and the Metropolitan Area Statement
6. The Duty to Co-operate
7. Housing Numbers

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.

Cannock Chase Council 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.

4. Birmingham City Council position on the Cannock Chase Local Plan No 1 and 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.

Discussions between Cannock Chase Council and the City Council have enabled such a commitment to be included in the Cannock Chase Local Plan (Part 1) – as set out paragraph 1.8. Similar undertakings have thus far been sought and taken forward in the following emerging development plans: the Solihull Core Strategy, the Lichfield District Local Plan Strategy, the Redditch Local Plan No 4 and the North Warwickshire Core Strategy.

Copies of the correspondence between Cannock Chase Council and Birmingham City Council can be made available, if required, but the notes of the DtC meeting included in Cannock Chase District Council's Duty to Co-operate report and the inclusion of the text in paragraph 1.8 of the Local Plan suggests this is unnecessary.

5. Revocation of the Regional Spatial Strategy and the Metropolitan Area Statement

In anticipation of the revocation of the WMRSS in June 2012 the West Midlands Joint Committee acting in the strategic interests of the Metropolitan Area endorsed a Strategic Policy Framework (Appendix 1). 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.

6. Duty to Co-operate

In the context of the above and for the avoidance of doubt Birmingham City Council considers that Cannock Chase Council has met the legal requirements in terms of engagement and collaboration under the Duty to Co-operate. Both authorities are in regular contact and understand that the duty is a continuing requirement to which both authorities are fully committed.

7. Housing Numbers

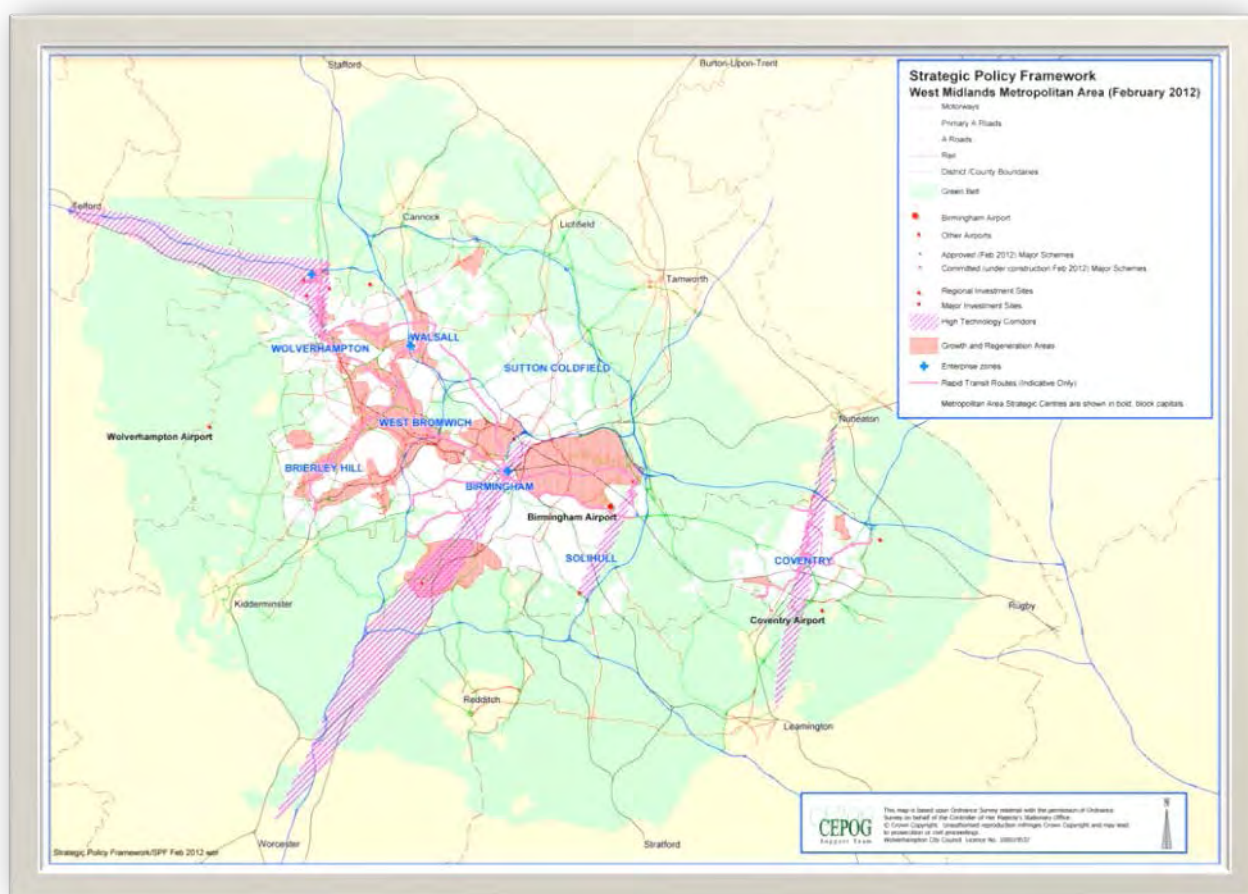
For clarity, Birmingham City Council has neither made representations nor questioned the soundness of the Cannock Chase Local Plan (No 1) in respect of the level of housing provision proposed. Subject to the incorporation of the position set out in paragraph 1.8 the City Council considers that an entirely reasonable approach to dealing with issues relating to its long-term growth will be protected.

David Carter
Head of Planning & Growth Strategy
Birmingham City Council

30 August 2013

APPENDIX 2

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

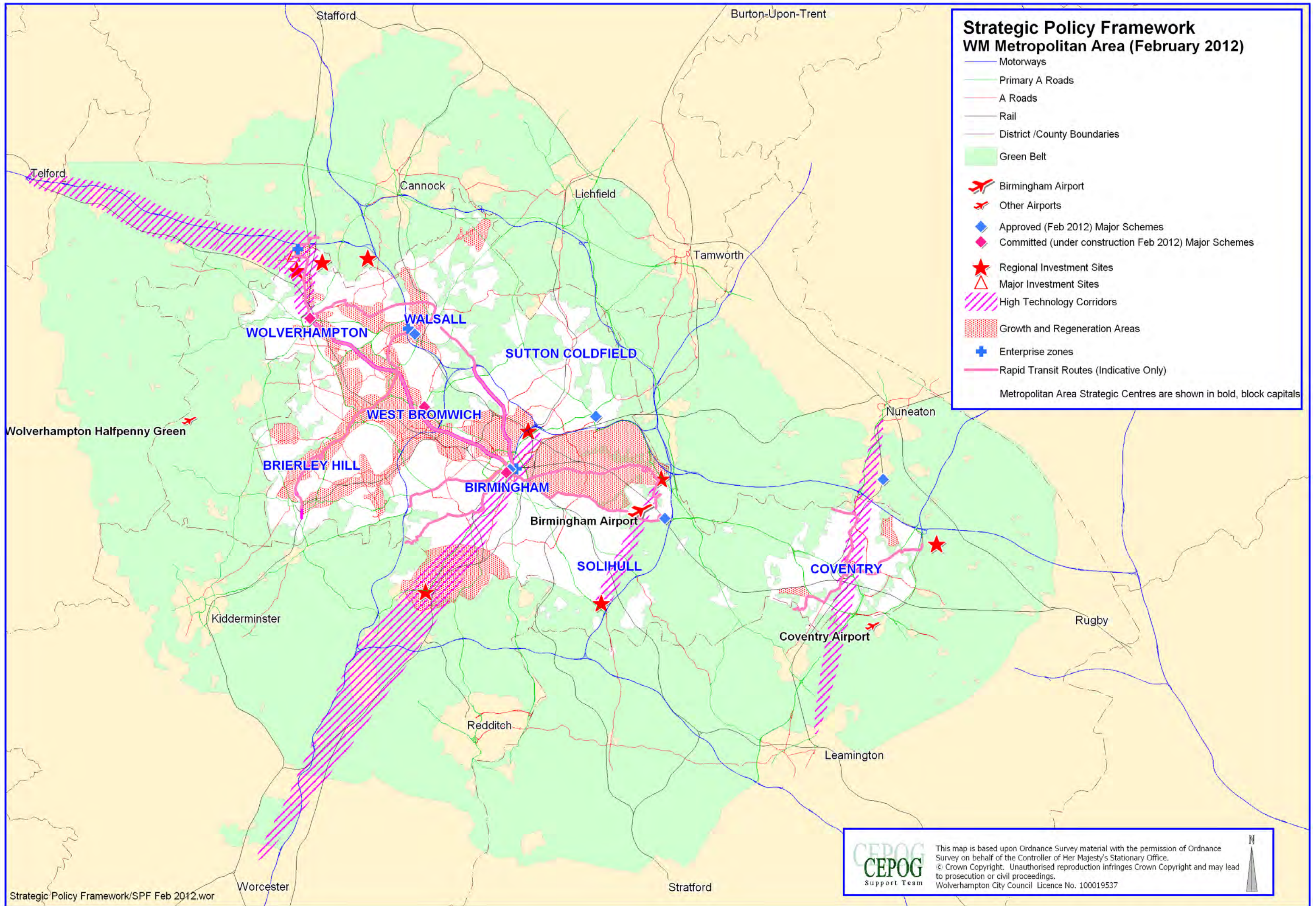
35. Following consultation on Issues & Options and on an Emerging Core Strategy, the pre-submission draft Local Plan was published in January 2012.
36. It focuses housing growth and new employment opportunities in or near North Solihull including Green Belt adjustments to facilitate local regeneration 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.



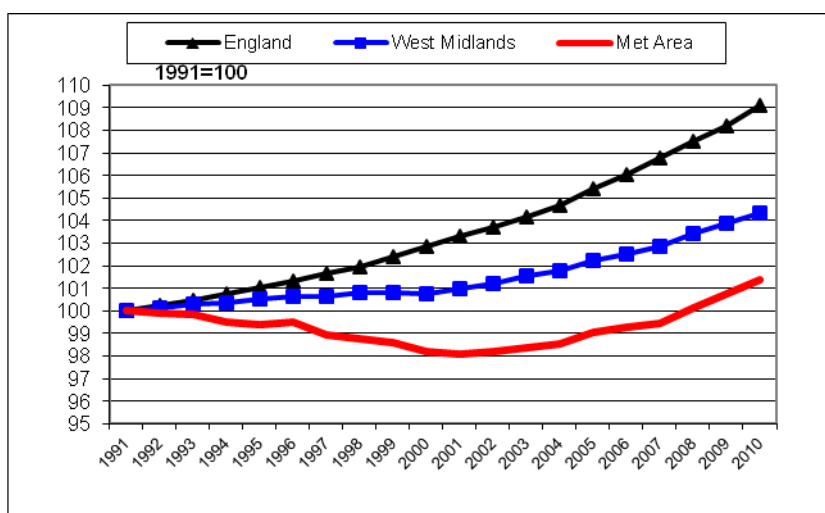
Appendix: Progress towards Urban Renaissance

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

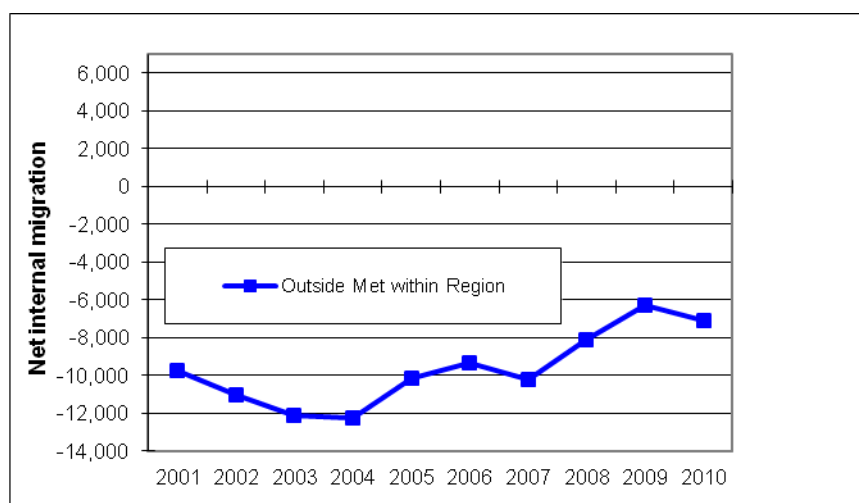


Source: ONS Mid Year Estimates

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.

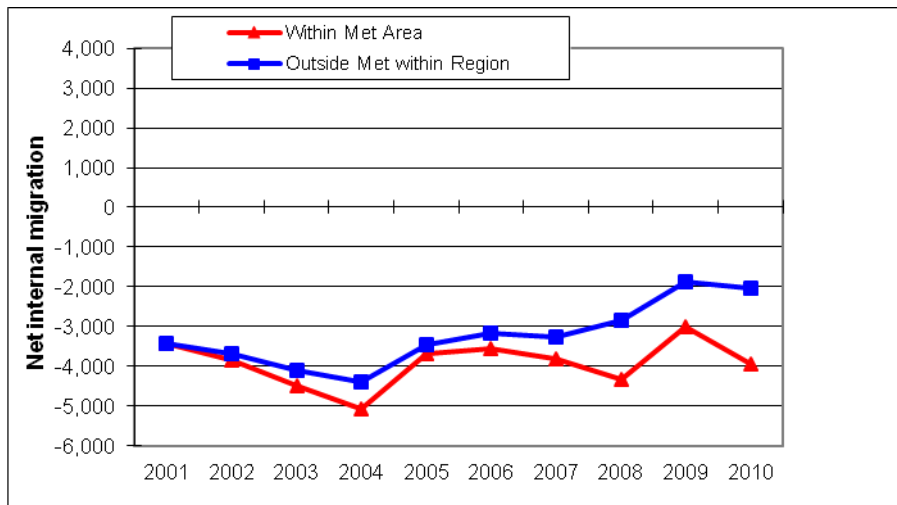
Figure 2: Net migration from Metropolitan Area to elsewhere in region



