

Our Ref: BRE/LR

17th November 2014

Please ask for: B. R. Edwards

Direct Dial: (01902) 696129

Email: b.edwards@sstaffs.gov.uk

Jan Britton
Chief Executive
Sandwell Metropolitan Borough Council
Sandwell Council House
Oldbury
B69 3DE

Dear Mr. Britton,

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

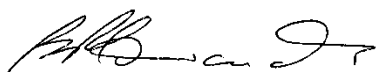
I refer to your letter dated the 12th November 2014 concerning the Greater Birmingham-Solihull/Black Country LEPs Strategic Housing Study. I am most grateful for the detailed response you have provided me.

I fully accept that the Housing Study does not represent Housing Policy, however, I am mindful that all but one of the six scenarios which are to be looked at during Stage 3 of the Study are dispersal options which to me, points to a level of intent in terms of policy. This approach is in contrast to the policy adopted by Leeds Council which has decided to meet its not inconsiderable housing need (70,000) within its own boundaries.

I would however welcome the opportunity to comment on the Stage 3 Housing Study once it has been published.

Thank you once again, for the consideration that you have given to the concerns of South Staffordshire Council.

Yours sincerely,



Councillor B.R. Edwards
Leader of the Council

Cc: Andrew Johnson – Director of Planning and Strategic Services



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

Our Ref: JB
Date: 12th November 2014
Please ask for: Tracey King
Direct Line: 0121 569 3501

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

Dear Councillor Edwards

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

I am writing in reply to your letter of 20 October 2014. This response has been agreed with Black Country colleagues. You will see I have copied it to them, as well as to the Black Country and Greater Birmingham-Solihull LEPs.

I am pleased that you do appreciate the invitation to participate in the Study despite your decision not to take it up. I do recognise your concerns and want to try to address them to suggest a way forward that will help to support continuing cooperation.

I am aware of your correspondence with Birmingham City Council, the GBSLEP and the BC LEP (who I understand will be writing to you). I hope this has been helpful in clarifying that, whilst the Study was initiated by the GBSLEP, the participation of the Black Country is by the four local authorities acting together as the Association of Black Country Authorities (ABCA).

The decision of the four authorities has been based on the Government's policy requirement that housing needs should be assessed on the basis of Housing Market Areas (HMAs). As you know, projected household growth is pointing towards a shortfall in capacity for housing development across the GBSLEP area and especially from within Birmingham. Because the Black Country is considered to be within Birmingham's HMA then the GBSLEP Study would have had to consider the Black Country whether or not the Black Country authorities take part in the work. The Black Country authorities have taken the view that in such circumstances participation in the Study would allow a better understanding of and influence over the analysis and the conclusions drawn and the ways in which they are to be used.

At its meeting on the 17th September 2014, ABCA agreed the findings of stages 1 and 2 of the Study as a basis for future technical work. ABCA also agreed that the Black Country authorities should participate in stage 3 of the Study – the assessment of a number of spatial scenarios for addressing any shortfall in terms of numbers of homes, quantities of land required and possible locations. Discussions are continuing on the details of the brief for the stage 3 work.

Bearing in mind the differences in circumstances across the wide area to be covered by the Study and the scale of the projected shortfall in housing capacity, it does seem likely that not all of the predicted future housing need could be accommodated within existing urban areas, so it is necessary to envisage options whereby some of the additional housing might be accommodated elsewhere. However, it is notable that at recent hearings for the Examination of the Birmingham Development Plan, the City Council confirmed that the Study will look at how additional capacity might be found within the city. As far as the Black Country is concerned the four authorities will be working to ensure that the ways in which the possible options will be evaluated and conclusions drawn should reflect the importance of regenerating the Black Country as embodied in the Black Country Core Strategy. In my view, concerns about future investment in the area make this all the more important. It is relevant to see that the Study work available so far indicates that the areas where the projections of household growth are highest (Sandwell and Walsall) are those where the largest amounts of housing growth are being achieved.

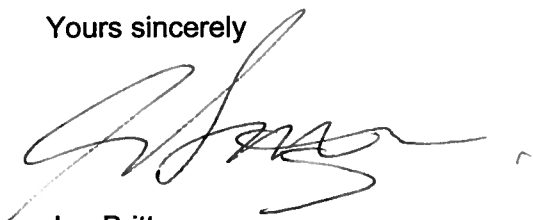
The Study will not make policy itself but will inform future reviews of statutory development plans. This will include the review of the Black Country Core Strategy which is due to start in 2016. I understand that this is likely to be followed by the start of a review of your authority's Core Strategy. Clearly, the plans for the Black Country and for South Staffordshire should be closely coordinated, not only because of the requirements of the Duty to Cooperate but also because of our mutual interest in ensuring that our development strategies should remain complementary. To this end it is likely we will want a common basis for much of the work. As referred to at the Birmingham Examination it has been envisaged that this will include a shared Strategic Housing Market Assessment (another Government requirement for plan-making) because South Staffordshire and the Black Country also share a Housing Market Area. Such work would have to draw on the evidence of the GBSLEP and Black Country Housing Study. Thus, the Study will be likely to have at least an indirect influence on the future planning of our areas.

In this position, I do feel that it will be important to be as fully informed as possible about the issues that will lie ahead. Whilst I respect your views about participating in the Study, might a way forward be to ask for your authority to be consulted on drafts of the stage 3 work and to have the opportunity to comment upon it? I would be grateful if you could let me have your thoughts on this proposal.

As far as the Black Country is concerned, the authorities will continue to work in an open and transparent way as we prepare or implement plans for the future. We will cooperate with South Staffordshire and we will want to maintain relationships that are as constructive as possible.

I hope you find this helpful. I and / or my colleagues will be happy to discuss any of the points raised.

Yours sincerely



Jan Britton
Chief Executive
Sandwell Council

Copy to:

Steve Winterflood, Chief Executive, South Staffordshire Council
Paul Sheehan, Chief Executive, Walsall Council
John Polychronakis, Chief Executive, Dudley MBC
Keith Ireland, Managing Director, Wolverhampton City Council
Stewart Towe, Chair, Black Country LEP
Andy Street, Chair, Greater Birmingham and Solihull LEP

