

11 December 2020

To Solihull Metropolitan Borough Council  
LPR Consultation Policy and Delivery  
via email to [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk)

Dear Policy and Delivery Team,

### **Solihull Local Plan Review – Draft Submission Plan**

Thank you for consulting with Birmingham City Council on the Draft Submission Plan for the Solihull Local Plan Review and we provide the following comments in response.

#### **Strategic Housing Need and Duty to Cooperate**

As you are aware, the adoption of the Birmingham Development Plan (BDP) in 2017 confirmed a housing shortfall of 37,900 homes primarily to be met by other authorities in the Greater Birmingham and Black Country Housing Market Area (HMA). In arriving at the scale of the housing shortfall to be met outside of Birmingham, the BDP Inspector concluded that the allocation of additional sites within the city boundaries would not be justified and that evidence shows that, for many years, a substantial proportion of Birmingham's need has been met in other parts of the West Midlands.

As indicated in your Draft Submission Plan, the 14 authorities that comprise the HMA have worked together since that time to regularly update housing land supply capacity across the whole HMA area. In addition, the HMA authorities commissioned and published a Strategic Growth Locations Study to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. Significant progress has been made in identifying land to meet the shortfall identified within the Housing Market area (including that of Birmingham) up to 2031.

The latest position Statement published by the 14 HMA Authorities in September 2020 identifies a shortfall of only 2,597 homes across the whole HMA up to 2031, with a significant proportion of this shortfall met by Birmingham City Council itself, mainly through high density windfall schemes not previously identified coming forward in and around the City Centre. However, a proportion of this shortfall is also being met through local plan reviews where local planning authorities are proposing to provide additional housing over and above their Local Housing Need (LHN) figures. This includes Solihull's identified contribution within the Draft Submission Plan of 2,105 dwellings as well as proposed contributions from other local planning authorities such as North Warwickshire District Council (4,410) and Stratford District Council (2,720). The West Midlands Strategic Growth Study (GL Hearn) was also commissioned by the 14 local authorities which make up the HMA including Solihull. This Study suggested scenarios for higher growth to meet housing shortfalls which were to be tested in Local Plan Reviews across the HMA area.

The situation beyond 2031 is currently emerging but, as work progresses on the Black Country Plan and a review of the Birmingham Development Plan is due to commence in 2021, it is envisaged that housing shortfalls will continue to be experienced within the HMA beyond 2031. The Black Country has evidenced a shortfall of 29,260 dwellings between 2019 and 2038 through its 2019 Urban Capacity Review, which it will consider through the Black Country Plan review. The shortfall expected to arise during this term of the position statement up to 2031 is estimated to be

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7,485 dwellings. The need for Duty to Cooperate arrangements within the HMA to ensure that shortfalls can be accommodated within local plan reviews in neighbouring local authorities, will therefore continue to be crucial.

### **Response to previous stages of the Solihull Local Plan Review**

The City Council has responded to previous consultations of the Solihull Local Plan review, the most recent being the Supplementary Consultation in March 2019. The City Council has always welcomed the contribution of 2,000 dwellings being proposed by Solihull in the Local Plan review but has previously questioned the justification and evidence base for this figure particularly given the strong functional relationship between Birmingham and Solihull. In the Council's response to the Supplementary Consultation in March 2019, concerns were raised regarding whether scenarios to test the validity of the spatial strategy and higher housing provision and growth had been fully considered and assessed.

### **Draft Submission Plan**

#### Providing Homes for All

The Draft Submission Plan proposes housing growth of 15,017 dwellings for the period 2020-2036. This includes 5,130 dwellings proposed in the green belt and equates to 2,105 dwellings above Solihull's Local Housing Need. As previously mentioned, the City Council welcomes this as a contribution towards meeting the HMA housing shortfall.

