



Gary Palmer
Group Manager – Policy &
Engagement
Growth & Development
Solihull Metropolitan Borough
Council

Our Ref:

PINS/Q4625/429/4

Date:

6 March 2023

Dear Mr Palmer,

Examination of the Solihull Local Plan

1. Thank you for your letter of 8 February 2023 which raises issues in relation to anticipated reforms to the planning system and funding for the Arden Academy. The consultation on proposed changes to the National Planning Policy Framework (NPPF) ended on 2 March 2023. No specific date has been set for the changes to be implemented and the detailed changes are clearly subject to the consultation process. You will appreciate that our assessment of the soundness of the Local Plan must be based on current national policy at the time.
2. A fundamental element of the submitted Local Plan is for the housing requirement to be based on meeting Solihull's own housing needs in full (an average of 816 dwellings per year) plus a contribution of approximately 2,000 dwellings to unmet needs from Birmingham up to 2030/31. For an extended plan period to 2036/37 and with the stepped annual requirement suggested by the Council during the examination, this would result in a total requirement of 15,873 dwellings.
3. The long standing and clear commitment of the Council to meeting its own housing needs in full plus a contribution of approximately 2,000 dwellings to unmet needs from Birmingham was a key factor in duty to co-operate discussions and statements of common ground with relevant local planning authorities. We appreciate that the Council does not share our view on delivery at the NEC site, or the implications of it. However, we have made our position very clear on this matter. As it stands there would be a significant shortfall in housing supply for the plan period and the contribution to unmet needs from Birmingham up to 2030/31.
4. It is unclear from your letter whether the Council wishes to continue its commitment to meeting Solihull's own housing needs in full and make a contribution of approximately 2,000 dwellings to unmet needs from Birmingham up to 2030/31. If this is the case, additional site allocations will be required. If this is not the case, this would be a significant shift in position. A Local Plan which did not meet Solihull's own needs in full and did not make a contribution of approximately 2,000 dwellings to unmet needs from Birmingham up to 2030/31 would be significantly different to that submitted and would constitute an approach that was very different to that which formed a key element of duty to co-operate

discussions and statements of common ground. You will appreciate that the hearing sessions and the examination generally have been conducted on the basis of the Council's clear position on these fundamental matters.

5. However, we note your request to provide an opportunity to consider the implications of revisions to the NPPF. Given that the proposed revisions are subject to consultation and may well change as a result, it would be appropriate to wait until the finalised version is published. With this in mind we propose a pause to the examination until the revisions to the NPPF have been finalised and published. We will reconsider the situation at that time, but it would seem likely that we would provide an opportunity for the Council and other interested parties to set out their position on the implications and way forward. As this may raise some fundamental issues, it is likely that further hearing sessions would be required and the discussion on some of the strategic issues would need to be re-opened. You will appreciate that this will inevitably involve some further delay to the process. The alternative is to proceed on the basis of our previous letters and for the Council to undertake a process of identifying additional housing land allocations to ensure an adequate supply to meet Solihull's needs in full and contribute approximately 2,000 dwellings to unmet needs from Birmingham up to 2030/31.
6. We would be grateful if the Council could confirm how it wishes to proceed. If a pause in the examination takes place, we will keep the situation under review depending on timescales for publication of the revised NPPF.
7. We have noted the information provided regarding the Arden Academy and the Schools Rebuilding Programme and will give this consideration. We can also confirm that whilst there are a range of soundness issues, we consider that the overall spatial strategy of the submitted Local Plan and the other housing site allocations are in principle appropriate. This letter should be added to the examination website.

Yours sincerely,

Kevin Ward and Kelly Ford

INSPECTORS