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>

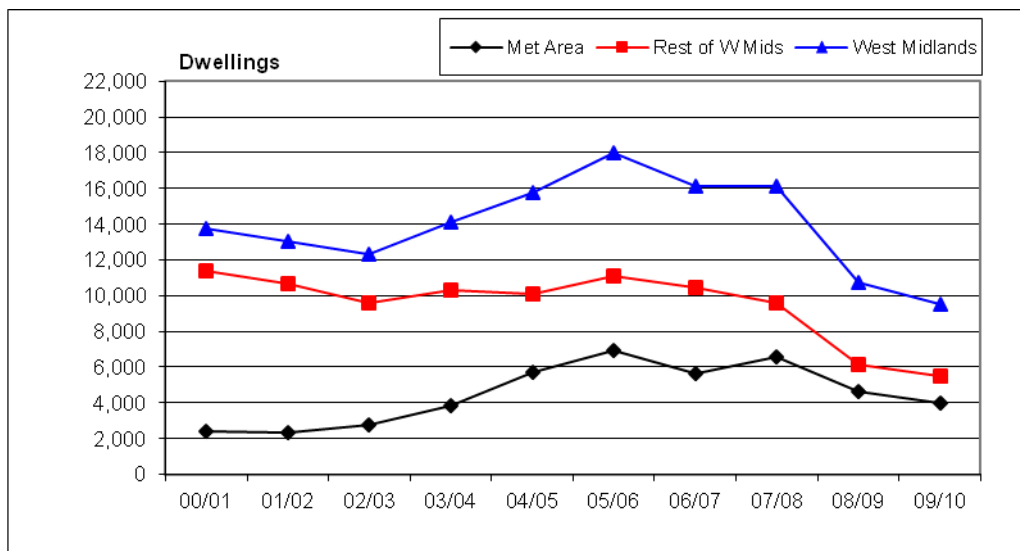
Figure 3: Migration from Birmingham to adjoining Metropolitan Authorities/ elsewhere



Housing

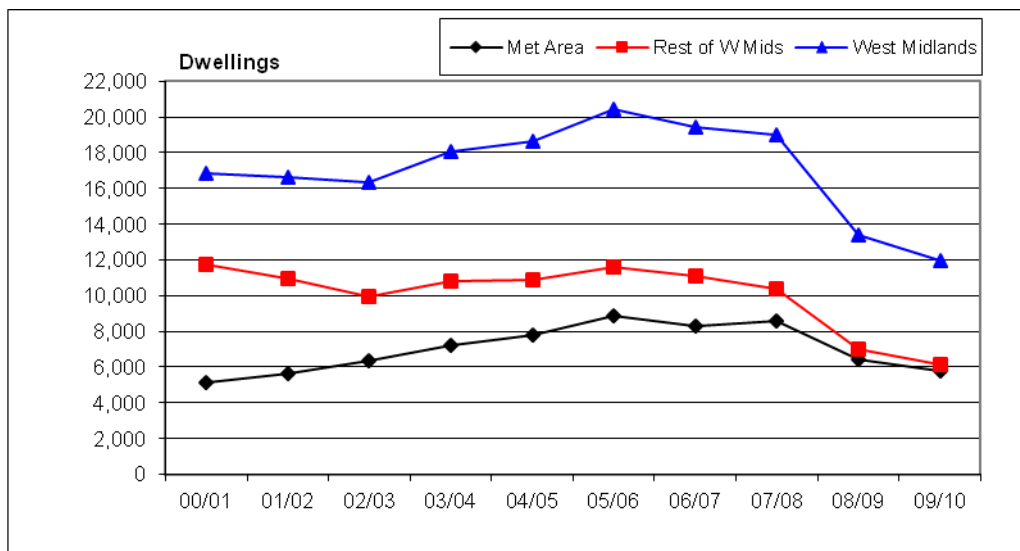
48. Despite the economic downturn net housing completions in the Metropolitan Area were twice their 2000/1 levels in 2019/10; at their peak in 2005/6 they were three times higher. Net housing completions beyond the Metropolitan Area in 2009/10 were only half of their 2000/1 levels (figure 4)

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.

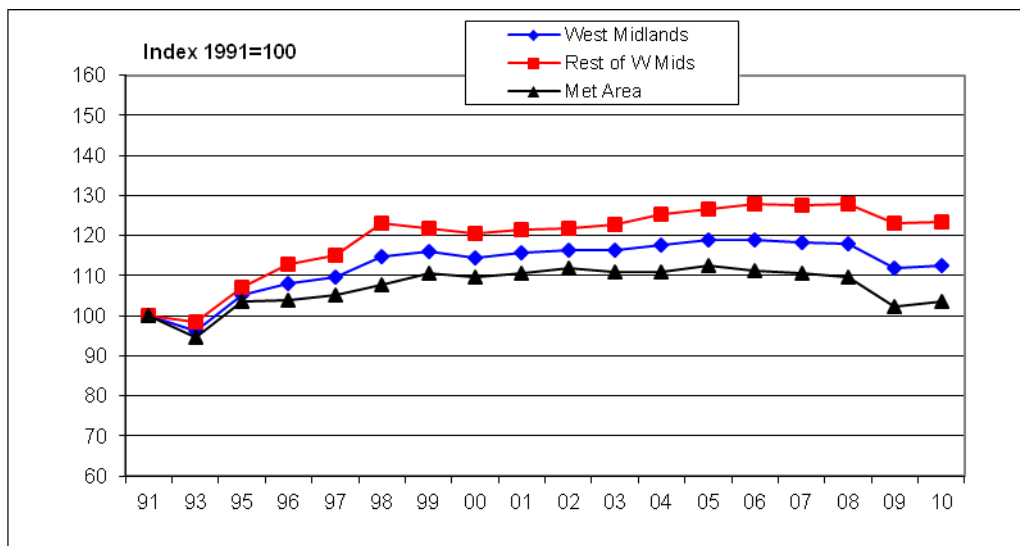
Figure 5: Gross housing completions in the West Midlands



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).

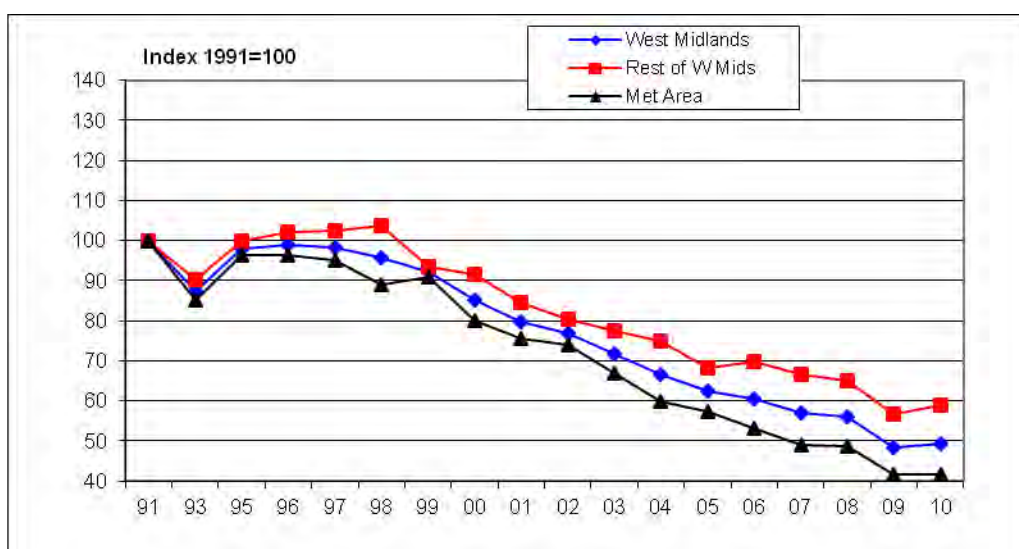
Figure 6: Total Employees in the West Midlands by Workplace, 1991-2010



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

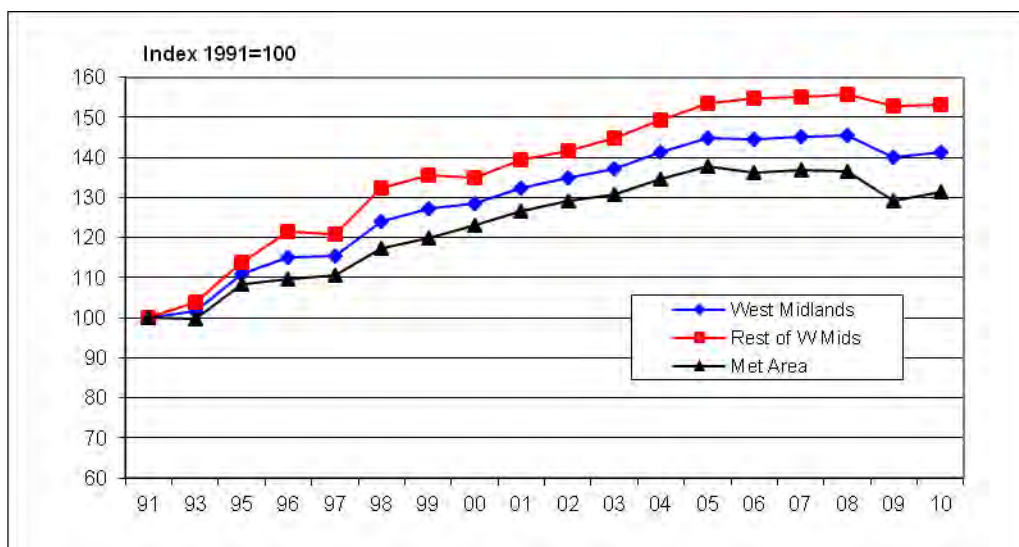
51. There is a familiar pattern across the West Midlands in terms of a reduction in manufacturing based employment and a growth in jobs in the service sector. Jobs have been lost at a greater rate and created at a lower rate in the Metropolitan Area compared to elsewhere.

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

CANNOCK CHASE COUNCIL

DUTY TO CO-OPERATE MEETING

BIRMINGHAM CITY COUNCIL

3.00 PM TUESDAY 4 DECEMBER 2012

LANCASTER CIRCUS, BIRMINGHAM

PRESENT:

Antony Lancaster - Planning Policy Manager, Cannock Chase Council

John Morgan -Principal Planner, Planning Policy, Cannock Chase Council

**David Carter -Head of Planning & Growth Strategy, Planning & Regeneration,
Birmingham City Council**

1. Duty to co-operate

- 1.1 CCC explained that under new Planning Regulations, which came into force on 6 April 2012, the Council now have a 'duty to co-operate' with various prescribed organisations. The Council therefore requested this meeting to identify and discuss relevant cross boundary and strategic issues of importance to both parties under the 'duty to co-operate' requirement. Birmingham City Council had also indicated a desire for such a meeting in its Local Plan response of 17 September 2012.

2. Local Plan consultation

Publication draft

- 2.1 CCC had recently completed a consultation on the draft Local Plan, which now combined the former Core Strategy and Rugeley Town Centre Area Action Plan into a single document. The proposed changes were taken to Cabinet on 15 November and the Publication Local Plan is planned to go to Full Council on 23 January 2013, followed by a further consultation and Submission. The Examination could take place later on in 2013. The Infrastructure Delivery Plan is a live document and can be updated as necessary.
- 2.2 CCC explained that their housing demand evidence had been informed by an updated Housing Needs Assessment and SMHA. Local housing demand evidence has identified a south-east Staffordshire minimum housing requirement of 19,8000 houses, based on joint working by Cannock Chase, Lichfield, and Tamworth Borough Councils, over the period 2006 – 2028. Cannock Chase DC had signed a Memorandum of Understanding (MoU) with Lichfield DC, with respect to 500 dwellings being provided to serve Rugeley's needs on a cross boundary basis. Lichfield had also signed a MoU with Tamworth BC to provide 500 dwellings on a cross border basis. North Warwickshire BC had also signed

MoU with Tamworth, on a similar basis. CCDC's housing targets compare with the Household Projection data, towards the bottom end of the range.

Birmingham City Council's housing requirements

- 2.3 **BCC** have updated their SHMA which has suggested a housing requirement to 2031, in the range of 80,000 – 105,000 dwellings. The SHLAA has identified a capacity of 43,000, including windfall allowance. The current Plan proposes 80,000 dwellings, less 43,000 = 35,000 unmet demand. The current consultation looks at Green Belt options to meet some of this demand on four sites to the east of Sutton Coldfield, to provide 5,000 – 10,000 houses and 50 hectares for employment. BCC do not wish to hold up other authorities Local Plan preparation, but seek some recognition in emerging plans of this issue. They have already suggested an amendment to Solihull MBC to take this into account through a Plan review. BCC are therefore looking for the GBS LEP Members and North Warwickshire BC, to address this issue through their Plans. Past trends had shown 8.8% out-migration from Birmingham into Cannock, Lichfield, Tamworth and East Staffordshire Council areas.
- 2.4 **CCC** will be preparing Part 2 of the Local Plan which will look at Site Specific Allocations. This may be an opportunity to consider Birmingham overspill. An alternative may be to include some reference in the current Local Plan Objectives. However, any further changes need to be made by 14 December, in order to get the Plan to Full Council on 23 January.

RSS revocation position

- 2.5 **CCC** highlighted that the Black Country authorities have emphasised the need for the Local Plan to be in compliance with RSS 2008. The latter is based on meeting local housing needs rather than the needs of the conurbation. A further meeting is to be arranged with Walsall MBC shortly.

3. Cannock Chase SAC Partnership

- 3.1 **CCC** highlighted the work of the SAC Partnership over the last five years, which includes the Black Country authorities and Birmingham City Council. The final reports had now been received and while the zone of influence had now been reduced from 19 to 15 km, visitor pressure on the SAC arising from proposed development in the partner authorities Plans, had increased from 9 to 15%. The restrictions on CCC to accommodate additional development within the District, were therefore severe, particularly for a small area, in which 60% was in Green Belt and one third of the AONB was included. The Council has already had to agree with Lichfield DC to include 500 dwellings to meet the housing needs of Rugeley.

4. GBS LEP matters

- 4.1 **CCC** is currently carrying out CIL viability testing in partnership with Lichfield DC and Tamworth BC. Viability testing of Affordable Housing is being carried out by CCC.

5. Chase Line

- 5.1 CCC highlighted the importance of the Birmingham-Walsall-Rugeley, Chase Line, to the District, in terms of promoting sustainable transport, regeneration and the Local Plan strategy. The Government announced approval of the £30m electrification scheme in July while the linespeed upgrade was approved in the 2011, Government, Autumn spending statement. Resignalling is also currently being carried out for completion by August 2013.

6. HS2

- 6.1 CCC has given its conditional support for HS2 subject linked to improved connectivity with Birmingham city centre and investment. There was concern that the journey time from Rugeley and Cannock to Birmingham, will be longer than from Birmingham to London. Reduced journey times will therefore be required to maintain support.

7. M6Toll

- 7.1 CCC was a member of the A5 steering group of 16 local authorities, from Staffordshire to Northamptonshire. Other GBS LEP members include Lichfield and Tamworth Councils and Walsall MBC is also a member. The functioning of the M6T is of concern to the group, as it is not carrying the intended traffic or providing the relief to the A5 and M6, it was originally intended to do. Parts of the A5 have been declared an Air Quality Management Area and a further extension may have to be declared. HGV's are the main source of air pollution.

