

Housing & Land Delivery Board

Date	2 November 2020
Report title	Local Plans: Progress Update
Portfolio Lead	Housing & Land - Councillor Mike Bird
Accountable Employees	Gareth Bradford, Director of Housing & Regeneration (Accountable Director) Patricia Willoughby, Head of Policy (Housing & Regeneration) (Accountable SRO and joint report author)
Report has been considered by	14 October 2020: Housing & Land Delivery Steering Group

Recommendation(s) for action or decision:

The Housing & Land Delivery Board is recommended to:

- (1) **Note** the contents of this short briefing paper that Housing and Land Board commissioned on local plan progression, provided in full collaboration with local authorities, and
- (2) **Note** the March 2018 Housing Deal commitment that all reasonable steps are taken to progress local plans to adoption, keep plans up to date and ensure the region can demonstrate it is planning for delivery of 215,000 homes to 2031.

1.0 Purpose

1.1 At the meeting of the Housing & Land Delivery Board (6 September 2020), Members asked for a short position statement on local plan progress across the region, in particular, focusing on bringing forward sufficient housing land supply given the Board's targets in its Business Plan and Covid19 Recovery Plan around housing delivery and the commitment in the March 2018 Housing Deal on Local Plans.

1.2 The purpose of this paper is therefore to summarise the position on local plans which has been developed with the Local Plans HMA Group. We also use this opportunity to refer the Board to the fact that local plan progression is a key condition of most HMG funding decisions at present on housing and regeneration.

2.0 Background

2.1 **Local plan progression** is important to the remit and Business Plan of the Housing & Land Delivery Board:

- Local plans lie at the heart of the planning system and central government places great store on the preparation of local plans.
- The ability to progress local plans is a key factor in investment case approval by Government (e.g. on business cases we submit for brownfield funding).
- Continuing to demonstrate satisfactory performance against local plans is a key requirement of the March 2018 Housing Deal and the funding provided to the region contained within that agreement.
- WMCA has a key role in supporting local authorities in delivery of key development projects and many of these projects are identified in adopted or emerging local plans.
- Local plans play a really beneficial role in supporting business cases investment from WMCA under devolved housing and land funds.
- Local plans reduce risks on site-specific development proposals and make them more attractive to potential investors.
- The Covid19 pandemic has had an impact on some local plans progression (e.g. public consultations and examination by the Planning Inspectorate having been postponed).
- Central government is seeking reassurance from WMCA that all possible steps are being taken in the region to minimise local plans delay and to maintain delivery of new homes.

2.3 Given the importance of the March 2018 Housing Deal, officers from authorities across the WMCA geography meet on a regular basis to discuss matters relating to housing need and land supply, and to review progress on individual local plans. The inter-relationship between local plans is clearly acknowledged. This officer group provides an excellent forum for discussing how any potential problems can be resolved.

2.4 Outside this meeting, separate discussions take place between authorities to discuss how any unmet need in housing provision might be shared. It is important to note that this group considers housing need across both the Greater Birmingham & Black Country HMA (GBBCHMA) and the geography of the WMCA Housing Deal which is wider. Provision in both of these areas is considered in more detail below.

3.0 GBBHMA Joint Position Statement (September 2020)

- 3.1 The authorities in the Greater Birmingham & Black Country Housing Market Area (GBBCHMA) recently published a Joint Statement on housing need and housing land supply. It should be noted that the geography of the HMA is different to that of WMCA (and therefore the Housing Deal) so the two are not directly comparable but, as there are 14 authorities in the GBBCHMA, the work overlaps to a significant degree.
- 3.2 The GBBHMA Position Statement demonstrates that **strong progress has been made in meeting the housing need shortfall for the period 2011-31**. It is acknowledged that future completions might slow in the short term because of the COVID19 crisis but the public statement highlights the strong pipeline of homes either allocated in local plans or with planning permission.
- 3.3 The Joint Statement reports that there is expected to be a housing shortfall post 2031. The scale of the post 2031 shortfall across the HMA area is the subject of work that is underway by the authorities together. There may be scope for contributions to meeting that shortfall from local authorities outside the HMA but with a strong functional link to it.
- 3.4 **The Joint Statement shows clear progress is being made in bringing sites forward for development and progressing local plans in a timely manner.**

