

# Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

## 1 Introduction

1.1 This third position statement sets out housing need and land supply in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA)<sup>1</sup>. It draws on the baseline established in the Strategic Growth Study (SGS, GL Hearn/ Wood, 2018)<sup>2</sup>, which was commissioned by the 14 Local Planning Authorities; the baseline primarily monitored progress on meeting the 37,900 home shortfall established in the Birmingham Development Plan (BDP adopted 2017). It also considered potential options for addressing the shortfall. The study was published on all participating local authorities' websites along with an initial position statement<sup>3</sup> and a further update in September 2018<sup>4</sup>. For the avoidance of doubt, this Position Statement relates to the GBBCHMA, and not the West Midlands Combined Authority's Housing Package, which applies to a different geography and timeframe.

1.2 This Position Statement extracts the most relevant information regarding housing need and supply from the SGS and updates the land supply position from 31<sup>st</sup> March 2017 to 31<sup>st</sup> March 2019. It also sets out progress and timetables for plan reviews including likely increases in capacity up until July 2020. The purpose of this statement is to provide a starting point from which future Statements of Common Ground, as required by the revised 2019 National Planning Policy Framework (NPPF), can develop.

1.3 Policy TP48 of the BDP states that:

*The Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city. This will focus on:*

- *The progress of neighbouring Councils in undertaking Local Plan reviews to deliver housing growth to meet Birmingham's needs.*
- *The progress of neighbouring Councils in delivering the housing targets set out in their plans.*
- *The extent to which a 5-year housing land supply is maintained in neighbouring areas.*

1.4 Policy TP48 goes on to state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham's capacity by means of a full or partial BDP review after three years.

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<sup>1</sup>Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Borough Council, Lichfield District Council, Redditch Borough Council, Solihull Metropolitan Borough Council, Tamworth Borough Council, North Warwickshire District Council, Stratford-on-Avon District Council, Sandwell Borough Council, South Staffordshire District Council, Walsall Borough Council, Wolverhampton City Council.

<sup>2</sup>[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

<sup>3</sup>[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

<sup>4</sup>[https://www.birmingham.gov.uk/downloads/file/10619/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study\\_position\\_statement](https://www.birmingham.gov.uk/downloads/file/10619/greater_birmingham_hma_strategic_growth_study_position_statement)

- 1.5 January 2020 signalled three years since adoption of the BDP. In December 2019 Birmingham City Council published an updated Local Development Scheme (LDS)<sup>5</sup>, which concluded that an early review was not required. This stated that:

*'the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022'*

- 1.6 The 2018 Position Statement also provided a specific context for the North Warwickshire Local Plan review. Examination hearings have now ended and progress towards the next Modifications Stage of the Local plan process has been delayed by the COVID 19 crisis. It is expected this will start in autumn 2020 prior to the Inspector's final report. Elsewhere, there has been significant progress in reviewing local plans and updating evidence bases, as set out later in this statement

## **2 Housing Need – Summary of Strategic Growth Study findings**

### **Objective Assessments of Need for Individual Authorities**

- 2.1 When the SGS was published the Objective Assessment of Need (OAN) was the method whereby local authorities' housing needs were assessed and where this could not be met, the basis upon which shortfalls were calculated. The starting point for determining an OAN was the official household projections. If necessary, these were adjusted upwards to reflect market signals, affordable housing, past policy constraints and whether there is likely to be a sufficient labour supply to meet future job growth.
- 2.2 Within the GBBCHMA, eight local plans have been adopted post NPPF using the OAN method. South Staffordshire and the Black Country do have a plan including an OAN tested at examination. Solihull has a post NPPF adopted local plan, but it does not include an OAN following legal challenge in 2014. All three of these plan making areas, however, have technical studies published in 2016, which established OANs as the basis for going forward.

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<sup>5</sup> <https://www.birmingham.gov.uk/lds>

**Table 1: GBBCHMA Authority Plans and Objective Assessments of Need (OAN)**

Local Authority	Plan Period	OAN	OAN dpa	Study
<b>Birmingham</b>	2011-31	89,000	4450	PBA Stage 2 Study
<b>Bromsgrove</b>	2011-30	6,648	350	Amion/ Edge Housing Needs Assessment Report, Aug-14
<b>Cannock Chase</b>	2006-28	5,800	264	NLP Implications of CLG 2011 Household Projections, 2013
<b>Lichfield</b>	2008-29	8,600	430	NLP Implications of CLG 2011 Household Projections, 2013
<b>Redditch</b>	2011-30	6,400	337	Amion/ Edge Housing Needs Assessment Report, Aug-14
<b>Solihull</b>	2014-33	14,277 <sup>6</sup>	751	PBA 2016
<b>Tamworth</b>	2006-31	6,250	250	NLP Implications of CLG 2011 Household Projections, 2013
<b>North Warwickshire</b>	2011-29	3,150	175	2013 Cov/War SHMA Update
<b>Stratford-on-Avon</b>	2011-31	14,600	730	ERM 2016
<b>Black Country<sup>7</sup></b>	2014-36	78,190	3554	PBA 2016
<b>South Staffordshire</b>	2014-36	5,933	270	PBA 2016
<b>HMA Total</b>	-	-	11,513	

**Source:** *Strategic Growth Study table 6*

- 2.3 Comparing OANs on a like for like basis is very difficult as the methods by which they were prepared, and assumptions made vary significantly. Furthermore, as they were prepared at different times the demographic and employment data used may not be comparable. Plans also have different start and end dates making direct comparison difficult. Table 1 shows the OAN identified through existing local authority studies for each plan area and includes an annual rate for direct comparison. In reality, however, planned delivery is often staggered over time and the housing requirement is expressed as a trajectory.
- 2.4 Having established an OAN, local plans must then consider whether this can be met in full in their area and, if not, whether it can be accommodated by neighbouring local authorities. The final plan's housing requirement may be higher or lower than the OAN dependent upon circumstances.
- 2.5 As is shown in Table 2 (replicated from the SGS), there are three adopted plans in the GBBCHMA that have not been able to accommodate their OAN; this generates an overall unmet need of 40,325. These are:
- Birmingham 38,000
  - Tamworth 1,825
  - Cannock Chase 500

<sup>6</sup> Solihull's OAN figure includes an upward adjustment to take account of under-provision between 2011 and 2014.

