



Association of Black Country Authorities  
Dudley, Sandwell, Walsall and Wolverhampton

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Dear Strategic Planning Team

### **Solihull Local Plan Review – Regulation 19 Consultation**

We write to you as the Association of Black Country Authorities (ABCA) in response to the ongoing review of the Solihull Local Plan. This letter forms our formal response to the Regulation 19 consultation.

The letter summarises the background to our approach to the Plan, followed by specific representations on housing provision, employment land and minerals.

#### **Background**

You will be aware that the Black Country authorities (BCA) are in the process of replacing the current Black Country Core Strategy (BCCS) with a new Black Country Plan (BCP). The BCA began to prepare the BCP in 2016 and published an Issues and Options Report for consultation in 2017. It is intended to publish the Draft Plan for public consultation in Summer 2021. The new plan will cover the period up to 2039 and, unlike the BCCS, it will allocate sites for housing and employment development.

Currently, the Black Country has allocated enough land to build up to 63,000 homes and 303ha of employment land between the years 2006 to 2026. Up to now, the BCA have been successful in allocating and building on brownfield sites and will continue to allocate land in the urban area and on brownfield sites wherever possible.

The BCA have reviewed their urban land supply and, as of 2019, estimate that this could provide around 44,500 homes to 2038, against a standard methodology housing need figure of 71,500 homes – a shortfall of around 27,000 homes. There is also a significant shortfall of employment land supply against need, of between 287-567ha.

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Extensive information (as summarised in the Black Country Urban Capacity Review Update 2019) has been published by the BCA since 2018 to evidence a significant level of unmet need for both housing and employment land over the period covered by the Solihull Local Plan (up to 2036). The Greater Birmingham and Black Country HMA (which includes Solihull) have also recently published a 2019 Housing Position Statement setting out the current HMA-wide shortfall up to 2031. This still stands at 2,597 homes, taking account of a contribution of 2,000 homes from the emerging Solihull Local Plan.

The Statement also reports that:

*“It is, however, now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially other authorities, is not yet known, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated. It is evident, however, that a number of HMA local plan reviews (e.g. South Staffordshire, Lichfield and Cannock Chase) are considering levels of growth above local need, up to and beyond 2031.” (para 6.3).*

ABCA have made representations to previous stages of the Solihull Local Plan – i.e. in March 2019 to the Supplementary Consultation. At that time, the consultation indicated that Solihull’s contribution to the Birmingham and Black Country Housing Market Area (HMA) shortfall up to 2031 remained at 2,000 homes with the potential for this to be revised in the Draft Submission.

The ABCA representation indicated that this level of contribution was disappointing given the strong physical and functional relationship with the conurbation and the recommendations of the HMA Growth Study.

## **Housing issues**

### **Housing provision**

The principle of the Plan contributing towards the housing needs of the wider HMA is welcomed. Further work will be required to establish and set out how this contribution will be apportioned to individual local plans across the HMA, specifically in relation to the division between the Black Country authorities and Birmingham.

The Solihull Local Plan period now extends to 2036, and the Plan should therefore consider any shortfalls in the wider HMA over this longer period. By comparison, South Staffordshire, North Warwickshire and Lichfield are all currently testing levels of growth higher than that of Solihull.

Solihull’s Draft Submission Plan now includes a contribution of 2,105 dwellings towards the wider HMA over the period to 2036, though this is not apportioned between the needs of the City of Birmingham and the Black Country. The contribution is the difference between local housing need (12,912 dwellings) and the identified supply of developable land (15,017). This level of contribution is disappointing, given the strong physical and functional relationships between Solihull and the conurbation and the specific recommendations of the

HMA Growth Study that the potential for employment-led growth south of Birmingham Airport / NEC and a potential new settlement at Balsall Common should be explored.

Further clarity is sought on the basis for deriving the proposed contribution of 2,105 dwellings for the period to 2036, and why it is not possible to make a more significant contribution. The basis for the land supply figure is unclear, other than that the 2,105 is close to the figure of 2,000 which Solihull committed to test as a contribution to the HMA shortfall in 2016.

The current UK Central housing target for the plan period is 2,740 (out of a total of 5,000 for the location to 2047), which appears to represent a proportionate response to the recommendations of the HMA Growth Study. However, a limited amount of housing (1,615 homes) has been allocated at Balsall Common, and no land has been removed from the green belt for potential development in future plans. This does not amount to a new settlement and no explanation is provided as to why this area has been judged not suitable for a new settlement.

Challenge B sets out the aim to accommodate “... *some of the HMA wide housing shortfall without adversely affecting the quality of its environment and its attractiveness for businesses and residents*”. However, the Plan and supporting documents do not explain how the limits of the environment or the area’s attractiveness have been assessed and quantified; and therefore it is not clear how these factors prevent Solihull from allocating further land for housing, both in the strategic locations identified in the HMA Growth Study and elsewhere, on smaller sites. Therefore, it appears that the Plan has not explored all reasonable alternatives, as required by national guidance.

The BCA would therefore expect Solihull to undertake further work to establish whether they can increase the contribution to meeting the housing needs of the HMA.

The Solihull Local Plan needs to demonstrate that the full implications of the call for sites and the HMA Study have been robustly tested. For the plan to be found sound, the selected housing target will need to be justified and the methodology used to derive it should be identified and, if appropriate, incorporated into the Plan.

