

GREATER BIRMINGHAM AND BLACK COUNTRY HOUSING MARKET AREA (GBBCHMA) POSITION STATEMENT ADDENDUM, April 2023

1. In December 2021 an addendum¹ was published to update the third Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement (published September 2020)² This second addendum updates key information to the year end 2020/21. The overall timeframe covered remains 2011-31. The reporting format follows that set out in the Strategic Growth Locations Study (GL Hearn / Wood, 2018).³
2. All data has been provided and verified by the fourteen GBBCHMA local planning authorities. The 2020/21 data is directly comparable with the 2018/19 data published in the 2020 Position Statement and the 2019/20 data in the 2021 addendum as it incorporates the local non-implementation discounts (September 2020 document, Table 4). The 2020/21 summary data (and that for previous years) by supply category is shown in table 1 below.

GBBCHMA summary of land supply by category

Table 1: GBBCHMA land supply summary (31st March 2021)

	SGS baseline	2017 published	2017 update (revised)*	2019	2020	2021
	2011-2031					
Total Supply:	191,654	197,273	199,238	205,382	201,677	205,926
of which						
Completions	35,016	40,092	40,092	63,383	75,607	84,809
Sites with planning permission	55,759	61,211	61,508	61,058	54,615	61,546
Allocations in adopted plans	49,485	41,740	42,230	36,007	27,802	21,372
Proposed Allocations in emerging plans	19,443	19,101	19,101	11,413	11,274	12,861
Additional urban supply	17,114	18,811	19,989	19,410	19,784	13,717
Windfalls	14,837	16,318	16,318	14,111	12,595	11,621

* Dudley MBC data revised only

3. The 2020/21 data shows that the capacity to accommodate new homes has increased to 205,926 compared to 201,677 in the previous year, a difference of 4,252. As Table 2 shows, Birmingham is responsible for identifying by far the largest share of additional capacity, sufficient to accommodate an additional 18,703 homes. Most of the lost capacity can be accounted for by Sandwell, where a review of land allocations has reduced the amount of occupied employment land likely to be available for housing. A full schedule of capacity identified by local authorities in 2021 is included as Appendix 1.

¹ [GBBCHMA housing supply and need position statement September 2020 \(updated December 2021\) | Birmingham City Council](#)

² [GBBCHMA housing supply and need position statement \(September 2020\) | Birmingham City Council](#)

³ [Greater Birmingham HMA Strategic Growth Study | Birmingham City Council](#)

Table 2: GBBCHMA Change in supply by Local Authority (SGS Baseline – 2021)

	SGS Baseline	Year-end 2017	Year-end 2019	Year-end 2020	Year-end 2021	Change SGS baseline to 2021	% change
Birmingham	51,458	56,598	65,400	67,529	70,161	18,703	36%
Bromsgrove	5,099	5,099	5,335	5,441	5,616	517	10%
Cannock Chase	4,615	4,920	4,969	5,597	5,843	1,228	27%
Dudley	17,918	18,911	17,514	16,420	16,411	- 1,507	-8%
Lichfield	10,973	10,973	11,287	10,155	10,275	- 698	-6%
North Warwickshire	9,060	9,060	9,071	9,920	9,935	875	10%
Redditch	7,488	7,488	7,329	7,449	7,344	- 144	-2%
Sandwell	19,930	20,252	14,824	11,460	12,369	- 7,561	-38%
Solihull	15,717	15,795	17,273	16,959	16,135	418	3%
South Staffordshire	3,493	3,493	4,090	4,438	4,545	1,052	30%
Stratford on Avon	16,713	16,569	16,624	16,082	16,510	- 203	-1%
Tamworth	4,495	4,495	5,267	4,913	4,347	- 148	-3%
Walsall	10,879	10,879	12,155	12,595	12,321	1,442	13%
Wolverhampton	13,816	14,706	14,244	12,719	14,114	298	2%
Total	191,654	199,238	205,382	201,677	205,926	14,272	7%

Calculating the shortfall

- Table 3 shows the estimated shortfall as at 2020/21 indicating that it is now 2,053, compared to 6,302 the previous year. As reported in the previous addendum and position statements, Stratford-on-Avon and North Warwickshire straddle the GBBCHMA and the Coventry and Warwickshire Housing Market Area (C&WHMA). Consequently, their entire supply of housing land cannot be assumed to meet GBBCHMA needs. Like Birmingham, Coventry was unable to meet its Objectively Assessed Need (OAN) within its administrative boundary and has signed a Memorandum of Understanding (MoU) with the Warwickshire Districts to distribute this. 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 (2011-31).

