To: The Chairman and Members of the Local Development Framework Sub-Committee

(Councillors Reilly, Chambers, T Clews, D Humphreys, Jarvis and Osborne)

For the information of the other Members of the Council

For general enquiries please contact Democratic Services on 01827 719221 or via e-mail: democraticservices@northwarks.gov.uk

For enquiries about specific reports please contact the officer named in the reports.

This document can be made available in large print and electronic accessible formats if requested.

# LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

# **26 NOVEMBER 2020**

The Local Development Framework Sub-Committee will meet on Thursday, 26 November 2020 at 6.30pm via Teams. An email invite will be sent to all Members and the meeting will be live streamed on the Council's YouTube channel, accessible from the home page of the Council's website or at https://www.youtube.com/user/northwarks

# AGENDA

- 1 Apologies for Absence/ Members away on official Council business.
- 2 **Disclosable Pecuniary and Non-Pecuniary Interests.**

## 3 Minutes of the meeting of the Local Development Framework Sub-Committee held on 1 October 2020 (copy herewith).

# 4 **Public Participation**

Up to twenty minutes will be set aside for members of the public to put questions to elected Members. Questions should be submitted by 9.30am 2 working days prior to the meeting. Participants are restricted to five minutes each.

PLEASE BE AWARE THAT THIS MEETING WILL BE TAKING PLACE REMOTELY.

Members of the public wishing to address the Board must register their intention to do so by 9:30am two working days prior to the meeting. Participants are restricted to five minutes each.

If you wish to put a question to the meeting, please register by email to <u>democraticservices@northwarks.gov.uk</u> or telephone 01827 719221/719226.

Once registered to speak, an invitation will be sent to join the Teams video conferencing for this meeting. Those registered to speak should dial the telephone number and ID number (provided on their invitation) when joining the meeting to ask their question. However, whilst waiting they will be able to hear what is being said at the meeting. They will also be able to view the meeting using the YouTube link provided (if so they made need to mute the sound on YouTube when they speak on the phone to prevent feedback).

# ITEMS FOR DISCUSSION AND DECISION (WHITE PAPERS)

5 **Local Plan Progress** – Report of the Chief Executive

# Summary

The report provides an update on the progress of the Local Plan.

The Contact Officer for this report is Dorothy Barratt (719250).

# 6 Solihull Local Plan Reg 19 Draft Submission Plan October 2020 – Consultation – Report of the Chief Executive

# Summary

This report informs Members of the consultation on the Solihull Local Plan Draft Submission Plan.

The Contact Officer for this report is Dorothy Barratt (719250).

STEVE MAXEY Chief Executive

# NORTH WARWICKSHIRE BOROUGH COUNCIL

## MINUTES OF THE LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

1 October 2020

Present: Councillor Reilly in the Chair.

Councillors Chambers, T Clews, D Humphreys, Jarvis and Osborne.

Councillors D Clews, Farrell, H Phillips Lebrun, Moss, Parsons, Smith were also in attendance.

## 1 Disclosable Pecuniary and Non-Pecuniary Interests

Councillor Reilly declared a non-pecuniary interest in Minute No 4, Warwickshire Minerals Plan Update, by virtue of being a resident of Lea Marston.

## 2 Local Development Scheme (LDS) October 2020

The Chief Executive updated Members on a revised, up to date Local Development Scheme.

#### **Recommendation to Executive Board:**

- a That Appendix A appended to the report of the Chief Executive be amended to include expected dates for additional hearings, main modifications and the Inspectors' report. Further information sources should also be updated to include direct links to the Local Plan, Examination Page and the Forward Planning Team; and
- b That, subject to the amendments at a above, the Local Development Scheme be approved.

#### 3 Infrastructure Delivery Plan (IDP) Update

The Chief Executive updated Members on the Infrastructure Delivery Plan (IDP) and compared some of the allocated sites with the information from recent planning applications.

#### **Resolved:**

That the Infrastructure Delivery Plan (IDP), as set out in the report of the Chief Executive, be noted.

# 4 Warwickshire Minerals Plan Update – Statement of Common Ground, Examination Hearing Date – Outstanding Issues

The Chief Executive updated and informed Members of the Warwickshire County Council's Minerals Plan Examination in Public (EiP).

## Resolved:

- a That the date for the Examination Heattngs into the Minerals Local Plan be noted; and
- b That the Statement of Common Ground recommendations and responses contained within the report are noted, agreed, signed and Members note the outstanding issues remaining will be dealt with through the written representation process, by the Inspector into the Plan.

