

- (b) Agree that progress will continue to be made on the Local Plan Review in accordance with the timetable set out in paragraph 4.9;
- (c) Agree that progress will continue to be made on the Local Plan Review including continued Member engagement as set out in the 'Next Steps' part of this report.

3. Background

3.1 In July 2015 the Council decided that instead of pursuing a Local Area Plan (LAP) for potential development around the HS2 Interchange, it should be pursued through a review of the Solihull Local Plan (SLP) which was adopted December 2013. Two further factors also pointed to an early review of the plan; namely to deal with the legal challenge to the housing requirement in the SLP and to address the housing shortfall that is occurring in the wider housing market area.

3.2 The Local Development Scheme (LDS) (May 2016) (available [here](#)) sets out an outline programme for a review of the plan in the following terms:

- Scope, Issues and Options Consultation – November 2015-January 2016
- Draft Local Plan – autumn 2016
- Publication of Submission Draft – spring 2017
- Submission to Secretary of State – summer 2017
- Adoption of the Local Plan Review – winter 2017.

Scope, Issues and Options Consultation (November 2015)

3.3 The first stage of the LPR consultation took place from 30th November 2015 to 22nd January 2016. At this stage views were invited on the scope of the review, the issues that ought to be taken into account and the broad options for growth that ought to be considered.

3.4 The consultation document (available [here](#)) set out the key issues/questions and broad options for accommodating the anticipated growth. At the same time a “call for sites” invitation was made in order to seek evidence on what potential land supply would be available.

3.5 A summary of the representations and the Council’s responses to them can be found [here](#) and the schedule of sites submitted under the “call for sites” exercise can be found [here](#).

Draft Local Plan (November 2016¹) (available [here](#))

3.6 Consultation on the Draft Plan commenced on 5th December 2016 and finished on the 17th February 2017. The consultation was originally scheduled to run until 30th January 2017 but was extended to over 10 weeks in recognition that there had been updates to the evidence base studies that were published after the consultation commenced.

3.7 An appendix to this report is a summary of the representations received. It is

¹ Draft Local Plan approved for consultation at Full Cabinet on 10th November 2016.

intended that this be published alongside the evidence base for the local plan review as soon as practically possible after this meeting.

- 3.8 There have been a total of 1,750² respondents to the consultation. These raised 6,320 representations in total. Each individual or organisation making a response is known as a 'respondent' and makes a single 'submission'. Each submission is reviewed to see how many of the consultation questions have been addressed and each one that has been is recognised as an individual 'representation'. So a single respondent can make multiple representations depending on the number of questions addressed.
- 3.9 Of the representations made, 1,153 were in support of the policy/allocation and 5,165 raised objections.

High Level & Significant Issues

- 3.10 The representations document attached as an appendix provides a comprehensive summary by subject area and/or site³. Inevitably it is difficult to extract just a few headline issues from such a schedule, and conclusions should only be drawn from an understanding the representations as a whole. However for the purposes of this covering report some of the particularly key issues have been highlighted as follows:

- Policies/Issues Attracting a Measure⁴ of Support
 - The right challenges being identified
 - The spatial strategy
 - Policy P1 & P1A – UKC Hub Area & Blythe Valley Park
 - Scale and location of development in the town centre
 - Self & custom housebuilding
 - Provision of sites for gypsies & travellers
 - Protecting the environment
 - Quality of place
- Policies/Issues Attracting a Measure⁵ of Opposition
 - The spatial strategy
 - Number of new homes to be built
 - Location of new homes
 - Infrastructure requirements

² This compares to 485 that were submitted at a similar stage in the plan making process for the SLP.

³ The summary document and this report make reference to numbers of representations made, and whilst this can be a good indication of strength of feeling it should also be remembered that even if only a few representations are made on an individual issue or site the arguments put forward can be equally valid.

⁴ In terms of number of representations made by comparison to either (a) other issues gaining support or to (b) the number of objections made to the same policy/issue.

⁵ In terms of number of representations made by comparison to other issues raising objections.