Table 3: GBBCHMA Change in Shortfall SGS Baseline - 2021

	SGS baseline	2017 published	2017 update (revised)	2019	2020	2021
GBBCHMA Housing Need (Strategic Growth Study baseline)	205,099	205,099	205,099	205,099	205,099	205,099
Contribution to CWHMA	- 2,880	- 2,880	- 2,880	- 2,880	- 2,880	- 2,880
Minimum Housing Requirement	207,979	207,979	207,979	207,979	207,979	207,979
Supply baseline	191,654	197,273	199,238	205,382	201,677	205,926
Total shortfall / surplus	- 16,325	- 10,706	- 8,741	- 2,597	- 6,302	- 2,053

Local Plan reviews

5. Appendix 2 sets out the position regarding local plan reviews in March 2023. The wider GBBCHMA contributions from North Warwickshire (3,790 homes) and Solihull (2,105 homes) local plan reviews are captured in the data in tables 1 – 3, as these Plans are adopted and at examination respectively. Table 4 sets out those local plans within the GBBCHMA that are at Regulation 19 stage and anticipate making contributions to the wider GBBCHMA shortfall. These potential contributions are not yet included in tables 1-3. Although not in the GBBCHMA, the Shropshire Local Plan review has identified additional housing capacity which would contribute towards the Black Country shortfall which forms part of the wider GBBCHMA shortfall, given its strong functional relationship with the Black Country.

Table 4: Potential further contributions - March 2023

Local Plan	Timeframe	GBBCHMA contribution
Lichfield Regulation 19, July 2021	2018-40	2,665 (2,000 to Black Country post 2027)
Cannock Chase - Regulation 19, September 2022	2018-38	500
South Staffordshire - Regulation 19, November 2022 ⁴	2018-38	4,000
Shropshire Examination commenced, July 2021	2016-38	1,500 towards Black Country shortfall

Looking ahead

6. This document focuses on the period 2011-2031, uses figures from the municipal year 2020/21 and deals primarily with the 37,900 home shortfall identified in the Birmingham Development Plan 2011 - 31 (BDP, adopted 2017⁵). As plans are now in the process of being reviewed their end dates will extend and housing need must be calculated using the Standard Method as required by the current National Planning Policy Framework and Guidance.
7. As of January 2022, the BDP became five years old and upon reaching this milestone its housing requirement became out of date and instead the Standard Method should be used until such time as a new requirement is set in a reviewed local plan. In late 2022 Birmingham City Council formally commenced the review of its plan and estimated a shortfall of 78,415 homes to 2042 in its Issues and Options document based on the Standard Method. The Standard Method calculation of Housing Need is higher than that used in the Strategic Growth Study baseline, which along with extended plan periods implies a much higher shortfall going forward. Further details and links can be found in Appendix 2.
8. In summer 2021, the Black Country Authorities consulted on a Regulation 18 Draft Black Country Plan which estimated a shortfall of 28,239 homes to 2039 based on the Standard Method. This is not reflected in the above information, which only extends to April 2021. Although progress on the Black Country Plan ceased in October 2022 in favour of separate

⁴ . Progress has been paused pending the outcome of the Government's proposed changes to national planning policy

⁵ [Adopted Birmingham Development Plan | Birmingham Development Plan | Birmingham City Council](#)

local plans for Dudley, Sandwell, Walsall, and Wolverhampton, this is the latest published estimate.

APPENDIX ONE															
GBBCHMA: Land supply by category as at 31 March 2021															
	Birmingham 2021	Bromsgrove 2021	Cannock Chase 2021	Dudley 2021	Lichfield 2021	North Warwickshire 2021	Redditch 2021	Sandwell 2021	Solihull 2021	South Staffordshire 2021	Stratford on Avon 2021	Tamworth 2021	Walsall 2021	Wolverhampton 2021	Total 2021
Sites with planning permission	27,474	1,049	1,203	3,148	4313	1254	590	3,044	2,155	1773	6,697	1,656	2,252	4,938	61,546
Allocations - Adopted Plans	5,791	1,366	58	2,969	870	5982	4,318	1495	315	268	850	387	1465	1,220	27,354
Proposed Allocations - (current SADs / new Local Plans)	0	0	0	0	719	0	0	0	6,018	0	142	0	0	0	6,879
Additional Urban Supply	7,111	102	1,329	1,832	0	0	97	298	353	0	0	0	1,845	750	13,717
Windfall	3,610	320	48	1,810	440	660	66	640	1,600	210	370	266	679	902	11,621
Completions 2011/12 - 20/21 (10 years)	26,175	2,779	3,205	6,652	3933	2039	2,273	6,892	5,694	2,294	8,451	2038	6,080	6,304	84,809
Total	70,161	5,616	5,843	16,411	10275	9935	7,344	12,369	16,135	4,545	16,510	4,347	12,321	14,114	205,926
Estimated land supply 21/22 - 30/31 (10 years)	43,986	2,837	2,638	9,759	6342	7896	5,071	5,477	10,440	2,251	8,059	2,309	6,241	7,810	121,116

