

**Response to Solihull MBC on the Solihull Draft Local Plan Review consultation**

|                            |                       |
|----------------------------|-----------------------|
| Relevant Portfolio Holder  | Councillor Kit Taylor |
| Portfolio Holder Consulted | Yes                   |
| Relevant Head of Service   | Ruth Bamford          |
| Wards Affected             | All Wards             |
| Ward Councillor Consulted  | Yes                   |
| Non-Key Decision           | Yes                   |

**1. SUMMARY OF PROPOSALS**

- 1.1 The current local plan for Solihull, the “Solihull Local Plan” (SLP), was adopted in December 2013 and covers the period 2011 to 2028. Although it is a recently adopted plan, and is up-to-date in many respects, there are three reasons that have triggered the need for an early review of it.
- 1.2 Firstly, the successful legal challenge to the local plan post adoption means that the current Local Plan has no overall housing requirement for the Plan period. This makes it difficult to demonstrate that the Borough has a five-year housing land supply, as required by the National Planning Policy Framework (NPPF).
- 1.3 Secondly, the examination of the Birmingham Development Plan has made clear that the City Council is unable to meet its own housing need within its boundaries, and that the shortfall will have to be met elsewhere within the Housing Market Area (HMA) (or other nearby areas) such as Solihull. The adopted Solihull Local Plan acknowledges that when work on housing needs identifies a need for further provision in the Borough, a review will be brought forward to address this. Solihull MBC believes that this is the appropriate time for doing this.
- 1.4 Finally, the arrival of HS2 to the Borough, and in particular the Interchange station marks a significant shift from the SLP. The ‘Proposed Local Area Plan for the High Speed 2 Interchange and Adjoining Area’ highlighted the need to review the Green Belt boundary.
- 1.5 Solihull MBC have therefore produced the Solihull Draft Local Plan (November 2016) and is now consulting on this stage of the Plan’s progression.
- 1.6 The closing date for submission of responses was 17<sup>th</sup> February 2017 and the attached response has been issued to Solihull MBC as an officer response until formal authorisation by the Council is received.

**2. RECOMMENDATION**

- 2.1 That Members note the contents of the report
- 2.2 That Cabinet recommends to Council that the officer response to the Solihull Draft Local Plan Review consultation (as attached at Appendix 1) be approved by Council as the formal consultation response.

**3. KEY ISSUES**

**Financial Implications**

- 3.1 None identified.

**Legal Implications**

- 3.2 The attached response discusses the Duty to Co-operate which is a legal requirement under Section 33A of the Planning and Compulsory Purchase Act 2004 and Section 112 (2) of the Localism Act 2011.

**Service / Operational Implications**

**3.3 Summary of Response**

The response is structured in two parts; firstly, consideration of the housing and employment development targets and secondly, in relation to site selection in terms of potential impacts on Bromsgrove District.

- 3.4 Housing and employment development targets:  
Robust evidence should be available regarding the justification and proportionality of the 2000 dwellings contribution contained within the Plan, towards meeting the unmet housing needs arising in the Greater Birmingham Housing Market Area (GBHMA). Bearing in mind Solihull's pivotal economic position within the region, BDC consider that the appropriate level of growth commensurate with this position should be thoroughly evidenced and justified in an open and transparent manner, which will stand up to the scrutiny it will inevitably receive .
- 3.5 Solihull MBC need to remain committed to the recently advertised GBHMA Strategic Growth Study and ensure flexibility is maintained in the Plan to reflect the Study's strategic findings regardless of pre-existing local evidence. BDC consider that this issue strikes at the heart of the ethos of the Duty to Co-operate, that co-operation on this basis should be both meaningful and ongoing.
- 3.6 There appears to be an absence of an objectively assessed need (OAN) figure within the Plan at this stage. A clear calculation or

commentary should be included in the Local Plan as to how the dwellings target has been arrived at, specifically defining the OAN and any other 'policy-on' factors over and above this.

- 3.7 BDC would question the robustness of the decision in the SHMA to uplift the demographic starting point by 10% in response to market signals. This represents a modest uplift in the light of evidence and BDC consider a 20% uplift would be more appropriate.
- 3.8 Based on the evidence provided BDC consider that the growth in jobs in the Borough has been underestimated.
- 3.9 In addition to the modest uplift for market signals and the lack of any uplift for future jobs growth, it is noted that the SHMA does not propose an uplift to the OAN to address affordable housing need. BDC consider that this position should be reviewed.
- 3.10 Site selection:  
Three sites appear to be proposed for allocation in the Plan in relatively close proximity to Bromsgrove;  
1) Proposed site allocation 4 west of Dickens Heath-700 dwellings  
2) Proposed site allocation 13 (Christmas tree farm) south of Shirley - 600 dwellings  
3) Proposed site allocation 12- Dog Kennel Lane east of Dickens Heath- 850 dwellings
- 3.11 The first of these, site 4, abuts the County and District boundary, with Majors Green already abutting the boundary to the west. This is obviously contrary to purpose 2 of the function of Green Belts, to prevent the coalescence of settlements (Paragraph 80 NPPF). The other sites are situated to the south of Shirley at a further distance than site 4 but nonetheless could still have an impact on the infrastructure of Bromsgrove.
- 3.12 BDC are concerned that the evidence base being used, in many cases post-dates the Plans production in November 2016, for example, the Sustainability Appraisal (January 2017), Landscape Character Assessment (December 2016), Topic Paper 4- Options for Growth and Site Selection (December 2016). BDC therefore questions how the evidence base has been used to support the site selection process.
- 3.13 Furthermore BDC are also concerned about the lack of evidence regarding the impact of the three allocations, amounting to 2150 dwellings, on the infrastructure of nearby Bromsgrove District, for example, in terms of the impact on the wider transport network, highways and public transport; education; community facilities; GP surgeries and so forth.

**4. Customer / Equalities and Diversity Implications**

4.1 None identified.

**5. RISK MANAGEMENT**

5.1 The risks associated with not responding to this consultation is that BDC's concerns will not be taken into account by Solihull MBC in the future progression of the Local Plan which have an impact to a greater or lesser extent on Bromsgrove District.

**6. APPENDICES**

Appendix 1 – BDC response to Solihull MBC

**7. BACKGROUND PAPERS**

1. Solihull Draft Local Plan November 2016

**8. KEY**

Solihull MBC- Solihull Metropolitan Borough Council  
GBHMA- Greater Birmingham Housing Market Area  
NPPF- National Planning Policy Framework 2012  
OAN- objectively assessed need (housing)  
SHMA- Strategic Housing Market Assessment  
HS2- High Speed 2 (rail network)

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