

**REDDITCH BOROUGH COUNCIL**

**EXECUTIVE  
COMMITTEE**

Date 4<sup>th</sup> April 2017

**REDDITCH BOROUGH COUNCIL RESPONSE TO SOLIHULL DRAFT LOCAL PLAN**

Relevant Portfolio Holder	Councillor Chance
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Ward(s) Affected	All Wards
Ward Councillor(s) Consulted	N/A
Non-Key Decision	

**1. SUMMARY OF PROPOSALS**

The purpose of this Report is to seek Council approval for the Officer response that was submitted to the consultation on the Solihull Draft Local Plan.

**2. RECOMMENDATIONS**

- 2.1 That members note the contents of the report
- 2.2 That Executive Committee is asked to RECOMMEND to the Council that the Officer response to the Solihull Draft Local Plan (attached at Appendix A) be approved by Council as the formal consultation response.

**3. KEY ISSUES**

**Financial Implications**

- 3.1 No financial implications.

**Legal Implications**

- 3.2 The attached response discusses the Duty to Co-operate which is a legal requirement under Section 33A of the Planning and Compulsory Purchase Act 2004 and Section 112 (2) of the Localism Act 2011.

**Service / Operational Implications**

**3.3 Summary of Response**

Solihull Metropolitan Borough Council (SMBC) consulted on their Draft Local Plan between 5<sup>th</sup> December 2016 and 17<sup>th</sup> February 2017. An Officer response (attached at Appendix A) was submitted on the 17<sup>th</sup> February 2017 in order to meet the consultation end date. The purpose of the Consultation on the Draft Local Plan was to seek views on the revised policies and proposed site allocations for housing and employment land, in addition to those in the existing Plan. The Council also published an updated evidence base.

- 3.4 The Officer response to the consultation raised a number of concerns which Officers felt still needed to be addressed through the Plan. A full copy of the Officer response can be seen at Appendix A, however for convenience the main points will be detailed here.
- 3.5 It is not clear from the Draft Local Plan exactly what the Objectively Assessed Housing Need (OAHN) for Solihull is. The Solihull Strategic Housing Market Assessment (SSHMA) (November 2016) states at paragraph 7.21 that the OAHN for Solihull is either 13,094 or 14,278 dwellings. Neither the text nor the table in Policy P5 'Provision of Land for Housing' specifies which figure has been used. Furthermore, the Policy is confusing and misleading with regard to the overall housing requirement figure of 6,522 it is unclear how this number has been arrived at.
- 3.6 It is considered that the Draft Plan does not adequately respond to the shortfall of 37,900 dwellings arising from Greater Birmingham Housing Market Area (GBHMA) as indicated in the Birmingham City Development Plan. The Main Modifications to the Birmingham Plan (MM2 and MM3) indicate that the focus of the search for capacity to address this shortfall will be within the authority areas of The Black Country, Bromsgrove, Redditch, Solihull, North Warwickshire, Tamworth, Lichfield, Cannock Chase, South Staffordshire and parts of Stratford-on-Avon. The Draft Local Plan states that SMBC will test whether it could potentially accommodate 2000 dwellings (paragraph 211) that arise from the GBHMA need, but this is not a firm commitment to actually accommodate 2000 dwellings. There is no clear rationale or evidence to help determine or indicate what the relevant level of additional housing Solihull should be accommodating to address this shortfall. Furthermore, statistics released by the ONS in 2011 confirm that there are significant links between Solihull and Birmingham, including travel to work patterns. This factor amongst many others has not been used to support the 2000 dwelling figure as the correct allocation to address the shortfall of housing in the GBHMA within Solihull Borough.
- 3.7 It is encouraging that SMBC's reference the Duty to Co-operate with its neighbours to address the GBHMA housing shortfall in paragraph 211 of the Draft Local Plan. However due to the views expressed above Officers do have concerns at this stage as to whether Solihull will be able to satisfy the tests of the Duty to Cooperate as the plan progresses if these issues are not addressed. Officers from the RBC are 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.

**Customer / Equalities and Diversity Implications**

- 3.8 It is in the wider interest of the Borough that Solihull contributes as effectively as possible to ensuring the housing need from Birmingham is met in the most suitable locations. If this is not achieved then it is possible that other less suitable

areas such as Redditch are required to accommodate growth which is not in the most sustainable location.

**4. RISK MANAGEMENT**

- 4.1 As stated above it is in the Boroughs best interest to ensure that Solihull work effectively with Birmingham and the other Authorities within the Housing Market Area to ensure that the needs from Birmingham are addressed in the most sustainable and suitable places. It will be a risk to Redditch Borough if Solihull does not do this. Work has not been completed to consider if or how Redditch could contribute towards meeting any need arising from Birmingham.

**5. APPENDICES**

Appendix 1 - Redditch Borough Council response to Solihull Draft Local Plan (February 2017)

**6. BACKGROUND PAPERS**

Solihull Draft Local Plan (November 2016)

**7. KEY**

GBHMA - Greater Birmingham Housing Market Area  
OAHN - Objectively Assessed Housing Need  
SMBC - Solihull Metropolitan Borough Council  
SSHMA - Solihull Strategic Housing Market Assessment

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