APPENDIX TWO

SUMMARY OF GBBCHMA shortfall and potential contributions (April 2023)

Local Authority	Plan timeframe (for housing purposes ⁶)	Published housing shortfall	Latest published document and link	Next key stages
Birmingham (Plan review)	2020 -2042	78,415	A revised Local Development Scheme (LDS) was published in October 2022 Local Development Scheme for Birmingham Birmingham City Council and the issues and Options consultation took place October – December 2022 Issues and Options Consultation New Local Plan for Birmingham Birmingham City Council . This states a need of 149,286 homes with an estimated 78,415 shortfall.	Preferred Option (Regulation 18), October-November 2023 Publication / Pre-submission (Regulation 19), October 2024 Submission for examination (Regulation 22), June 2025
Black Country	2018 - 39	28,239	Regulation 18 Draft Black Country Plan published for consultation in August 2021. The overall housing need was 76,076 of which 47,837 could be accommodated leaving a shortfall of 28,239 homes. https://blackcountryplan.dudley.gov.uk/t2/p5/ Work on the Black Country Plan stopped in October 2022 when Dudley MBC formally withdrew from the process. The four local authorities are now preparing separate local plans (see below).	Not to be progressed
Dudley (First post NPPF local plan)	2024-2041		Local Development Scheme approved January 2023 Local Development Scheme Dudley Council	Regulation 18 Preferred Option, Summer 2023 (timescale to be reviewed in light of Government's review of national planning policy) Regulation 19 Publication Version, Spring / Summer 2024 Submission for examination, Autumn 2024

⁶ NPPG (para 008) requires local housing need to be updated up until Submission. Local housing need calculated using the standard method cannot be applied retrospectively. Therefore, the start date for housing purposes for any Local Plan will always be the monitoring year before Submission.

Sandwell (First post NPPF local plan)	2024-2041		Local Development Scheme published November 2022 Sandwell Local Development Scheme (LDS) Sandwell Council . Issues and Options published for consultation February – March 2023, this states that 30,300 homes are required and suggests a likely shortfall in provision but does not yet provide an estimate of this.	Regulation 18 Preferred Option, October 2023 Regulation 19 Submission Version, July 2024 Submission for examination, November 2024
Walsall (First post NPPF local plan)	2025-2040/42		Local Development Scheme approved November 2022 Microsoft Word - 5. Black Country Plan - Walsall Local Plan	Issues and Options consultation September/October 2023 Regulation 18 Preferred Option consultation, September – October 2024 Regulation 19 Publication Version consultation, September – October 2025 Submission for examination – March 2026
Wolverhampton (First post NPPF local plan)	2024-41		Local Development Scheme published February 2023 2 (wolverhampton.gov.uk) Timetable subject to timing of outcome of Government’s review of national policy during 2023.	Issues and Preferred Options Consultation (Regulation 18), July – September 2023 Publication (Regulation 19), Feb - April 2024 Submission for examination, Mid 2024 Adoption, Late 2025
Total shortfall		106,654		
		Housing contribution		
South Staffordshire (First post NPPF local plan)	2018-38	4,000	A revised Local Development Scheme published in November 2022 Local Development Scheme October 2022 (sstaffs.gov.uk) A Publication version local plan (Regulation 19) was consulted in November – December 2022. This includes a housing requirement of 8,881 of which 4,000 is to meet the GBBCHMA shortfall.	Submission of Local Plan, Spring 2023. • Local Plan Examination, Summer 2023 • Adoption of Local Plan, Winter 2023 The Council has since advised that progress on the local plan review has been suspended pending the outcome of Government’s review of national policy.
Lichfield (Plan review)	2018-40	2,655	The Lichfield Plan was submitted for examination in June 2022, hearings have yet to commence.	

