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

Our Ref:

PINS/Q4625/429/4

Date:

11 February 2022

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Dear Mr Palmer,

## Examination of the Solihull Local Plan

As we explained at the last of the scheduled hearing sessions held on 3 February 2022, we have concluded that the Council has complied with the duty to co-operate in the preparation of the Local Plan.

However, as we also explained, we are still giving consideration to a number of significant issues of soundness. Realistically, the earliest date for adoption of the Local Plan will be during 2022/23. With this in mind, at the hearing sessions we asked the Council to consider the implications of extending the plan period to at least 2036/37 so that strategic policies look ahead over a minimum fifteen year period from adoption in order to be consistent with national policy. At the hearing sessions we also asked the Council to consider an amended stepped annual housing requirement which would include a contribution of approximately 2,000 dwellings to unmet needs in the wider Housing Market Area up to 2031, as proposed in the submitted Local Plan, whilst providing for a five year supply on adoption (using 2022/23 as the base date).

In terms of the supply of housing land we have particular concerns in relation to the Council's estimates of the scale and timescale for housing completions at the National Exhibition Centre (NEC) and indeed the overall approach that the Local Plan takes to the site. The Local Plan is justified in recognising the importance of the NEC site and the potential for redevelopment including housing. The Local Plan and the Council's updated housing trajectory (HD046) envisage 2,240 dwellings being completed on the NEC site in the plan period. This would be a major element of the overall housing supply and by far the largest single site in terms of dwelling numbers. Given this, we consider that it is necessary for the site to be allocated and for the Local Plan to include a specific policy for the allocation, setting out a clear framework for development, policy criteria, constraints and infrastructure requirements. This would reflect the approach taken to site UK1 and the housing site allocations.

The updated housing trajectory anticipates completions at the NEC site from 2026/27 onwards with 217 completions in this first year of delivery. With the earliest realistic year of adoption being 2022/23, this would mean that the NEC site would contribute to the five year supply on adoption and would therefore need to be considered deliverable. In line with Annex 2 to the

NPPF, there needs to be clear evidence that housing completions will begin on site within five years.

On the basis of the evidence and information currently before us, we are not able to conclude that the site is deliverable. Furthermore, whilst we are satisfied that in principle the site is developable, there is currently insufficient basis to conclude that the annual rate and overall scale of housing anticipated in the plan period is realistic. The NEC Masterplan (Consultation Draft Nov 2021) sets out an ambitious vision for the site. However, the Masterplan and other evidence currently available does not provide sufficient detail and clarity on delivery. Specifically, there is insufficient detail and clarity in relation to the following:

- Physical and other constraints and how these would be addressed.
- Policy criteria/requirements that would be applied and how these would be addressed.
- The physical, social and community infrastructure required, how it would relate to phases of housing development and how it would be funded and delivered.
- The mix of housing types and tenures and how these are expected to be phased.
- The process and timescale for involving a development partner and housebuilders.
- The process and timescale for planning applications/permissions and progress with any background work such as technical studies.
- Evidence on feasibility and viability, taking into account the particular scale and nature of the site and the mix of housing types and tenures.
- The basis for the high number of completions (217) in the first year of delivery without any build up to this.
- The basis for the significant annual completion rates envisaged and the fluctuations from year to year.

The updated trajectory anticipates the NEC site making a substantial contribution to the overall housing supply. This includes a contribution of 1,258 dwellings by 2030/31. One of the key aspects of the Local Plan is the commitment to making a contribution of approximately 2,000 dwellings towards unmet needs in the wider Housing Market Area up to 2031. The NEC site is a major element in this. We therefore need to be satisfied that the delivery of housing on the scale and timescale envisaged is realistic. You will appreciate that there would potentially be significant implications for the examination if we were to conclude that this was not the case. With this in mind, before we proceed any further with the examination, we are giving the Council the opportunity to provide further evidence and information in response to the specific concerns set out above.

We would be grateful if you can confirm that the Council is willing and able to do this and if so, provide us with a realistic timescale for the work to be completed. It would be sensible to undertake this work in the context of the approach to the length of the plan period and stepped annual housing requirements referred to above and a specific allocation and associated policy for the NEC site. Please let us know via the Programme Officer if you have any queries regarding the above. We look forward to your response.

Yours sincerely,

*Kevin Ward and Kelly Ford*

INSPECTORS