



Policy and Spatial Planning
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15th March 2019

Dear Sir / Madam,

Solihull Draft Local Plan Supplementary Consultation

Bromsgrove District Council Consultation Response

Bromsgrove District Council (BDC) welcomes the opportunity to comment on the Solihull Draft Local Plan Supplementary Consultation. This response represents an informal view at this stage.

BDC has read the Supplementary Consultation (January 2019) with interest and wishes to comment on the parts of the draft plan that are relevant to the district and the wider Greater Birmingham Housing Market Area (GBHMA). Our comments draw on those made to your earlier Draft Local Plan (2016) consultation, which raised concerns over the consideration of the wider housing needs of the GBHMA and the allocation of sites in the vicinity of Bromsgrove District and the resulting potential cross boundary impacts of developing these areas.

Duty to Co-operate Issues

Paragraphs 25-29 of the consultation document relate to the Duty to Co-operate and we welcome recognition of this. However, it is noted that Paragraph 27 in particular acknowledges previous consultation representations that Bromsgrove District Council (amongst others) has submitted. This being that there is no clear justification as to why 2,000 dwellings was chosen as the figure Solihull could accommodate towards the GBHMA shortfall.

As we have stated previously, it is important to ascertain how any contribution, 2000 dwellings or otherwise, has been arrived at and how it has been concluded that this is an 'appropriate proportion'. This figure was not agreed by the Greater Birmingham and Black Country Authorities and therefore, the 2,000 dwellings contribution from SMBC cannot be considered to have been formally agreed and is not a firm basis on which to progress a sustainable development strategy and site allocations. This is a fundamental issue that would need to be set out within a Statement of Common Ground in accordance with the Duty to Co-operate Requirements within the Revised National Planning Policy Framework. Any contribution towards meeting the shortfall from the GBHMA should have support of the GBHMA authorities and should be based on an apportionment methodology.

Despite this, we note that Paragraph 29 of the consultation document still refers to Solihull's contribution towards the GBHMA shortfall as 2,000 dwellings, but with the potential for this to be revised at submission draft stage remaining. Furthermore, Paragraph 51 affirms that the consultation is not seeking views on any potential addition that the Council may make towards the GBHMA shortfall and that the Council will incorporate its response to the Strategic Growth Study at submission stage. We are concerned that there has been little change in this position over the 2016-2019 time period.

It is considered that submission stage is too late on in the process to address the Borough's contribution to the GBHMA housing shortfall as this will have significant connotations for the overall development strategy and could also have knock on effects on neighbouring areas. Furthermore, it is imperative that any increase in the overall dwelling figures is subject to options testing and sustainability appraisal. We therefore urge SMBC to progress a Statement of Common Ground to establish the appropriate figure to meet the GBHMA shortfall prior to submission stage.

Proposed Allocations and Site Selection Methodology

SMBC will be aware that BDP has previously raised a number of concerns relating to its proposed site allocations adjacent to the District's north eastern boundary and the potential cumulative impacts that this could have on settlements in Bromsgrove in particular Wythall and Hollywood. We wish to reiterate that these concerns still stand and again would request that these are fully addressed prior to submission stage under the Duty to Co-operate requirements.

It is noted that with regard to proposed site allocations at Blythe (Dickens Heath, Cheswick Green & Tidbury Green), Paragraph 118 states "As a whole the villages benefit from some key facilities and Whitlock's End Station has been upgraded with 3 services per hour to Birmingham and Stratford. However, the wider sub area suffers from poor public transport provision with limited bus services between settlements, which perpetuates travel by private car." (Our emphasis)

It is imperative that public transport improvements are sought as well as highway capacity improvements as this could have adverse impacts on the communities to the north east of Bromsgrove District such as Wythall & Hollywood. We have also previously cited concerns relating to the potential impact on other components of infrastructure for example schools and GP surgeries within these settlements. There appears to be little in the consultation document that begins to address these potential impacts, and it is considered that a great deal of evidence based work is still needed with regards to infrastructure requirements and provision.

Officers from the Council will be more than willing to meet with SMBC representatives to try and ensure that the issues outlined above are addressed through the progression of a Statement of Common Ground.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'R. W. J.', written in a cursive style.

Ruth Bamford
Head of Planning and Regeneration
Bromsgrove and Redditch Councils