<sup>7</sup> Joint Core Strategy for Dudley, Sandwell, Walsall and Wolverhampton

**Table 2: Plan Housing Requirements and Unmet Need in the GBBCHMA Authorities as published in SGS 2018**

Local Authority	Current / Emerging Plan	Plan Period	Plan Requirement	Annual Requirement dwellings per annum (dpa)	Unmet Need	Provision for GBBCHMA Unmet Need
<b>Birmingham</b>	Adopted Jan 2017	2011-31	51,000	2,550	-38,000	
<b>Bromsgrove</b>	Adopted Jan 2017	2011-30	7,000	368	0	
<b>Cannock Chase</b>	Adopted 2014	2006-28	5,300	241	-500	
<b>Lichfield</b>	Adopted Feb 2015	2008-29	10,030	478	0	1,000
<b>Redditch</b>	Adopted Jan 2017	2011-30	6,400	337	0	
<b>Solihull</b>	Draft Plan Nov 16	2014-33	15,029	791	0	2,000
<b>Tamworth</b>	Adopted Feb 2016	2006-31	4,425	177	-1,825	
<b>North Warwickshire</b>	Draft Plan 2017	2011-31	9,070	454		4,410
<b>Stratford-on-Avon</b>	Adopted July 2016	2011-31	14,600	730	0	2,720
<b>Black Country</b>	Adopted Feb 2011	2009-26	63,000	3,150	0	
<b>South Staffordshire</b>	Adopted Dec 2012	2006-28	3850	175	0	
<b>HMA Total</b>				9,451	-40,325	10,130

**Source:** *Strategic Growth Study table 7*

- 2.6 As set out in Table 2, at the time the SGS was published, four plans either adopted or emerging made a formal commitment to meeting part of this unmet need.
- 2.7 Solihull's Draft Local Plan included a commitment to test accommodating a 2,000 dwelling contribution towards Birmingham's unmet needs
- 2.8 Lichfield's adopted plan has made provision for a 500 dwelling unmet need from Cannock Chase and a 500 dwelling unmet need from Tamworth. This is part of the overall unmet need in the GBBCHMA.
- 2.9 Both North Warwickshire and Stratford-on-Avon sit within two HMAs - the GBBCHMA and the Coventry and Warwickshire Housing Market Area (CWHMA). The CWHMA authorities have an agreed Memorandum of Understanding (MoU) regarding the distribution of housing provision which states that 2880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA, arising from Coventry. Appendix 1 shows the extent of both HMAs and their overlap.
- 2.10 The Coventry and Warwickshire MoU (tested through the Coventry City Council & Warwick District Council examinations) estimates that the Stratford on Avon plan

provides 5,440 dwellings more than demographic need and this is apportioned 50/50 between the GBBCHMA and C&WHMA, equivalent to 2,720 each. North Warwickshire is making provision through its submitted Local Plan to meet 4,410 of the GBBCHMA shortfall, which specifically includes 500 homes towards Tamworth's unmet needs.

- 2.11 Whilst not specifically referenced in Table 2, the adopted Bromsgrove Local Plan 2011-30 (January 2017) meets a 3,600 homes shortfall, which could not be accommodated by the neighbouring Redditch Local Plan 2011 - 30 (January 2017). The two plans were prepared, examined and adopted simultaneously, so the shortfall was met as soon as its existence was known.

### **Local Plan Reviews as at July 2020**

- 2.12 Since the publication of the 2018 Position Statement, progress has been made in reviewing local plans, this along with actual and emerging shortfalls and potential contributions to meeting these is summarised in Appendix 2.
- 2.13 Caution is urged in interpreting this table as neither the method for calculating housing need nor the plan time frames are necessarily comparable. For example, the adopted Birmingham Plan calculates a shortfall of approximately 38,000 using the OAN method for the period 2011-31, whilst the emerging Black Country shortfall of up to 29,260 is calculated using the newer Local Housing Need (LHN) method for the period 2019 – 38. Using this method, the Black Country's shortfall emerges in 2027/28, with an estimated shortfall of 7,485 up to 2031 (Black Country Urban Capacity Review Update 2019)<sup>8</sup>.

### **Housing Need figure used for the GBBCHMA in the Strategic Growth Study**

- 2.14 As there was no consistent OAN for the GBBCHMA, the SGS considered three baselines based on past demographic trends:
- **The 2014 based Household Projections** as published by MHCLG
  - **Rebased 2014 based Household Projections**, which takes account of growth between 2014 and 2015 as shown in the ONS Mid-Year Population estimates. This simply uses published data for the initial projection year and then applies assumptions on the year on year changes in the official projections thereafter
  - **10 Year Migration Trends** – this considers the difference between the trends in migration over the input period to the SNPP (the 5 years to 2014 for domestic and 6 years for international migration) and those over a ten year period (2005 to 15), and then adjusts future trends in migration based on these.
- 2.15 There is a degree of commonality between the official projection and the variants and the SGS concludes that the rebased 2014 based projection of 205,099 (which includes a vacancy allowance) is a reasonable estimate of housing need for the GBBCHMA over the period 2011 – 31. The SGS only provides overall parameters of need at HMA level and does not disaggregate this to district level.