8. Regional Logistics Study (RLS) - Mid Cannock

- 8.1 CCC had been initially involved in a steering group to examine the need for a Regional Logistics Site, post RSS P2 and in response to a proposal for a 50 ha RLS in a Green Belt site, in South Staffordshire DC area at Four Ashes. The partnership comprises the four Black Country authorities, Staffordshire CC, South Staffordshire DC and Centro. A draft report has been received. 'Hub and spoke' sites had been suggested including Mid Cannock, near to the A5/M6T junction. Pentalver, the existing HGV operator are keen to transfer much of the traffic to Rail and promote the rail freight proposal in any event.

9. AOB

- 9.1 BCC consider that a further meeting in 4/5 months time would be appropriate.

ACTION

BCC to provide suggested additional wording regarding BCC housing requirement to CCC.

CCC to consider including wording in Local Plan Part 1 – Objectives or Part 2 Site Specific Allocations.

CCC/BCC to meet in 4-5 months time.



Bob Phillips
Head of Planning and Regeneration
Cannock Chase District Council
PO Box 28
Beecroft Rd
Cannock
Staffordshire
WS11 1BG

Date: 29.07.13

Dear Bob,

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', with a stylized, cursive script.

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.

Date: 22nd March 2013

**Planning Policy
Cannock Chase Council
Civic Centre
P.O. Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG**

Email: planningpolicy@cannockchasedc.gov.uk

Dear Sir/Madam,

Cannock Chase Local Plan (Part 1) Proposed Submission 2013

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

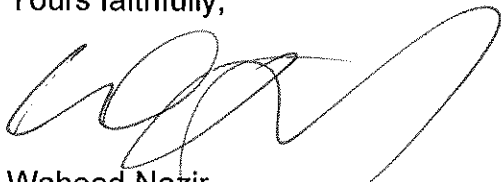
As co members of the Greater Birmingham and Solihull (Local Enterprise Partnership) the City Council welcomes the commitment given in paragraph 1.8 of the Local Plan (Part 1) reflecting the outcome of our recent discussions. Birmingham City Council also welcomes Cannock Chase Council's long-term commitment to continued collaboration with other Planning Authorities under the Duty to Co-operate (DtC).

There is a strong commitment from the LEPs to work in a coherent way across LEP boundaries on mutual priorities. This will be key in the Cannock Chase district where the economic geography is closely linked with the Birmingham, Solihull and Black Country conurbations.

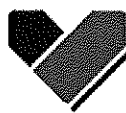
Following discussions falling under the DtC, Cannock Chase Council recognised the emergence of evidence indicating that Birmingham will not be able to accommodate the whole of its new housing requirement for 2011-31 within the Birmingham administrative boundary and that some provision would need to be made in adjoining areas to assist Birmingham to meet this need.

It is understood that Cannock Chase Council will work collaboratively with Birmingham and other Planning Authorities, including joint commissioning of appropriate evidence to assess the emerging housing shortfall and scale of any such requirement. In the event that additional work identifies Cannock Chase District as a reasonable option to help meet this requirement, it is understood this could be addressed further as part of your Local Plan 2. This approach is welcomed and Birmingham City Council will look forward to further cooperation in this area.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Waheed Nazir', with a large, sweeping flourish extending to the right.

Waheed Nazir
Director of Planning and Regeneration



Planning Policy
Cannock Chase Council
Civic Centre
PO Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG

Date: 07 December 2012

Dear Sir/Madam

Birmingham's Future Growth Requirements and the Cannock Chase Local Plan (No 1)

Following our recent correspondence and very helpful meeting covering our respective development plans I am writing 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 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 Cannock Chase 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 to the end of existing paragraph 1.8.

"Following discussions falling under the Duty to Co-operate Cannock Chase 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. Cannock Chase 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 Cannock Chase, an early review of the Cannock Chase Local Plan will be brought forward to address this."

Both Cannock Chase 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 Cannock Chase Local Plan (No 1) should progress through its public examination in its current form.

Yours sincerely

Waheed Nazir
Director of Planning & Regeneration



06 November 2012

Planning Policy
Cannock Chase Council
Civic Centre
P.O. Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG

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

Date: 17th September 2012

**Planning Policy
Cannock Chase Council
Civic Centre
P.O. Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG**

Email: planningpolicy@cannockchasedc.gov.uk

Dear Sir/Madam,

Public Consultation 2012 – Draft (Part 1) Cannock Chase Local Plan

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 Cannock Chase Local Plan (CCLP) appear to 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. For this reason, the Council's support for the Draft CCLP 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 Cannock 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 emerging CCLP, the Birmingham Development Plan and Birmingham's housing requirement. This would be additional to ongoing consideration of the Duty to Co-operate through the Greater Birmingham and Solihull Local Enterprise Partnership 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 black ink, appearing to read 'Waheed Nazir', with a stylized flourish at the end.

Waheed Nazir
Director of Planning and Regeneration

08th August 2012

Bob Phillips
Head of Planning and Regeneration
Cannock Chase District Council
PO Box 28
Beecroft Rd
Cannock
Staffordshire
WS11 1BG

Dear Bob,

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.

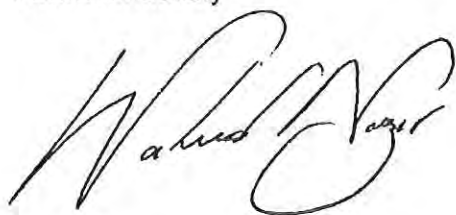
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of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

Waheed Nazir
Director of Planning and Regeneration

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

APPENDIX 4

Coventry - 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.

- CCC response to the Birmingham Development Plan 2031 Pre Submission version dated 03/03/14
- Action Note from meeting held on 25/02/14
- BCC letter to CCC on Birmingham's Future Growth Requirements dated 29/07/13
- Further BCC submission re CCC Preliminary Hearing dated 05/02/13
- BCC submission to the Coventry Local Development Plan – Core Strategy – Preliminary Hearing Session Concerning the Duty to Cooperate dated 23/01/13
- CCC response to Birmingham Development Plan – Planning for Birmingham's Growing Population Options Consultation dated 14/01/13
- BCC letter to CCC confirming response to Coventry Core Strategy dated 06/11/12
- BCC letter to CCC re Proposed Coventry Core Strategy dated 10/09/12
- BCC letter to CCC on Birmingham's Future Growth requirements dated 08/08/12
- CSWAPO response to Birmingham Core Strategy 2026 – Consultation Draft dated 17/03/11

Place Directorate

Civic Centre 4
Much Park Street
Coventry
CV1 2PY

Please contact:
Direct line 024 76 83 4295
E-mail: mark.andrews@coventry.gov.uk

Reference:

Date: 3rd March 2014

Dear Sir / Madam,

Please accept the following comments in response to Birmingham City Council's (BCC) Proposed Submission Draft. Please note that these comments have been prepared by Coventry City Council (CCC) officers and have not been formally endorsed by Full Council.

Duty to Cooperate (DtC)

We recognise that a significant degree of work has been undertaken by BCC with a view to discharging the DtC and we note that BCC's issues, especially in relation to housing provision have been well documented.

Coventry's specific position in terms of its cooperation with BCC, is being documented within a DtC Checklist. Although not finalised at this time, we would expect it to be completed prior to formal submission of BCC's plan. Subject to the completion of this checklist, we are therefore satisfied that the DtC has been discharged in relation to BCC and CCC.

We recognise that at this current time BCC continue to undertake additional work with other members of the GBSLEP. We understand that this is intended to provide an objective assessment of housing need for the Birmingham Housing Market Area. Although the timing of this additional work is sub-optimal in terms of developing the plan, we appreciate that developing such evidence can be time consuming and that the data that feeds into it is fast moving. As such, we hold no objection to the plan on this basis and support the development of this additional evidence.

Notwithstanding this, it is our view that to fully discharge the DtC BCC must be satisfied that prior to submission the results of these subsequent assessments and the implications they have for BCC, other GBSLEP members and any other authorities are fully recognised, understood and planned for. Failure to do this, in our view, may jeopardise the ability to realise the objectively assessed housing need for BCC. By default this would mean cooperation between respective authorities may not have been sufficiently constructive.

Again however, we would stress that at this stage we hold no formal objection on this matter, but do wish to hold a 'watching brief'.

Executive Director, Place
Martin Yardley
Assistant Director for Planning Transport and Highways
Colin Knight

Housing Need

Building upon our comments to the DtC, we recognise that unless a significant reduction in housing need is evidenced by the GBSLEP housing study, then there is a significant need to provide for Birmingham's housing requirements in other local authority areas. Indeed the Submission Draft suggests this equates to around 29,000 dwellings (based on the BCC SHMA).

The management of this circa 29,000 homes is commented upon in our DtC Checklist, however we would re-emphasise that this must be dealt with in a sequentially sustainable way that reflects the wider Birmingham Housing Market Area and adjoining Housing Market Areas as and where appropriate. We would recommend that this is undertaken as follows:

1. All reasonable alternative options have been considered and justifiably dismissed within the BCC local authority area – this includes all Green Belt options;
2. That all reasonable alternative options have been considered and justifiably dismissed within local authority areas that are solely within the defined Birmingham Housing Market Area;
3. That all reasonable alternative options have been considered and justifiably dismissed within local authority areas that are within the defined Birmingham Housing Market Area but that also overlap with an adjoining Housing Market Area;
4. Only once all reasonable alternative options within stages 1-3 have been evidenced and dismissed should consideration be given to authorities within neighboring Housing Market Areas that do not overlap with the BCC HMA .

We would acknowledge that in some circumstances local authorities that would sit within point 4 may choose to deliver some of BCC's housing growth. If such a desire is expressed then we would expect BCC to explore this option accordingly and with a view to delivering sustainable development.

At this stage however, it is our view that BCC may not have sufficiently demonstrated that housing supply options have been maximised within their local authority area. This is principally in relation to the proposed urban extension at Sutton Coldfield. This is clearly identified as a deliverable and developable site for residential development, yet only 5,000 of the possible 6,000 dwellings are identified for the plan period. We recognise the evidence developed by PBA in terms of market conditions etc., however to suggest the remaining 1,000 dwellings cannot be delivered in the plan period is not accepted. If these 1,000 homes are not built at Sutton Coldfield as part of a wider developable scheme in this plan period then they need to be built elsewhere (outside of Birmingham and potentially within wider Green Belt areas that, subject to the results of an SA/SEA, may not be as sustainable as the Sutton Coldfield site). The fact is the need remains for the homes to be built by the development industry and that this area of land has been identified as a developable option for the plan period. It is therefore the responsibility of the development industry to deliver these homes within the plan period, in simple terms this could include an additional house builder or an additional point of sale being added to the development program, or alternatively a promotion of the site starting sooner in the plan period. As such, our view is that the capacity of the proposed urban extension at Sutton Coldfield should be 6,000 homes within the plan period as opposed to the 5,000 currently identified. This would reduce the need for further land to be released unnecessarily and support sustainable development.

Summary

We would stress at this stage that we hold no objection to the BCC proposed plan, subject to the satisfactory completion of our DtC checklist and appropriate management of the BCC OAN housing overspill (as evidenced by the new GBSLEP Housing study). As part of this position, it is our view that all reasonably alternative options within the BCC boundary should be maximised first and that a key aspect of this includes an increase in the capacity of the Sutton Coldfield urban extension from 5,000 dwellings to 6,000 dwellings for the plan period.

Further Input and Attendance at Hearings.

Coventry City Council and Birmingham City Council, have a strong and longstanding working relationship, which will be formally evidenced through the DtC Checklist. With a view to maintaining these on-going and constructive channels of co-operation, Coventry City Council are happy to attend the appropriate examination sessions of the Birmingham plan in order to support the Inspector in reaching their recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Andrews', with a stylized flourish underneath.

Mark Andrews
Acting Planning Policy Manager

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1200, Tuesday 25 February 2014, North Warwickshire Borough Council Offices

Present:

Jim Newton – Coventry City Council (JN)

Mark Andrews – Coventry City Council (MA)

David Carter – Birmingham City Council (DC)

Discussion

The meeting focussed around two matters, the current position on GBSLEP Strategic Housing Study and the Coventry Warwickshire SHMA and, (2) The Birmingham Development Plan and the DtC. 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 Districts both of which were also covered by the Warwickshire SHMA.

The recently completed SHMA for Coventry and Warwickshire does not specifically address housing shortfalls in the GBSLEP (Birmingham and Tamworth are both relevant in this context) and it was recognised there would be a need for ongoing discussions around these issues. The scale of the requirement in Coventry was also noted as were the possible consequences of this for adjoining areas within Warwickshire.

In relation to the relationship between Birmingham and Coventry it was recognised that gross migration flows between the two cities were substantial but that net flows were much smaller. It was therefore agreed that neither Birmingham nor Coventry would be seeking housing capacity in each-others administrative areas.

JN noted further discussions upcoming with Warwickshire authorities with a view to recommending a position to the Warwickshire Joint Committee. It was noted that this report could helpfully note the need for further negotiation between the two LEP areas on the matter of shortfalls.

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 Coventry 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.

In relation to point b) Coventry would wish to add some text to reflect their position. At present the text focussed on the position within the GBSLEP area.

Similarly a more tailored comment would be added in relation to point c)

On Point d) there was a discussion on the proposed Strategic Employment Sites work and DC agreed to add a note on this.

On g) Coventry CC would consider if any further clarification might be required.

Item h) was considered not to be applicable.

It was agreed that DC would provide an amended version of the document adding the detail on correspondence etc. This would be sent to JN 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.



Colin Knight
Assistant Director of Planning
Coventry City Council
Council House
Earl St
Coventry
CV1 5RR

Date: 29.07.13

Dear Colin,

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 recognise the difficulties that this has created, but 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.

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, and in this respect I am conscious that your Council's position has changed somewhat with your decision to commission a joint Strategic Housing Market Assessment with your neighbours in Warwickshire.

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', with a stylized flourish at the end.

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.

Coventry DPD Core Strategy

Duty to Co-operate – Birmingham City Council Preliminary Hearing Documentation

At the Preliminary Hearing on 1 February 2013 the Inspector requested the following information:

1. An electronic copy of the letter dated 18 January 2013 sent to authorities adjoining Birmingham together with the distribution list.
2. A summary of the negotiations and 'agreements' that have already been put in-place in respect of the Solihull and Cannock Chase development plans.

NB: The attachments to this document are attached in chronological order.

1. Birmingham's Future Growth Requirements – Letters sent to Adjoining Authorities

For completeness, the two letters that have been sent to adjoining authorities are attached.

The first letter, dated 8 August 2013, was sent to ALL authorities in the West Midlands Metropolitan Area, the additional authorities in the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and North Warwickshire District Council:

Metropolitan Area	GBSLEP	Others
Coventry Dudley Sandwell Solihull Walsall Wolverhampton	Bromsgrove Cannock Chase East Staffordshire Lichfield Redditch Solihull Tamworth Wyre Forest	North Warwickshire

The second letter, dated 18 January 2013, was sent to the same authorities as the first letter with the exception of Cannock Chase, Coventry and Solihull (copy attached). It should be noted that North Warwickshire District Council is neither within the metropolitan area nor the GBSLEP but officer-level discussions have commenced with a view to securing a reference in the emerging development plan to involve the Borough Council in future collaborative work in relation to dealing with Birmingham's future growth requirements.

