



Our Ref: SMBC/DTC

17 December 2020

Please ask for: Ed Fox

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LPR Consultation Policy and Delivery
Solihull MBC
Solihull
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Dear Sir/Madam,

South Staffordshire District Council response to Solihull MBC Local Plan - Draft Submission Plan

Please accept this letter as South Staffordshire Council's formal response to Solihull Metropolitan Borough Council's Draft Submission Local Plan. I can confirm that the response below has now been considered by Members through our constitutional process and remains unchanged from our holding response sent via email on 10 December 2020.

In providing a response to this Draft Submission consultation South Staffordshire Council would wish to reiterate the concerns which we have previously expressed about the scale of the contribution being proposed by Solihull Metropolitan Borough Council towards meeting the housing shortfall identified in the GBHMA. It is considered that continuing with this approach risks the plan failing in meeting statutory requirements. Specifically, South Staffordshire considers that the post 2031 shortfall should be considered as part of this present Local Plan review rather than being deferred.

To support such an approach, we would welcome clarity on the steps taken to ensure that Solihull's approach to utilising the Green Belt review in site selection is broadly consistent with that taken by other authorities in the GBHMA. Specifically, the approach set out in the Site Selection Process Topic Paper of classifying 'moderately performing' Green Belt land as being unlikely to be allocated may not be consistent with other approaches taken elsewhere in the GBHMA. For example, the Association of Black Country Authorities advised in their response to the latest consultation stage of South Staffordshire's Local Plan Review (see Appendix A) that otherwise sustainable sites should only be automatically excluded from site selection on Green Belt/Landscape grounds if they were in both 'Very High harm' Green Belt land and 'Moderate-

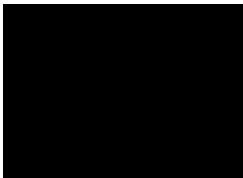




High sensitivity' landscape areas. Whilst it is acknowledged there will always be slight differences in approach between local assessments, a lack of clarity on this point may risk affecting the potential of Green Belt sites to be considered for development in both South Staffordshire and the Black Country. This could risk undermining South Staffordshire's ability to commit 4,000 dwellings to the GBHMA and could exacerbate the extent of the emerging Black Country housing shortfall.

Therefore, should the examination of Solihull's approach suggest that other deliverable land is available within the Borough, we would strongly encourage this being brought forward in order to avoid the deferral of the GBHMA's post 2031 shortfall. Officers from South Staffordshire Council are happy to participate in a meeting with officers from Solihull and the Black Country to ensure that a consistent approach to utilising the Green Belt review in site selection is taken.

Yours sincerely



Ed Fox
Strategic Planning Team Manager