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<sup>8</sup> <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf>

- 2.16 Since the SGS was published in 2018, the revised NPPF (2019) changes the approach to assessing local authorities' housing need using a standardised formula known as Local Housing Need (LHN). This takes the 2014 based household projection for each authority and then applies an uplift based on relative affordability, whereby those authorities with higher affordability ratios relative to workplace earnings receive the highest uplift.
- 2.17 In March 2020, however, MHCLG published its Planning for the Future policy paper, which commits to reviewing the formula for calculating LHN to encourage greater building within and near to urban areas and whilst making sure that the country is planning for the delivery of 300,000 new homes a year<sup>9</sup>. Whilst it remains the case that the only shortfall tested through local plan examinations was established under the OAN method, the Black Country emerging shortfall is measured using the LHN method.

### **3 Housing Land Supply**

#### **Update of Existing Supply**

- 3.1 The SGS drew together and analysed information on housing land supply within the GBBCHMA using the following categories:
- i. Completions – net completions over the period from 1 April 2011 to the base date for the latest monitoring information (either 1st April 2016 or 1st April 2017)
  - ii. Sites with Planning Permissions – capacity of all sites with planning permission (full or outline) at the base date.
  - iii. Extant Allocations without Planning Permission – supply from sites allocation in adopted plans (including Neighbourhood Plans) which did not have planning permission (full or outline) at the base date.
  - iv. Allocations in Emerging Plans – capacity of sites proposed to be allocated in emerging Site Allocations Documents (under the current system) and Local Plans (Under the new system)
  - v. Additional Urban Supply – sites within existing urban areas which do not have planning consent and are not allocated in the adopted or emerging Local Plan (including Neighbourhood Plans), but which have been identified as suitable for residential development and could be delivered by 2031 or 2036.
  - vi. Windfalls – GL Hearn assumed that most SHLAAs will include a site size and/or capacity threshold. The proforma requested that this was set out in addition to the assumptions made regarding windfall development.
- 3.2 The SGS established a baseline, which was subsequently updated to a 2017 baseline in the previous Position Statement. Consistent monitoring information is now available as at 31st March 2019 and comparative data is shown in Table 3. As time has elapsed, it is apparent that additional capacity has been identified, mainly within Birmingham. Summaries of the SGS baseline and the 2017 and 2019 updates by local authority are attached as appendices 3 - 6. It is acknowledged that the COVID 19 crisis might impact

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<sup>9</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872091/Planning\\_for\\_the\\_Future.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872091/Planning_for_the_Future.pdf)

on completion rates during 2020-21, however there remain over 97,000 homes on sites either allocated in plans or with planning permission.

**Table 3: Housing Land Supply for the GBBCHMA 2011 – 31: SGS baseline, 2017 updates and 2019.**

	<b>SGS Baseline</b>	<b>2017 (published)</b>	<b>2017 Update (revised)<sup>10</sup></b>	<b>2019</b>
	<b>(2011-31)</b>	<b>(2011-31)</b>	<b>(2011-31)</b>	<b>(2011-31)</b>
<b>Total Supply</b>	<b>191,654</b>	<b>197,283</b>	<b>199,238</b>	<b>205,382</b>
<b>of which:</b>				
<b>Completions</b>	35,016	40,092	40,092	63,383
<b>Sites with planning permission</b>	55,759	61,211	61,508	61,058
<b>Allocations in adopted plans</b>	49,485	41,740	42,230	36,007
<b>Proposed allocations in emerging plans</b>	19,443	19,101	19,101	11,413
<b>Additional urban supply</b>	17,114	18,811	19,989	19,410
<b>Windfalls</b>	14,837	16,318	16,318	14,111

### **Non – Implementation Discounts on Supply**

3.3 To provide a realistic assessment of the developable land supply across the HMA, with a view to quantifying what additional land supply needs to be identified, the SGS applies the following discounts:

- A discount of 5% to the supply from sites with planning consent. This recognises that the presence of planning permission provides some basis for considering that a site will be delivered and that some sites in this category are likely to be under construction; but that in some instances planning permission will have been sought for other purposes (such as to raise land values) and some permissions do lapse;
- A discount of 15% to the supply from specific sites without planning consent in the Black Country authorities. A higher discount is considered appropriate in these authorities to take account of the significant proportion of the land supply which comprises occupied employment sites where there are challenges associated with delivery related to assembling land, relocating existing occupiers and development viability.
- A discount of 10% to the supply from specific sites without planning consent in the other authorities within the HMA.

<sup>10</sup> Since publication of the 2018 Position Statement, the 2017 housing land supply data has been revised, this is due to an underestimate of capacity in Dudley of 1955, more detail is available in Appendix 5

3.4 The SGS, however, specifically states that:

*These discounts are judgement based and applied for the purposes of this report only and should not be considered to prejudice what allowance should be made for non-implementation in individual local plans or authorities' land supply assessments, which can take account of locally specific circumstances and evidence.*

3.5 In the light of this the previous Position Statement did not apply these blanket discount rates. In order to provide a more realistic estimate of local authorities' capacity, however, this refreshed Position Statement applies discounts for non-implementation in accordance with local practice. It is also apparent that some local authorities include a buffer to their land supply to offer flexibility and reflect local circumstance, but this is not universal. These buffers are not to be confused with those that are applied to ensure a 5-year land supply in accordance with Government guidance. The discounts and buffers applied, where appropriate, are summarised in Table 4 and any discounted figures are reflected in the 2019 data in table 5 and Appendix 6.

