

Bromsgrove District Council welcomes the opportunity to comment on South Staffordshire Council's Preferred Option Local Plan 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 19th January 2022 for approval and then to full Council on the 26<sup>th</sup> January, and we will update you after this time.

These comments are in addition to comments submitted to both the South Staffordshire Council's 2018 Issues and Options consultation, and the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation.

Officers have reviewed the plan and in particular the locations and amount of development being proposed across South Staffordshire. In terms of location, we have no comment to make other than to say the locations chosen seem appropriate, and the site selection process appears to have been done in a robust manner.

The level of housing development being proposed is consistent with the requirements of the Government's standard methodology and we see no reason to revert to any number other than this. The 4000 houses being proposed for the wider needs of the Greater Birmingham and Black Country Housing Market area are also welcomed. As with previous comments submitted on this issue, Bromsgrove District Council does not object to this proposal, but also does not specifically endorse the process taken to arrive at this figure as one which should be seen as the most appropriate approach to how the wider needs of the GBHMA should be apportioned across the housing market area. We understand that the approach has been heavily informed by the GBHMA Strategic Growth Study in 2018, Bromsgrove District Council's position on that study remains that it is simply one piece of evidence to be considered in relation to any plan review which takes place in the GBHMA. We are aware of the discussions due to take place on the 15<sup>th</sup> December 2021 with other GBHMA authorities. The Council will be represented at this discussion and may wish to add to this response as a consequence of that meeting.

With regards to the levels of employment development being proposed, we note that South Staffordshire has a surplus of employment land. We are conscious that the Economic Development Needs Assessment (EDNA) is currently being updated and as part of this the appropriateness of the Functional Economic Market Area (FEMA) is looking to be confirmed. Bromsgrove District Council is also progressing its economic development needs evidence base albeit as part of wider piece of work which also looks at housing needs (a HEDNA). Whilst the result of this work is yet to be finalised, Bromsgrove District Council is happy to engage with South Staffordshire on understanding what is the most appropriate approach to defining the correct FEMA for both districts.

The approach taken to the Duty to Co-operate (DtC) has been explained in full in the supporting DtC statement. We believe this to be an accurate representation of the engagement that has taken place with regards to the DtC.