In relation to Coventry the letter was not sent since Birmingham City Council is involved in the public examination process following its representations to the effect that it considers the emerging Coventry Plan to be unsound in respect of the proposed level of housing growth.

In respect of Cannock Chase and Solihull discussions have been ongoing to secure recognition of the need for urgent collaborative working. The nature of these are set out below.

2 – Duty to Co-operate Agreements in-place

2a – Solihull

Following the 8 August letter bi-lateral meetings between senior officers of the two Council's took place on 3 September 2012 and 19 December 2012,

On 24 October 2012 Solihull wrote to the City Council (copy attached). Following further discussions the City Council's response is as set out in the letter dated 13 December 2012 (copy attached) to which confirmation of acceptability was confirmed by email. The 13 December letter includes a form of words which Birmingham City Council hopes will be incorporated into the final adopted version of the plan.

2b – Cannock Chase

Following the 8 August letter a specific response to the Cannock Chase consultation was sent in a letter dated 17 September 2012 (copy attached) and a senior-level bi-lateral meeting took place on 4 December 2012. Subsequently an exchange of correspondence has led to an agreed approach to addressing the potential housing shortfall in Birmingham. This exchange comprises a letter to Cannock Chase DC dated 7 December 2012 (copy attached). This was countered by a proposed alternative suggested wording for inclusion in the plan by email on 12 December 2012 as follows:

“Following discussions falling under the duty to co-operate Cannock Chase 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. Cannock Chase Council will work collaboratively with Birmingham and other authorities, including joint commissioning of appropriate evidence to assess the emerging housing shortfall and the scale and distribution of any such requirement. In the event that the additional work identifies Cannock Chase District as a reasonable option for helping to meet the requirement, this will be addressed further as part of Local Plan Part 2.”

The final correspondence was a response to Cannock Chase DC in an email from Waheed Nazir, Director of Planning and Regeneration on 14 December 2012 as follows:

“Having carefully considered your alternative I think I would prefer to leave my letter on record as it was written. However if your response to that letter is that you would be happy to include the wording you suggested back to me I think that would be satisfactory. However, I would have to emphasis that the appropriate evidence in our view should include a Joint Strategic Housing Market Assessment and Green Belt review.”

2c – Other authorities

The City Council intends to make representations seeking appropriate forms of wording in emerging plans that are well advanced in other local authority areas to protect the long-term position and to encourage appropriate forms of collaborative working. As mentioned at the hearing session discussions and representations similar to those for Cannock Chase and

Solihull have been made in respect of North Warwickshire BC. These discussions are ongoing.

The possible need for additional discussions with some of the other authorities in the Coventry-Warwickshire Housing Market area was also highlighted at the Preliminary meeting.

David Carter
Head of Planning & Growth Strategy
Birmingham City Council
5 February 2012

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.

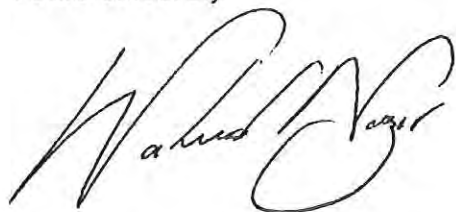
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of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

Waheed Nazir
Director of Planning and Regeneration

Date: 17th September 2012

**Planning Policy
Cannock Chase Council
Civic Centre
P.O. Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG**

Email: planningpolicy@cannockchasedc.gov.uk

Dear Sir/Madam,

Public Consultation 2012 – Draft (Part 1) Cannock Chase Local Plan

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 Cannock Chase Local Plan (CCLP) appear to 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. For this reason, the Council's support for the Draft CCLP 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 Cannock 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 emerging CCLP, the Birmingham Development Plan and Birmingham's housing requirement. This would be additional to ongoing consideration of the Duty to Co-operate through the Greater Birmingham and Solihull Local Enterprise Partnership 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 black ink, appearing to read 'Waheed Nazir', with a stylized flourish at the end.

Waheed Nazir
Director of Planning and Regeneration

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

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

Planning Policy
Cannock Chase Council
Civic Centre
PO Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG

Date: 07 December 2012

Dear Sir/Madam

Birmingham's Future Growth Requirements and the Cannock Chase Local Plan (No 1)

Following our recent correspondence and very helpful meeting covering our respective development plans I am writing 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 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 Cannock Chase 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 to the end of existing paragraph 1.8.

"Following discussions falling under the Duty to Co-operate Cannock Chase 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. Cannock Chase 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 Cannock Chase, an early review of the Cannock Chase Local Plan will be brought forward to address this."

Both Cannock Chase 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 Cannock Chase Local Plan (No 1) should progress through its public examination in its current form.

Yours sincerely



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

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', with a stylized, cursive script.

Waheed Nazir
Director of Planning & Regeneration

Examination of the Coventry Local Development Plan – Core Strategy

Preliminary Hearing Session Concerning the Duty to Cooperate

Birmingham City Council Submissions

Issue 1

Taking account of the housing need/supply position within Coventry, Birmingham City Council (BCC) does not anticipate that the emerging shortfall in housing provision within Birmingham will lead to a request to accommodate any of that provision within Coventry's administrative area. It is possible, however, there could be implications elsewhere in the Coventry and Warwickshire Local Enterprise Partnership (LEP) area.

BCC is not aware of any request from any of the authorities in the Coventry and Warwickshire LEP to 'transfer' any of the apparent housing shortfall from that area into Birmingham or elsewhere within the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP).

Issue 2

BCC accepts that the ONS household projections should not and need not be slavishly followed in the production of a development plan. The ONS figures, however, can be seen as a clear starting point and 'industry standard' in informing the level of housing need. The following paragraph summarises the BCC's concerns which it proposed should be included in the joint statement with Coventry City Council. Coventry City Council would not agree to the inclusion of this into the statement:

"BCC's position is that its representation was necessary since Coventry City Council has not provided for a level of growth to a level broadly consistent with objectively set need nor had it sought to explain how any shortfall was to be accommodated. BCC notes that the annual provision proposed in the Coventry Plan is about 55% of the 2008-based ONS household projections and comparable figures in Warwick and Stratford are around 63% and 46% respectively. This position could have knock-on implications for Birmingham and other authorities."

BCC remains of the view that Coventry have failed to provide adequate explanation for, and dealt with the possible consequences of an apparent significant under-provision of housing.

Coventry City Council have made extensive references to joint work within the metropolitan area including the joint metropolitan area statement and Joint

Committee and support arrangements. There is no need for BCC to add to that evidence.

Inside the GBSLEP, BCC has moved to a position where existing work on Local Plans/ Core Strategies which broadly propose levels of growth at or close to either the 2008-based Household Projections or Phase 2 of the Regional Spatial Strategy should proceed towards adoption subject to a shared view that additional collaborative working will be required to address the longer term implications of growth pressures in Birmingham. The City Council's position was informed by the analysis of the housing provision in areas adjoining Birmingham which was added as an Examination Document following the Exploratory Meeting.

The City Council is involved in similar discussions with North Warwickshire District Council.

In the GBSLEP collaborative work on the production of a LEP-wide Strategic Spatial Framework Plan is underway and it is the intention that this work will address the long term scale and distribution of growth. The working group responsible for this work also includes representatives from adjoining LEPs – including the Coventry and Warwickshire LEP and the Black Country LEP. These connections have been made as it is clear that that appropriate linkages and provision for development will cross LEP areas.

The City Council understands that Solihull MBC neither participated in the drafting nor signed off the Statement of Common Ground and Cooperation for the Coventry, Solihull and Warwickshire Sub Region (Appendix 4 of CS22).

David Carter
Head of Planning & Growth Strategy
Birmingham City Council
23 January 2013



**City Services and Development
Directorate**

Mr David Carter
Head of Planning & Growth Strategy
Planning & Regeneration
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

Planning Policy Team
City Services & Development
Directorate
Floor 3, Tower Block
Much Park Street
Coventry CV1 2PY

Please contact: Jim Newton
Direct line 024 7683 1187
Fax 024 7683 4372
E-mail: jim.newton@coventry.gov.uk

Reference: DPD/Plan2031/Stat
Date: 14th January 2013

Dear Dave

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

I am writing in response to your consultation, specifically concerning the housing target and its implications for Coventry. This response has not been seen or endorsed by Members of the Council. I will focus on three main areas: the alternative options considered and conclusions drawn from the evidence; the relevance and age of the published evidence; and the implications for Coventry’s Local Development Plan.

The Alternative Options considered and conclusions drawn from the evidence

It is noted that, on page 37 of the Sustainability Appraisal, “the preferred development strategy selected ... is Option 1 based on 50,600 dwellings”. This is the RSS Phase II Preferred Option figure, and is referred to elsewhere in the SA as the ‘baseline’. The alternative options appraised appear to be arbitrary increases on that figure (variously +10%, +20%, and +30%). Past trends and the current proposed target were not appraised. It is unclear to me how the SA which says that 50,600 dwellings is the preferred figure, and does not mention either past trends or the 80,000 target that is now being promoted, has been used.

The SHMA and the SA both appear not to have expressly considered the Census data around actual household formation rates. While there may be issues concerning restrictions of housing development land acting as a disincentive to household formation, this is not shown to have been investigated by the SHMA (in particular) to sensitivity test the historic household formation rate. The table below projects actual (Census) household data for Birmingham forward in a straight line to 2031, and projects forward the actual net completions during the ten years to 2011. Even taking into account the apparent acceleration of household growth, setting a target that is more than double the historic delivery rate, and nearly double the evidenced supply of sites for new homes, is

*Director of City Services and
Development*
Martin Yardley
Assistant Director
**Colin Knight, Assistant Director for
Planning, Transport & Highways**

unlikely to be delivered. Such a target could not therefore be effective so may not ultimately be sound in the context of NPPF paragraph 182. This is especially so given that the economy has been in and out of recession for the best part of five years now.

Households in Birmingham				
1991	2001	2011	2031	Required 2011 – 2031
	390,800	410,736	450,608	39,872
377,200		410,736	444,272	33,536
(2001 – 2011 18,484 net completions)				36,968

The AMR 2011 shows that during the decade to 2011, some 18,484 net additional dwellings (29,652 gross) were completed in Birmingham. Given the current prolonged economic weakness, it is perhaps unsurprising to note that net completions have fallen from a peak of 3,141 in 2005-6 to 933 in 2009-10 (and 985 in 2010-11).

I have not seen any discussion within the evidence base of the substantial differences between the actual delivery and formation of new homes, and the proposed target for future delivery of new homes in Birmingham. This has implications for Coventry's Local Plan which are discussed later.

The relevance and age of the published evidence

It is unclear how the Sustainability Appraisal that predates the ONS Household Projection on which the 80,000 target is predicated, can usefully support the Plan. This is especially the case because the SA does not specifically consider the chosen target.

It is also unclear how the current RSS and RSS Phase II Preferred Option targets, can be said to usefully inform or support the Plan. This is an important consideration because, unless and until the RSS is formally abolished, the Local Plan must be in general conformity with it.

I do acknowledge that the second government sustainability report is currently subject to consultation, with a view to abolition of the West Midlands RSS, but the Cala Homes saga has established that it is unlawful to take that into account in plan making. It is debatable whether this is effectively superseded by the Localism Act, but given that the Birmingham Plan published SA report says that the RSS Phase II Preferred Option is the preferable target, you will need to show how and why the Council is moving away from that figure at this stage.

The implications for Coventry's Local Development Plan

The problem that I find with the change from the 50,600 target to 80,000 is the impact on Coventry. Notwithstanding that we are in two different Housing Market Areas for the purposes of the NPPF, Birmingham City Council has maintained an objection to the Coventry Plan because it proposes a housing target substantially below its RSS Phase II figure.

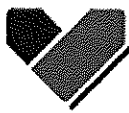
Conversely, choosing a housing target that is so far above the deliverable 'known' capacity (SHLAA identifies 41,502 homes) has led Birmingham to seek assistance from other Councils to accommodate the balance of homes. The evidence to support this target, for the reasons set out above, is questionable, and it appears to unnecessarily create a problem. If Birmingham City Council were to have opted for a more realistic and effective (deliverable) target, then it might not have had to ask other Councils for assistance in accommodating its growth, it might not have had to review its Green Belt, and it might not have felt the need to maintain objections to other Councils in different Housing Market Areas.

In summary, I am concerned that significant sections of the published body of evidence does not appear to relate very well to the 80,000 target for the provision of new homes, and given that Birmingham City Council is currently objecting to Coventry's Core Strategy housing target I do not think it is in either of our interests for Birmingham to pursue what looks like an undeliverable strategy.

Yours sincerely



Jim Newton
Planning Policy Manager



06 November 2012

Coventry City Council
Local Development Framework Team
Civic Centre
4 Much Park St
Coventry
CV1 2PY

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

Local Development Framework Team
Civic Centre
4 Much Park St
Coventry
CV1 2PY

Date: 10 September 2012

Dear Sir/Madam,

Coventry Proposed Core Strategy

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

The City Council has concerns over the level of housing provision proposed in the Strategy.

The Strategy proposes a development rate of 670 dwellings per year. This is substantially below both the level required by the Regional Spatial Strategy Phase 2 Revision (1,675 dwellings per year) and the level which would be needed to meet the household growth in Coventry indicated by the 2008-based household projections (1,210 dwellings per year). The City Council has been unable to identify any clear rationale for this under-provision.

The effect of this under-provision will be to place added pressure on housing markets in the Solihull/South Birmingham area. This is a concern to the City Council particularly in view of the latest evidence regarding household growth in Birmingham which suggests that there will be an increase of 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. .

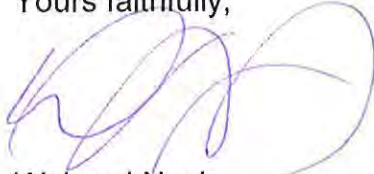
For this reason the City Council does not consider that the Coventry Proposed Core Strategy can be considered sound in terms of its proposed level of provision for new housing.

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' and I would confirm that my officers would be happy to discuss any issues with you in relation to progress of the Coventry Core Strategy. This would be additional

to ongoing consideration of the Duty to Co-operate through the Joint Committee arrangements.

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 be 'Waheed Nazir', with a large, stylized loop at the end.

Waheed Nazir
Director of Planning and Regeneration

08th August 2012

Colin Knight
Assistant Director of Planning
Coventry City Council
Council House
Earl St
Coventry
CV1 5RR

Dear Colin,

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.