#### 5 Planning Consultations

The Chief Executive summarised and provided comments on the recent consultations relating to Planning, including the White Paper "Planning for the Future"

#### Resolved:

That, in accordance with the recommendation at Executive Board on 21 September 2020 any comments from Members of the Sub-Committee be incorporated into the response to the consultation on the White Paper and any such comments be passed to the Chair of the Sub-Committee for inclusion in the response.

#### 6 Local Plan Progress

The Chief Executive provided an update on the progress of the Local Plan and outlined the possible timescale to adoption.

#### **Resolved:**

That the update, as outlined in the report of the Chief Executive, be noted.

D Reilly Chairman

# Agenda Item No 5

Local Development Framework Sub-Committee

26 November 2020

# **Report of the Chief Executive**

Local Plan Progress

# 1 Summary

1.1 The report provides an update on the progress of the Local Plan.

# Recommendation to the Sub-committee

That the report be noted.

## 2 **Consultation**

2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

## 3 Update

- 3.1 Members will recall that an update on the Local Plan was provided at the last meeting of this sub-committee (Agenda item 8 1 October 2020).
- 3.2 Since the last LDF meeting the consultation relating to the additional documents has closed. There were 54 representations. These can be viewed: <u>https://www.northwarks.gov.uk/downloads/download/2641/local\_plan\_addition\_al\_consultation\_responses\_2020</u>.
- 3.3 All of the representations have been sent to the Local Plan Inspector who has asked for further hearings to take place virtually from 15 to 17 December (18 December is held as a reserve date). The Local Plan Inspector has also issued agendas for the hearings and these can be found in INSP5b: <u>https://www.northwarks.gov.uk/downloads/file/8508/insp5b\_additional\_hearing\_matters\_issues\_questions\_and\_agendas\_updating\_insp5a</u>
- 3.4 The hearings will be completely virtual. The proceedings will be available to view live on YouTube. However, it is recognised that not everyone who wants to participate will be able to access Microsoft Teams so representors can request to supply written material if they want to supplement their representations.

## 4 Next Steps

4.1 As explained in the October report following the hearings there will be a sixweek consultation on a finalised schedule of Main Modifications – a set of changes that the Inspector feels are required to make the Local Plan sound. The main modifications will need to be appraised through an update of the Sustainability Appraisal. Subject to the incorporation of these changes the Inspector may then recommend in his final report that the plan is sound. This report will be considered by the Council. Although the forthcoming hearings have taken longer to put in place it is still envisaged that adoption could take place by March 2021.

The Contact Officer for this report is Dorothy Barratt (719250).

# Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

# Agenda Item No 6

Local Development Framework Sub-Committee

26 November 2020

## Report of the Chief Executive

Solihull Local Plan Reg 19 Draft Submission Plan October 2020 – Consultation

## 1 Summary

1.1 This report informs Members of the consultation on the Solihull Local Plan Draft Submission Plan.

# Recommendation to the Board

To forward this report with any additional comments Members may raise as the Council's response to the consultation which closes on 14 December 2020.

## 2 **Consultation**

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.
- 2.2 The Solihull Local Plan Reg 19 Draft Submission Plan consultation commenced on Friday 30 October 2020 and will run to 14 December 2020. This plan largely replaces the Solihull Local Plan (Dec 2013)

# 3 The Solihull Draft Submission Plan consultation (October 2020)

- 3.1 Solihull Council has published the Solihull Draft Submission Plan, Regulation 19 document for consultation. This plan covers the period 2020-2036. The consultation documents are available on <u>www.solihull.gov.uk/lpr</u>. Solihull is seeking views on the Plan policies, housing and employment requirements and proposed site allocations for housing and employment land, which also includes a number of Concept Masterplans which show aspirations for the allocated sites. It takes account of the earlier consultations that took place between 2015 and 2019 and is also based on updated evidence.
- 3.2 Members may recall the Borough Council previously commented on the Solihull Local Plan Review Scope, Issues and Options following consideration at the Local Development Framework Sub-Committee on Monday 29 February 2016 and at the Planning and Development Board on Monday the 16th January 2017. I have attached the Members' response letter to these earlier consultations in