We note at paragraph 229 the reference to UK Central and the quantum of housing it is likely to generate; this is identified as the HEDNA UK Central Hub ‘uplift figure’. The paragraph goes on to state that:

*“The occupation of the additional dwellings needed as a result of the UKC Hub uplift would be as a result of additional net migration into the Borough (as it is above the Borough’s own demographic needs) from elsewhere and to have added this to the contribution to the HMA shortfall would result in double counting”.*

The BCA would support this approach. However, while the difference between the identified minimum needs figure of 12,912 and the uplift figure (13,056) is small, this does demonstrate the close interrelationship between Solihull and the wider HMA.

### Housing density

The table of indicative densities in paragraph 240 identifies a series of locally-derived density assumptions ranging from 90 – 150dph for apartments in town centres and at UK Central to 30 – 35dph for houses in limited settlement expansions.

ABCA would wish to be satisfied that these represent the most appropriate and robust densities for all locations through seeing evidence for the adoption of the identified levels. The HMA Growth Study recommends testing and adopting densities of at least 35dph outside the Birmingham and Black Country urban areas, where higher densities of 40dph are promoted.

### **Employment Land**

The Plan has made no contribution to the Black Country in respect of employment land. The reasoning behind the lack of a contribution to meeting employment land needs arising in the Black Country, equivalent to housing needs, is unclear, and at this stage this represents a failure to meet the requirements of the Duty to Co-operate.

### **Minerals**

At present the Black Country produces no primary (land-won) aggregates (sand and gravel, crushed rock); Solihull is currently the only West Midland Metropolitan Area (WMMA) authority producing any primary (land-won) construction aggregates (sand and gravel). Sand and gravel production ceased in Walsall in 2013 but has the capability to recommence during the BCP plan period (although Solihull remains by far the biggest producer). Historically, Walsall has contributed up to 10% of the WMMA's annual sand and gravel production, and therefore Solihull 90% or more.

The emerging BCP growth agenda for housing and employment will give rise to an increased demand for construction aggregates (sand and gravel, crushed rock) - although accurately quantifying this additional demand in terms of tonnages has proved difficult and has not been achieved previously.

Wood Consultants, who have produced the BCP Minerals Study (as part of the BCP evidence base) and are assisting with the BCP draft plan's Minerals Chapter / policies, have advised that provision for sand and gravel require careful consideration. They also advise engagement with other MPAs in the West Midlands that produce sand and gravel, particularly given the potential impact of HS2 on Solihull's permitted sand and gravel reserves and future production capacity.

The BCP Minerals study identifies that a majority of the WMMA's (and therefore the Black Country's) sand and gravel is provided by Staffordshire and (to a lesser extent) Warwickshire.

In terms of the current submission version of Solihull's emerging Local Plan, the following points are made:

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**Policy P13** Minerals section 5 – is supported since it provides for sand and gravel to help meet the identified requirement of 8.24 million tonnes for the WMMA over Solihull’s plan period.

Paragraph 366 is supported – the supporting text states that Policy P13 provides for a minimum sand and gravel landbank of seven years at the end of the plan period (in accordance with national guidance).

Paragraph 363 is supported - in that it states:

- Solihull provides for over 90% of the recent-most Local Aggregate Assessment (LAA) production target for the Metropolitan Area;
- Policy P13 takes account of the provision for primary sand and gravel production within the Black Country Core Strategy (BCCS);
- *‘There may be a need to review the policy when the Black Country Plan review is completed’.*

The last bullet point above is helpful in suggesting a willingness at Solihull in policy terms to be flexible in helping to meet future increased demand for construction aggregates from the Black Country (where possible to do so).

However, and accepting the last above bullet point, Policy P13 Minerals (section 5) is only couched in terms of helping to meet currently identified requirements for the WMMA (including the Black Country). The wording of this policy should be expanded such that any likely (but not currently identifiable) future increased sand and gravel demand from areas such as the Black Country, can more readily be considered in policy terms by Solihull (and be accommodated if and where possible to do so).

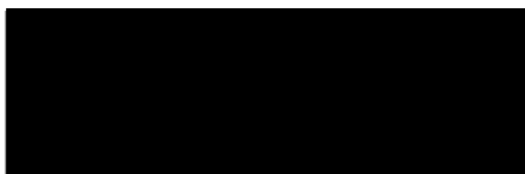
Additionally, and given concerns around HS2’s potential impact on Solihull’s permitted sand and gravel reserves and future production capacity, the last sentence of paragraph 363 (supporting text to Policy P13) should be amended to reflect that the policy may also need to be reviewed once the impacts of HS2 are better known.

Policy P13 supporting text - paragraph 365 - states that two sites proposed for sand and gravel extraction are in the Green Belt - however the paragraph is also correct in stating that mineral extraction is not inappropriate development in the Green Belt (NPPF para 146 refers).

We hope these comments and responses are helpful to you and assist with suitable modifications to the Plan.

If you would like to discuss our response please contact Ian Culley, Lead Planning Manager at Wolverhampton Council on 01902 555636 or via email [ian.culley@wolverhampton.gov.uk](mailto:ian.culley@wolverhampton.gov.uk)

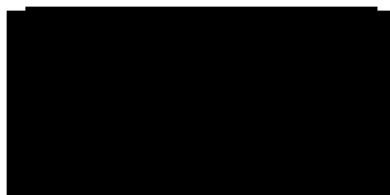
Yours sincerely



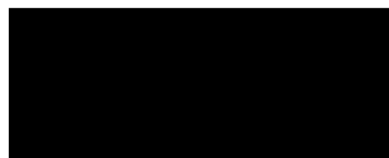
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