

Places, Prosperity & Sustainability Directorate, Birmingham City Council, Council House, Victoria Square, Birmingham. B1 1BB

To South Warwickshire Local Plan Team

via email to swlp@stratford-dc.gov.uk

1st March 2023

Dear South Warwickshire Local Plan Team,

South Warwickshire Local Plan – Issues and Options Consultation

Thank you for consulting with Birmingham City Council on the Issues and Options Consultation for the South Warwickshire Local Plan.

Overall, Birmingham City Council supports the general approach, vision and strategic growth options put forward within the Issues and Options document in providing a detailed and well-balanced analysis of the options for strategic growth for the area up to 2050. The City Council welcomes the particular attention given to the strategic matters of housing and employment land provision and recognising the need to consider shortfalls of land in other areas outside of South Warwickshire. This recognises and reflects the continued close working and the role that South Warwickshire (particularly Stratford District Council) has played alongside other local authorities as part of Duty to Cooperate arrangements within the Greater Birmingham and Black Country Housing Market Area (HMA).

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs Chapter 6 – Delivering homes that meet the needs of all our communities

Unmet housing needs from the wider housing market area.

Stratford-upon-Avon Council (as part of the South Warwickshire Plan area) have been a proactive participant in HMA discussions in seeking to provide additional housing to meet any shortfalls within Birmingham and the wider the HMA area. This is reflected and welcomed in the emerging Stratford-on-Avon Site Allocations Plan (Policy SAP.4) which makes a number of Reserve Site allocations with a total capacity of approximately 380 homes to meet the needs of the Greater Birmingham and Black Country HMA up to 2031.

Birmingham City Council fully supports this approach and the continued need for unmet needs from elsewhere within the HMA is evident in shortfalls demonstrated within the Black Country and latest household requirement figures for Birmingham in the Issues and Options consultation for our new Local Plan. Although the new Local Plan is still in the early stages of its production, the City Council has commissioned a Housing and Employment Development

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Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA) as part of its evidence base. These two studies, coupled with wider urban capacity work, has shown that there is an initial estimated shortfall of 78,415 homes across the City for the proposed Plan period of 2022-2042. The City Council still has further work to do to identify further potential sources of housing land supply and will ensure that opportunities within its administrative area will be truly maximised prior to any shortfall being exported to other areas. However, it is highly likely that shortfalls will still remain as well as additional shortfalls from the Black Country authorities which are likely to be identified in the conurbation beyond 2031.

We are therefore in full support of the summary position on Page 112 of your Issues and Options document which states that close working will need to continue across the Greater Birmingham and Black Country HMA to try and address any shortfall, including consideration of the strength of the relationship between the South Warwickshire authorities and the source of these shortfalls. We also very much welcome the testing of the effects of an additional 5,000 to 10,000 homes in the sustainability work for the South Warwickshire plan as a potential contribution to continued shortfalls elsewhere within the HMA.

This position is therefore set out in detailed sustainability work in Chapter 4 of the Issues and Options Document which includes the potential for a new settlement or settlements within South Warwickshire as one of several options being considered to deliver the growth required over the plan period.

The City Council is supportive of the consideration of new settlements in the Plan which have the potential to serve the wider needs of the HMA and alleviate some of the pressures on the West Midlands Conurbation. A new settlement, which is well connected to the Conurbation by a wide choice of transport modes, may be a more sustainable option than urban extensions so it is essential that such options in areas such as South Warwickshire are explored which could mutually benefit the future sustainable growth of the HMA. The City Council would therefore support a potential location of a new settlement which is well connected to the West Midlands Conurbation to complement and provide the mutual growth benefits for South Warwickshire and the wider Greater Birmingham and Black Country HMA.

Birmingham City Council will therefore continue to support on-going collaborative working across the HMA including further HMA-wide studies and Statements of Common Ground as a roadmap for further work and potential local plan allocations.

Chapter 5 – Delivering South Warwickshire's Economic Needs

Issues E6 and E7: Core Opportunity Area and Major Investment Sites

With good access to the M40 and M6 and two railway lines, the South Warwickshire Plan area is an important strategic location for large employment sites of regional significance which could help serve the wider West Midlands area. Birmingham City Council has recently evidenced a shortfall of 73.64ha of employment land against its identified need to 2042 through its Issues and Options Consultation Document but also lacks the opportunities for further large employment sites. The City Council would therefore support proposals within the South Warwickshire Plan which protect major investment sites, particularly those which would have the potential to provide wider regional economic benefits for the West Midlands.

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Summary

In summary, Birmingham City Council is fully supportive of the approach being taken in the South Warwickshire Plan in exploring the potential of the area to contribute towards housing shortfalls being experienced in the Greater Birmingham and Black Country HMA. The City Council also supports the need to protect and grow major investment sites which have the mutual benefit to serve the needs of the wider West Midlands region. We look forward to continued engagement with you through Duty to Cooperate arrangements and through continuation of the joint work being done alongside the other local authorities which make up the Greater Birmingham and Black Country HMA.

If you require any further information or input from Birmingham City Council in formulating your Local Plan Review, please do not hesitate to contact us at <u>planningstrategy@birmingham.gov.uk</u>.

Yours faithfully

Ian J. Marleod

Ian MacLeod Director of Planning, Transport & Sustainability

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