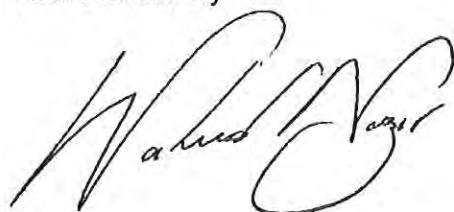
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of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

Waheed Nazir
Director of Planning and Regeneration

Coventry, Solihull & Warwickshire Association of Planning Officers



Planning Strategy
Development Directorate
Birmingham City Council
1 Lancaster Circus
Birmingham
B4 7DQ

17th March 2011

Dear Sir/Madam

Birmingham Core Strategy 2026 – Consultation Draft

Please find below comments in respect of the Birmingham Core Strategy – Consultation Draft, sent on behalf of CSWAPO.

Policy SP2 – Overall Levels of Growth

Prioritising land within the urban area, including as a first priority previously developed land, for housing is consistent with PPS3 (paragraphs 36 and 38) and conforms to the general approach of the extant Spatial Strategy of the adopted Regional Spatial Strategy (RSS) and its emphasis on an urban renaissance of the MUAs, such as Birmingham, within policies UR1, CF1, CF3, CF4 and CF6.

It is noted, however, that the number of additional dwellings proposed within the Consultation Draft is some 36,400 dwellings short of the latest ONS projections of 87,000 newly forming households. Moreover, it is noted that the number of additional dwellings is some 6,900 dwellings less than the figure recommended by the RSS Phase Two Revision Panel Report of 57,500 dwellings minima which the Panel noted could be accommodated without recourse to urban extensions (consistent with Consultation Draft Policy SP25). Whilst recognising that the City has a finite capacity in terms of land for housing, the implications for the region of a failure to adequately meet housing needs in Birmingham will be the continued net out-migration to adjoining areas, such as Coventry, Solihull and Warwickshire, putting pressure on these areas to accommodate further growth and contribute to potentially 'unsustainable patterns of development' in a regional context.

It is acknowledged that the forthcoming Localism Bill intends to abolish the RSS in due course and from that point Councils will be allowed to set their own levels of growth. However, the Bill's proposed 'duty to cooperate' implies

a requirement on Councils to work together to resolve issues which may have impacts over a much wider area than the boundary of the Council. CSWAPO (excluding Coventry City Council) therefore consider that it is imperative that your authority demonstrate through the examination process that the Core Strategy has maximised the potential for new housing development within the City Council's boundary (including consideration of the potential use of greenfield land) to minimise the potential overspill of newly forming households, in accordance with the extant regional policy approach.

Should you require any additional information/clarification, please contact Gary Stevens at Warwick District Council - Gary.Stephens@warwickdc.gov.uk (01926 456502).

Your faithfully

P. Neal

Pam Neal
Chair of Coventry Solihull & Warwickshire Association of Planning Officers

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

APPENDIX 5

Black Country (Dudley, Sandwell, Walsall & Wolverhampton) - 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.

- Association of Black Country Authorities response to the Birmingham Development Plan 2031 Pre Submission version dated 28/02/14
- Action Note from meeting held on 25/02/14
- BCC letters to each Black Country District re Birmingham's Future Growth Requirements dated 29/07/13
- BCC letters to each Black Country District re Birmingham's Future Growth Requirements dated 18/01/13
- Walsall MBC response to Birmingham Development Plan Options Consultation dated 13/01/13
- Note on Black Country population projections arising from meeting between BCC and Black Country Local Authorities to discuss future housing requirements held on 17/10/12
- BCC letter to each Black Country District on Birmingham's Future Growth requirements dated 08/08/12



Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: PS/CW
Date: 28 February 2014
Please ask for: Christine Williams
Direct Line: 01922 652089

Planning Strategy
Planning and Regeneration
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

Dear Sir /Madam,

Birmingham Development Plan 2031 – Pre-Submission Consultation

I refer to the consultation for the Birmingham Development Plan (BDP).

Please find attached on behalf of the Black Country Authorities their response. This plan, like previous consultations, has been the subject of careful consideration within the individual councils as well as across the Black Country. There have also been discussions at all levels between Birmingham and the Black Country, utilizing the mechanism which exists to address strategic cross-boundary issues on a continuing basis through the metropolitan officers' Duty to Co-operate Group.

We support the broad direction of the plan. The approach to development is generally in line with the former Regional Strategy and the Strategic Policy Framework for the West Midlands Metropolitan Area, which has been endorsed in an updated form by the West Midlands Planning and Transportation Sub-Committee. In this context it should be made clear that the policies and proposals of the plan, and the ways in which they would be applied, should support the urban regeneration strategy for the West Midlands. This would help ensure that the Development Plan would be consistent with the Black Country Core Strategy.

We recognize the need to work closely with our neighbours, in the understanding of the evidence base behind the assumptions and the preferred locations for growth. We also recognize the need to ensure that our strategic planning decisions, undertaken through our own plan preparation or through the Duty to Co-operate,

ensure that we have sufficient capacity of attractive sites. Therefore, in addition to understanding the evidence base and assumptions behind the Birmingham Plan, we are committed to a review of the Black Country Core Strategy in 2016. In the meantime, we will endeavour to assist Birmingham City Council to meet housing targets, by looking to identify new sites for housing development within the framework of the Black Country Core Strategy.

We have set out our detailed comments, including some queries, in the attachment to this letter. In most cases we are supportive and / or wish to work with you to progress the issues in the plan. Whilst there are some major issues facing Birmingham and the Black Country several of our concerns at this stage relate to points of comparative detail.

We would be happy to discuss any of the issues raised. The 4 Black Country Authorities will also continue to work with you both in the progress of the Birmingham Development Plan and more generally on addressing the requirements for development to meet the needs of and support the regeneration of the West Midlands conurbation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Sheehan', with a stylized, cursive script.

Paul Sheehan
Chief Executive, Walsall MBC
And Secretary Association of Black Country Authorities

Enc.

COMMENTS ON THE BIRMINGHAM DEVELOPMENT PLAN 2031 – PRE-SUBMISSION CONSULTATION

The points (generally) reflect the order of the Pre-submission Consultation and refer to the questions in the document where relevant. Where there are requests or proposals for changes to the wording of the plan these are in bold (with specific wording changes underlined and proposals for deletion struck through).

GENERAL

The BDP is well-written and generally well-argued. As we refer below, we broadly support the approaches that it seeks to take, and we will continue to work with the City Council to address issues that need to be addressed together or where we have particular concerns. The comments below should be seen within this overall supportive context.

We support the broad direction of the plan. The approach to development is generally in line with the former Regional Strategy, and the Strategic Policy Framework for the West Midlands Metropolitan Area, which has been endorsed in an updated form by the West Midlands Planning and Transportation Sub-Committee. In this context it should be clear that the policies and proposals of the plan, and the ways in which they would be applied, should support the urban regeneration strategy for the West Midlands. This would help ensure that the Development Plan would be consistent with the Black Country Core Strategy.

However, the extent the supporting evidence base has been updated to cover the longer time frame to 2031 (compared to the date of 2026 used in the past) is not entirely clear. There are certain inconsistencies in the evidence, which may be in part because the various documents use different time scales. We consider that the evidence used to inform the plan is neither as transparent nor as freely-available as it might be.

There has been a great deal of discussion between representatives of our authorities and we recognise there will need to be further discussions. Not least this is because we understand that:

- i. there are to be some changes to the Plan and / or different approaches taken to the expression of planning policy. In particular, we understand that a development Management DPD is now to be prepared; and
- ii. work is underway on additional evidence - besides the current Housing Needs Study that covers the GBSLEP, the Black Country and other areas.

THE VISION, OBJECTIVES AND STRATEGY (Question 03)

The objectives for Birmingham are supported in principle. However, it would appear beneficial to **include references (under the sustainability point) to the importance of safeguarding and making the best use of natural resources and of avoiding or mitigating pollution.**

The inclusion of these points would help address all of the relevant aspects of sustainability and to provide an underpinning for the approaches and policies proposed.

THE STRATEGY (Q04)

The Strategic Policy Framework agreed between the metropolitan authorities and the recent consultations on the GBSLEP Spatial Plan have both placed considerable emphasis on urban regeneration. However, we cannot see that “*urban regeneration*” is referred to at all within the strategy set out in the plan (the first references seem to be in Chapter 5). In our view, the clear need to support the regeneration of the Black Country cannot be separated from the strategy for Birmingham, and it is important to recognise the importance of urban regeneration if the existing urban areas of the Black Country, together with those of Birmingham, are to maximise their abilities to meet the needs of the conurbation.

We ask that the strategy should include a statement to the effect of the following.

To achieve economic revitalisation and to meet people’s needs in a sustainable way that maximises access to opportunities and makes the best use of assets and resources in a city like Birmingham means that the strategy is one of urban regeneration. The approach is to encourage investment and improvement within the existing city wherever possible. Where development does have to be accepted elsewhere it should be done in ways that support the overall strategy and that provide benefits as widely as possible.

It would also be consistent with sustainability objectives and with the points we have made above in respect of the Objectives to **refer to:**

- **an approach that safeguards and seeks to make the best use of resources; and**
- **ensuring that new developments seek to avoid or to mitigate the effects of pollution and to ensure that pollution does not hold back the growth of the city.**

POLICY PG1: PLANNING FOR GROWTH (Q05)

We support the positive approach of the plan towards the development needs that have been assessed. We do not have any objections at this stage to the evidence that has been used to derive to headline growth figures, but we will wish to comment further in future in light of the current work on Strategic Housing needs in which the Black Country is participating.

Of course, we have noted carefully that this Consultation says that whilst ONS statistics indicate there could be an increase of 80,000 in the number of households in Birmingham up to 2031, the City Council is planning for 51,100 additional homes to be provided, so that – for the remainder - *“options outside the City’s boundaries will need to be explored”* (para. 4.1).

As part of our joint work and continuing discussion the Black Country authorities will take a positive approach in seeking to identify where they might appropriately accommodate additional growth within the framework of the Black Country Core Strategy and the continuing need to regenerate the area. In doing this, both in the current context and as part of the planned future review of the Core Strategy, we will consider whether it would be appropriate to allow more housing on industrial land and existing open space where these are not needed and we recognise that the Core Strategy Review will be likely to have to examine the roles of the Green Belt at least in part.

If the Black Country authorities are to undertake comprehensive assessments of how growth might be accommodated, it will be important for it to be seen that Birmingham has been doing the same. Of course, the City Council consulted last year on ‘Green Belt Options’. We understand that work has been done on the likely availability of future housing capacity from existing employment land and open space within the city’s boundaries and that this is represented in the SHLAA that supports the plan, including in the assumptions for future ‘windfalls’. It would be useful – as a basis to aid joint working, as well as for the examination of the plan – if the approaches taken, the sites assessed, the assumptions made and the conclusions reached could be set out in a way that provide clear evidence as to the work done.

Although this section of the plan refers to the cross-boundary implications of potential housing needs, it does not refer to other forms of development, notably for employment. The discussions we have had so far on the Duty to Co-operate, however, seem to indicate that the City Council has a view that where there is housing growth in areas outside of Birmingham this should be accompanied by a proportionate amount of economic development. We would like to continue to discuss this issue, including with reference to the regeneration of the Black Country, but we do feel **it will be important to acknowledge in the plan that housing growth will have economic development implications too.**

We have made some more specific comments, in respect of particular issues such as housing (see below).

SPATIAL DELIVERY OF GROWTH (Q08)

Subject to our more detailed comments, we support the focussing on growth areas, based on centres and other focal points, as the most effective and sustainable means of accommodating and supporting large-scale development. We also consider that, in broad terms, the areas identified and the scales and kinds of development proposed are to be supported or we recognise the proposals are in adopted plans.

We do have some detailed comment in respect of one proposed Growth Area.

POLICY GA5: LANGLEY SUSTAINABLE URBAN EXTENSION (Q13)

We recognise this response to the analyses of the likely need for housing has emerged as the result of last year's consultation on Green Belt Options and – on the basis of the evidence available at present – we would not wish to comment on the principle of allocating such a site to meet a long-term need. However, we observe that:

- if the plan is based on an urban regeneration strategy this would imply that a site released from the Green Belt should not be able to start development until substantial progress has been made on existing sites within the urban area; and
- the evidence so far (see re housing, below) indicates that there is sufficient physical capacity within the existing urban area to meet the city's housing needs in quantitative terms up to about 2025/2026.

In these circumstances, and with the Black Country looking to maximise the development that can be accommodated within the framework provided by the BC Core Strategy, we feel it is important that the need for this site and for the arrangements for its proposed release are properly explained and justified. In particular **we ask that serious consideration be shown to the phasing of the site, so that brownfield sites within the existing urban areas of Birmingham and the Black Country can be developed before there is a need to release more peripheral land.**

On the other hand, you have advised that you have evidence, in terms of the need to maintain the city's housing land supply, that justifies allowing the Langley area to come forward immediately. We would be pleased to see such evidence and to have the opportunity to discuss it with you. Does it also consider the impact of the release of such land on the likely take-up of sites within the urban area and how this might relate to a strategy for the growth of the conurbation based on urban regeneration?

ENVIRONMENT AND SUSTAINABILITY

POLICY TP3: SUSTAINABLE CONSTRUCTION (Q21)

Whilst sustainability is a laudable aim, we wonder whether – especially if it might result in additional costs on development – such an approach would be consistent with a regeneration strategy, or whether it might increase pressures for decentralisation from the urban areas. Development on greenfield sites might be more likely to achieve ‘zero carbon’ / ‘excellent’ standards, but risk being less sustainable in overall terms (including social exclusion, best use of resources including infrastructure, and the effects on the need to travel) than sites that fit within the plan’s locational strategy.

The Black Country authorities are seeking to promote sustainability through regeneration and we would be grateful to see and have the chance to discuss the evidence the City Council has in terms of the likely effects of the proposed standards on the viability of development and on the strategy put forward in the plan. How is it proposed that the approach will take account of the Government’s recent Housing Standards Review and recent developments in standards for commercial / public buildings?

GREEN INFRASTRUCTURE AND OPEN SPACE

POLICY TP7: GREEN INFRASTRUCTURE NETWORK (Q25)

It should be recognised that, as closely interlinked urban areas, Birmingham and the Black Country share many environmental issues and that these issues do not stop at local authority boundaries. Indeed the plan refers to the work of the Birmingham and the Black Country Local Nature Partnership. It is important to ensure that linkages, such as wildlife corridors, should be protected and enhanced not just within an authority's boundaries but on a functional basis.

Amend the first sentence to read: The City Council will seek to maintain and expand a green infrastructure network throughout Birmingham, **including with linkages to surrounding areas.**

POLICY TP8: BIODIVERSITY AND GEODIVERSITY (Q26)

Similar considerations apply as for Policy TP7. Provision needs to be made to protect and enhance wildlife corridors that cross authorities' boundaries.