**Table 4: Summary of Local Authority discounts for non-implementation and land supply buffers<sup>11</sup>**

Local Authority	Non-implementation Discounts	Buffer to land supply
<b>Birmingham</b>	No	No
<b>Black Country</b>	Sites with planning permission (Inc. conversions) not yet under construction: 10% discount  Housing allocations on occupied employment land: 15% discount  Other housing allocations: 10% discount  Other commitments (SHLAA sites): 10% discount*	No
<b>Solihull</b>	Draft Local Plan made provision for a 10% discount to be applied to sites with planning permission (only to those not commenced), sites identified in land availability assessments and adopted allocations.	The Draft Plan noted there was a surplus of 726 units through comparing supply with the housing requirement. This represents a 'margin' of 11% against the supply from new allocations and is akin to a buffer.
<b>Bromsgrove</b>	No	No
<b>Cannock Chase</b>	15% discount applied to all minor sites in deliverable	No

<sup>11</sup> This table relates to adjustments to housing trajectories and not 5-year Housing Land Supply calculations

	supply and all sites in developable supply (bar those that are under construction and/or constitute a major site which is phased over from deliverable supply)	
<b>Lichfield</b>	Adopted Local Plan includes 5% non-implementation discount based on local evidence and confirmed at Examination in Public.	No, but potential need for buffer of appropriate scale to be considered as Local Plan review progresses.
<b>North Warwickshire</b>	5% flexibility rate on site allocations to ensure flexibility, choice and competition in the market for land.	No
<b>Redditch</b>	No	No
<b>South Staffordshire</b>	A 19% non-implementation rate is applied to small sites (9 or less dwellings), reflecting traditional lapses/delays in delivery on such sites in the District. This is not applied to sites of 10 or more units as these are usually greenfield sites	No
<b>Stratford on Avon</b>	No	Land supply includes a buffer of approximately 10% to offer flexibility
<b>Tamworth</b>	Non-delivery factor of 10% applied by Inspector to secure flexibility	No

\* Walsall other commitments without a lapsed permission have a discount of 15%

**Source:** Local Authorities

### **Potential Supply from Increasing Residential Densities**

- 3.6 The SGS sets out the benefits of higher density housing and notes that equally there are factors such as viability and deliverability in areas which do not commonly deliver higher density development. It does not advocate specific policies; instead it seeks to consider the extent to which an increase in densities could contribute towards addressing the housing shortfall. It estimates that up to 13,000 additional dwellings could be accommodated by applying average densities of 40 dwellings per hectare (dph) in Birmingham and the Black Country and 35 dph elsewhere. It suggests that local authorities should consider increasing densities through changing local plan policies and checking density estimates used when they refresh their SHLAAs; any increases would then filter through into increased capacity.
- 3.7 The 2018 Position Statement did not make any allowance for capacity gains that may arise from increased residential densities, particularly as some of the sites identified by the SGS may have been granted planning permission. Instead, it was for local authorities to estimate likely residential densities when updating their SHLAAS and to

set density standards through policy when reviewing local plans. It was also apparent that the blanket non-implementation discounts reduced capacity by 11,824 dwellings, broadly equivalent to the potential gains from a blanket density uplift. (13,000), so the two broadly cancelled each other. The revised NPPF places greater emphasis on making effective use of land and requires local authorities to consider minimum density policies. The 2019 based data reflects any adjustments local authorities have made to their land supply estimates already and local plan reviews (for example the Black Country) will continue to explore the possibility of increasing densities.

### **Contribution towards the Coventry and Warwickshire Housing Market Area (CWHMA)**

- 3.8 As explained in paragraph 2.9 Stratford-on-Avon and North Warwickshire straddle the GBBCHMA and the CWHMA. Consequently, their entire supply of housing land cannot be assumed to meet GBBCHMA needs. Like Birmingham, Coventry was not able to meet its OAN within its administrative boundary and has signed a MoU with the Warwickshire Districts in order to distribute this unmet need. The agreed MoU states that 2,880 dwellings in Stratford-on-Avon and North Warwickshire's local plans are to meet unmet needs within the CWHMA. Therefore, this contribution must be deducted from the GBBCHMA housing land supply.

### **Potential Contributions from beyond the GBBCHMA**

- 3.9 In line with the SGS, the principal focus of this statement is the GBBCHMA. It is evident, however, that HMAs are not hermetically sealed and that there are population flows between them. The local planning authorities of Telford and Wrekin, and Shropshire, which adjoin the GBBCHMA, have defined separate, single authority HMAs. The adopted plans for both authorities do not make any direct provision to accommodate any of the GBBCHMA shortfall but the Shropshire Draft Plan (Regulation 18) (July 2020)<sup>12</sup> proposes a contribution of 1,500 dwellings towards the Black Country shortfall. The review of the Telford and Wrekin Plan is at an early stage and no formal decision has been made yet regarding the level of growth.

## **4 Comparing Housing Need and Housing Land Supply**

### **Shortfall 2011 - 2031**

- 4.1 Table 5 compares the SGS baseline housing need figure, with the 2017 baseline (published and revised) and 2019 supply estimates for the period 2011 – 31. Over this period there were three plans (Birmingham, Cannock Chase and Tamworth) with shortfalls that had been formally established through public examination. The latest monitoring suggests that the shortfall is now 2,597 dwellings, a fall of 13,728 since the SGS baseline was established. It is considered that the pre 2031 shortfall will continue to fall as local plan reviews progress as indicated in Appendix 2. As these reviews progress it will become clearer as to the extent of their capacity pre and post 2031 and this will be reported in future statements.

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<sup>12</sup> <https://shropshire.gov.uk/committee-services/documents/s24933/Local%20Plan%20Pre%20Submission%20Draft%20-%20Cabinet%20Report%2020-07-2020.pdf>

### Shortfall post 2031

- 4.2 The Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update of up to 29,260 between 2019 and 2038, against LHN. Whilst this shortfall starts to arise during the term of this position statement and is estimated to be 7,485 up to 2031, the majority (over 20,000 homes), will arise post 2031. This is being considered through the Black Country Plan review and associated Duty to Cooperate discussions with neighbouring local authorities and is subject to revision as more work is undertaken and this will be reported in future statements. The HMA shortfall post 2031 will be further informed by the review of the Birmingham Development Plan when it commences.
- 4.3 Whilst formal shortfalls have only been tested and established over the period 2011 to 2031 it is clear that a further shortfall is emerging post 2031. This shortfall has not been established through adopted or submitted plans, nor tested in emerging draft plans, for those areas giving rise to the shortfall. However, how this emerging shortfall can be met will be the subject of ongoing duty to co-operate discussions.

