

5858

Comment

**Document Element:** Policy DS4: Development Needs

**Respondent:** Solihull Council

**Date received:** 30/05/2024 via Web

**Summary:**

SMBC notes that this iteration of the plan includes a significantly different housing requirement than that included in the R19 version of the plan published in November 2022. It recognises that, at least in part, this is driven by SSDC seeking to use the greater flexibilities in the December 2023 NPPF in its approach to release of Green Belt land to accommodate needs.

SMBC is seeking to adopt a similar approach in its emerging local plan, which is currently at examination, and it believes there are parallels in the circumstances which justify such an approach, for both authorities.

**Full text:**

SMBC notes that this iteration of the plan includes a significantly different housing requirement than that included in the R19 version of the plan published in November 2022. It recognises that, at least in part, this is driven by SSDC seeking to use the greater flexibilities in the December 2023 NPPF in its approach to release of Green Belt land to accommodate its own needs, and a small contribution to unmet need arising elsewhere in the wider HMA.

SMBC is seeking to adopt a similar approach in its emerging local plan, which is currently at examination, and it believes there are parallels in the circumstances which justify such an approach, for both authorities.

What is less clear is how unmet need from other authorities in the HMA is to be dealt with. This includes need arising in both Dudley MBC and Wolverhampton CC areas which have recently been the subject of R18 consultations. The context for these consultations includes the following:

- The Draft Black County Plan proposed the realisation of Green Belt sites in Dudley and Wolverhampton.
- The Draft Dudley & Wolverhampton Local Plans have drawn back from any Green Belt land releases.
- There remains unmet need originating from DMBC & WCC that is higher than it otherwise would have been due to the plans' approach to not releasing any Green Belt land.
- It is not clear from the plans what the DMBC & WCC's expectations are for other LPAs in the housing market and functional economic areas (and beyond) to assist in meeting their need, particularly if the only opportunity for the other LPAs to accommodate DMBC's need is for Green Belt land release in these other LPAs (including SMBC & SSDC).

SMBC welcomes the opportunity to explore these issues in more detail with SSDC through the on-going duty to cooperate discussions.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Attachments:** None