- Providing Homes for All - Housing Numbers
 - Welcomed that Solihull is dealing with all of its own needs, but does not provide scale of growth to meet appropriate proportion of HMA shortfall (the latter expressed by some LPAs⁶ and development industry).
 - Housing numbers not balanced with economic ambitions of the Local Authority or wider area.
 - Alternative housing needs assessments have been submitted (just for Solihull's own needs – ie the Borough's OAN) which range from 890 to 1317 (dwellings per year)⁷. These alternative OAN suggestions are mainly due to arguments that the Draft Local Plan OAN does not reflect the economic ambitions of the borough.
- Providing Homes for All - Housing Sites (General)
 - Too much reliance on large sites - more smaller sites are required.
 - A greater focus on brownfield sites is required.
 - A number of locations are accommodating disproportionate levels of growth.
 - There is too great an impact on the Green Belt and gaps eroded between settlements.
 - Not all sites are in accessible locations.
 - Lack of physical and social infrastructure.
- Providing Homes for All - Housing Sites (Locations⁸)
 - The following allocations have attracted significant levels of objection:
 - Balsall Common – Sites 1 (Barratt's farm), 2 (Frog Lane) & 3 (Windmill Lane)
 - Dickens Heath – Site 4 (land west of Dickens Heath)
 - Knowle – Sites 8 (Hampton Road) & 9 (land south of Knowle)
 - Shirley – Sites 11 (TRW/The Green), 12 (land south of Dog Kennel Lane) & 13 (land south of Shirley)
 - Solihull – Site 18 (Sharmans Cross Road)
 - The following allocation has attracted significant level of qualified⁹ support:

⁶ These are listed under question 14 of the summary document

⁷ The Council's SHMA identifies the Borough's own need amounts as 689 dwellings per year (which does not include a proportion of the HMA shortfall that the Borough will be expected to accommodate).

⁸ The summary document (at appendix A) includes a 'heat map' which plots the known postcodes from those making responses to the consultation.

- Knowle – Site 9 (land south of Knowle)

- Sustainable Economic Growth

- Overall, generally supportive comments for approach in Policy P1 (UK Central Hub Area), although some concerns raised. Also some highlight the opportunity to go further (significantly so in some cases).
- Insufficient land for business purposes identified (in particular for B8 purposes) especially in the context of the WMCA SEP.

The Council's Response

- 3.11 It is pleasing to note that there has been such a level of response to the consultation both in terms of the number of responses and the detail that has been provided.
- 3.12 Responses to the representations will generally fall into the following categories:
- (a) **Explanation** – Where additional explanation or clarification of the Council's position is required this will be provided as additional or amended commentary in the plan/associated publications.
 - (b) **Evidence Base** – Where comments have been made on matters or output from the evidence base studies, these will be used to either amend existing studies (if required to deal with factual issues) or indicate that additional updates or further studies are required.
 - (c) **Policy/Strategy Wording** – Representations may indicate the need for policy wording to be amended. These will be considered and included where appropriate in the submission version of the plan after the implications of changes have been considered.
 - (d) **Allocations** – Perhaps the greatest number of representations relate to the allocations, both in terms of those included in the Draft Local Plan and those others believe should have been included. The representations made will be considered alongside both the existing/amended evidence base and any changes to strategy wording to assess whether existing allocations remain appropriate and/or whether alternative/additional sites should be included. The outcome will be included in the submission version.
- 3.13 At this stage it is not possible to respond in detail to the representations that have been made as most will require detailed assessment under one or more of the above headings – this would have unnecessarily¹⁰ held up progress on the next stage of the plan and wouldn't have enabled the early publication of the consultation representations. The Council is keen that these representations (and those that promote further sites as detailed in following paragraphs) are available for public inspection as soon as reasonably possible.
- 3.14 Therefore the outcome will effectively be reflected in the content of the submission version of the plan. The responses will be taken into account as the next version of

⁹ Whilst indicating support for residential development of this site a number of responses have indicated that less than 500 dwellings should be provided (rather than the 750 indicated in the draft plan).

¹⁰ Producing such a response at this stage is not a statutory requirement and the preference is that a statement be submitted alongside the submission version of the plan indicating how the consultation on the Draft Local Plan has been addressed.

the plan is produced and it is intended that it will be published with a statement setting out how the representations have helped shape the submission version of the plan.

Updated Schedule of “Call for Sites” Submissions

- 3.15 As part of the representations on the Draft Local Plan a number of respondents have suggested that alternative sites are available for development and are preferred to the ones included in the Draft Local Plan. In many cases these suggestions relate to sites already put forward through the “call for sites” exercise noted above. However there were also new suggestions made, primarily from those with an interest in a site that they wished to promote. The opportunity has therefore been taken to produce an updated schedule of sites and a copy of which is attached as an appendix to this report.