### Changes in land supply over time

- 4.4 Table 6 sets out the changes in housing capacity for each local authority over time. The data is not directly comparable as the SGS baseline and 2017 updates did not make any discounts for non-implementation or blanket increases for density uplifts. This is justified as the two effectively cancelled each other out. As monitoring has been refined, however, non-implementation discounts and gains due to higher density assumptions have been applied in accordance with local practices. It is considered that this gives a more accurate and consistent reflection of land supply.

**Table 5: Housing Shortfall for the GBBCHMA 2011 – 31: SGS Baseline, 2017 updates and 2019 update**

	<b>SGS Baseline (2011 – 31)</b>	<b>2017 update (published) (2011 - 31)</b>	<b>2017 Update (revised) (2011 – 31)</b>	<b>2019 Update (2011 – 31)</b>
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099
Contribution to CWHMA	-2880	-2880	-2880	-2880
Minimum housing requirement	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,283	199,238	205,382
<b>Total shortfall</b>	<b>16,325</b>	<b>10,696</b>	<b>8,741</b>	<b>2,597</b>

4.6 Appendices 3 – 6 set out in detail where capacity estimates have changed by local authority and by the development status of the land; this is summarised in Table 6. Birmingham is by far the main source of this increase having identified capacity for a further 13,942 dwellings since 2017, a 27% increase. This is due to many previously unidentified sites coming forward and is consistent with the Birmingham Development Plan Inspector’s report,<sup>13</sup> which states that windfall estimates may be exceeded. Elsewhere, previously identified capacity has declined, this is particularly apparent in Sandwell where capacity for 5,106 dwellings has been removed following the Black Country Urban Capacity Review Update 2019. In the main, the sites identified are now expected to remain in active employment use rather than come forward for housing.

**Table 6: Change in housing capacity (2011-31) by Local Authority 2017 (SGS baseline) to 2019<sup>14</sup>**

LPA	2017 SGS	2019	change	%	LPA	2017 SGS	2019	change	%
<b>Birmingham</b>	51458	65400	13942	27%	<b>Sandwell</b>	19930	14824	-5106	-26%
<b>Bromsgrove</b>	5099	5335	236	5%	<b>Solihull</b>	15717	17273	1556	10%
<b>Cannock Chase</b>	4615	4969	354	8%	<b>South Staffordshire</b>	3493	4090	597	17%
<b>Dudley</b>	17918	17514	-404	-2%	<b>Stratford on Avon</b>	16713	16624	-89	-1%
<b>Lichfield</b>	10973	11287	314	3%	<b>Tamworth</b>	4495	5267	772	17%
<b>North Warwickshire</b>	9060	9071	11	0%	<b>Walsall</b>	10879	12155	1276	12%
<b>Redditch</b>	7488	7329	-159	-2%	<b>Wolverhampton</b>	13816	14244	428	3%
					<b>Total</b>	191654	205382	13728	7%

## 5 Options for Addressing Unmet Need

5.1 Detailed consideration of where need can be met is ongoing across the authorities, in 2018 an initial piece of work known as the Greater Birmingham Strategic Growth Study was published (see footnote 1). This is an independently prepared, objective study and not a policy statement. It does not commit the participating authorities to any one approach, nor does it exclude the testing of alternatives for where need can be met, but formed a significant part of the evidence base for the commencement of the Local Plan review process.