- Appendix A, as, despite the recent work undertaken by Solihull and noted in their updated evidence, particularly the Plan's Sustainability Appraisal and comments on the Greater Birmingham Housing Market Area shortfall and the updated 2020 Strategic Housing and Employment Land Availability Assessment 'SHELAA', the comments are still considered broadly relevant to the latest plan, especially in regards of addressing the recent and projected long term shortfall arising from the Birmingham Local Plan.
  - 3.3 The Plan notes "Around two thirds of Solihull's 17,800 hectares is countryside and designated Green Belt, which separates the West Midlands conurbation surrounding from settlements. The vital strategic gap between Birmingham/Solihull and Coventry is known as the Meriden Gap. This area is predominantly rural, characterised by a series of settlements, historic villages hamlets, scattered farmsteads and dwellings set within attractive countryside. This highlights and informs the Boroughs approach to addressing housing need and is similar in character to much of the southern area of North Warwickshire, where protection of Green Belt receives significant focus and importance. Nevertheless, there are some areas of concern that impact on North Warwickshire and the wider HMA area
  - 3.4 There are 3 Challenges noted in the Draft Submission Plan that directly relate to Members earlier comments and implications for and impacts on North Warwickshire. These Challenges are noted as follows;
  - 3.5 Challenge B Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA (Housing Market Area) wide shortfall.
  - 3.6 Challenge E Protecting key gaps between urban areas and settlements -Maintaining the integrity of the Green Belt and the Borough's attractive rural setting that helps to attract investment, in the context of the significant pressures on agriculture and for development to meet the housing requirements for Solihull including the local and wider Housing Market Area needs.
  - 3.7 Challenge H Increasing accessibility and encouraging sustainable travel, with the following points most relevant to North Warwickshire's situation, immediately adjoining Solihull's eastern boundary;
    - Difficulties of access to services, facilities and employment leading to social exclusion, in the North Solihull area and for young and elderly in rural areas.
    - Public transport journey times and poor reliability can discourage modalshift.
    - Poor pedestrian and cycle connectivity between communities and retail and employment centres.
    - Physical, behavioural and perceptual barriers to more sustainable forms of transport, most notably cycling and bus.

- Poor north-south public transport links.
- Poor cross-Borough transport links to key destinations such as Birmingham Airport and lack of direct public transport link to University of Warwick.

# 4 Plan Proposals

- 4.1 The Solihull Draft Submission Plan seeks to deliver 13,056 dwellings over the plan period up to 2036. Solihull is also one of 14 local authorities within the Greater Birmingham Housing Market Area (GBHMA). The Birmingham Development Plan (adopted January 2017) recognises that there is a shortfall of 37,900 homes, which needs to be met in the wider GBHMA up to 2031. The Plan proposes a contribution towards the HMA of 2,105 dwellings. Thus 15,017 will be the housing requirement for the plan, this equates to an average of 938 dwellings per annum.
- 4.2 Following earlier consideration of a number of options the Plan indicates the locations where growth should be focused, and land released from the Green Belt which are as follows:

Growth Option E (The UK Central Hub Area & HS2):

• Land to the east of the NEC – the HS2 Interchange site

Growth Option F – Limited Expansion of Rural Villages/Settlements:

- Land to the east of Hampton-in-Arden
- Land to the west of Meriden
- Land to the south west of Hockley Heath
- Land south and south east of Balsall Common
- Land to the north east of Knowle
- Land east of Catherine-de-Barnes

Growth Option G – Large Scale Urban Extensions:

- Land to the north east of Damson Parkway
- Land south of Shirley (south of Dog Kennel Lane)
- Land south of Shirley (Whitlocks End Farm)
- Land east of Solihull (between Grand Union Canal and Hampton Lane)

Growth Option G – Significant Expansion of Rural Villages/Settlements:

- Land west of Dickens Heath
- Land south of Knowle
- Land east of Balsall Common

The spatial strategy is illustrated in the following page diagram:



- 4.3 The Plan, not surprisingly, focusses on the economic growth and opportunities arising from the forthcoming HS2 Interchange, Birmingham Airport growth, proposals at UK Central, Birmingham and Blythe Valley Business Parks and along the M42 corridor
- 4.4 Following the evidence from the updated HEDNA and SHELAA the Plan seeks to deliver around 147,000 sq m of employment floorspace to meet local needs for the Plan period to 2036. For offices existing supply including vacancies balances the need, but for industrial use and warehousing there is a shortfall of around 26,300 square metres (thus requiring between 5.2 ha 6.6 ha of land (although examination of the HEDNA notes a review of Solihull demand and supply balance reveals that there is no need for additional office floorspace supply to meet local needs. The supply and demand balance for industrial floorspace shows a shortfall of 26,300 sqm or around 6.5 ha to 2036).