Involving Members

- 3.16 To ensure that Members have had the opportunity to engage with the LPR, a series of workshops have been undertaken as follows:
- 3.17 14th Jan 2016 – Members workshop on Scope, Issues and Options
- Explanation and discussion of the issues.
 - Role of Members
 - Discussion on spatial options using an exercise in distributing growth using counters equivalent to 500 dwellings
- 3.18 28th Jul 2016 – Members workshop (i) on Developing the Draft Local Plan
- Understanding the emerging evidence base
 - Developing a vision
 - Assessing options against the vision
- 3.19 6th Sep 2016 – Members workshop (ii) on Developing the Draft Local Plan
- Understanding constraints and opportunity mapping
 - Testing a range of potential allocations to enable an understanding to be gained of:
 - Advantages/disadvantages of potential sites
 - Principles that should be accommodated in any allocations
 - Infrastructure requirements
- 3.20 In addition to the above, opportunity has been taken to provide an update to all Members via email when particular stages have been reached (e.g. when the representations & responses document and Call for Sites schedule were published).

4. Next Steps

Housing Market Area (HMA)

- 4.1 Planning for an area's needs should be undertaken at the 'Housing Market Area' level, and in this respect Solihull is one of 14 local planning authorities that is within (in whole or in part) the HMA that includes Birmingham and surrounding authorities. The Scope, Issues and Options Consultation set out that across the HMA there is a shortfall of some 37,500 dwellings between the number of houses needed between 2011 and 2031 and the number of dwellings included in authority's current (or emerging) development plans. It is recognised that this is a shared issue for the HMA as a whole and a number of districts will be in a position to help to accommodate some of this shortfall.
- 4.2 Through the Draft Local Plan, the Council included within the housing requirement a figure that not only accommodated the Borough's own needs (which was not being achieved through the SLP 2013), but also tested incorporating a contribution of 2,000 towards accommodating the shortfall noted above.
- 4.3 The 14 HMA authorities have now commissioned¹¹ a HMA wide "Strategic Growth Study". The purpose of the study is as follows:
- "The scale of the housing shortfall in the Greater Birmingham and Black Country Housing Market Area (GBHMA) has been formally acknowledged through the adopted Birmingham Development Plan and the PBA Strategic Housing Needs Study. The purpose of this study is to build on this and other evidence to identify more specific options and broad locations for addressing the shortfall, which can be delivered by the market."*
- 4.4 It is important to stress that through the duty to cooperate; the constituent local authorities agree to test the distribution of the housing shortfall in their plans. If through the plan making process it becomes clear that the level of housing expected to be provided in an area can not be sustainably accommodated (and a plan is found sound on this basis) then the issue would need fresh consideration across the HMA. This was a factor effectively acknowledged by the Birmingham Development Plan Inspector who recommended modifications to the plan to ensure appropriate monitoring of plan making progress takes place across the HMA as a whole.

Involving Members

- 4.5 Further Member workshops will be arranged during the course of the year to cover the following issues:
- Awareness raising and understanding the consequences of the representations made on the Draft Local Plan Consultation (summer 2017).
 - Emerging concept masterplans and how different densities affect capacity (summer/autumn 2017).
 - Developing the submission version of the local plan (autumn 2017).

¹¹ It is anticipated that findings from the study will be available in September 2017 and these will form the basis of further discussions under the duty to cooperate.

Housing White Paper

- 4.6 The recently published white paper (Fixing Our Broken Housing Market (Feb 2017)) includes proposals for 'making sure every community has an up-to-date, sufficiently ambitious plan'.
- 4.7 One proposal from the white paper that has particular significance for the local plan review is the suggestion that housing need will be established through a standardised methodology. The Government indicated that options for introducing a standard methodology would be subject to consultation during 2017. This may have implications (both in terms of content and the suggested timescale) for the Local Plan Review, and progress of the white paper will be closely monitored. This may result in the timetable set out below having to be amended.

Brownfield Land Register

- 4.8 In April 2017 the Government introduced a requirement on Local Planning Authorities (LPAs) to publish a Brownfield Land Register (BLR) by 31 December 2017. A BLR is a list of previously developed sites that are potentially suitable for residential development. The Council is now in the process of identifying sites to inform Part 1 of the BLR. In addition to utilising existing sources of information available, including the most recent Strategic Housing and Employment Land Availability Assessment (SHELAA), a targeted Brownfield call for sites exercise is being undertaken. This will enable the Council to gain a full and comprehensive understanding of the extent of previously developed land in the Borough.

