

Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (September 2018)

1 Introduction

- 1.1 This second position statement draws upon the Strategic Growth Study (SGS, GL Hearn/ Wood, 2018), which was commissioned by the 14 Local Planning Authorities to establish the extent to which the Greater Birmingham and Black Country Housing Market Area¹ (GBBCHMA) can meet its own housing needs up until 2031 and 2036. The SGS was published on all participating local authorities' websites along with an initial position statement².
- 1.2 The statement extracts the most relevant information regarding housing need and supply from the SGS and updates as appropriate where additional information is available. It also sets out the timetables for plan reviews for GBBCHMA authorities. It is anticipated that this statement will provide a starting point from which future Statements of Common Ground, as required by the revised 2018 National Planning Policy Framework (NPPF), can develop.
- 1.3 The Birmingham Development Plan (BDP, adopted January 2017) identifies a shortfall of 37,900 dwellings for the period 2011 – 31. Policy TP48 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.
- 1.5 The revised North Warwickshire Local Plan (2011-33) has been submitted for examination and this will be tested against the 2012 NPPF.
- 1.6 This statement provides a context for both the North Warwickshire Local Plan review examination and for monitoring of the BDP in accordance with Policy TP48. Therefore, for the purposes of this statement, the Objective Assessment of Need (OAN) method from the 2012 NPPF will be used rather than the Local Housing Need (LHN) standard method introduced through the revised 2018 NPPF. The LHN will

¹ 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

² https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study

provide the context for subsequent statements, plan reviews and examinations (see Appendix 1).

- 1.7 The statement covers the period 2011 to 2031 as this is the timeframe within which the BDP shortfall should be met and the North Warwickshire local plan review is making a contribution towards this. Future statements will need to be extended to 2036 to reflect new local plan end dates and provide for fifteen year time periods as required by the revised NPPF.

2 **Housing Need**

Objective Assessments of Need for Individual Authorities

- 2.1 The starting point for determining an OAN is the official household projections. If necessary these are 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. Within the GBBCHMA eight local plans have been adopted post NPPF. Only South Staffordshire and the Black Country are yet to 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.

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

Local Authority	Plan Period	OAN	OAN dpa	Study
Birmingham	2011-31	89,000	4450	PBA Stage 2 Study
Bromsgrove	2011-30	6,648	350	Amion/ Edge Housing Needs Assessment Report, Aug-14
Cannock Chase	2006-28	5,800	264	NLP Implications of CLG 2011 Household Projections, 2013
Lichfield	2008-29	8,600	430	NLP Implications of CLG 2011 Household Projections, 2013
Redditch	2011-30	6,400	337	Amion/ Edge Housing Needs Assessment Report, Aug-14
Solihull	2014-33	14,277 ³	751	PBA 2016
Tamworth	2006-31	6,250	250	NLP Implications of CLG 2011 Household Projections, 2013
North Warwickshire	2011-29	3,150	175	2013 Cov/War SHMA Update
Stratford-on-Avon	2011-31	14,600	730	ERM 2016
Black Country ⁴	2014-36	78,190	3554	PBA 2016
South Staffordshire	2014-36	5,933	270	PBA 2016
HMA Total	-	-	11,513	

- 2.2 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

³ Solihull's OAN figure includes an upward adjustment to take account of under-provision between 2011 and 2014.

⁴ Joint Core Strategy for Dudley, Sandwell, Walsall and Wolverhampton

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.

2.3 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. This final plan housing requirement may be higher or lower than the OAN dependent upon circumstances.

2.4 As is shown in Table 2, 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

Table 2: Plan Housing Requirements and Unmet Need in the GBBCHMA Authorities

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

2.5 As set out in Table 2, there are four plans either adopted or emerging which make a formal commitment to meeting part of this unmet need.

2.6 Solihull's draft local plan is making provision for a 2000 dwelling contribution towards Birmingham's unmet needs to 2033.

- 2.7 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.
- 2.8 Both North Warwickshire and Stratford-on-Avon sit within two HMAs - the GBBCHMA and the Coventry and Warwickshire HMA (CWHMA). The CWHMA authorities have an agreed 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.
- 2.9 Stratford-on-Avon makes provision for 5,400 homes up to 2031 beyond its own demographic needs, which is split equally between the two HMAs. It thus contributes 2,720 to meeting unmet needs within the GBBCHMA. North Warwickshire is making provision through its submitted Local Plan to meet 4,410⁵ of the GBBCHMA shortfall, which specifically includes 500 homes towards Tamworth's unmet needs.
- 2.10 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.
- 2.11 In addition, whilst there is not a specific unmet need arising from the Black Country authorities at this point, the Black Country Core Strategy review is underway and rolls forward to 2036. The 2017 Issues and Options report identifies a shortfall of 21,670 homes when comparing supply within the urban area to identified needs. The document states that the shortfall arises predominantly in the period 2031 – 36. The document also states that the review will test the accommodation of 3,000 homes of unmet housing need from the wider GBBCHMA.

