

## Redditch Borough Council

Town Hall,  
Walter Stranz Square,  
Redditch,  
Worcestershire B98 8AH

tel: (01527) 64252  
fax: (01527) 65216  
minicom: 595528  
DX: 19106 Redditch



Policy and Spatial Planning  
Solihull MBC  
Council House  
Manor Square  
Solihull  
B91 3QB

[devplans@bromsgroveandredditch.gov.uk](mailto:devplans@bromsgroveandredditch.gov.uk)

15<sup>th</sup> March 2019

Dear Sir/ Madam,

### **Solihull Draft Local Plan Supplementary Consultation**

#### **Redditch Borough Council Consultation Response**

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

RBC 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.

In particular concerns were raised over the justification behind the identification of SMBC's commitment to test the potential to accommodate 2,000 dwellings arising from the GBHMA housing needs. RBC considered that this level of commitment would not adequately respond to the shortfall of 37,900 dwellings arising from GBHMA as indicated in the Birmingham City Development Plan, given that Birmingham and Solihull form the 'Metropolitan Core' of the LEP area and that the Borough is seen as the focus for many of the economic drivers of the conurbation (as identified in the Strategic Economic Plan).

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 that a number of previous consultation responses raised concerns over the 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.

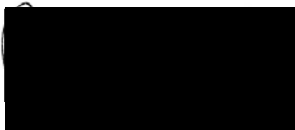
This is a fundamental issue that would need to be set out within a Statement of Common Ground in accordance with the Duty to Co-operate Requirements within the Revised National Planning Policy

Framework. Any contribution towards meeting the shortfall from the GBHMA should have the 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. 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 in later iterations of the Draft Local Plan review.

Yours faithfully,

A black rectangular redaction box covering the signature of Ruth Bamford.

Ruth Bamford

Head of Planning and Regeneration  
Bromsgrove and Redditch Councils