# 5 **Observations**

- 5.1 The Borough Council welcomes Solihull in delivering a Local Plan that addresses their current housing needs, as identified in the November 2016 SHMA, SHELAA and HEDNA updates. However, there are still serious concerns over the lack of adequate response to the shortfall of 37,900 arising from the Birmingham City Development Plan, which indicates that the focus of the search for capacity to address this shortfall will be within the authorities including The Black Country, Bromsgrove, Redditch, Solihull, North Warwickshire, Tamworth, Lichfield, Cannock Chase, South Staffordshire and parts of Stratford-on-Avon. Again it is pertinent to note Solihull's concentration on the economic needs and opportunities up to 2036. But the Plan does not adequately balance this with a similar approach to the housing need up to 2036 and particularly how to account and address the projected HMA shortfall post 2031.
- 5.2 Through the Duty to Co-operate and in conjunction with adjoining authorities North Warwickshire have pro-actively addressed this issue in their own recent Local Plan process through examining levels of inward and outward commuting within the appropriate Travel to Work areas (using recent work by Metro Dynamics for the City of Wolverhampton) and determining an appropriate level of housing to accommodate from this shortfall. This approach, or a similar one, does not appear to have been seriously undertaken for the purposes of the Solihull Local Plan and 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 and that reflects its close functional and physical relationship with Birmingham.
- 5.3 The Metro Dynamics work noted above examined the relationships and similarity between authorities in the Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull LEPs. This document's findings showed the largest travel to work commuting flows in or out of the authority were between Birmingham and Solihull, and also that some of the largest migration inflows and outflows were between Birmingham and Solihull.

5.4 The ONS in 2011 indicated that of people/residents travelling to work in Solihull, 36% of the total of all trips were between Birmingham and Solihull.

Local Authority	Number of Residents	% of Total
Solihull	32,114	39%
Birmingham	29,458	36%
All Solihull Residents Travelling to Work	81,316	100%

Source: ONS Census 2011

The number of Solihull residents travelling outside of the borough for work (49,202) is exceeded by the number of people living outside of the borough and travelling into Solihull for work. (51,403). This work and other similar assessments would appear to indicate that the level of housing proposed to address the shortfall of housing in the Greater Birmingham Housing Market Area (GB HMA) is insufficient. The proposed 2,105 does not truly reflect the links and relationships between Solihull and Birmingham.

- 5.5 Indeed it is pertinent to note that the latest SHELAA update does not even refer at all to Birmingham by name, or its shortfall specifically, referring only to "the housing shortfall that is occurring in the wider housing market area". It appears to wholly ignore the longer-term projected shortfall post 2031, despite the Submission Plan period covering up to 2036. Nevertheless, the Housing and Economic Development Needs Assessment, October 2020 (HEDNA) does note the Birmingham shortfall and, along with the SHELAA provides the Borough's evidence of or the more limited contribution towards the HMA shortfall along with the Local Housing Need of 13,056, which includes an element of "uplift" from UK Central as a result of additional net migration into the Borough.
- 5.6 Following the previous Local Plan review Solihull Council had indicated it would test the ability to accommodate 2,000 dwellings from the shortfall up to 2031. The Draft Submission Plan notes that Solihull has tested and established an appropriate capacity and confirmed the contribution to the HMA as the difference between the identified supply and the LHN. However, the contribution to the HMA was calculated using a figure of 12,912 for the LHN. This figure was used rather than 13,056 (the HEDNA UK Central Hub 'uplift figure') as this 12,912 figure represents the minimum needs of the Borough as determined by the standard methodology, without the UKC Hub uplift. Thus the contribution to the HMA is 2,105, being the difference between 15,017 and 12,912. Thus 15,017 will be the housing requirement for the plan, this equates to an average of 938 dwellings per annum.
- 5.7 This is of particular concern for North Warwickshire given the clear economic, housing and transport links and relationships Solihull has with Birmingham, which are far greater than those between North Warwickshire and Birmingham. This gives rise to concerns that if Solihull does not adequately address this issue the knock-on effect on North Warwickshire will be further development pressure, both within and outside North Warwickshire's Green Belt and on its settlements.

