



Walsall Council

Economy & Environment Directorate

Your Ref:

Our Ref:

Date: 15th March 2019

Ask for: Mike Smith

Direct Line: [REDACTED]

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Gary Palmer
Group Manager – Policy & Engagement
Growth & Development
Managed Growth & Communities Directorate
Solihull Council
Council House
Manor Square
Solihull
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Dear Mr Palmer,

Solihull Local Plan Review - Draft Local Plan Supplementary Consultation January 2019

Thank you for consulting Walsall Council on Solihull's Local Plan Review. We respond to this consultation under delegated authority and following discussions with colleagues in the Black Country (Dudley, Sandwell, Walsall and City of Wolverhampton). These representations will be reported to the Association of Black Country Authorities (ABCA) in April. Following this meeting we will confirm any relevant decisions.

We note from your supplementary consultation statement that Solihull's contribution towards the Housing Market Area (PSA) shortfall remains at 2,000 with the potential for this to be revised as part of the Submission Draft (to be published in summer 2019). The Black Country are disappointed that your supplementary consultation statement does not appear to have considered the full implications of the GL Hearn Study and taken the opportunity to test the findings with regards to the growth scenarios within the study.

The Black Country Authorities would like to seek clarity as to whether the new 'call for sites' sites, which has been published as part of the consultation, will be an additional allocation to the 2,000 dwellings already proposed over and above Solihull's own projected need. There are a number of other Local Authorities e.g. South Staffordshire, North Warwickshire and Lichfield who are currently testing higher levels of growth above that of Solihull.

Solihull has a strong function relationship with the Great Birmingham/Black Country HMA. Recent evidence tells us that the Black Country cannot accommodate all of its identified needs within the urban area of the Black Country. This view is supported by our current work reviewing the urban capacity of the Black Country¹ and the Birmingham and Black Country HMA study. Even by increasing densities and looking to other sources of urban land supply we estimate that we have a shortfall in the region of 22,000 dwellings and 300ha of employment

¹ See website for the study: <http://blackcountrycorestrategy.dudley.gov.uk/t2>

land. We would expect Solihull to undertake work to establish whether you can increase the contribution to meeting the needs of the conurbation. We also seek assurances that the full implications of the call for sites and the GL Hearn Study have been fully tested and justified one way or another at the Publication Stage and if appropriate, incorporated into the Strategy to enable the process to be considered sound.

If this exercise results in increases in the housing numbers which can be accommodated within Solihull and/or a change in the overall Strategy, than there may be a need to include a further consultation stage prior to Publication.

We trust these representations are useful and that they will be given due regard as part of Solihull's plan making process and evidence work evolves. Under the Duty to Cooperate we will, of course, be happy to continue to work with your authority, both through the HMA Officer Working Group and through other mechanisms.

Yours faithfully.



Planning Policy Manager