



Local Plan Review Consultation Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	
First Name	Mike	
Last Name	Dunphy	
E-mail Address	m.dunphy@bromsgroveandredditch.gov.uk	
Job Title (if applicable)	Strategic Planning & Conservation Manager	
Organisation (if applicable)	Bromsgrove District Council	
Address	Town Hall Walter Stranz Square Redditch	
Post Code	B98 9AH	
Telephone Number	01527 881325	

The South Staffordshire Local Plan review **Spatial Housing Strategy & Infrastructure Delivery** document is being consulted on for a period of 8 weeks from Thursday 17 October until 5pm Thursday 12 December 2019. For advice on how to respond to the consultation form please email localplanreview@sstaffs.gov.uk or call 01902 696000.

Please note:

- Comments must be received by **5pm on Thursday 12 December 2019**. Late comments will not be duly made under the Regulations.
- Please fill in a separate Part B for each paragraph/table/topic you are commenting on
- Please explain your response where necessary

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However your contact details will not be published.

Part B: Please complete a new Part B for each representation you wish to make.

Name: Mike Dunphy

Organisation: Bromsgrove District Council

1. Which part of the Local Plan review Spatial Housing Strategy and Infrastructure Delivery consultation paper does this representation relate to?

Chapter	
Paragraph	
Table	
Question (if applicable)	
Other document eg SA, HRA	

2. Please set out your comments below

Bromsgrove District Council welcomes the opportunity to comment on South Staffordshire’s Spatial Housing Strategy and Infrastructure Delivery consultation. Please note that these comments represent the views of Officers only at this stage and have not been subject to Member endorsement. It is planned to take this response to the meeting of Bromsgrove’s Cabinet on 15th January 2020 for approval and then to full Council on the 22nd January, and we will update you after this time.

We welcome South Staffordshire Council’s continued commitment to plan for not only its own housing needs, but also to make a contribution of **up to 4,000 dwellings** towards unmet needs in the wider HMA (para 2.2). However, we do note the subtle change in wording from the Issues and Options consultation which stated the Council’s preferred option at this stage was to provide “*a **minimum** of an additional 4,000 dwellings towards the wider housing shortfalls from the HMA*” (I&O Option C). As with our previous comments, it is not possible to fully endorse this level of contribution at this stage, without an up to date understanding of the shortfall and how the remainder will be dealt with. We do however support South Staffordshire’s positive efforts so far in their Local Plan Review on working to address the HMA shortfall.

The final sentence of para 2.2 states that if there is evidence that the shortfall across the HMA has significantly reduced prior to Submission of the Local Plan Review, then South Staffordshire Council will reduce its contribution to meeting unmet needs proportionately. Until an up-to-date level of shortfall has been quantified and agreed across the HMA, it is premature to make this assumption, particularly given that the 2018 GBHMA Strategic Growth Study focused on the shortfall to 2031, which falls midway through the proposed Local Plan Review plan period. Given that many local authorities have commenced plan reviews which extend beyond the timeframe of the GBHMA SGS, it is possible that there will be further unmet needs which the HMA constituent authorities will need to address. The wording at para 2.2 could therefore be altered in future versions of the Local Plan Review to acknowledge that the opposite is also possible.

We note at para 2.3 that in response to the Government’s standard methodology, South Staffordshire’s housing requirement for the period 2018-2037 has fallen from the level of 9,130 dwellings in the 2018 Issues and Options consultation to 8,845 dwellings in this consultation. Apart from local affordability data which has been used to inform the housing options, Gypsy and Traveller work which is ongoing, no reference is made to any further evidence base work in relation to housing needs. Given that the standard methodology gives a minimum annual

housing need figure, is any further work proposed to consider a higher housing need figure, particularly given that evidence on employment needs is currently lacking? The relationship between housing and economic development needs should be explored together through the evidence base.

It is noted under Spatial Housing Strategy Option G that: *“Urban extensions are provided across all neighbouring authorities within the Greater Birmingham Housing Market Area (GBHMA) with unmet housing needs to ensure that the district’s contribution to the GBHMA shortfall is met in locations from which households are being displaced.”* Whilst Bromsgrove District has committed to review its Green Belt to accommodate the remaining housing needs of the adopted Bromsgrove Development Plan and the future needs of the District Plan Review, the suitability of land within the Green Belt for development has not yet been assessed. This is one of the next key pieces of work in the Bromsgrove District Plan Review process. There is the potential for there to be a shortfall in the amount of suitable land available for development. This means that, together with the requirement under para 137 of the NPPF regarding establishing exceptional circumstances to justify the amendment of Green Belt boundaries, we will need to discuss the potential for the development needs of our district to be accommodated by our neighbouring authorities, including South Staffordshire.

Spatial Housing Strategy Options B, D, E, F and G all include a proposed area of search for an urban extension along the western edge of the Black Country, with the indicative number of dwellings associated with this broad location ranging from 619 (Option B) to 1106 (Option D) [Appendix 4: Indicative Growth Tables]. This is shown as a hatched area along the western edge of the Black Country on the associated diagram and this extends down to south of the district and its border with Bromsgrove district. Whilst Bromsgrove district only has a small common boundary with South Staffordshire, we would be keen to learn of the precise location of any planned urban extension in this vicinity at the earliest stage possible, so that any cross boundary impacts can be understood and explored.

Whilst we understand South Staffordshire’s approach in producing a consultation document which focuses solely on options for housing distribution and infrastructure at this stage, this presents questions which are unanswerable at this stage about the relationship with other uses, namely employment land. We therefore welcome the acknowledgement at para 5.4 of South Staffordshire’s role in the employment market area and that future employment land allocations in the area are likely to come from the Black Country authorities. We are interested to understand more detail of this proposal, preferably through Duty to Cooperate discussions prior to the finalisation of a Preferred Options document.

We look forward to continuing to work with South Staffordshire Council both through our roles in the GBHMA and during ongoing discussions in respect of the Duty to Cooperate as we work towards developing the next stages in our respective Local Plan Reviews.

All comments should be made in writing preferably using this form and should be made no later than 5pm Thursday 12 December 2019

You can view the documents online at www.sstaffs.gov.uk/localplanreview

Contact:

Email the form to: localplanreview@sstaffs.gov.uk

Or send by post to: Strategic Planning Team, South Staffordshire Council, Council Offices,
Wolverhampton Road, Codsall, South Staffordshire, WV8 1PX.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>