Housing Need figure to be used for the GBBCHMA

- 2.12 As there is no consistent OAN for the GBBCHMA as a whole, 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.
- 2.13 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

⁵ Within this 620 is counted as an economic uplift together with a further 3,790 to meet the needs of the HMA. See SGS page 51 for more detail.

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.

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 Consistent monitoring information is now available for the period 2011 to 2017 and is compared with that published in the SGS in table 3. It is apparent that additional capacity has been identified, mainly within Birmingham. Summaries of the SGS baseline and the 2017 update by local authority are attached as appendices 2 and 3.

Table 3: Housing Land Supply for the GBBCHMA 2011 – 31: SGS baseline and 2017 Update

	SGS Baseline (2011-31)	2017 Update (2011-31)
Total Supply	191,654	197,283
of which:		
Completions	35,016	40,092
Sites with planning permission	55,759	61,211
Allocations in adopted plans	49,485	41,740
Proposed allocations in emerging plans	19,443	19,101
Additional urban supply	17,114	18,811
Windfalls	14,837	16,318

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 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.

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 prejudge 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 It is, therefore, a matter of judgement for each local authority to determine the extent to which non-implementation discounts should apply and reflect this as they update their SHLAAs. For example, the Black Country has recently published an Urban Capacity Review (May 2018)⁶, which proposes retaining the 10% discount on sites with planning consent used in the adopted Core Strategy.

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 set 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 Consequently, this statement does 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 now have been granted planning permission. Instead, it is for local authorities to estimate likely residential densities when updating their SHLAAS and to set density standards through policy when reviewing local plans. The revised NPPF places greater emphasis on making effective use of land and requires local authorities to consider minimum density policies.

⁶ <http://blackcountrycorestrategy.dudley.gov.uk/t2/>

Contribution towards the Coventry and Warwickshire Housing Market Area

- 3.8 As explained in para's 2.8-2.9, 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 in a position to meet all of 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. Both authorities are planning for housing growth above demographically driven local housing need. No specific authorities have as yet been identified as potential sources for any net in migration. Both local authorities are also Non-Constituent members of the West Midlands Combined Authority and as such will be covered by its emerging Spatial Investment and Delivery Plan.

4 Comparing Housing Need and Housing Land Supply

- 4.1 Table 4 compares the SGS baseline housing need figure and unadjusted land supply position with an updated supply position as of April 1st 2017. This suggests that the shortfall has fallen by 5,629 homes. It should be noted that the land supply figures are unadjusted whereas the headline figures provided in the SGS have non-implementation rates applied. Local authority's approaches to undertaking SHLAAs differ and many do not include non-implementation rates whereas the Black Country, for example, has recently published its Urban Capacity Review, which applies higher rates than the SGS.
- 4.2 This statement does not include estimates of gains that could be made from increased densities, whereas the SGS estimates that approximately 13,000 additional dwellings could be delivered if minimum densities of 35 – 40 dph were applied to sites without permission across the HMA. Local authorities will need to consider this matter further as they update their SHLAAs and review their Plans, particularly in the light of the revised 2018 NPPF.

Table 4: Housing Shortfall for the GBBCHMA 2011 – 31: SGS Baseline and 2017 Update

	SGS Baseline (2011 – 31)	2017 Update (2011 – 31)
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099
Contribution to CWHMA	-2880	-2880
Minimum housing requirement	207,979	207,979
Supply baseline (unadjusted)	191,654	197,283
Total shortfall	-16,325	-10,696

5 Options for Addressing Unmet Need

5.1 Having established supply and need parameters, the SGS proceeded to examine options for meeting the shortfall both beyond and within the Green Belt. The methodology is summarised below.

Beyond Green Belt

5.2 For areas beyond the Green Belt, the study mapped nationally significant constraints such as flood plains, AONB, SSSI's and National Parks and Gardens, and identified relatively unconstrained locations. The strategic transport network was overlaid to refine areas of search and these were then subjected to landscape appraisal and high level viability assessment.

Within Green Belt

5.3 In the case of land within the Green Belt, a further appraisal stage was added. Physical features such as motorways, A roads and railway lines were used to define 120 parcels. These parcels were assessed against four of the five purposes of Green Belt as defined in national policy:

- preventing sprawl,
- preventing towns merging into each other,
- safeguarding the countryside from encroachment and
- preserving the setting and character of historic towns.