## 6 Conclusions

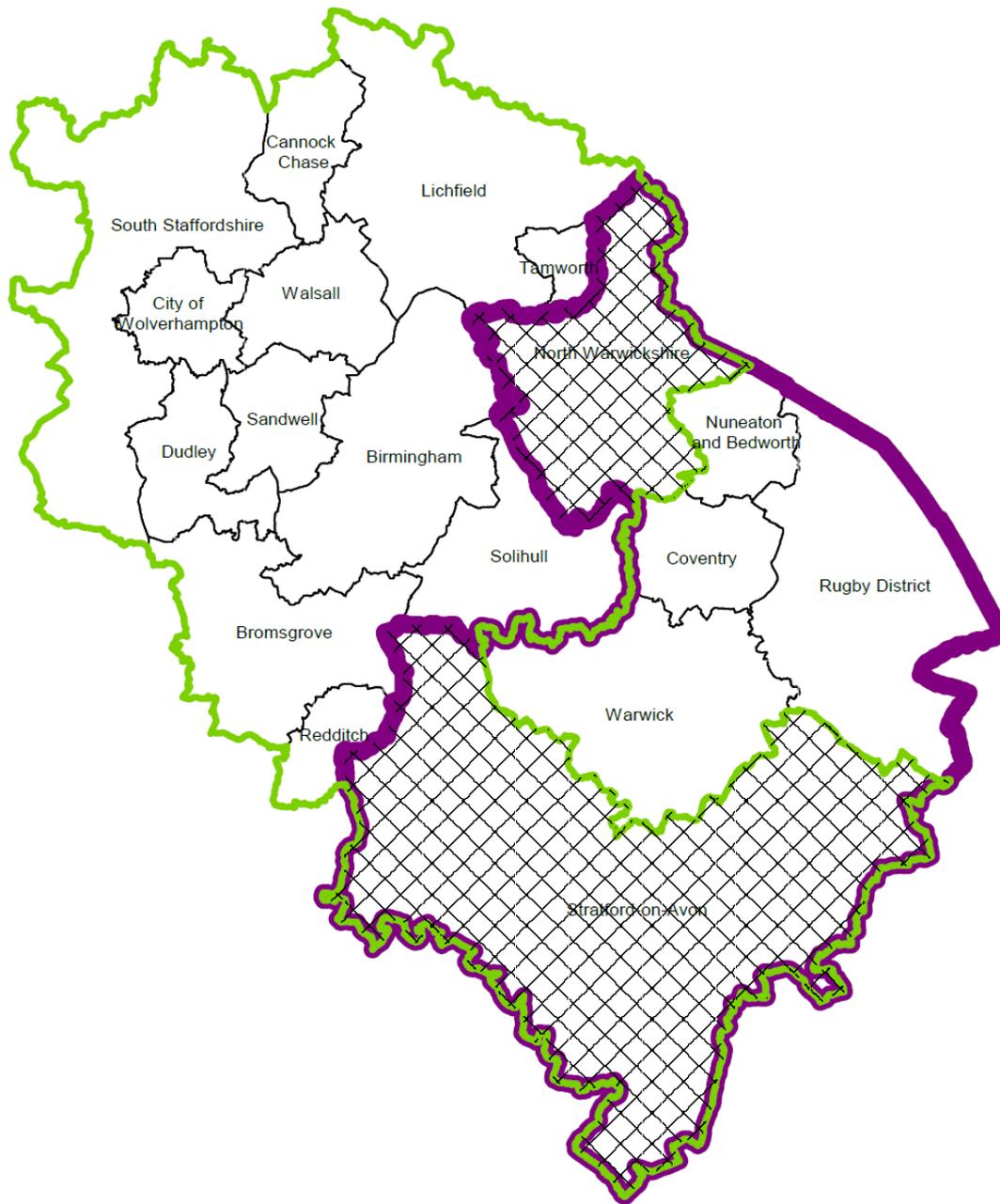
6.1 Monitoring since the adoption of the Birmingham Development Plan in 2017 and the publication of the SGS in 2018 suggests that good progress has been made in meeting the HMA shortfall for the period 2011-31. It is conceded that future completions might slow in the short term because of the COVID19 crisis but as of 2019, there were 97,000 homes either allocated in local plans or with planning permission. As the 2019 data includes local adjustments for non-implementation and density increases where local authorities consider this appropriate, it is not directly comparable with the SGS baseline and the 2017 update; however, it is considered that these local adjustments give a more accurate estimate of housing land supply.

<sup>13</sup> [https://www.birmingham.gov.uk/downloads/file/2626/bdp\\_inspectors\\_reportpdf](https://www.birmingham.gov.uk/downloads/file/2626/bdp_inspectors_reportpdf) see paragraph 58

<sup>14</sup> The North Warwickshire Local Plan review extends to 2033, for consistency the final two years of the housing trajectory have been removed

- 6.2 The 2011-31 shortfall is now estimated to be 2,597, a fall of 13,728 since the SGS baseline was established, and it is considered that it will fall further as local plan reviews progress. Most of the additional capacity has come forward in Birmingham where many previously unidentified sites have been granted planning permission. Elsewhere, there have been reductions in capacity estimates, most notably in the Black Country where the Urban Capacity Review Update considers that many employment sites previously identified as suitable for housing will remain in active employment use.
- 6.3 It is, however, now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially other authorities, is not yet known, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated. It is evident, however, that a number of HMA local plan reviews (e.g. South Staffordshire, Lichfield and Cannock Chase) are considering levels of growth above local need, up to and beyond 2031. There may also be scope for contributions from local authorities outside the HMA but with a strong functional link to it, such as Shropshire, to help address the shortfall up to and beyond 2031.

**Appendix 1  
Housing Market Areas**



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Date:26/8/2020  
Scale 1:



**KEY**

-  Coventry and Warwickshire Housing Market Area
-  Greater Birmingham and Black Country Housing Market Area
-  Areas Of Overlap
-  Local Authority Boundaries

## Appendix 2: GBBCHMA Local plan review progress including shortfalls and contributions

Local Authority	Plan timeframe	Dwelling shortfall	Latest published document and link	Next key stages
Birmingham (adopted)	2011-31	37,900	<p>The 2011-19 AMR states that an early review (after three years BDP adopted January 2017) is not required.</p> <p><a href="https://www.birmingham.gov.uk/downloads/file/14798/authority_monitoring_report_2018_to_2019">https://www.birmingham.gov.uk/downloads/file/14798/authority_monitoring_report_2018_to_2019</a></p>	<p>The revised LDS states that... <i>'the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in the next version of the LDS by January 2022.'</i></p> <p><a href="https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2">https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2</a></p>
Black Country (review)	2019 – 2038 (UCR)	29,260	<p>Issues and Options document published Summer 2017.</p> <p><a href="https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf">https://blackcountryplan.dudley.gov.uk/media/11458/cs_final_amended_200717.pdf</a> estimates shortfall of 21,670 homes over the period 2014-36 plus 3000 to test to meet Birmingham's needs.</p> <p>Urban Capacity Review (UCR), December 2019.</p> <p><a href="https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf">https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf</a></p> <p>revises estimate of shortfall to 29,260 (2019-2038) against an overall LHN of 71,459, with an estimated shortfall of 7,485 up to 2031. The UCR estimates that up to a further 2,370 homes could be brought forward in the urban area through the new Black Country Plan via density uplifts and additional capacity in Strategic Centres. This will be tested further through the plan review and is not included in the figures elsewhere in this statement.</p>	<p>Regulation 18 consultation August – September 2021</p> <p>Regulation 19 pre-submission consultation August – September 2022</p> <p>Submission to SoS March 2023</p> <p>Examination April 2023 – March 2024</p> <p>Adoption April 2024</p> <p><a href="https://blackcountryplan.dudley.gov.uk/t2/p1/">https://blackcountryplan.dudley.gov.uk/t2/p1/</a></p>
<b>Total</b>		<b>67,160</b>		

