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Ian MacLeod
Director Planning, Transport & Sustainability
Birmingham City Council

2nd December 2022

Dear Ian

This letter represents a response to both the Birmingham City Council (BCC) Issues and Options plan and the Duty to Cooperate letters sent to Bromsgrove District Council (BDC) and Redditch Borough Council (RBC) on 3rd October 2022.

As BCC is aware, BDC and RBC have a Memorandum of Understanding in place which addresses certain elements of plan making across Bromsgrove and Redditch districts, one of which is:

That the Councils consider issues in relation to the GBBCHMA together and wherever possible, respond jointly to all requests to assist those authorities which have a shortfall in housing supply.

Birmingham Local Plan Issues and Options

BDC and RBC welcome the decision of BCC to adopt the standard method for the identification of housing need, giving a total need figure of 149,286 dwellings. This approach is in line with the approach identified in the Housing and Economic Development Needs Assessments (HEDNA) for both Bromsgrove District and Redditch Borough.

BDC and RBC note both the capacity of 70,871 dwellings and the shortfall of 78,415 dwellings over the plan period and support the approach of BCC to continue to further investigate the supply available within the City Council's boundaries.

BDC and RBC support the six options for housing growth identified (repeated below) but would stress that presenting these as options at this stage is misleading. It is clear from the evidence presented regarding the housing capacity the City currently has, that a combination of all of these options should be firm requirements for the plan going forward.

- Option 1 – Increase housing densities
- Option 2 – More active public sector land assembly
- Option 3 – Further comprehensive housing regeneration
- Option 4 – Utilise poor quality under-used open space for housing
- Option 5 – Utilise some employment land for housing
- Option 6 – Release Green Belt for housing

In relation to Option 6 "Release of Green Belt for housing", BCC is requesting through the Duty to Cooperate that BDC and RBC confirm whether they can make a contribution to addressing the shortfall arising from the Birmingham Local Plan. BCC is well aware that any large-scale development in either authority area would require releasing land from the Green Belt. To that end BDC and RBC would expect BCC to commit to reviewing and releasing land in the Green Belt within the City's boundaries at the same time as expecting other local authority areas to review and release Green Belt land. This is particularly significant as BCC is promoting land in its ownership in Bromsgrove District for release from the Green Belt under the Bromsgrove Local Plan review. With this in mind BDC and RBC would have expected a firm commitment to reviewing the Birmingham Green Belt at this early stage of plan making and are disappointed this has not happened.

BDC and RBC acknowledge the requirement for 295.6 hectares of employment land and the current shortfall of 73.64 hectares. It is noted that no options to address the employment land shortfall have

been presented in the Issues and Options document but this instead takes the form of a question. Therefore, in response to Q35 (How do you think the shortfall in the supply of employment land should be addressed?), BDC and RBC offer the following response:

As with the housing requirement, the efforts taken to provide this development within the City's boundaries is welcomed, but it is stressed that any future options including Green Belt release within the City's boundaries should be considered as a preference before release of land in neighbouring Green Belt Authority areas is considered.

BDC notes the proposed changes to the policy for the Longbridge area which would involve removing its designation as a Regional Investment Site but retaining its designation as a Core Employment/Industrial Area. Whilst there is no objection in principle at this stage, BDC welcomes the intention that Longbridge's focus on high-quality advanced manufacturing is not diluted and would wish to see the established development objectives secured though the Longbridge Area Action Plan retained as far as possible.

BDC and RBC note BCC's commitment to delivering an efficient, fair, green, sustainable and healthy transport system and welcome the intention to embed the key objectives from the Birmingham Transport Plan in the Local Plan. With Birmingham as the regional centre for employment and leisure and the Midlands transport hub, BDC and RBC would like to see a much bigger commitment in the Local Plan to improving the connectivity of area's beyond the city's administrative boundaries. Whilst this is referred to briefly in the context of Sprint rapid transit buses, cross-city bus routes and rail, further detail is need and it would be welcomed if this commitment was extended to enhancing active travel routes between local authority areas.

Duty To Cooperate letter – 3rd October 2022

In response to the questions posed, please see BDC's and RBC's responses below:

- *Whether at this stage you are able to make a contribution to addressing the shortfall arising from the Birmingham Local Plan.*

Both Councils are in the process of agreeing to sign the Greater Birmingham and Black Country Housing Market Area Statement of Common Ground. That Statement commits BDC and RBC to continue to work towards an agreed approach to distributing any shortfall in housing needs. Other than identifying the housing requirement, the Birmingham Local Plan Issues and Options document does not move this issue forward in any significant way. As such it would be premature for BDC or RBC to commit to any contribution at this stage. BCC agreed with this position in response to BDC's Duty to Cooperate letter in June 2022, and at this point in time, nothing has taken place to change this position.

- *That you are committed to continuing discussions both through the HMA working group and with BCC independently, as required, to work towards accommodating the shortfall.*

Yes, the Councils are still committed to continuing discussions.

I hope you find these responses useful, which at this stage this represents the views of the officers of Bromsgrove District and Redditch Borough Councils. Should this response change as a result of the formal consideration processes in January, an updated response will be submitted to you.

Yours Sincerely

Mike Dunphy
Strategic Planning and Conservation Manager
Bromsgrove District and Redditch Borough Councils