5.4 Assisting in urban regeneration was excluded as it was assumed all Green Belt land fulfils this purpose.

5.5 These parcels were categorised as providing either a Principal or Supporting Contribution to Green Belt purposes. Although making a Principal Contribution provided a starting point for selecting areas of search, clear exceptions were applied for highly sustainable locations, such as areas close to a railway station.

Spatial Development typologies

5.6 Once areas of search had been identified, a series of spatial development typologies (as defined through previous Peter Brett Associates work) to support development of 1500+ homes were identified, as follows:

- Urban Extensions (1,500 - 7,500 dwellings)
- Employment-led Strategic Development
- New Settlements (10,000+ dwellings)

5.7 In addition, a number of areas were identified within the Green Belt where “proportionate dispersal” might be appropriate, in terms of smaller scale developments (500 to 2,500 dwellings in the aggregate); this should be taken forward through the local plan process.

Sustainability Assessment

5.8 The spatial development typologies and areas of search were subject to sustainability and high level infrastructure assessments. The infrastructure assessment identified possible large scale highways and public transport infrastructure requirements alongside likely utilities investment.

Recommended Areas of Search

5.9 Drawing the analysis together, the study recommended 24 locations for further examination and shortlisted 11, which are summarised in Table 5.

Table 5: SGS Long List and Short List Locations

Short List	Long List
<p>New Settlements</p> <ul style="list-style-type: none"> • South of Birmingham • Between Birmingham and Bromsgrove / Redditch • Around Shenstone • Around Balsall Common 	<p>New Settlements</p> <ul style="list-style-type: none"> • Between Wolverhampton and Penkridge • Around Dunston • Around New Arley • Around Fradley and Alrewas • South West of Stratford-on-Avon District • Around Wellsbourne
<p>Urban Extensions</p> <ul style="list-style-type: none"> • South of Dudley • North of Tamworth • East of Lichfield • North of Penkridge 	<p>Urban Extensions</p> <ul style="list-style-type: none"> • South of Penkridge • South of Stafford • North west of Tamworth • East of Polesworth • South of Stratford-on-Avon town • South East of Redditch • North of Walsall around Brownhills
<p>Employment Led</p> <ul style="list-style-type: none"> • North of Wolverhampton (I54) • East of Birmingham • South of Birmingham Airport/ NEC 	

6 Plan Review Timetables

- 6.1 Most existing adopted plans were prepared prior to the BDP shortfall being formally established. In order that plan adoption was not delayed, commitments were included in plans to review once the scale of the shortfall was established. The exceptions to this are the Black Country and South Staffordshire, which have not yet prepared post NPPF plans.
- 6.2 The SGS was prepared as a means of identifying options for meeting surplus housing requirements, with the intention that these are tested through the local authority plan-making process. Table 6 sets out the current position regarding plan reviews for GBBCHMA authorities and includes reference to the SGS where appropriate.

Table 6: GBBCHMA Plan Review Timetables

Birmingham	LDS approved December 2017 does not include timetable to review Birmingham Development Plan https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/2
Bromsgrove	Local development scheme published April 2018. http://www.bromsgrove.gov.uk/media/3460514/Local-Development-Scheme-2018.pdf This LDS will shortly be reviewed The Bromsgrove Plan Review issues and option consultation is now scheduled to begin on the 24th September.
Solihull	Local Development Scheme published January 2018, key milestones http://www.solihull.gov.uk/Portals/0/Planning/LDF/Local-Development-Scheme-2018.pdf Publication of Submission Draft (for consultation) summer/autumn 2018 Submission to Secretary of State – winter 2018/19 Examination of plan – spring 2019 Adoption of the Local Plan Review – summer 2019
Lichfield	Local Development Scheme published 2017. https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Downloads/Local-Development-Scheme/Local-Development-Scheme-2017.pdf Scoping April 2018 Preferred Option: January 2019 Publication document: September 2019 Submission document: January 2020 Adoption: End of 2020 Consultation on the Local Plan Scope Issues and Options document concluded in June 2018. The document made reference to all six areas of search identified in the SGS and integrated these into specific options for future growth in Lichfield. Question 12 also specifically asked: <i>How should Lichfield District Council assist in meeting unmet needs arising from within the GBHMA?</i> https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Downloads/Local-plan-review/Local-Plan-Review-Scope-Issues-Options.pdf

