



**South  
Staffordshire  
Council**

Our Ref: SW/AC/LEP

20<sup>th</sup> October 2014

Please ask for: Cllr. B.R. Edwards

Direct Dial: (01902) 696700

Direct Fax: (01902) 696805

Email: b.edwards@sstaffs.gov.uk

Mr. J. Britton,  
Chief Executive,  
Sandwell Council,  
Sandwell Council House,  
Freeth Street,  
Oldbury,  
West Midlands  
B69 3DE

Dear Mr. Britton,

**Re: Greater Birmingham and Solihull Local Enterprise Partnership and Black Country Strategy Housing Study**

I refer to the letter from the Leaders of the Black Country Councils dated the 6<sup>th</sup> October 2014.

I greatly appreciate the invitation to participate in Stage 3 of the GBS and Black LEP Strategic Housing Study.

Currently, the Black Country LDF and the South Staffordshire LDF Core Strategy share common objectives and aspirations centred on urban regeneration and the economic success of the Black Country. Essentially, both plans seek to prioritise investment in the Black Country. Unfortunately, the GB&S/Black Country LEP Strategic Housing Strategy provides a strong steer to disperse investment (in this case housing investments) away from the metropolitan area. It is my understanding that in order to meet Birmingham's future housing needs Stage 3 of the Strategic Housing Study will look at six possible scenarios with all but one based on increased housing development outside of the metropolitan area. I understand that PBA, the authors of the study, feel that such scenarios need to be considered because the Black Country housing market is under performing. I feel that such an approach is both defeatist, short-term and lacks the vision which is clearly evident in the Black Country LDF.

Together with the Leaders of Stratford upon Avon District Council, Wychavon District Council, and North Warwickshire Borough Council, we have written to Sir Albert Bore stating our objection to the stage 3 work. Our basic view is that before any consideration is given to meeting Birmingham's long-term housing needs outside the metropolitan area, a full study is carried out into maximising the possibility of meeting Birmingham's housing needs within the metropolitan area, or indeed if necessary, within the two LEP areas. To carry out a study before such work is completed is, in our view, premature and contrary to



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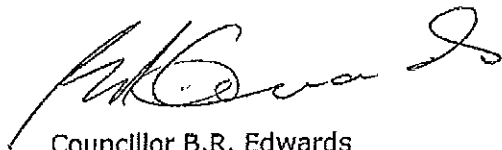


the long-term principles of urban regeneration which has been pursued, certainly by the Black Country authorities, over recent years.

As I stated earlier, I really appreciate the invitation, however, I hope you and the Black Country Leaders understand that I feel strongly that the approach being taken by the two LEP's is not in the interest of South Staffordshire Council. I would of course be quite happy to discuss my concerns in more detail.

I attach for your information a copy of the letter that was sent to Sir Albert Bore.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'B.R. Edwards', written in dark ink.

Councillor B.R. Edwards  
Leader of the Council



Our Ref: BRE/SW/AC

5th September 2014

Please ask for: Cllr. B.R. Edwards

Direct Dial: (01902) 696700

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Email: b.edwards@sstaffs.gov.uk

Sir Albert Bore,  
Birmingham City Council,  
Council House,  
Birmingham  
B1 1BB

Dear Sir Albert,

**BDP Public Examination - GBSLEP Strategic Housing Needs Study**

We write to you further to the 'related authorities briefing' that was held on 31 July 2014 at Baskerville House, Birmingham. Peter Brett Associates (PBA), on behalf of the Greater Birmingham & Solihull LEP (GBSLEP), presented their Stage 1 & Stage 2 findings of a Strategic Housing Needs Study commissioned by the GBSLEP.

The 'related authorities' that had been invited to the meeting were Stratford-on-Avon Council, North Warwickshire District Council, South Staffordshire Council and the combined South Worcester Authorities (Wychavon, Worcester City & Malvern Hills).

We understand that the Black Country LEP (BCLEP) have agreed to be part of the Study, although at the time of the meeting endorsement of the Stage 1 & Stage 2 findings had not been received from the BCLEP Board.

Birmingham City Council (BCC) submitted the Birmingham Development Plan (BDP) to PINs on 01 July 2014. It is now at Public Examination. It is stated in the City Council's Duty to Co-operate proforma that capacity work in 2012 indicated a shortfall of circa 29,000 dwellings up to 2031 and that BCC are seeking to accommodate these new dwellings outside the boundaries of the City. BCC then sought to engage local planning authorities within the GBSLEP in the preparation of a Strategic Housing Needs Study - although we understand that this Study is not a SHMA as defined in the National Planning Policy Framework (NPPF). NPPF (Para 159) lists a number of actions that a local planning authority should undertake in order to gain a 'clear understanding of housing needs in their area'. This includes 'Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.'