Local Authority	Plan timeframe	Dwelling contribution	Latest published document and link	Next key stages
South Staffordshire (review)	2018--38	Up to 4,000	Spatial Housing Strategy & Infrastructure Delivery, October 2019  <a href="https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm">https://www.sstaffs.gov.uk/planning/spatial-housing-strategy-infrastructure-delivery.cfm</a>	Preferred Options – Summer 2021. Publication – Summer 2022.  Submission of Local Plan – Winter 2022.  Local Plan Examination – Spring 2023  Adoption of Local Plan – Winter 2023  <a href="https://www.sstaffs.gov.uk/doc/181628/name/LDS%20June%202020%20Final%20for%20Website.pdf/">https://www.sstaffs.gov.uk/doc/181628/name/LDS%20June%202020%20Final%20for%20Website.pdf/</a>
Lichfield (review)	2018-40	4,500	Preferred Option, consultation completed January 2020.  <a href="https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?Cid=138&amp;Mid=1533&amp;Ver=4">https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?Cid=138&amp;Mid=1533&amp;Ver=4</a>	Publication (regulation 19 consultation) Winter 2020 / 21  Submission Spring 2021
Cannock Chase (review)	2018-36	500-2,500	Issues and Options, May 2019  <a href="https://www.cannockchasedc.gov.uk/residents/planning/planning-policy/cannock-chase-local-plan">https://www.cannockchasedc.gov.uk/residents/planning/planning-policy/cannock-chase-local-plan</a>	The LDS is being updated in the light of the COVID 19 crisis
Solihull (review)	2018-2035	2,000	Supplementary consultation, July 2019  <a href="https://www.solihull.gov.uk/lpr">https://www.solihull.gov.uk/lpr</a>	LDS Updated in January 2020  <a href="https://www.solihull.gov.uk/Portals/0/Planning/Local_Development_Scheme_Jan_2020.pdf">https://www.solihull.gov.uk/Portals/0/Planning/Local_Development_Scheme_Jan_2020.pdf</a>  Submission draft Summer 2020  Examination Winter 2020 – 21  Adoption Spring Summer 2020/21

North Warwickshire (review)	2014-2033	3,790 + 620	<a href="https://www.northwarks.gov.uk/info/20002/planning/1444/local_plan_examination">https://www.northwarks.gov.uk/info/20002/planning/1444/local_plan_examination</a> Plan examination commenced September 2018. Makes a direct 10% contribution to BDP shortfall (3,790 which includes 500 to meet unmet Tamworth need), plus an additional 940 above own demographic need for workforce / economic uplift apportioned 65% GBBCHMA / 35% C&WHMA (620/320). Principles of latter tested through Warwick District Council and Coventry City Council examination hearings.	Further progression of examination was dependent on outcome of the HIF bid for A5 highway works, then hearings were suspended due to the Covid 19 crisis. MCHLG and Highways England have now confirmed to the County Council that the A5 highway funding will be delivered outside of HIF Bid process and primarily through the RIS process-
Bromsgrove (review)	2023-40 (provisional)	To be determined	District Plan Review Update and Call for Sites Consultation (September 2019). Yet to be determined what share of shortfall to be tested / accommodated.	Two rounds on consultation have taken place, including a call for sites. Preferred option being worked and timetable for publication to be confirmed.
Stratford on Avon (adopted)	2011-2031	2,720	Site Allocations Plan being prepared identifying further circa 2,900 homes for reserve purposes, including contributing towards housing arising from outside Coventry & Warwickshire, although releasing reserve sites for other reserve purposes may also contribute to GBBCHMA. Revised Preferred Options Site Allocations Plan being prepared for consultation autumn 2020. <a href="http://www.stratford.gov.uk/siteallocations">www.stratford.gov.uk/siteallocations</a>	Policy CS.17 commits LPA to undertaking plan review if scale of unmet needs arising from outside the District needing to be met within the District cannot be adequately be met without a review. Work is expected to commence on the plan review in autumn 2020. <a href="http://www.stratford.gov.uk/corestrategy">www.stratford.gov.uk/corestrategy</a>
Tamworth (adopted)	2006-31	N/A	Local plan adopted 2016 and reliant on North Warwickshire and Lichfield to deliver surplus housing and employment land for needs which cannot be met in Tamworth. LDS indicates pre submission consultation document to be available early 2020. <a href="https://www.tamworth.gov.uk/sites/default/files/planning_documents/Local-Development-Scheme.pdf">https://www.tamworth.gov.uk/sites/default/files/planning_documents/Local-Development-Scheme.pdf</a> . Tamworth, however, is	Local authority has determined that the adopted local plan requires changes required that would best be addressed by the production of a new plan. The current LDS contained an unrealistic timeframe and is now out of date. New LDS to be prepared taking account of the potential impact of Covid 19.

			unlikely to be able to meet any needs from wider HMA due to its own capacity constraints.	
Redditch (adopted)	2011-30	N/A	Redditch has shortfall of 3,600 dwellings, which is been met through the adopted Bromsgrove local plan. There is no timetable for reviewing the Redditch local plan and consequently it is unlikely to be able to meet any wider HMA need.	Plan making timetable to be published in due course.
Total		<b>18,130 - 20,130</b>		