North Warwickshire	<p>Local Plan review submitted to Secretary of State for examination, hearings to commence September 2018.</p> <p>The North Warwickshire Local Plan Review commits to meeting 4,410 of the GBBCHMA shortfall and is set out in a MoU, which has been submitted to the examination hearings (Appendix D to NWBC4, the Duty to Cooperate Paper).</p> <p>In terms of the SGS, the Local Plan Review proposes major development East of Polesworth, a long-listed site in the study.</p>
Cannock Chase	<p>LDS published April 2018. Local Plan review commenced, key milestones: Regulation 18 Issues and scope currently published for consultation Issues and options consultation February 2019 Preferred Option October 2019 Pre submission (regulation 19) consultation July 2020 Submission to Secretary of State for examination: December 2020 Examination March 2021 Adoption: September 2021 Consultation Local Plan Review (Issues and Scope document) concluded in August 2018.</p> <p>https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_review_full_doc_final.pdf</p> <p><i>Paragraph 5.46 states that: An initial 24 areas of search for large scale strategic growth (new settlements and large urban extensions) were narrowed down by the study to a short list of 11 areas, none of which are located in this District, although it should be noted in terms of cross-boundary implications that the area north of Walsall (Brownhills) was identified on the original 'long list'. For this District, the areas of search which we will need to investigate relate to smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District. However, we will need to consider these 'in the round' with other options for accommodating housing in the District.</i></p>
Tamworth	<p>LDS published March 2017. http://www.tamworth.gov.uk/sites/default/files/planning_docs/LDS_2017.pdf</p> <p>The current LDS references the potential early review but the LDS is being revised to reflect the new work programmes and whether an early review is carried out.</p>
Redditch	<p>Published Local Development Scheme (2016) does not include timetable to review Local Plan</p> <p>http://www.redditchbc.gov.uk/media/2180170/RBC-LDS-2016-2019.pdf</p>
Stratford-on-Avon	<p>Local Development Scheme published October 2017. Does not include a commitment to review Local Plan</p> <p>https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173513&name=SDC%20Local%20Development%20Scheme%20%2D%20Dec%202016.pdf</p> <p>Revised LDS expected December 2018.</p> <p>Council currently preparing a Site Allocations Plan to identify reserve sites capable of accommodating 20% of the housing requirement. Adoption expected 2019. Core Strategy Policies CS.16 and CS.17 commit the Council to bringing forward a review of the Core Strategy if the required scale of housing is beyond that which can be addressed through the Site</p>

	Allocations Plan.
Black Country	Issues and options consultation completed September 2017 http://blackcountrycorestrategy.dudley.gov.uk/t1/ Draft plan autumn 2019 Adoption 2021
South Staffordshire	Review to commence October 2018 with issues and options document. https://www.sstaffs.gov.uk/doc/179540/name/SAD%20Full%20Document%20June%202018.pdf Policy SAD1 in Site Allocations Document commits Council to submitting revised plan for examination to Secretary of State by the end of 2021.

Revised National Planning Policy Framework and Standard Method for calculating Local Housing Need

- (i) The revised NPPF 2018 sets out a standard method for establishing Local Housing need (LHN) to replace the OAN approach. This takes the demographic household projection as a starting point and then uplifts dependent on local affordability based on the ratio of median workplace earnings and average house prices. The LHN figure is then capped at 40% above the average annual housing requirement figure set out in any Plan adopted less than five years ago.
- (ii) The LHN method was first trailed through the MHCLG Planning for the right homes in the right places consultation in 2017, which provided worked examples for each local authority using the 2014 sub national household projections. For the GBBCHMA this resulted in a collective annual LHN of 10,294, very similar to the annualised SGS requirement of 10,255 (205,099 / 20). It is of note that the annual LHN figure provided for Birmingham is 3577, capped at 40% above its adopted local plan requirement of 2,555; this is significantly lower than the tested OAN of 4450.
- (iii) A MHCLG statement which accompanied the NPPF acknowledged that the 2016-based population projections indicated lower growth than previously and that this would have a corresponding impact on the 2016-based household projections which are to follow in September 2018. In light of this, Government will consider reviewing the standard method so that it aligns with house-building targets set out in the Housing White Paper once the household projections are published.

Appendix 2: 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	10417	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	10489	165	134	1200		38	359	685	286	70			1,646	2,042	17,114
Windfall	4525	440	154	1650	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
Total	51,458	5,099	4,615	17,918	10,973	9,060	7,488	19,930	15,717	3,493	16,713	4,495	10,879	13,816	191,654
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	3995	7,070	10,949	156,638

Appendix 3: GBBCHMA - Land supply summary table 2011 - 31 (as at 1st 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	10606	1,146		2,190	455	106	3,724	41,740
Proposed Allocations - (current SADs / new Local Plans)	159		695		2,552	6,158			6842	891			1,804		19,101
Additional Urban Supply	13757	165	362	612		38	359	725	221	70			1,646	856	18,811
Windfall	5910	440	140	1991	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
Total	56,598	5,099	4,920	16,956	10,973	9,060	7,488	20,252	15,795	3,493	16,569	4,495	10,879	14,706	197,283
2016/17 - 2030/31 supply	45,711	3,549	3,823	13,172	9,783	7,991	6,469	15,985	13,146	2,228	13,007	3995	7,070	11,262	157,191

