

Appendix 3

Interim Officer Response to Birmingham Local Plan Issues and Options Consultation

Planning Policy
Birmingham City Council Planning
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Dear Planning Policy Team,

Birmingham Local Plan Issues and Options consultation

This letter is an officer response to the Local Plan Issues and Options consultation on behalf of the City of Wolverhampton Council (CWC). The letter also provides a response to the 3rd October letter from Ian Macleod confirming the commencement of the consultation and seeking the views of the Council on a number of issues related to how the housing shortfall could be accommodated.

This response will be considered by the Councils Cabinet at its next meeting on 14th December and we will contact you again following that meeting.

In summary, CWC welcomes the progress made with the preparation of a new Local Plan for the City, which will replace the out-of-date adopted Birmingham Plan (BP). Rather than responding to the detailed questions set out in the consultation document, this letter focusses on strategic issues that we ask are considered to inform the next stage of the Plan preparation process. These issues are set out below:

1. CWC notes the significant scale of **housing need** and associated shortfall being identified through the BLP. In responding to the housing shortfall, we encourage the testing of all of the options listed in paras 4.17-4.35 of the consultation document. For Option 5, any potential displacement of employment activity should be accommodated within Birmingham. This is important in order to avoid the possibility of such displacement creating additional demand for employment land in Wolverhampton and the Black Country, given the shortfall of employment land identified through work on the Black Country Plan.
2. CWC would also ask BCC to clarify that it considers the commencement of the BLP review and recognition of the BLP 2020-2041 housing shortfall effectively removes any requirement to address the historic 2011-31 shortfall under the out-of-date adopted BP. This is because the current local housing need method now supercedes the out-of-date BP housing target for Birmingham. There would also be an overlap between the remaining BP period and the BLP period, therefore the two shortfalls cannot co-exist.
3. The 3rd October letter requested a view on the possibility of a Wolverhampton contribution to addressing the BLP housing shortfall. I confirm that, on the basis of work progressed on the Black Country Plan, Wolverhampton itself has a significant shortfall of land to meet its own needs and so there is no potential to bring forward

additional land to meet needs arising in Birmingham. Given the scale of the shortfall, it is clear that a regional approach is required and we encourage the Council to continue to engage in the programme of work being discussed through the Greater Birmingham and Black Country Housing Market Area (HMA) Group, as detailed in the draft Statement of Common Ground (SoCG) recently published by South Staffordshire Council as part of its Regulation 19 consultation (<https://www.sstaffs.gov.uk/doc/183834/name/DtC%20Full%20Topic%20Paper%20Nov%202022.pdf/>) (Appendix B).

4. Alongside this work, we ask that the Council revisit and clarify the appropriate sequence of release of land to meet shortfalls through the Duty to Cooperate process to ensure the approach is consistent with para 141 of the NPPF relating to the status of the green belt – the appropriate sequence being: non-green belt land in Birmingham; non-green belt land in neighbouring authorities; green belt land in Birmingham; green belt land in neighbouring authorities. Current statements in the Issues and Options Report are not consistent with this approach as they suggest that a Birmingham green belt review would not take place until the capacity of neighbouring authorities (including green belt land) has been exhausted. Indeed, and related to point (3) above, given the extent of unmet need with the HMA, many authorities across the HMA have already exhausted potential options to meet their own needs along with the needs of neighbours. As such it is considered highly likely that the Council will need to consider further opportunities within the Green Belt to deliver its housing need. The Council should be proactive about this and make clear from this early stage of plan-making that it will likely require an updated review of the potential for Green Belt land within Birmingham to deliver development needs.
5. Turning to **employment land**, CWC notes the scale of need (221.96ha) and current shortfall (73.6ha) identified through the HEDNA and reflected in para 7.6 of the consultation document. We encourage the progression of the work outlined in para 7.8 to identify additional sources of supply to respond to this need, and support the suggestion in para 7.8 that a proportion (53ha) of land at the West Midlands Interchange (WMI) site in South Staffordshire District could be reasonably attributed towards meeting Birmingham needs. This would significantly reduce the shortfall and is of a scale consistent with the approach set out in the Black Country Plan (BCP) evidence.

We would be happy to discuss any of the issues raised in this letter in more detail and CWC is keen to engage closely with the Council at all stages of the preparation of the Local Plan.