### Appendix 3: GBBCHMA - Land supply summary table 2011 - 31 SGS baseline

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	16,668	1,073	2,660	3,320	5,426	1,135	1,295	4,142	2,262	937	8,254	3,133	2,623	2,831	55,759
Allocations - Adopted Plans	9,435	1,871	81	8,752	1,200		4,694	10,417	2,470		5,605	455	106	4,399	49,485
Proposed Allocations - (current SADs / new Local Plans)	335		861		2,552	6,158			6,842	891			1,804		19,443
Additional Urban Supply	10,489	165	134	1,200		38	359	685	286	70			1,646	2,042	17,114
Windfall	4,525	440	154	1,650	605	660	121	1,320	1,650	330	407	407	891	1,677	14,837
Completions	10,006	1,550	725	2,996	1,190	1,069	1,019	3,366	2,207	1,265	2,447	500	3,809	2,867	35,016
<b>Total</b>	<b>51,458</b>	<b>5,099</b>	<b>4,615</b>	<b>17,918</b>	<b>10,973</b>	<b>9,060</b>	<b>7,488</b>	<b>19,930</b>	<b>15,717</b>	<b>3,493</b>	<b>16,713</b>	<b>4,495</b>	<b>10,879</b>	<b>13,816</b>	<b>191,654</b>
Supply baseline to 2030/31	41,452	3,549	3,890	14,922	9,783	7,991	6,469	16,564	13,510	2,228	14,266	3,995	7,070	10,949	156,638

### Appendix 4: GBBCHMA – Land supply summary table 2011 – 2031 (as at 1<sup>st</sup> April 2017)

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
Sites with planning permission	17,298	1,073	2,545	3,489	5,426	1,135	1,295	3,345	3,437	937	10,447	3,133	2,623	5,038	61,221
Allocations - Adopted Plans	8,587	1,871	81	7,080	1,200		4,694	10,606	1,146		2,190	455	106	3,724	41,740
Proposed Allocations - (current SADs / new Local Plans)	159		695		2,552	6,158			6,842	891			1,804		19,101
Additional Urban Supply	13,757	165	362	612		38	359	725	221	70			1,646	856	18,811
Windfall	5,910	440	140	1,991	605	660	121	1,309	1,500	330	370	407	891	1,644	16,318
Completions	10,887	1,550	1,097	3,784	1,190	1,069	1,019	4,267	2,649	1,265	3,562	500	3,809	3,444	40,092
<b>Total</b>	<b>56,598</b>	<b>5,099</b>	<b>4,920</b>	<b>16,956</b>	<b>10,973</b>	<b>9,060</b>	<b>7,488</b>	<b>20,252</b>	<b>15,795</b>	<b>3,493</b>	<b>16,569</b>	<b>4,495</b>	<b>10,879</b>	<b>14,706</b>	<b>197,283</b>
Remaining capacity to 2030/31	45,711	3,549	3,823	13,172	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3,995	7,070	11,262	157,191

**Appendix 5: GBBCHMA - Land supply summary table 2011 - 31 (as at 1<sup>st</sup> April 2017 (REVISED))**

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
<b>Sites with planning permission</b>	17,298	1,073	2,545	3,776	5,426	1,135	1,295	3,345	3,437	937	10,447	3,133	2,623	5,038	61,508
<b>Allocations - Adopted Plans</b>	8,587	1,871	81	7,570	1,200		4,694	10606	1,146		2,190	455	106	3,724	42,230
<b>Proposed Allocations - (current SADs / new Local Plans)</b>	159		695	0	2,552	6,158			6842	891			1,804		19,101
<b>Additional Urban Supply</b>	13757	165	362	1790		38	359	725	221	70			1,646	856	19,989
<b>Windfall</b>	5910	440	140	1991	605	660	121	1,309	1,500	330	370	407	891	1,644	16,318
<b>Completions</b>	10,887	1,550	1,097	3,784	1,190	1,069	1,019	4,267	2,649	1,265	3,562	500	3,809	3,444	40,092
<b>Total</b>	<b>56,598</b>	<b>5,099</b>	<b>4,920</b>	<b>18,911</b>	<b>10,973</b>	<b>9,060</b>	<b>7,488</b>	<b>20,252</b>	<b>15,795</b>	<b>3,493</b>	<b>16,569</b>	<b>4,495</b>	<b>10,879</b>	<b>14,706</b>	<b>199,238</b>
<b>Rmainining capacity to 2030-31</b>	45,711	3,549	3,823	15,127	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3995	7,070	11,262	159,146

**Appendix 6: GBBCHMA - Land supply summary table 2011 - 31 (as at 1<sup>st</sup> April 2019)**

	Birmingham	Bromsgrove	Cannock Chase	Dudley	Lichfield	North warwickshire	Redditch	Sandwell	Solihull	South staffordshire	Stratford on Avon	Tamworth	Walsall	Wolverhampton	Total
<b>Sites with planning permission</b>	21,305	560	2,227	2,569	6,221	1,279	753	2,966	3,425	1,319	8,036	3,328	2,412	4,658	61,058
<b>Allocations - Adopted Plans</b>	7,837	1,871	69	6,500	1,877	0	4,516	4646	1,146	691	1,770	460	1,788	2,836	36,007
<b>Proposed Allocations - (current SADs / new Local Plans)</b>	251	0	0	0	0	5,612	0	0	5370	0	180	0	0	0	11,413
<b>Additional Urban Supply</b>	12923	163	605	1457	0	10	178	251	1114	17	0	0	1,709	983	19,410
<b>Windfall</b>	4760	400	112	1701	385	600	88	1,224	2,000	270	370	456	927	818	14,111
<b>Completions 2011/2 - 18/19</b>	18,324	2,341	1,956	5,287	2,804	1,570	1,794	5,737	4,218	1,793	6,268	1023	5,319	4,949	63,383
<b>Total</b>	<b>65,400</b>	<b>5,335</b>	<b>4,969</b>	<b>17,514</b>	<b>11,287</b>	<b>9,071</b>	<b>7,329</b>	<b>14,824</b>	<b>17,273</b>	<b>4,090</b>	<b>16,624</b>	<b>5,267</b>	<b>12,155</b>	<b>14,244</b>	<b>205,382</b>
<b>Remaining capacity to 2030-31</b>	47,076	2,994	3,013	12,227	8,483	7,501	5,535	9,087	13,055	2,297	10,356	4244	6,836	9,295	141,999