Amend the fifth paragraph to read: The integrity of wildlife corridors and 'stepping stones', **including to areas outside the City's boundaries,** will be protected from development which would harm their functions.

Amend the reasoned justification at para. 6.46 to refer to connecting sites both within the City and in surrounding areas.

POLICY TP9: OPEN SPACE, PLAYING FIELDS AND ALLOTMENTS (Q27)

See our comment on Policy PG1 and the need to make explicit how the future of open space has been considered in the work for Birmingham's SHLAA.

POLICY TP10: GREEN BELT (Q28)

We support that a Green Belt review has been carried out and the most sustainable option appears to have been chosen for development. However, see our comments on the Langley Growth Area (Policy GA5). If urban regeneration is to be supported across the conurbation, with the Black Country seeking to plan for as much housing and other growth as is appropriate and feasible, it will be important to ensure that suitable opportunities within the existing urban areas are developed insofar as possible before recourse might be had to the Green Belt. **The Policy should set out how and when the land will be released. A sequential approach that emphasises brownfield sites first would be more sustainable and assist with the regeneration of urban areas.**

WASTE MANAGEMENT

POLICY TP13: SUSTAINABLE MANAGEMENT OF THE CITY'S WASTE (Q31)

The approach of the plan, as set out in Policy PG1, is *“to increase recycling and disposal capacity and minimise the amount of waste sent directly to landfill.”* This is supported, as is the thrust of this policy to minimise the production of waste and to manage waste up the waste hierarchy. We also support the aim that seeks to ensure that the amount of waste treated and managed within Birmingham is equivalent to the tonnage of waste arising, including the recognition that a reduction in the amount of waste sent to landfill will require increased alternative provision.

However, the waste policies do not quantify existing capacity or future capacity requirements in any detail. We understand that further / updated evidence is being prepared and this is to be welcomed. To meet the requirements of PPS10 and Government Guidance on the Waste Framework Directive, we consider this should enable the policy to identify how much additional waste management capacity (e.g. for re-use and recycling, organic waste treatment, and specialist waste treatment) the city will need by 2031 to cope with current and anticipated future demand, based on the levels of growth and development planned.

The evidence available so far (summed up in the reasoned justification to this policy and referred to in the City Council's Infrastructure Development Plan, IDP) suggests the city currently has a 'capacity gap' of around 1.2 million TPA, based on the following assumptions:

- Birmingham currently generates around 3.2 million TPA of waste and this is not expected to change significantly over the plan period; and
- the total capacity of Birmingham's waste management infrastructure is estimated to be around 4.0 – 4.5 million TPA, of which 2.0 – 2.5 million TPA is waste transfer; and
- when transfer capacity is excluded, this leaves a treatment capacity of around 2 million TPA.

The main gaps in terms of types of facilities are recycling and organic treatment.

At the moment, it is not entirely clear whether the Birmingham Plan can provide for the 1.2 million TPA of additional waste treatment capacity (or however much it turns out to be following the updating of the evidence base). The additional evidence should consider the extent to which the additional capacity and particularly the more 'difficult' types of waste management operations (e.g. IVC, open windrow composting, CD&EW recycling) can practically be accommodated within existing provision or on employment land. It should also provide a basis for long-term provision for Local Authority Collected Waste (LACW) as it is understood that the current contract with Veolia to operate the Tyseley EfW ends in 2019. Such work would also help to inform Policies TP14 and TP15.

POLICY TP15: LOCATION OF WASTE MANAGEMENT FACILITIES (Q33)

See our comments above on Policy TP13. Additional evidence should help inform whether existing waste capacity can be accommodated in the types of location identified and if not, whether additional locational criteria might need to be identified.

On the information available so far we support this policy. However, we are concerned that the criteria identified might not address all of the potential impacts from waste management operations in Birmingham on the environment and amenity of local communities, including in adjoining authority areas.

In particular, the draft wording currently requires anaerobic digestion plants to be a minimum of 250m away from housing, but no such restriction applies to composting facilities. However, we understand that the Environment Agency will normally not permit composting within 250m of 'sensitive receptors' (including housing) because of the risks from bio-aerosols. It may be that (subject to clarification from the Agency) planning policy does not need to repeat the restrictions in other regimes, but **the existence of such controls should be referred to in the policy or in the reasoned justification.**

In addition, it would be useful to make clear that **problems of noise and/or odour would also be addressed through the criteria in the policy (either in terms of the first bullet point or through inclusion in the issues that need to be addressed through pollution control measures).**

MINERALS

Discussions under the Duty to Cooperate show that the City Council acknowledges that its proposals for major growth are reliant on minerals that are most likely to be produced in surrounding areas. This is likely to lead to pressure on mineral resources and facilities in surrounding areas, with impacts upon the areas affected. Whilst the minerals planning authorities around Birmingham have policies for minerals in their areas, there are (with the exception of a reference to the recycling of aggregates in Policy TP14) no policies for minerals in the current consultation on the Birmingham Development Plan.

Birmingham is working with the other WM metropolitan authorities to meet the recently-introduced requirement for a Local Aggregates Assessment, but in our view, there is a need to publish more wide ranging technical evidence for technical evidence to set out

- the potential future demand for raw materials and manufactured mineral products (including bricks and concrete, etc.) arising over the plan period from the additional levels of development anticipated;
- where materials and products are likely to come from, and realistically what things could be produced in Birmingham; and
- the transport and infrastructure implications for the transport of minerals and materials to where they will be needed.

Such work is likely to be important in informing the delivery of the plan, as well as affecting viability and land availability, and of course, it should enable the potential implications for surrounding areas to be assessed¹.

We recognise it is very likely that a compilation of the information that is already available will be likely to show the amounts of minerals and materials that might be provided locally is likely to be significantly less than those required to support planned growth. But we do not think this should mean efforts should not be made to source minerals as close as practicable to where they would be used. Birmingham's IDP (pages 14 and 35) acknowledges that the city has some minerals of local and national importance but it takes the view that working these minerals will not be feasible, and the plan does not propose to define mineral safeguarding areas (MSAs) around them. We consider such an approach is not, so far at least, justified in terms of national policy. In our view **the plan should define MSAs showing where mineral resources can be found as there may be opportunities for 'prior extraction' in some cases.**

We also take the view that in accordance with national policy **it will also be important to identify and to safeguard existing minerals handling and facilities for construction products (such as RMX concrete and concrete products, cement, lime and mortar and coated products) in Birmingham where these will be necessary for the city's planned growth. It could also be necessary to examine whether further sites might be required.**

¹ It is important to note that Walsall has been the only local authority in the Black Country that has produced aggregates in recent years, but it presently has no operational quarries so it does not appear that any significant reliance can be placed on the availability of primary land won sand and gravel from this area.

ECONOMY AND CENTRES

EMPLOYMENT LAND

POLICY TP16: PORTFOLIO OF EMPLOYMENT LAND AND PREMISES (Q34)

We support the overall approach of the plan in seeking to identify the needs for employment to 2031 and then planning in pursuit of those needs. We do not dispute the extensive evidence base on employment land.

In general terms we consider the overall quantum of development proposed is consistent with the employment needs of the city and is unlikely to compromise investment activity within the Black Country. Indeed, the growth of the Birmingham economy and the bringing forward of development sites will benefit adjacent areas in terms of job creation and synergy with existing business activity.

We also support the approach towards providing a portfolio of employment land. Whilst we note the proposal to release land from the Green Belt at Peddimore (Policy GA6), we support the overall basis of the strategy on the recycling of employment land and premises.

POLICY TP17: REGIONAL INVESTMENT SITES (Q35)

We recognise the potential contribution that the RIS approach should make to regenerating the metropolitan economy. We support the policy to promote the development of the two existing RIS in the City, at Longbridge and East Aston, for *“high quality”* industrial uses.

This policy would benefit from clarification in terms of the approach to B1(a) office development. B1(a) office uses are recognised as a town centre use in the NPPF and the adopted Black Country Core Strategy. Other policies in the Birmingham Development Plan – in particular TP20 direct B1(a) office development to a network of defined centres including the City Centre.

It is recommended that Policy TP17 is amended to confirm that proposals for B1(a) office development on the RIS will only be permitted subject to Policy TP20 to ensure conformity with national planning policy.

We also suggest that the policy would benefit from a definition of *“high quality”*, and – on the basis of this definition – **we recommend that consideration is given to a requirement that B1(b) & (c) and B2 developments on these sites should not fall below a certain size (perhaps 4ha) and that development plots should not be sub-divided.**

POLICY TP18: CORE EMPLOYMENT AREAS (Q36)

We support the policy to define Core Employment Areas as locations where employment uses (B1(b&c), B2 and B8) are to be retained and promoted. Such an

approach is essential for a strategy for economic growth based on a finite resource of employment land. We take a very similar approach in the Black Country Core Strategy.

POLICY TP19: PROTECTION OF EMPLOYMENT LAND (Q37)

We support the policy to protect land and premises for employment uses in Core Employment Areas.

We also support the provision of a framework of criteria to assess proposals for the redevelopment of poorer quality land in other locations, although we note that in part this relies on a Supplementary Planning Document. Appropriate redevelopment of employment land that is likely to no longer be suitable for employment is likely to provide an important source of land supply to meet the plan's housing targets (see also our comment about the importance of showing in the SHLAA the basis for including redeveloped employment sites in the housing land supply).

We also support the principle that the loss of employment land should not simply be allowed without a contribution to maintaining or improving provision for employment. However, we have two potential concerns about the proposal (also referred to in para. 3.17) that the redevelopment of employment land should be required to make a contribution in financial terms towards the upgrading and improvement of retained employment land in the vicinity.

1. If such a policy is to be pursued, it should of course be subject to allow for exceptions where such a contribution would not be viable. Without this the policy could hold back the provision of a sufficient supply of land for housing, and it could also impact upon efforts to relocate existing businesses. On the other hand, such an exception might mean that the contributions received would be limited.
2. If the contribution intended to be secured through the Section 106 mechanism the funds would be subject to the limitations of pooling up to 5 obligations for each individual 'employment land improvement project' and these projects would not be able to be included on the City Council's CIL Regulation 123 list. Additionally, each planning obligation for this purpose would need to meet the statutory CIL Regulation 122 tests. Alternatively, if the intention is to use CIL for this purpose it should be noted that it is not currently possible to directly match up the rates paid via CIL from a specific development to a particular project on the Regulation 123 list. It would therefore be difficult to implement and monitor this element of Policy TP19.

In our view, the policy should address the important issues of the potential effects on nearby occupiers and on existing businesses. **We suggest that Policy TP19 should be amended to include provisions to ensure that:**

- **a comprehensive approach is required for the redevelopment of existing employment sites and/or areas;**
- **the introduction of new / different uses should not have adverse impacts on nearby occupiers and should not constrain the operations of existing businesses; and**
- **wherever possible satisfactory arrangements should have been made to secure the relocation of existing viable businesses that would be displaced by redevelopment for different uses.**

Such provisions are set out in Policy DEL2 of the Black Country Core Strategy, and a copy of the policy is annexed to these comments, for your information.

TOWN CENTRES

POLICY TP20: THE NETWORK AND HIERARCHY OF CENTRES (Q38)

We support the recognition given to the importance of centres and to the identification of a network and hierarchy across Birmingham, with appropriate approaches to development for the different levels of the hierarchy. We note the evidence and analyses informing the policy and we have no objections to the amounts of development proposed for the centres identified.

We do not object to the approach towards developments “outside” of the network of centres, being based on national policy. We take it that “outside” in this context includes edge of centre as well as out-of-centre developments. However, the types of developments said to fall within national tests does not encompass all of those identified in national policy and this could result in the potential implications, including for centres outside of Birmingham, not being properly considered. This part of the policy should be amended to read:

“Proposals for additional retail, office, leisure, **and entertainment and other town centre uses** outside of the network of centres will not be supported unless they satisfy the requirements set out in national planning policy. An impact assessment will be required for proposals greater than 2,500 sq.m. (gross)”.

POLICY TP24: TOURISM AND TOURIST FACILITIES (Q42)

We have no objection to the general support for tourism, but the policy provides no guidance as to the locations for new assets and facilities. The NPPF includes tourism developments and hotels among town centre uses and the policy should ensure that the implications for the centres- based strategies of Birmingham and its neighbours need to be able to be addressed (allowing of course, for the fact that some tourist attractions, such as natural scenery or historic buildings might justify provision outside of centres.

The policy should be amended to include a statement to the effect that tourism developments are town centre uses and should be directed into existing centres at an appropriate scale wherever practicable. Tourism and hotel developments outside of existing centres will be subject to the requirements set out in national planning policy and/or justified by their relationship with a particular tourist asset.

HOUSING AND NEIGHBOURHOODS

HOUSING

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 the 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 an allowance for windfalls. The BDP proposes that 51,000 net new dwellings should be provided including the removal of land from the Green Belt to increase capacity within Birmingham, leaving a balance of c29,000 dwellings. However, it is not explicit in the Plan itself what the start date is, especially in respect of the dwelling numbers proposed.

We have the following comments on documents that have been published as evidence:

HOUSING TARGETS TECHNICAL PAPER

This is generally a helpful summary of the issues. However, it contains potential errors or comments that need clarifying.

- I. Paragraph 2.5 refers to *"The publication of new, higher, household projections by CLG (November 2010)"*. These projections (2008-based) in fact indicated lower growth, at least to 2026, than the earlier (2006-based) projections. Subsequent (2011-based) household projections have been published that indicate even lower growth, however these are interim and only run to 2021.
- II. Paragraph 3.5 refers to the SHMA and states *"four alternative projection scenarios tested the impact of four different levels of migration, resulting in four different population numbers."* However, these are not clearly set out in the SHMA itself (chapter 11 of the latter discusses demographic projections).

STRATEGIC HOUSING MARKET ASSESSMENT 2013

Paragraph 12.7 (and also paragraph 1.3 of the executive summary) of this document states that:

"For the sub-regional housing market area (comprising Birmingham, the Black Country, Bromsgrove, Coventry, Lichfield and Solihull), the best available estimate of objectively assessed housing need to 2031 is for some 9,300 net new homes per annum...."

"iii. If past trends were to continue in the future, at least 4,100 of these homes would be accommodated in Birmingham City."

"iv. But Birmingham City at present has identified sustainable capacity for just 2,200 homes per year" [this latter figure excludes capacity in Birmingham's Green Belt].

In fact, the figure of 2,200 homes per year is derived by taking the total capacity available over the next 20 years (44,000 homes) and dividing by 20. The reality is that much of this capacity would be physically available sooner. If 4,100 new homes were provided in Birmingham each year, the City would have sufficient capacity for the next 11 years with no need to build either in its own Green Belt or anywhere else over this period. Based on past completion rates however, it is the limitations of the housebuilding industry that would affect deliverable capacity rather than any shortage of sites.

