
Main issue: Have the Council complied with the requirements of section 33A of the Planning and Compulsory Purchase Act 2004?

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- There is a Main Modification (MM4)

tied up with the GBSLEP work that is currently being carried out. This work is considering the shortfall and options to deal with any shortfall within the GBSLEP area in total and only if there are not the appropriate solutions within the GBSLEP area will solutions elsewhere be considered.

- 2.5 A letter has been sent to the GBSLEP from a number of adjoining local authorities (attached as Appendix A) querying the scope of the Stage 3 work being carried out and raising concerns that the work should be initially confined to the GBSLEP area. This is not saying the Borough Council will not work with the GBSLEP but there needs to be clarity as to the capacity and consistency of consideration of land before an assumption that solutions lie beyond this area.

Sir Albert Bore,
Birmingham City Council,
Council House,
Birmingham
B1 1BB

Dear Sir Albert,

BDP Public Examination - GBSLEP Strategic Housing Needs Study

We write to you further to the 'related authorities briefing' that was held on 31 July 2014 at Baskerville House, Birmingham. Peter Brett Associates (PBA), on behalf of the Greater Birmingham & Solihull LEP (GBSLEP), presented their Stage 1 & Stage 2 findings of a Strategic Housing Needs Study commissioned by the GBSLEP.

The 'related authorities' that had been invited to the meeting were Stratford-on-Avon Council, North Warwickshire District Council, South Staffordshire Council and the combined South Worcester Authorities (Wychavon, Worcester City & Malvern Hills).

We understand that the Black Country LEP (BCLEP) have agreed to be part of the Study, although at the time of the meeting endorsement of the Stage 1 & Stage 2 findings had not been received from the BCLEP Board.

Birmingham City Council (BCC) submitted the Birmingham Development Plan (BDP) to PINs on 01 July 2014. It is now at Public Examination. It is stated in the City Council's Duty to Co-operate proforma that capacity work in 2012 indicated a shortfall of circa 29,000 dwellings up to 2031 and that BCC are seeking to accommodate these new dwellings outside the boundaries of the City. BCC then sought to engage local planning authorities within the GBSLEP in the preparation of a Strategic Housing Needs Study – although we understand that this Study is not a SHMA as defined in the National Planning Policy Framework (NPPF). NPPF (Para 159) lists a number of actions that a local planning authority should undertake in order to gain a
This includes

For this reason, we strongly assert that the Phase 3 exercise, to consider spatial options for accommodating future housing growth, should be confined to the geography of the 2 LEPs – GBSLEP and BCLEP. There is no reasoned justification for seeking to accommodate the identified housing needs in administrative areas beyond the 2 LEPs. Surely you would agree that meeting housing needs in locations close to where the need arises is both common-sense and good practice.

We are asking for confirmation that the PBA Stage 3 work will confine its search to the