- 5.8 Similarly the Plans emphasis on regeneration, economic and employment growth and opportunities to 'deliver Solihull's future economic success' and 'enhance Solihull's competitive advantage' should be matched and balanced with housing growth that reflects the above relationship with Birmingham and wider sub-region, a "balance" sought and supported by the National Planning Policy Framework guidance (para 37).
- 5.9 Notwithstanding the recent increases in delivery of housing within Birmingham, that has gone some way towards addressing its earlier and current identified shortfall, there is still projected to be a significant shortfall within/arising from Birmingham post 2031 that needs to be addressed robustly by the authorities within the GBBCHMA. It is considered the Solihull Local Plan Reg 19 Draft Submission Plan is not adequately addressing the Borough's capacity and the potential to help contribute further towards the current and future shortfalls, particularly given its close social, housing, economic and commuting links with Birmingham, its immediate urban neighbour.

# 6 Summary

- 6.1 In summary the following comments are considered relevant to the Solihull Local Plan Review consultation;
  - The SHMA supporting the Plan for Solihull deals primarily with their local need and does not adequately address the wider and longer term (post 2031) GBBCHMA needs and shortfall. (Indeed Para 7.32 of SHMA on Unmet cross-boundary need notes; "*The OAN above does not consider any additional homes SMBC might provide to address unmet need from elsewhere in the HMA*").
  - There is limited rational of how Solihull have got to 2105 dwellings figure (para 211) for dealing with the GB HMA shortfall, particularly in view of the clear , historic, transport routes and links, commuting and travel to work links the Plan notes/highlights elsewhere. This is considered a potentially serious failing in the Plan in terms of adequately addressing the "Duty to Co-operate", given the clear shortfall in need identify in the Birmingham City Local Plan, noted in the proposed Modifications to the Plan, and the comments from the earlier Solihull Local Plan Inspector as well as the longer term projected significant shortfall post 2031 (60,900 dwellings to 2036 across the Birmingham HMA Greater Birmingham HMA Strategic Growth Study Feb 2018).
  - It is considered that the Plan needs to better maximise development opportunities at a transport hub, which could be a combination of the HS2 International Interchange, maximising links into the Birmingham Metropolitan area and opportunities of future links into North Warwickshire and Coventry as part of the wider Midlands Connect work and 'Movement for Growth' strategy, but also into North Warwickshire and the main settlement at Coleshill, as sought be Members in earlier responses. Policy P2 of the Plan highlights in criteria (iii) "The need to develop a multi-modal Integrated Transport Hub at the site of the current

train station in Solihull. The new Integrated Hub will provide accessible, modern facilities which can accommodate forecast growth in passenger numbers, and enable effective integration with public transport, and investments in walking, cycling, key highways junctions and SPRINT". Indeed one of the Plan's objectives to meet its Challenge C is to "Provide cycle ways and wildlife to provide sustainable connectivity between communities, transport hubs and public open spaces. And for Challenge M, the objective of *"Ensuring that the HS2 Interchange prioritises access by bus, cycle, Metro, SPRINT bus rapid transit network, or the Coventry Ultra-Light Rail system rather than the private car.* Yet the Plan only seeks "Opportunities for enhancing existing walking and cycling routes and creating new routes will continue to be explored", but unfortunately does not identify any actual opportunities.

- As a result the Plan is considered to be inward looking and fails to look at real opportunities of linking the Borough to the wider countryside and rural area through improved public transport links to adjoining settlements and communities such as Coleshill, through cycle route proposals or links with similar route safeguarding and proposals in adjoining authorities such as North Warwickshire. Hopefully this will be better addressed through the Borough's intentions to develop a Cycling and Walking Strategy for the Borough.
- 6.2 This Report and the observations above, should form the basis of the initial response to the Solihull Local Plan Reg 19 Draft Submission Plan October 2020 along with any further comments from Members, which will be added following consideration of this Report and the Plan consultation.

# 7 Report Implications

# 7.1 Human Resources Implications

- 7.1.1 Staff and member involvement may be required in the subsequent hearings and responses to Solihull Local Plan Examination in Public to follow. Also work on Statements of Common Ground, Memorandums of Understanding through cross border issues and Duty to Co-operate requirements, and in particular the provision of housing, the need to address the shortfall in the GB SHMA, HS2 and UK Central implications and possibly employment land and housing balance.
- 7.2 Legal Implications
- 7.2.1 As indicated in the report, local planning authorities have a statutory duty to cooperate in relation to preparation of local plan documents and local development documents. This Council's response to Solihull's consultation forms part of its duty to do so.

# 7.3 Links to Council's Priorities

7.3.1 The Local Plan has links to all of the Council's priorities.

The Contact Officer for this report is Dorothy Barratt (719250).

