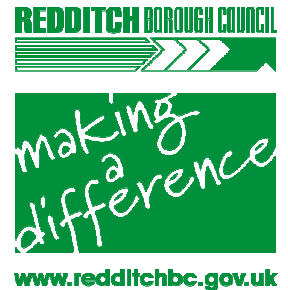


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17th February 2017

Dear Sir/ Madam,

Redditch Borough Councils Response to the Solihull Draft Local Plan

Redditch Borough Council (RBC) welcomes the opportunity to comment on the Solihull Draft Local Plan (November 2016). This response is an informal response at this stage, once formal endorsement is received from the Council we will confirm the wording of the final response via email.

The comments we wish to make on the Solihull Draft Local Plan, are structured under a number of sub-headings and predominantly relate to the proposed housing provision in Solihull Borough and Consultation Q14: *“Do you agree that we are planning to build the right number of new homes? If not why not, and how many do you think we should be planning to build?”*.

Objectively Assessed Housing Need

1 RBC considers that building on the data in the Greater Birmingham and Solihull LEP and Black Country Local Authorities Strategic Housing Needs Study, August 2015 (SHNS) offers a starting point for the Solihull Strategic Housing Market Assessment, November 2016 (SSHMA). However it must be remembered the figure contained within the August 2015 study does not represent the objectively assessed need for the Greater Birmingham Housing Market Area.

2 It is not clear from the Draft Local Plan exactly what the Objectively Assessed Housing Need for Solihull is. The SSHMA states at paragraph 7.21 that the OAN 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.

Greater Birmingham Housing Growth

3 The SSHMA underpinning the housing requirement in the Draft Local Plan appears to only deal with meeting the local housing need of the Borough and does not adequately address the wider Greater Birmingham and Black Country Housing Market Area (GBHMA) needs and shortfall. In

particular, paragraph 7.32 of the SSHMA states, *“The OAN above does not consider any additional homes SMBC might provide to address unmet need from elsewhere in the HMA”*.

4 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. RBC considers that for the above reasons the plan does not adequately respond to the shortfall of 37,900 dwellings arising from 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.

5 Birmingham and Solihull are inextricably linked. This is fundamentally expressed by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP). Birmingham and Solihull form the *‘Metropolitan Core’* of the LEP area and is seen as the focus for many of the economic drivers of the conurbation. The GBSLEP is summarised in the GBSLEP Strategic Economic Plan 2016-2030 (SEP) as *“a partnership of business, public sector and further and higher education leaders with a mission to grow the economy of Greater Birmingham and Solihull.”* The SEP also presents key statistics for Greater Birmingham and Solihull inclusively, for example, *“Greater Birmingham and Solihull has an economy worth £40bn”* and *“Greater Birmingham and Solihull has a population of 2m”*.

6 The SEP identifies Solihull as a key location for economic growth including UK Central (HS2, NEC and Birmingham Airport) and promotes HS2 (Solihull) as a *“once-in-a-generation opportunity to drive productivity, economic growth and prosperity across the Midlands”*. The Birmingham Curzon Investment Plan and the growth plans for UK Central in Solihull have set out the opportunity to create more than 52,000 jobs and £1.25bn in GVA per annum. The opportunities to deliver economic growth make Solihull an ideal location to achieve balanced and sustainable development, by accommodating an appropriate level of housing in close proximity to such major economic growth. It would be remiss of SMBC to assume that the significant benefits afforded to the Council by increased economic activity, should not be balanced with a significant contribution to meeting the GBHMA shortfall. RBC considers that the SSHMA is particularly dismissive of jobs-led scenarios given the important role that Solihull plays in the context of Midlands growth and a *‘once-in-a-generation opportunity’*.

7 A Strategic Growth Study for the GBHMA is being commissioned by the local authorities in the GBHMA to provide a clear recommendation on, the broad locations for growth, a range of potential housing capacities from each growth location, and an indicative delivery timetable. This work includes a full strategic review of the Green Belt within the GBHMA. Whilst it is a significant positive that Solihull have agreed to take part in this study, it is essential that the land within the Borough is considered on an equal basis to land within other local planning authority areas. It is essential that this happens for robust conclusions to be reached and a solution found to meeting the needs of the GBHMA. It is acknowledged that work has been undertaken on assessing the green belt within Solihull, it is important that the conclusions of this work are reassessed in the light of the more

strategic work now being progressed. The need for a strategic green belt review is also highlighted in the recently published West Midlands Land Commission report which stresses;

The (Green Belt) review should pick up from and, where appropriate, supersede the reviews which a significant number of local authorities have underway, where the Commission has heard from a number of respondents that individual local reviews risk a piecemeal and unsustainable 'chipping away' of the Green Belt.

8 RBC was encouraged by SMBC's reference to the Duty to Cooperate with its neighbours to address the GBHMA housing shortfall in paragraph 211 of the Draft Local Plan. However due to the views expressed above RBC 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 Council will be 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.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ruth Bamford', written in a cursive style.

Ruth Bamford

Head of Planning and Regeneration
Bromsgrove and Redditch Councils