4.0 WMCA Housing Deal and Local Plans

- 4.1 The WMCA Housing Deal requires the delivery of 215,000 dwellings by 2030/31 in return for up to £350m of investment including £100m of which would be provided in the form of a Land Fund to accelerate the delivery of new homes.
- 4.2 The Housing Deal requires Local Plans for both constituent and non-constituent local authorities to be progressed in a timely manner and adopted as necessary by 2021 to deliver and accommodate the 215,000 new homes target set in the Housing Deal.
- 4.3 To ensure that these targets are met, both local plans and housing land supply are monitored on a regular basis at a regional level in the same officer group as for the GBBCHMA.
- 4.4 We can report to the Board that the latest information from local authorities on housing land supply gives us real optimism that the target the region agreed with HMG back in March 2018 can be achieved and confirmed in adopted local plans.
- 4.5 In terms of the local plans themselves, it is not the purpose of this report to report progress on individual local plans (that is a matter for individual local planning authorities). It is clear, however, that central government expects continued progress on local plans. In that context two key events took place in spring this year the Board should be aware of:
- In the budget announcement in early March 2020, the Chancellor of the Exchequer announced that funding would be released for major infrastructure projects including some HIF applications and HS2. This paved the way for progress to be made on a number of local plans in the region which had been paused until such decisions were made.

- At the start of the lockdown in March 2020, the Chief Planner wrote to all local authorities acknowledging the impact that the pandemic would have on decision-making, both for local plans and planning applications

- 4.6 Although the lockdown has had an impact on some local plans in our region, particularly where public consultation was needed, **it is clear that local authorities in our region have been taking positive steps to make ongoing progress.** Those plans which had to be paused are making their way through the system. The region continues to have a good story to tell on this agenda and the progress being made.
- 4.7 The proposals for reform of the planning system and changes to the methodology for calculating housing need will of course have implications for local plans in our region but none of these changes have yet taken effect.

5.0 Conclusions and Next Steps

- 5.1 It is clear that continued progress is being made by all authorities across the region on local plans as committed to in the Housing Deal and that 'duty to co-operate' discussions are being effective in reaching agreement on how any unmet need might be accommodated. Although the pandemic has caused delay, local plans are being taken forward and we are able to give continued reassurance to government that provision is being made in local plans to meet the Housing Deal target of 215,000 dwelling.
- 5.2 It is clear that this continued progression on local plans will remain essential to securing future investment from government so that the Board may deliver the projects and programmes in its approved Business Plan and Covid19 Recovery Plan.

6.0 Financial Implications

- 6.1 There are no direct financial implications from the information contained in the report. Funding for future programmes will be analysed on a case by case basis and projects on which funding is sought will need to demonstrate a clear relationship with the direct outputs required by the Single Commissioning Framework approved by the WMCA Board in 2019, namely:
- brownfield land remediation
 - new homes delivered
 - new commercial, retail or employment floorspace delivered.

7.0 Legal Implications

- 7.1 Section 113A(1)(a) of the Local Democracy, Economic Development and Construction Act 2009 gives WMCA a power of competence appropriate for the purposes of carrying-out any of its functions. Part 4 of The West Midlands Combined Authority Order 2016 (2016 No 653) confers that the functions relating to any economic development and regeneration in the constituent councils are exercisable by WMCA. Part 3 of The West Midlands Combined Authority (Functions and Amendment) Order 2017 confers functions corresponding to the functions of the Homes and Communities Agency has in relation to the combined area. Paragraph 10 (2) (a) of the 2017 Order confers the function of improving the supply and quality of housing to the Combined Authority, 10 (2) (b) to secure the regeneration or development of land or infrastructure in the combined area, 10 (2)(c) to support in other ways the creation, regeneration or development of communities in the combined area or their continued well-being and 10 (2)(d) confers the function of contributing to the achievement of sustainable development and good design.
- 7.2 Although there are no direct legal implications it is noted that local plans play an important in securing investment from the Government and also assist in the delivery of development projects and provision of new homes. Hence progress in the development of the plans will encourage delivery of new schemes through co-investments with qualifying organisations including grant and/or loan funding from WMCA through the application of the criteria and governance systems set out in the WMCA Single Commissioning Framework.

8.0 Equalities Implications

- 8.1 There are no immediate equalities implications in relation to this report. However, individual strategies and delivery schemes will need to consider local area needs and local stakeholder needs to ensure the schemes developed through the delivery vehicle benefit local residents, including harder to reach groups. To that effect equality impact assessments will need to be conducted to understand demographics, key inequality issues and how investment can help address key inequality gaps. Engagement and consultation with key equality stakeholders is also crucial.

9.0 Inclusive Growth Implications

- 9.1 The proposals themselves are neutral when it comes to inclusive growth. However, implications will arise as investments are made and strategies are devised – in terms of who benefits from those investments and in who is involved in shaping and contributing to them. As such, any programmes should be devised with the responsibility to deliver inclusive growth. The Inclusive Growth Framework can be as a guide to shape this process.
- 9.2 Current governance arrangements are satisfactory for building a strategic picture, but the shaping and delivery of specific programmes will need to involve a wider variety of stakeholders in order to be inclusive.

10.0 Geographical Area of Report's Implications

- 10.1 The recommendations of this report apply to the whole of the WMCA area.

11.0 Other implications

11.1 None.

12.0. Schedule of Background Papers

12.1 None.