After clarification of the above, we believe that satisfactory resolution of these issues will be pursued through:

- I. completion of the GBSLEP and Black Country Strategic Housing Study;
- II. distribution of the overall housing need and the resultant 'overspill' housing informed by the Second Iteration of the GBSLEP Strategic Spatial Plan and through arrangements negotiated with other authorities within and beyond the GBSLEP as justified by the evidence and;
- III. subsequent accommodation of the 'overspill' growth in the review of Local Plans in adjoining areas where possible and appropriate.

The Black Country authorities are committed to working positively with Birmingham in assessing the likely housing requirements and in seeking to accommodate this need insofar as practicable and supportable within the framework of the BC Core Strategy. Of course, the GBSLEP and Black Country Housing work is on-going at present. It is likely that this work – and responses to it – will go on for some time. It is also likely that it will produce more evidence that will inform the BDP as well as other plans, so there will be a need for continuing dialogue.

POLICY TP30: AFFORDABLE HOUSING (Q48)

The policy seeks a *“developer contribution of 35% towards provision of affordable housing....”* **Clarification of this policy would be welcome** as it is unclear what this means: are 35% of homes to be affordable, or are developers to fund 35% of the cost of individual units? If the latter, the policy does not indicate what proportion of units should be affordable or how the remaining 65% of cost will be found.

POLICY TP33: PROVISION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

The policy includes site selection criteria but does not provide a figure for how many sites are required. However, page 43 of the Infrastructure Delivery Plan states that 19 pitches are proposed by 2017. **In our view the City Council is required to state the number of pitches it is committed to provide.** Recent discussions indicate that further work is being undertaken for the City Council and that this will provide a number of pitches to be planned for.

CONNECTIVITY

POLICY TP 37: A SUSTAINABLE TRANSPORT NETWORK *et seq* (Qs 55, 58, 59 & 61)

We support the overall approach to ensure the use of more sustainable transport whilst enabling growth. Our authorities have been working together, through the WM Local Transport Plan and through our respective LEPs (and their Strategic Economic Plans, SEPs) to deliver transport improvements in a coordinated way. Much of this work is happening alongside development planning, but it is nevertheless important to deliver developments and improvements and we are aware that our respective Transportation Engineers have been in liaison in respect of your evidence and possible responses to the development proposals in the BDP.

The work so far has not identified specific Birmingham–Black Country needs for pieces of new transport infrastructure arising from the BDP’s particular growth proposals (especially not infrastructure that would require development plan allocations). The Green Belt Development Movement Infrastructure Plan (GBDMIP, para. 3.3.8) did refer specifically to the opening of the Sutton Park railway line (which would provide a link via Aldridge to Walsall), but this statement is not reflected in the BDP itself. Partly this relates to uncertainties caused by present proposals to electrify the line between Walsall and Aldridge, and officers have discussed the need for the authorities involved to continue to work together on the business case to reopen the link through Sutton Park to passengers.

However, this case also illustrates the wider situation. The evidence in the IDP (para. 3.3.11) recognises that whilst rail lines might not directly serve growth areas, they can provide services more generally and “*They have the potential to create a radical modal shift in the area and reduce the traffic volumes [and] are critical to the local economy. Therefore this infrastructure remains an important part of the Infrastructure Delivery Plan.*” In the context of growth in Birmingham and regeneration in the Black Country the authorities will no doubt continue to work together to seek to maximise insofar as possible the potential of the rail network for passengers as well as freight. From the Black Country perspective it will be especially important to strengthen links into Birmingham to connect to the potential benefits that might be provided in future by HS2.

Similar considerations will apply to other links between Birmingham and the Black Country, including the Birmingham-West Bromwich-Wolverhampton metro route and the A456, A41 and A34.

The need to support growth and development are also recognised in respect of the motorways over a wide area. The transport evidence identifies that M5 Junction 1, Birchley Island/M5 Junction 2 and M6 Junction 10 all experience increases in traffic flows resulting from the growth proposed in the BDP. We acknowledge that these junctions are all operating at, or close to, capacity in the base situation and that their improvement is required to support the growth envisaged in both the Black Country Core Strategy and the Birmingham Development Plan. To this end, proposals will be included in the Black Country LEP’s Strategic Economic Plan for major improvements at all three junctions. It would be of great assistance in the Black

Country's Growth Fund negotiations if the City Council could supply a letter of support for these proposals to accompany the SEP.

Of course, the Black Country authorities would like to continue to work more generally with Birmingham to bring forward improvements of mutual benefit.

ANNEX: BLACK COUNTRY CORE STRATEGY POLICY DEL2

See at: <http://blackcountrycorestrategy.dudley.gov.uk/>

DEL2 Managing the Balance between Employment Land and Housing

Spatial Objectives

Delivery and phasing are fundamental to the Vision and the achievement of the agenda for change. Policy DEL2 is intended to ensure the delivery of Spatial Objectives 2 and 3 supported by Objectives 5, 6 and 7 by providing a clear framework for a continuous supply of housing and employment land to meet the needs of the Black Country to 2026.

Without intervention, the Black Country is forecast to contain a surplus of employment land by 2026 of 1,003ha. Policy DEL2 manages the release of the poorest quality employment land which is not protected by Policies EMP1, EMP2 EMP3 and EMP4.

Policy

The Economy Key Diagram and Appendix 2 show the broad locations we propose to retain in employment use. Detailed boundaries for protected employment areas will be defined in Area Action Plans and Site Allocations Documents. These documents will also manage the release of surplus sites to alternative uses.

Before releasing any employment land in the Black Country we will first ensure the retention of an adequate supply of occupied and available employment land to meet defined needs as set out in Policies EMP2, EMP3 and EMP4. We will take into account the availability of employment land within the area, the quality of the site and its geographical market.

In areas identified for new housing we will positively plan to facilitate housing growth by:

- Encouraging any existing operation which by virtue of the scale and nature of operations, traffic generation and other amenity considerations may restrict the regeneration of the area to relocate. This relocation will be facilitated with the full support of the local authority concerned, provided that suitable alternative sites and premises are available.
- Resist new development where this may restrict the regeneration of the area by virtue of the scale and nature of operations, traffic generation and other amenity considerations. Existing businesses who may wish to redevelop or extend their premises will be encouraged to relocate with the full support of the local authority concerned, provided that suitable alternative sites and premises are available.

Before considering the release of employment land elsewhere we will:

- Ensure satisfactory arrangements for the relocation of existing occupiers to safeguard the existing employment base;
- Ensure that the development does not adversely affect the operation of existing or proposed employment uses;

- **Ensure that the site is no longer viable and required either for employment use, including relocation of businesses displaced from sites released to other uses, or for other employment-generating uses.**

The indicative phasing of housing development on surplus employment land is summarised for each local authority in Table 4. A more detailed illustration of this distribution is shown in Appendix 2. This distribution should be used as the starting point for AAPs and SADs. Where local documents propose an alternative distribution the local authority must consider the implication this may have on the need to meet local authority targets in EMP 1 – 4 and HOU1 and make alternative provision where necessary.

Any proposals resulting in the loss of employment land submitted in advance of the adoption of AAPs or SADs should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing existing and neighbouring uses. Incremental development will only be allowed where it would not prejudice master planning of the wider area. Proposals should also consider the distribution of land shown in Appendix.

DRAFT

Birmingham Development Plan – Duty to Co-operate

Action Notes of Meeting held:

1530, Tuesday 18 February 2014, Birmingham City Council Offices, Rm 208, 1. Lancaster Circus

Present:

Martin Dando – Dudley MBC

Philippa Smith – Sandwell MBC

Mike Smith – Walsall MBC

Ian Culley – Wolverhampton MBC

Martin Eade – Birmingham City 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 there were 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.

Mike Smith tabled, on behalf of the Black Country Districts a note compiling observations to inform the discussion.

It was agreed that the process should be to have a discussion around the matters identified. The Black Country Districts would, following the meeting, add a more definitive note which would be sent to BCC to add any appropriate additional response.

Each of the criteria were discussed in-turn. During the discussion BCC agreed to add notes of clarification under point j) to refer to the AWP and RTAB and under point k) the addition of a note to clarify that detailed policies on air quality and noise would appear in a separate Development Management DPD.

After the Black Country had responded in writing it was agreed that DC would provide an amended version of the document, taking account of the agreed changes to points j) and k) and adding the detail on correspondence etc. This would be sent back for checking and subsequent signature by all five authorities.

DRAFT

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.



Helen Martin
Head of Planning
Dudley Metropolitan Borough Council
Council House
Priory Rd
Dudley
DY1 1HF

Date: 29.07.13

Dear Helen,

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 hope that you will support us 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

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Waheed Nazir
Director of Planning & Regeneration



Birmingham City Council

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8. Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure
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11. Air quality matters
12. Any other matters that might reasonably identified.



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Oldbury
West Midlands
B69 3DE

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Walsall Metropolitan Borough Council
Civic Centre
Darwall St
Walsall
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WS1 1DG

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Head of Planning
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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.

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.
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Waheed Nazir
Director of Planning & Regeneration

Your Ref:	DPD/Plan2031/Stat
Our Ref:	
Date:	14 January 2013
Ask for:	Mike Smith
Direct Line:	01922 658024
Email:	SmithME@walsall.gov.uk

Regeneration Directorate

Planning Strategy
Planning and Regeneration
Birmingham City Council
PO Box 28
Birmingham
B1 1TU

Birmingham Development Plan – Options Consultation

Dear Sir /Madam,

Thank you for consulting Walsall Council on the Birmingham Development Plan. As you will be well aware, officers from the Black Country, from Birmingham and from the other West Midlands metropolitan authorities have on-ongoing discussions about our respective development plans, notably through the 'Duty to Co-operate Task Group'. At the last meeting of the Task Group there was discussion of a Black Country response to your plan being coordinated through the Association of Black Country Authorities (ABCA). I understand, however, that such a response will not be agreed in time to meet your deadline for the close of the consultation. In the circumstances, and using delegated authority, I have put together the following points on the basis that it would be helpful to offer you a view from the Black Country perspective.

Vision and Strategy

The overall strategy and vision for the city are supported as they appear to offer a laudable and clear response to circumstances in the West Midlands and they support the regeneration of the major urban areas. It would be helpful, however, if the plan could make a specific reference to the importance of such regeneration, as recognised in the Strategic Policy Framework for the West Midlands Metropolitan Area, which was recently endorsed in an updated form by the West Midlands Planning and transportation Sub-Committee. In this context it should be made clear that the policies and proposals of the plan, and the ways in which they would be applied, should support the urban regeneration strategy for the West Midlands. This would help ensure that the Development Plan would be in conformity with the West Midlands Regional Strategy, which remains part of the development plan (for the present time at least), and it would be consistent with, and not undermine, the Black Country Core Strategy.

Housing

I note the scale of the projected shortfall between the projected housing growth for Birmingham and the assessed capacity to accommodate that growth. I note also that the

shortfall relates substantially to the extension of the plan to cover up to 2031 and that the projected household growth relies on the ONS 2008-based household projections. The issues have been the subject of much discussion and you will have seen a note prepared by one of my colleagues, Neville Ball. This has estimated that the Black Country Core Strategy (to 2026) is seeking to provide around 3,100 dwellings above the number of households that might be expected to arise in / for the area according to the ONS 2006-based household projections. In my officer view, it would be appropriate to count this number as potentially contributing towards Birmingham's projected shortfall, to 2026.

I consider that, for the present time at least, I do not have sufficient information to go further, especially in a situation where:

- we are working to plans that have different end-dates;
- we have not reached clear agreement as to the basis for the household projections that might best be used as a basis for analysis, especially after 2026, and future household projections ought to be able to enable some comparisons to be made with the results of the 2011 Census;
- the Census results that have been published so far show that household sizes have tended to increase; and
- there is considerable uncertainty about the impacts of Government policy on household sizes, household formation, immigration and the deliverability and affordability of housing.

In the circumstances, I feel it is very important to ensure that where large amounts of housing development are being contended for, in pursuit of long-term projections, it will be vital to manage housing growth so that the overall strategy can be maintained. In this context the references to the focus development on brownfield sites within the existing urban area are welcome. However, to ensure this emphasis, within the Black Country as well as Birmingham, it will be vital to make sure that greenfield sites for housing, in Birmingham and in surrounding areas, are not released for development unless and until it can be shown that no more development could be provided on brownfield sites within the major urban areas of the Black Country as well as Birmingham. On the basis of the evidence so far, I would suggest that greenfield sites should not be released for housing development until at least 2026.

Employment

I recognise that there are likely to be issues about the ability of the existing built up area to accommodate major employment development of the scale referred to in your consultation (50 ha). However, I do not see that there has been any assessment of the implications, including for the Black Country, if Green Belt land releases of the scale and kind proposed were to be taken up by industrial / commercial activity generally. I consider that if land is to be released from the Green Belt then this should be only for major occupiers for industry / logistics (of kinds that, on an individual basis, would need a site of perhaps 20 hectares or more, and with limits on related / ancillary activity, including smaller factories / warehouses) and that office (B1a) and housing development should be excluded from such sites.

Town Centres

In broad terms the strategy for Birmingham's network of centres is to be supported. It will be important, however to ensure that developments for town centre uses should be in scale with the level of the hierarchy concerned and should not have any adverse impacts on centres in surrounding areas, including centres in the Black

Country. Notwithstanding the Panel report into the RSS Phase 2 Revision, I do not feel there is evidence to support the view that Sutton Coldfield might play a 'sub-regional' role.

Transport

The transport section of the document appears reasonable insofar as it goes, but in my view like the rest of the document there is a need to pay more attention to the relationships with areas around Birmingham,. In particular, Birmingham serves as an important transport node for the region as a whole and it will be important to ensure that the regeneration of the whole of the conurbation can be supported by ensuring access across the conurbation. The need to ensure strong linkages between the Black Country and HS2 is a case in point.

I hope these comments are of assistance. I will advise you of any further responses that might be produced by / on behalf of the Black Country. I, and Black Country colleagues, would be happy to have further discussions and to consider any additional evidence you might obtain. I look forward to continuing to be involved in future stages of the Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Smith', with a stylized, cursive script.

Mike Smith
Regeneration Manager, Planning Policy

Birmingham and Black Country Population Projection Note (October 2012)

Background

This note is based on one prepared by the Black Country authorities for the Examination of the Black Country Core Strategy (BCCS) in July 2010. It has been revised to take account of further data that has been published since then, in particular the 2008-based household projections and the initial results of the 2011 Census.

