

18 December 2023
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Dear Carl

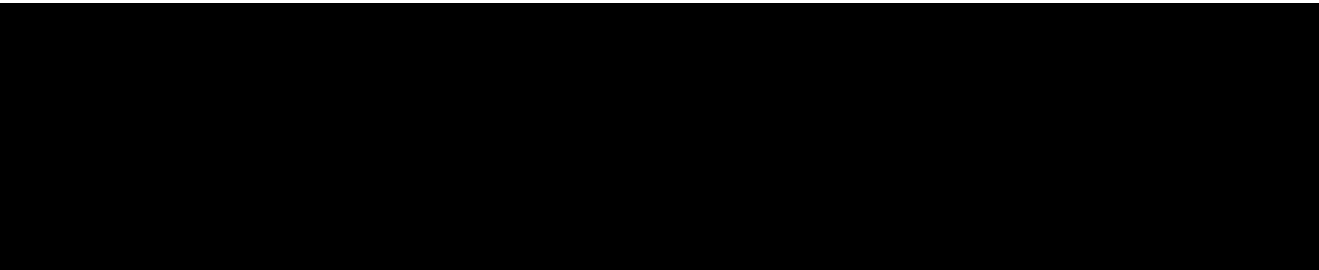
FALLING EVEN SHORTER – CONSORTIUM RESPONSE TO DUDLEY LOCAL PLAN

We write on behalf of a consortium of housebuilders and land promoters (listed below) to submit the enclosed Turley 'Falling Even Shorter: as updated review of unmet housing needs in the Greater Birmingham and Black Country Housing Market Area' report (December 2023).

- Bellway Strategic Land
- Catesby Estates Plc
- Gladman Developments Ltd
- Hallam Land Management
- Haworth Group Plc
- Taylor Wimpey
- Vistry Group Plc
- Wain Estates
- William Davis Homes

The report has assessed the conclusions of the most recent Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') updated Position Statement Addendum ('the Addendum') dates April 2023 but not published until October 2023. To reflect the Addendum, the report also assesses the housing need and supply for the plan period 2011-2031.

The Addendum claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time,



there is now additional monitoring data, and updated supply positions, which is not reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for 205,099 homes between 2011 and 2031, based on the GBBCHMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago. The standard method has since been introduced, offering the consistency the study itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the Strategic Growth Study scenario as an indicator of future needs.

Applying this from the 31 March 2023 base date and using the current outcome of the standard method which allows for worsening affordability and removal of the cap for Birmingham, the total housing need is **237,788 homes**. This approach best reflects national planning policy.

Against this need, based on the 14 authorities' claimed supply position, this would leave a shortfall of **34,742 homes up to 2031**. This rises to **40,676 homes** when applying the Turley supply position, which is based on the most up-to-date evidence.

Beyond 2031, the report calculates the unmet need as rising to 62,373 homes up to 2036, and 79,737 homes up to 2040, when extrapolating the available supply data. With the end of this plan period up to 2031 just over seven years away, this unmet need represents real people who are in real need of a home, now.

National Planning Policy Framework (December 2023) paragraph 35a) continues to make clear that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. This should be informed by agreement with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development.

There is no agreed strategy between the 14 GBBCHMA authorities as to how the unmet need up to 2031 will be accommodated, notwithstanding the significant scale of unmet need emerging beyond 2031. This is clear from Dudley's representation to Sandwell's Local Plan, objecting to their approach to addressing unmet needs.

In the absence of this strategic level agreement, all 14 GBBCHMA authorities should be exploring all growth options in order to meet its own objectively assessed needs and those of the wider GBBCHMA, if their plan is to be considered positively prepared.

In Dudley's case, it is clear that not all growth options have been explored to meet its own objectively assessed needs, let alone those of the wider HMA. The plan does not propose to meet the borough's own housing needs, exacerbating the shortfall of the wider HMA. In the context of NPPF paragraph 145 the borough's inability to meet its own needs, as well as the substantial scale of unmet need across the GBBCHMA, amount to exceptional circumstances for reviewing the borough's Green Belt boundaries.

In summary, the 14 GBBCHMA authorities should be seeking to agree a strategy now for how the unmet needs up to 2031 and beyond will be comprehensively met in full. As part of this all authorities should be exploring all options for growth, including the release of Green Belt land, given the unmet need represents exceptional circumstances for reviewing Green Belt boundaries.