# **Background Papers**

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

6/9

#### APPENDIX A



North Warwickshire Borough Council Steve Maxey BA (Hons) Dip LG Solicitor Assistant Chief Executive and Solicitor to the Council The Council House South Street Atherstone Warwickshire CV9 1DE

: 01<sup>th</sup> February 2017

Date

Gary Palmer, Planning Manager (Development) Policy and Spatial Planning, Solihull MBC Council House Manor Square Solihull B91 3QB	Switchboard : (01827) 715341 Fax : (01827) 719225 E Mail : dorothybarratt@northwarks.gov.uk Website : www.northwarks.gov.uk This matter is being dealt with by :   Direct Dial : (01827) 719250
Emailed to: psp@solihull.gov.uk	Your ref :   Our ref :

Dear Mr Palmer

#### Solihull Local Plan Consultation – Additional comments following LDF Sub-Committee meeting on 29<sup>th</sup> February 2016

Thank you for consulting the Borough Council on the Solihull Draft Local Plan, Regulation 18 Document consultation. I can confirm an initial Report on the consultation was considered at the Planning & Development Board on Monday the 16<sup>th</sup> January.

I have attached a copy of the Report and its Appendices to this letter for your attention and information as part of the Borough Council's response to the Solihull Local Plan consultation. Following consideration at the Board, Members from the Borough Council would wish the following additional comments to be highlighted and noted as part of the Council's consultation response.

The Borough Council recognises and welcomes that the Plan fully addresses Solihulls own Objectively Assessed Housing needs and notes the emphasis the plan places on Economic Growth and regeneration of areas such as Chelmsley Wood. Nevertheless, Members highlighted the potential huge implications on North Warwickshire of the development and growth at Solihull, particularly with reference to the "UK Central" proposals and the development around the HS2 Hub Interchange station. There are significant local concerns over the impact this proposal will have on the local, rural highway network and rural settlements from increased traffic flows and levels. Measures need to be considered and included in the Local Plan review to address any potential adverse impacts, in parallel with maximising connectivity to the HS2 Interchange station.

Access to the rural road network should be restricted and focussed on local services and local settlement access only, with Interchange Station Traffic concentrated, directed and routed onto the Strategic Transport Network only. Where necessary, to avoid traffic conflict with local traffic and adverse impacts on rural settlements (particularly from heavy construction traffic

and "rat running" by commuter and interchange traffic avoiding congestion points/routes), some route and road closures should be considered as an option.

The Board Report and Borough response also highlights by the potential implications arising from the shortfall from Birmingham, which re-inforces the need for this to be reflected in the review of the plan. Members noted that the Plan indicates a modest response to Birmingham's shortfall and wish to express major concerns that the level proposed at 2000 dwellings only does not significantly or sufficiently address both the scale of the shortfall identified in the Birmingham Plan and the clear and significant links and relationships that Solihull has with the Greater Birmingham area. This is considered particularly relevant in view of the proposal in the North Warwickshire Local Plan to test accommodating a figure of 3790 dwellings to address the Birmingham Shortfall and when the comparative infrastructure and services available in both authorities (North Warwickshire and Solihull) are considered and the significantly higher levels of commuting traffic and travel to work relationships between Solihull and Birmingham, both local and strategic.

Members also wish to stress strongly that the Solihull Local Plan should take account of, and address the highway infrastructure capacity wider than simply within the Metropolitan area and across the boundary into North Warwickshire, and note the need to address and minimise the traffic levels and impacts on the rural settlements and rural road network and seek to separate local traffic and networks from the strategic traffic, that is both generated by and servicing the growth in Solihull, the shortfall from Birmingham and the construction and eventual commuting traffic to the HS2 Interchange Station.

The Borough Council would wish to see the above issues clearly addressed through the Solihull Local plan process and would seek to maintain an objection to the Plan if it is not clearly indicated that the Plan will address both the clear traffic flows and highway infrastructure impacts on North Warwickshire Borough and the implications from inadequately and insufficiently addressing the shortfall from Birmingham at a level that reflects the clear and significant strategic and local relationships and links between Solihull and Birmingham.

I trust that you will find the above useful and look forward to on-going discussions on how Solihull will deal with the expected growth and consider any implications on this Borough. I have attached the Board Report and previous comments as an Appendix to this letter, to reinforce the objection above and restate earlier concerns that have been expressed at earlier stages of the Solihull Plan process.

Yours sincerely

# D M Barratt

Dorothy Barratt Forward Planning & Economic Strategy Manager