Several different counts, estimates and projections of population and household numbers have been used for policy development in recent years. Those which are currently available include the following:

Population projections: 2004, 2006, 2008 and 2010-based.
Household projections: 2004, 2006 and 2008-based.

These projections were derived from mid-year population estimates, which are produced on an annual basis. The estimates were in turn derived from the 2001 Census and subsequent counts of migration based on NHS records.

The projections predict how population and household numbers are expected to change in the future, for various periods up to 2033.

The initial results of the 2011 Census are now available. These include a count of population size and the number of occupied households in each local authority area. This count has not yet been used to generate projections of future change.

The Regional Spatial Strategy Phase 1 Revision uses the 2004-based household projections to indicate dwelling numbers for the period 2006-2021. By the time of the RSS2 Examination, the 2006-based household projections were available. These latter projections, which cover the period to 2026, were used to inform the recommendations in the Panel Report, as well as the housing numbers proposed in the Black Country Core Strategy.

The latest draft of the Birmingham Development Plan, published in October 2012, states that there is a need to plan for around 80,000 new homes over the period 2011-2031. This is slightly below the estimate of household growth for this period contained in the 2006 and 2008-based household projections. The 2006-based projections indicate an increase of 86,000 households in Birmingham over the period 2011-2031. The 2008-based projections do not provide a figure for 2011-2031, but the estimate for the period 2013-2033 is 81,000 households.

A spreadsheet has been prepared that compares the counts, estimates and projections in the various sources against the proposals in the BCCS, RSS1 and RSS2, for the different years for which they are available.

Projected Population Growth for the Black Country Authorities

2006-based household projections for the Black Country estimated that the number of households will increase by 13% (58,000) between 2006 and 2026 (see Table 1). However, 2006-based population projections for the Black Country estimated an increase of only 6% (65,900 residents) over the same period (see Table 2). This difference is due to a decrease in average household size across the sub-region.

The Black Country Core Strategy will deliver 63,000 net new homes between 2006 and 2026. As proposed through the RSS Phase 2 Revision process (and supported by most participants and the Panel), it should be assumed that 3% of these new homes will be vacant at any one time. Therefore, 61,110 households can be accommodated by these 63,000 new homes. This represents only **3,110** more new households than predicted by the 2006-based ONS household projections.

Effect of 2008-based Projections

2008-based **household** projections were published in November 2010. These predict significantly lower levels of household growth for most local authority areas. In the Black Country, they project the number of households to increase by only 50,000 between 2006 and 2026, some **8,000 fewer** than the 2006-based projections. For Birmingham, the 2006-based projections indicate there to be 494,000 households by 2026 (representing growth of 87,000 over the period 2006-2026) whereas the 2008-based projections indicate there to be only 477,000 households by 2026 (representing growth of 78,000 over the same 20 year period).

For both Birmingham and the Black Country as a whole, the 2008-based **population** projections indicate the population in 2026 to be more than predicted by the 2006-based projections. The projections for individual Black Country authorities however are more varied: the projections for Walsall and Sandwell are similar to the 2006-based ones whereas the projections for Wolverhampton and Dudley show greater population growth than shown by the 2006-based projections.

Effect of 2010-based Projections

2010-based **household** projections have not yet been published. However, 2010-based **population** projections are available. These estimate the existing population of Birmingham and all of the Black Country authority areas to be higher than previously thought. As a consequence, the population projections to 2026 and 2031 are also higher.

2011 Census

The initial figures from the Census show differing impacts between the authorities. In the Black Country, both at individual local authority level and in the sub-region as a whole, the count of occupied dwellings is almost identical to the projections for 2011 in both the 2004 and 2006-based projections (the 2008-based household projections do not provide figures for 2011), but the population counts are significantly higher than predicted by the projections both from these years and the 2010-based ones. However, in Birmingham the count of occupied dwellings in the Census is less than in the projections whilst the population count is higher.

The impact of the Census figures on household and population projections has not yet been calculated.

Implications

The 2008-based household projections, which are the most recently published, imply that the number of dwellings proposed in the BCCS will provide over 10,000 more homes than will be needed to accommodate locally-generated growth in the Black Country by 2026. However, the most recent population projections, and the count of the existing population that has been confirmed by the 2011 Census, show both the existing population and predicted future population to be greater than previously expected.

In both Birmingham and the Black Country, the latest counts or estimates mean that household sizes are currently larger than previously expected. This may be the result of suppressed demand, where single people and new couples are continuing to lodge with others or staying with parents for longer because of the difficulty in obtaining mortgages or affordable rented property as a result of the credit crunch and subsequent financial difficulties. Prior to the credit crunch, there was a long term trend for households to become smaller. If this trend resumes by 2026, locally-generated demand could exceed the supply of new homes proposed in the BCCS. However, because of the “lost years” when new households have failed to form, estimating the total number of households in 2026 is unlikely to be as simple as extrapolating past trends, and it is unlikely that the number will “catch up” with these previous trends.

Post 2026, population and household numbers are expected to continue to grow. The spreadsheet circulated separately includes projections for 2028, 2031 and 2033 (unfortunately the 2006 and 2008-based projections use different end-dates).

08th August 2012

Helen Martin
Head of Planning
Dudley Metropolitan Borough Council
Council House
Priory Rd
Dudley
DY1 1HF

Dear Helen,

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.

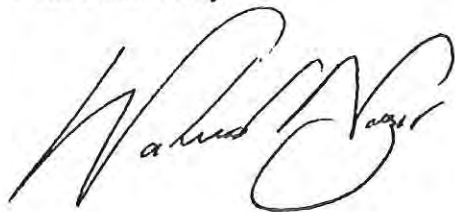
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of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

Waheed Nazir
Director of Planning and Regeneration

08th August 2012

Nick Bubalo
Head of Planning
Sandwell Metropolitan Borough Council
PO Box 2374
Oldbury
West Midlands
B69 3DE

Dear Nick,

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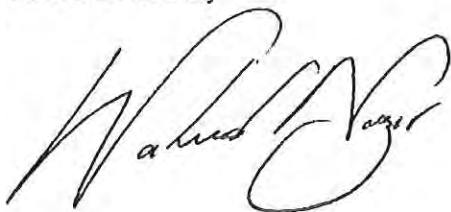
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Waheed Nazir
Director of Planning and Regeneration

08th August 2012

David Ellsworthy
Head of Planning
Walsall Metropolitan Borough Council
Civic Centre
Darwall St
Walsall
West Midlands
WS1 1DG

Dear David,

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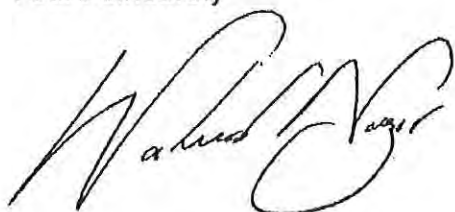
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Waheed Nazir
Director of Planning and Regeneration

08th August 2012

Steven Alexander
Head of Planning
Wolverhampton City Council
Civic Centre
St Peter's Square
Wolverhampton
WV1 1RP

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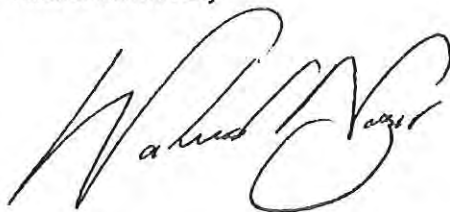
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Waheed Nazir
Director of Planning and Regeneration

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

APPENDIX 6

East 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.

- Copy of signed Duty to Co-operate agreement between Birmingham City Council and East Staffordshire Borough Council
- Action Note from meeting held on 05/03/14
- BCC response to consultation on the East Staffordshire Local Plan – Pre-submission – 2012-31 dated 29/11/13
- BCC letter to East Staffordshire Borough Council re Birmingham's Future Growth Requirements dated 29/07/13
- BCC letter to East Staffordshire Borough Council re Birmingham's Future Growth Requirements dated 18/01/13
- BCC letter to East Staffordshire Borough Council re 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. East Staffordshire Borough Council (ESBC)

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/	<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</p>

		<p>also, through the GBSLEP Strategic Spatial Framework Plan, the Strategic Policy Framework for the West Midlands Metropolitan Area and the local plans of other local authorities , 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 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/</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 housing included in population and household projections that is needed outside Birmingham's boundary in order that Birmingham's 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.</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 office provision	Agreed	<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 expected to be provided within the Enterprise Zone.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>

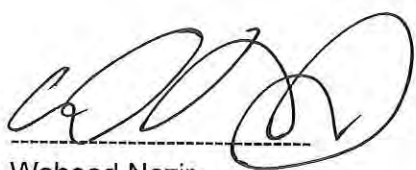
g) Appropriate provision made for public and private transport including Park & Ride and commuting patterns	Agreed	<p>1. The BDP incorporates a range of transport policies and proposals across all modes. These are consistent with the extant Local Transport Plan and emerging Birmingham Mobility Action 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 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>
h) Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure	Not Applicable	<p>1. There are no common boundaries between the authorities.</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 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 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</p>

		<p>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/	<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 its boundaries.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
k) Air quality matters	Agreed	<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	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 13/09/12 and 05/03/14. Meeting between the West Midlands Duty to Co-operate Group and TWC representatives on 11/07/13.
Groups	Regular meetings: (1) GBSLEP Planning Sub-Group (2) GBSLEP Spatial Planning Group (3) Development Management Group (4) West Midlands Planning Officers Group – Staffordshire LPAs connect to the group through the Staffordshire Planning Officers Group
Responses to consultation and correspondence	20/11/13 – BCC response to consultation on the East Staffordshire Local Plan – Pre Submission – 2012-31 29/07/13 – BCC letter to ESBC re Birmingham's Future Growth requirements 18/01/13 – BCC letter to ESBC on Birmingham's Future Growth requirements 08/08/12 – BCC letter to ESBC 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*



East Staffordshire Borough
Council*

* 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:

1530, Thursday 6 March 2014, East Staffordshire Borough Council Offices

Present:

Philip Somerfield – East Staffordshire Borough Council

Anna Miller – East Staffordshire Borough 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 East Staffordshire 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 checking and the following changes being agreed:

Under item d) DC to add a reference to the proposed employment land study.

Item h) and i) did not apply in the particular circumstances of the relationship between BCC and ESBC.

During the discussion under item g) there was a discussion in relation to the Twin Rivers proposal although this did not affect the wording as proposed.

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.

PS and AM then explained the current position on the East Staffordshire Local Plan and a recent change in Council control.

Planning Policy
East Staffordshire Borough Council
PO Box 8045
Burton upon Trent
DE14 9LG
Sent by e-mail to: LPconsultation@eaststaffsbc.gov.uk

29 November 2013

East Staffordshire Local Plan – Pre Submission – 2012-31

Thank you for the opportunity to comment on the Pre Submission Local Plan.

While both authorities are part of the GBSLEP, Birmingham's links with East Staffordshire are not as strong as they are with the districts in southern Staffordshire. Nevertheless, since East Staffordshire is a key participant in the preparation of the GBSLEP Plan for Growth and Recovery and associated technical work including the Strategic Housing Needs Study, it seems appropriate to comment.

In short, the City Council notes and supports the thrust of Pre Submission Plan. The accompanying Strategic Housing Market Assessment suggests that the proposed level of provision exceeds what is driven by demographic factors in order to reflect local economic growth aspirations. This is supported in that it is consistent with wider GBSLEP aspirations to deliver economic prosperity.

Following regular liaison and meetings in relation to the GBSLEP and duty to co-operate and specifically In relation to housing growth you will be aware Birmingham has capacity issues and cannot meet all of its own housing requirements and the GBSLEP Strategic Housing Needs Study has been commissioned recently to shed more light on this as well as long term growth across the wider LEP area. As this is an emerging issue, the City Council has requested that other local planning authorities, including all those within the GBSLEP make reference to this matter in their emerging local plans. This pragmatic approach has been supported by both the Solihull and Lichfield Inspectors.

In the case of the latter, the Inspector agreed a specific Main Modification 1 to the Plan as part of his Initial Findings (attached). As East Staffordshire directly adjoins Lichfield and is linked by the A38 corridor, it is considered appropriate that it includes a similar reference for consistency. The City Council would welcome further discussions with East Staffordshire Borough Council to achieve to best effect within the plan. One possible location for such a modification is in Strategic Policy 6 and its associated reasoned justification. The specific reference to a five year cycle of review in the policy might not be appropriate subject to the outcome of the ongoing technical work in the GBSLEP.

I trust that these comments are of assistance. Please do not hesitate to contact David Carter (Tel: 0121 675 4078 or email: david.r.carter@birmingham.gov.uk) if you wish to discuss further.

Yours sincerely

Waheed Nazir
Director of Planning & Regeneration

Appendix – Lichfield Local Plan Inspectors Initial Findings

Extract from Inspector's Letter to Lichfield DC, 3rd September 2013

Birmingham

4. Evidence that Birmingham may not be able to meet its own housing needs emerged relatively late in the preparation of the Plan. Consequently the council proposes a main modification which recognises this and proposes collaborative working with Birmingham and other authorities within the Greater Birmingham and Solihull Local Enterprise Partnership to establish the scale of any shortfall and where it should be met. If this work points to a need for further provision for housing in Lichfield then the Plan will be reviewed.

5. This appears to me to be a pragmatic response to a changing situation. Given that it has yet to be established what the level of the shortfall in housing land will be or whether any of this shortfall will be met in Lichfield District, I do not consider that there is a need at this stage to commit to a review of the Plan or to include reference to such a review in a policy rather than in the supporting text.

Proposed Main Modification 1

Inclusion of the following paragraph after para 4.5 '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 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.



Philip Somerfield
Head of Regulatory Services
East Staffordshire Borough Council
The Maltsters
Wetmore Rd
Burton-on-Trent
Staffordshire
DE4 1LS

Date: 29.07.13

Dear Philip,

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', with a stylized, cursive script.

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.

Philip Somerfield
Head of Regulatory Services
East Staffordshire Borough Council
The Maltsters
Wetmore Rd
Burton-on-Trent
Staffordshire
DE4 1LS

Date: 18 January 2013

Dear Philip,

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', with a stylized, cursive script.

Waheed Nazir
Director of Planning & Regeneration

08th August 2012

Philip Somerfield
Head of Regulatory Services
East Staffordshire Borough Council
The Maltsters
Wetmore Rd
Burton-on-Trent
Staffordshire
DE4 1LS

Dear Philip,

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.

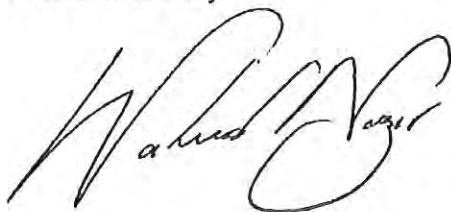
Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of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

Waheed Nazir
Director of Planning and Regeneration