The Draft Submission Plan is accompanied by further evidence including an updated Sustainability Appraisal which has tested higher growth scenarios including the scenarios suggested in the West Midlands Strategic Growth Study. The SA has therefore scored various growth scenarios in terms of sustainability principles. This ranged from Option 1 (13,000 dwellings) which only met local needs to Option 6 (25,000 dwellings) which considered the full growth scenarios put forward in the West Midlands Strategic Growth Study. In between, further options were tested including the chosen Option 2 (15,000 dwellings).

Whilst each growth option has been tested and assessed through the SA process, it is not clear within the Plan and the supporting evidence how Option 2 (15,000 dwellings) became the chosen option. The SA itself assesses each option and concludes in Section 5.5 that the effects of the higher growth Option 3 (16,000 dwellings) *“are very similar to the corresponding options under scenario 2. The additional 1000 dwellings involved should therefore be possible to accommodate without generating further significant effects that would not arise under scenario 2.”*

The Solihull Supplementary Consultation (2019) stated that any potential to revise the contribution towards the HMA shortfall beyond the 2,000 dwellings already identified would be done as part of the Draft Submission Plan. Given the above conclusion in the Sustainability Appraisal, there is clearly scope for the Submission Plan to accommodate higher levels of growth without compromising the sustainability of such growth and enabling Solihull to maximise its contribution to the HMA shortfall in line with requirements in the NPPF (paragraph 60). It therefore needs to be more clearly justified in the Draft Submission Plan why the potential to revise the contribution through higher growth options (e.g. Option 3) has not been fully realised.

Local Plans currently being prepared in other parts of the HMA are looking to maximise their growth as mentioned above and are looking at proportionately higher figures than those being proposed in Solihull. This is disappointing given that Solihull forms part of the conurbation where shortfalls currently exist (and are likely to continue in the future), and therefore provides the best opportunity to accommodate development needs close to where they arise to ensure more sustainable growth patterns across the West Midlands.

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## Housing Densities

The Submission Plan helpfully provides indicative masterplans for all of the proposed development allocations to indicate the levels of housing growth for each one. These show that, although gross density levels appear low, net density levels are in line with those recommended in the West Midlands Strategic Housing Study to promote additional growth. However, given that the masterplans provided are indicative, the Submission Plan should specify that the housing figures indicated for each site are therefore minima.

## UK Central Solihull Hub

The City Council welcomes the proposed approach taken within the Draft Submission Plan with regard to the UK Central Solihull Hub. As a key stakeholder in the development of the Hub and its strategic national importance, the City Council support the approach being taken particularly in relation to land at Arden Cross and at the NEC and the promotion of the site for high quality, high density mixed use development.

## **Conclusions**

Birmingham City Council has been instrumental in ensuring that the 14 local authorities that make up the HMA continue to work together to ensure that strategic housing requirements are met. Whilst the City Council welcomes the contribution of 2,105 dwellings proposed by Solihull in the draft Submission Plan, it is disappointing that growth options do not appear to be fully maximised.

Given the fact that the proposed Plan period is up to 2036, it is likely that housing shortfalls arising from the Black Country Plan will continue to require accommodating by neighbouring authorities in the HMA beyond 2031 (as well as existing shortfalls still to be accommodated up to that date). Birmingham will be commencing a review of its own Development Plan in 2021, including assessing its own capacity and needs over the next 15-20 years. Evidence has shown that, for many years, a substantial proportion of Birmingham's increasing need has had to be met in other parts of the West Midlands due to constraints in the supply of both brownfield and greenfield/green belt sites. It is therefore likely that the City Council will continue to rely on neighbouring authorities to meet its needs.

The City Council would therefore propose that the adoption of the Solihull Local Plan must be conditioned on committing to an early review once longer term needs and potential shortfalls in housing have been identified. Potential triggers for such a review could be adoption of the Black Country Plan or progress in the review of the Birmingham Development Plan up to the point where any housing shortfalls are fully identified and established.

The City Council would also welcome the development of an agreed Statement of Common Ground between the two local authorities in relation to the Draft Submission Plan based on this response.

I trust that these comments are useful and constructive.

Yours sincerely



**Maria Dunn**

**Head of Development Policy**

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