		(2,000 for Black Country post 2027)	<p>Local plan examination – Hearing sessions - agendas, statements & action points (lichfielddc.gov.uk)</p> <p>Policy SP1 of the plan document proposes 7,062 dwellings to meet local need and 2,655 dwellings to meet wider HMA needs. Paragraph 4.22 states that 2,000 of this is specifically to meet the Black Country shortfall.</p>	
Cannock Chase (Plan review)	2018-39	500	<p>A revised Local development Scheme was published in July 2022 lds_july_2022.pdf (cannockchasedc.gov.uk)</p> <p>Full Council approved the Regulation 19 Local Plan for consultation in Full Papers - Council 070922 (cannockchasedc.gov.uk) September 2022, consultation has yet to commence.</p> <p>Provision for 6016 dwellings, 500 of which contribute to the GBBCHMA shortfall</p>	LDS states submission for examination: Spring 2023 but may be some slippage.
Solihull (Plan review)	2020-36	2,105	<p>Local Development Scheme revised January 2020 https://www.solihull.gov.uk/sites/default/files/migrated/Planning_Local_Development_Scheme_Jan_2020.pdf#:~:text=1.%20A%20Local%20Development%20Scheme%28LDS%29%20is%20prepared%20by,principal%20statutory%20development%20plan%20document%20for%20the%20Borough.</p> <p>Local Plan review examination hearings commenced September 2021 and are currently paused. https://www.solihull.gov.uk/Planning-and-building-control/Local-Plan-Review</p>	Examination in public paused to consider implications of changes to national policy.
North Warwickshire (Adopted second post NPPF local plan)	2014-2033	3,790 + 620	<p>Local Plan adopted September 2021 https://www.northwarks.gov.uk/downloads/file/8839/local_plan_adopted_september_2021</p> <p>Makes a contribution based on a 10% of the Birmingham 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.</p>	As the Local Plan has recently been adopted, no formal timetable has been set for review.

			A Local development Scheme was published in April 2022 Local Development Scheme downloads North Warwickshire (northwarks.gov.uk)	
Bromsgrove (Plan review)	2023-40 (provisional)		<p>Latest Local Development Scheme published 2021 but currently under review https://www.bromsgrove.gov.uk/media/7087629/BDC-LDS-2021.pdf</p> <p>Announcement in August 2022 that local plan preparation is delayed to gather further evidence regarding infrastructure. Bromsgrove District Plan Review - bromsgrove.gov.uk</p>	Under review
Stratford on Avon (Plan review)	2011-2031 2025-2050	2,720 + 530	<p>A revised Local Development Scheme was published in April 2022</p> <p>A Site Allocations Plan Revised Preferred Option has been published in June 2022 for consultation following adoption of the Core Strategy in 2016 REVISED PREFERRED OPTIONS SAP JUNE 2022 .pdf (stratford.gov.uk)This identifies capacity for a further 1,517 homes for reserve purposes, including contributing towards housing arising from outside Coventry & Warwickshire (as set out in Annex 1). Annex 1 is referred to in paragraph 2.4.7 associated with Policy SAP.4, and SAP.4 itself lists the sites to meet the GBBCHMA area which would provide approximately 530 dwellings in total.</p> <p>The Core Strategy is being reviewed via the South Warwickshire Local Plan in conjunction with Warwick District Council an issues and Options document was consulted on January – March 2023 South Warwickshire Local Plan</p>	<p>Site Allocations Plan Regulation 19 Publication version, November/ December 2023 Adoption, Summer 2025</p> <p>South Warwickshire Local Plan Regulation 18 Preferred Option, July – October 2023 Regulation 19 Publication version, June – August 2024</p>
Tamworth (Plan review)	Up to 2043	N/A	<p>Revised Local Development Scheme published September 2022 Title (tamworth.gov.uk).</p> <p>Issues and Options consultation took place in Autumn 2022</p>	Preferred Option, early 2024 Pre-Submission Regulation 19, early 2025 Submission for examination, late 2025

			Appendix A Draft Issues and Options Consultation Document.pdf (tamworth.gov.uk)	
Redditch (Plan review)	2011-30	N/A	Redditch has shortfall of 3,600 dwellings, which is been met through the adopted Bromsgrove local plan. A Local development Scheme was published in November 2021 and is currently under review Vision (redditchbc.gov.uk)	Under review
Authorities beyond GBBCHMA				
Shropshire (First post NPPF local plan)	2016-38	1,500 towards Black Country shortfall	The plan is currently under examination, hearings began in July 2021. The Council is currently responding to the inspectors' requests for further information id28-inspectors-interim-findings-letter-15-feb-2023.pdf (shropshire.gov.uk)	Examination ongoing
Telford and Wrekin (Plan review)	Up to 2040		A revised Local Development Scheme was published in June 2022. Local Development Scheme 2022 - 2025 - Telford & Wrekin Council An Issues and Options document was previously published in October 2021 Issues and Options - Review of the Telford & Wrekin Local Plan - Telford & Wrekin Council	Regulation 18 draft plan, Autumn / Winter 2023 Publication version, Summer / Autumn 2024 Submission version, Winter 2024
Wyre Forest (Recently adopted post NPPF local plan)	2016-36	N/A	The local plan was adopted in April 2022 Wyre Forest District Local Plan (2016-2036) - Adopted April 2022 - Details - Keystone (objective.co.uk)	Recently adopted local plan
Total contributions		18,181		