We understand that BCC decided to use the geography of the GBSLEP, and subsequently adding the BCLEP, rather than the Birmingham housing market area in order to create the spatial framework within which 'objectively assessed housing needs' could be





accommodated. At the briefing on 31 July 2014 PBA stated that the geography of the 2 LEPs creates a justifiable housing market area that could be used to demonstrate compliance with NPPF.

For this reason, we strongly assert that the Phase 3 exercise, to consider spatial options for accommodating future housing growth, should be confined to the geography of the 2 LEPs – GBSLEP and BCLEP. There is no reasoned justification for seeking to accommodate the identified housing needs in administrative areas beyond the 2 LEPs. Surely you would agree that meeting housing needs in locations close to where the need arises is both common-sense and good practice.

We are asking for confirmation that the PBA Stage 3 work will confine its search to the geography of the GBSLEP and BCLEP and not look to areas beyond - such as our administrative areas.

Yours sincerely,

Councillor Brian Edwards  
Leader of the Council  
South Staffordshire Council

Councillor Chris Saint  
Leader of the Council  
Stratford-on-Avon District Council

Councillor P. Middlebrough  
Leader of the Council  
Wychavon District Council

Councillor M.E. Stanley  
Leader of the Council  
North Warwickshire Borough Council

Copy to: Mr. W. Naglr – Director of Planning & Regeneration, Birmingham City Council  
Mr. I. Kemp – Programme Officer – BDP Public Examination





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

Our Ref: PS/CW  
Date: 6 October 2014  
Please ask for: Christine Williams  
Direct Line: 01922 652089

Councillor Brian Edwards  
Leader of the Council  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX

Dear Councillor Edwards

**Greater Birmingham and Solihull Local Enterprise Partnership and Black Country Strategic Housing Study**

As you are aware the Greater Birmingham and Solihull Local Enterprise Partnership (LEP) has commissioned a study to assess the future level and distribution of housing growth across the Greater Birmingham and Solihull LEP area, to cover the period beyond current and previous strategies. Subsequently, in the light of projected increases in population and household growth across the country and the need for local authorities to co-operate with each other when producing plans for growth, it was agreed that the Black Country local authorities join the study.

The analysis for stages 1 and 2 of the study has now been undertaken to look at what the projected housing needs arising within the Greater Birmingham and Solihull LEP and the Black Country might be. It is understood that you attended a meeting of the 'Related Authorities' on the 31<sup>st</sup> July 2014 to hear the outcomes of the two stages with regard to the Greater Birmingham and Solihull LEP. We can inform you that the Black Country outcomes will be made publicly available now we have discussed them at a meeting of the Black Country Leaders on 17<sup>th</sup> September 2014. The next stage of the Study, stage 3, will assess a number of spatial scenarios for addressing any shortfall in terms of numbers of homes, quantities of land required and possible locations.

Decisions about where additional growth might be accommodated will undoubtedly have important impacts on the future planning and regeneration of the Black Country and its surrounding housing market area, which includes South Staffordshire Council. We feel that continuing involvement in the study will allow a better understanding of and greater influence over the technical analysis and material used. The study will also have a role in informing future local authority reviews of statutory development plans and enable local authorities to

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fulfil the Duty to Co-operate to engage constructively and actively in strategic and cross-boundary matters.

Consequently, we are writing to request that South Staffordshire Council consider participating in Stage 3 of the Strategic Housing Study.

We will be happy to receive your thoughts on this matter and would be pleased to discuss possible ways forward. In the meantime, please contact Jan Britton, Chief Executive of Sandwell Council who is the Lead for the Black Country on the Strategic Housing Needs Study on 0121 569 3501 or Paul Sheehan, Chief Executive of Walsall Council who is the Secretary to ABCA on 01922 652006 if you require any further information.

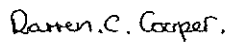
Yours sincerely



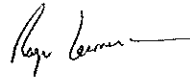
Councillor David Sparks  
Leader  
Dudley Metropolitan Borough Council



Councillor Sean Coughlan  
Leader  
Walsall Metropolitan Borough Council



Councillor Darren Cooper  
Leader  
Sandwell Metropolitan Borough Council



Councillor Roger Lawrence  
Leader  
Wolverhampton City Council