

## **Black Country Authorities**

5<sup>th</sup> October 2021

Dear Mr. Culley,

### **Consultation on Draft Black Country Local Plan**

Redditch Borough Council (RBC) welcomes the opportunity to comment on the above document and to continue to engage constructively with the Black Country Plan in the best interests of positive plan-making. The response below has been written in consultation with the Council's Portfolio Holder for Planning, Economic Development, Commercialism and Partnerships and is due to be reported to Members at Executive Committee on 26<sup>th</sup> October.

Firstly, we note and support the Black Country Authorities' intention at Paragraph 1.10 of the Draft BCP to draft and agree Statements Of Common Ground with all relevant bodies on Duty to Co-operate issues at the Plan's Publication Stage. RBC submitted its "Duty to Engagement Proforma" in 2018 which recognised the challenges of meeting the wider housing needs of the Birmingham and Black Country Housing Market Area. RBC reiterated in this Proforma that this needs to be based on fully evidenced scenarios and progressed through development planning work by the local authorities. We continue to emphasise this view.

Secondly, we recognise the significant shortfall of 28,239 homes and 210 hectares of employment land currently identified within the Draft BCP. In particular Paragraph 3.27 is noted, which places emphasis on the Black Country Authorities' support to neighbouring authorities in bringing forward land for housing and employment that "sits adjacent to the existing administrative boundaries."

As currently set out in the Draft Plan, it is RBC's interpretation that there are unlikely to be potential requirements for RBC to be involved in cross boundary discussions under the Duty to Co-operate with regard to meeting a proportion of the Black Country's housing and employment needs. This is because the authorities do not share any common boundaries.

I trust the above comments offer a helpful contribution. If I can be of further assistance, please do not hesitate to contact me.

Yours sincerely

Rebecca Brown  
**Principal Planning Officer – Strategic Planning**  
Redditch Borough Council