Revised Timetable

- 4.9 That the LDS be updated with a revised timetable as follows:
- Publication of Submission Draft¹² – winter 2017
 - Submission to Secretary of State – spring/summer 2018
 - Examination – autumn 2018
 - Adoption of the Local Plan Review – winter 2018

5. Evaluation of Alternative Option(s)

- 5.1 The early stage of the LPR process sought views on the scope of the review, the issues to be considered and the broad options for accommodating growth. These have been evaluated as part of the plan making process and the Council's preferred option was included in the Draft Local Plan.

6. Reasons for Recommending Preferred Option

- 6.1 These were set out in the Draft Local Plan and supporting documents.

¹² This will be subject to consultation and it is the outstanding objections made at this stage that will be the focus for the examination.

7. Scrutiny

7.1 As agreed through the scrutiny process, the Board has focussed on matters relating to process and engagement (including both wider Member engagement and effective public consultation). The Board has considered the LPR on the following occasions:

- (a) 17th March 2016 – Economic Development and Managed Growth Scrutiny Board.
- (b) 13th September 2016 - Economic Development and Managed Growth Scrutiny Board.
- (c) 14th March 2017 – Economic Development and Managed Growth Scrutiny Board.

8. Implications

Delivery of the Council's Priorities

8.1 The options/proposals in this report will contribute to the delivery of the following Council Priorities:

- Managed Growth
 - Local Plan delivery and review.
 - Deliver the North Solihull Regeneration Programme.
 - Define and develop the Council's approach to development of, and access to, housing.
 - Delivering UK Central.
 - Delivering the HS2 Growth Strategy and managing the construction impacts.
- Build Stronger Communities
 - Develop community capacity and enhance engagement and co-production to identify and meet local needs.

Policy/Strategy Implications

8.2 Review of the local plan will address the issues associated with the absence of an overall housing target in the adopted plan, and provide the framework for growth envisaged for UK Central.

8.3 As the plan is being prepared the opportunity will be taken to align it with and be informed by the work being undertaken on other strategies, e.g. Solihull Connected (and vice versa).

Meeting the duty to involve

8.4 Engagement with stakeholders and other local authorities is an integral part of the Plan process, which the Council is required to demonstrate through to the

Examination (and beyond).

8.5 Formal arrangements were made during the consultation exercise for Member engagement and this included support from the Homes and Community Agency through their advisory team (ATLAS) who assist with large proposals. This will be ongoing through the LPR review process

8.6 Chapter 2 of the Summary of Representations sets out the consultation methods and events used in relation publicising the Draft Local Plan.

Financial Implications

8.7 None as a direct result of this report.

Legal implications

8.8 None as a direct result of this report.

Risk Implications

8.9 The timetable that was set in July 2015 for a review of the plan was a challenging one. New issues that may arise from further consultation, the findings from new/updated evidence, or changes introduced by the Housing White Paper may impact upon the timetable.

8.10 It should also be recognised that not having a plan in place in a timely manner may also have an impact on potential planning appeals that may be lodged.

Statutory Equality Duty

8.11 None as a direct result of this report.

8.12 A Fair Treatment Assessment (available under the evidence base publications) was undertaken as part of the development of the draft plan.

Carbon Management/Environmental

8.13 None as a direct result of this report.

Partner Organisations

8.14 None as a direct result of this report.

Safeguarding/Corporate Parenting Implications

8.15 None as a direct result of this report.

Customer Impact

8.16 None as a direct result of this report.

Other implications

8.17 None as a direct result of this report.

9. List of Appendices Referred to

9.1 Reviewing the Plan for Solihull's Future – Local Plan Review – Draft Local Plan Consultation – Summary of Representations (July 2017).

9.2 Reviewing the Plan for Solihull's Future – Local Plan Review – Updated Schedule of "Call for Sites" Submissions (July 2017).

10. Background Papers Used to Compile this Report

10.1 Reviewing the Plan for Solihull's Future – Local Plan Review - Scope, Issues and Options Consultation (November 2015).

10.2 Reviewing the Plan for Solihull's Future – Local Plan Review - Scope, Issues and Options Consultation – Summary of Representations and the Council's Response (April 2016).

10.3 Reviewing the Plan for Solihull's Future – Local Plan Review – Draft Local Plan (November 2016).

11. List of Other Relevant Documents

11.1 N/A