

Reviewing the Plan for **Solihull's Future**

Solihull Local Plan Review

Reg 19 Draft Local Plan:
Overall Approach
Topic Paper

October 2020



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Contents

1.	Introduction.....	4
2.	Background.....	5
3.	Local Plan Review	10
4.	Summary of Key Evidence	16
5.	How the Evidence has been used	19
6.	Duty to Cooperate	29
7.	Conclusion	36
	APPENDICES	37
A.	The Spatial Strategy and Options for Growth	38
B.	HMA Position Statements	48

1. Introduction

1. This topic paper is one of a series of papers supporting the Council's Draft Submission Local Plan which has been published for consultation. The topic papers look at the relevant national and local guidance that impact on the emerging plan. They also provide a summary of the evidence base and how it has been used to shape the local plan. The topic papers do not contain any policies, proposals or site allocations and should be seen as explanatory supporting documents.
2. The Local Plan as a whole sets out the future spatial strategy for the Borough and includes the allocation of sites to promote development. It also identifies land where development would be inappropriate because of its impact on, for instance, environmental or historic assets and it incorporates a strategy for enhancing the natural, built and historic environment.
3. This topic paper focusses on the overall approach to development of the Draft Submission Local Plan. It sets out the context to the plan's preparation as a whole and includes the Duty to Cooperate.

2. Background

Previous Development Plan Strategy

4. The Unitary Development Plan (UDP) 1997 was developed in the context of the Strategic Planning Guidance for the West Midlands (1988), and also took account of RPG11 (1995) which replaced it. The UDP was based on 3 fundamental principles; regeneration, quality of life and Green Belt protection, focussing on urban regeneration, economic development, the Green Belt and making a positive contribution to the environment. The annual housing target was 570 dpa.
5. The strategic context for the UDP Review 2006 was RPG11 (2004), which became the RSS later that year. The UDP was based on the same fundamental principles, with a 4th added relating to sustainable development, defined as involving reuse of urban land, strengthening of public transport routes and focus on centres. The UDP Review's principal objectives included sustainable development, regeneration, meeting needs, protecting and enhancing the environment, and protecting the Green Belt. The annual housing target was 400dpa.
6. The current local plan, the "Solihull Local Plan" (SLP) was adopted in 2013 and covers the period 2011 to 2028. It was developed in the context of the RSS Phase 2 Revision, which reached Report of Panel Stage in 2009 but was never approved by the Government before the RSS was revoked. The SLP spatial strategy was based on North Solihull regeneration, promoting growth in the M42 Economic Gateway, Solihull town centre and along public transport routes, and on Green Belt protection.
7. Whilst the SLP remains up-to-date in many respects, the Council has recognised that the existing spatial strategy was developed in significantly different circumstances. In addition, there are a number of other issues that need to be addressed to enable the longer term development needs of the Borough to be planned for. The Plan therefore needs to be reviewed to ensure it remains up to date and provides a positive vision for the future of the Borough as required by the National Planning Policy Framework (NPPF).

National Planning Policy Framework (NPPF)

8. The NPPF provides the strategic framework for the Solihull Local Plan and sets out the presumption in favour of sustainable development, which all Plans are expected to follow. This means that the Local Plan should provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF.
9. The Local Plan must set out the strategic priorities for the Borough, addressing the homes and jobs needed, and the provision for other development, supporting infrastructure and social and environmental considerations. It must be underpinned by relevant and up to date evidence of the economic, social and environmental characteristics of the area.
10. In accordance with the NPPF, plans are sound if they are:
 - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.
11. The Council has a duty to cooperate with other local authorities and prescribed bodies to ensure proper coordination of strategic priorities across boundaries. Local Planning Authorities are expected to work collaboratively to meet needs that cannot be met wholly within their areas, and are expected to demonstrate evidence of effective cooperation.
12. In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Under its 'Duty to Cooperate' (DtC) obligations, the Council has been working with neighbouring authorities and other partners. The duty to cooperate is discussed in more detail in Section 6.

Planning Practice Guidance

13. The Planning Practice Guidance recognises that the role of Plans is to set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. In this respect it is essential that plans are in place and kept up to date.
14. The PPG sets out that authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties. The Sustainability Appraisal plays an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives.
15. The PPG states that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. The PPG also requires strategic policy-making authorities to explore all available options for addressing strategic matters within their own planning area, unless they can demonstrate that to do so would contradict policies set out in the NPPF.
16. The Local Plan Review has therefore needed to consider the wider strategic context within which the Borough operates.

Joint Development Framework for the UK Central Hub Area

17. Following the publication of the M42 Economic Gateway Study in June 2013, the area around the proposed HS2 Interchange Station and incorporating Jaguar Land Rover,

Birmingham Airport, National Exhibition Centre, the proposed HS2 Interchange and Birmingham Business Park has been known as the UK Central 'Hub' area.

18. The businesses within this area, including the key economic assets mentioned above, are known to have plans for their sites and possible aspirations for the wider area within which they operate. This is inevitable as each of them, like the wider community in which they are located, requires, for example, fast and effective transport links and a high quality environment.
19. The area has a history of continual evolution that goes with assets of this scale i.e. the airport, National Exhibition Centre and major advanced manufacturing facilities, and with the need to cater for ever changing demands and trends in their respective sectors. These assets are of national significance. In addition, three recent developments reflect the wider demand for new business space including investment by Rolls Royce, Interserve and Resorts World.
20. The Local Plan Review combined with the on-going UK Central initiative provide further opportunity to co-ordinate the continued evolution of this critical part of the Borough and in particular seeking to ensure that planning and investment in infrastructure and development are aligned for optimal results.

UK Central Masterplan 2013

21. In June 2013, the Council published the UK Central Masterplan, setting out a vision for economic growth and job creation. The document highlighted four key areas within the M42 Corridor including North Solihull, Solihull Town Centre, Blythe Valley Park/A34 corridor and the area known as the Hub. As discussed above, the latter area provides the most significant opportunity, encompassing the site of the proposed High Speed 2 Interchange station, Birmingham Airport, the NEC, Jaguar Land Rover and Birmingham Business Park.

Urban Growth Company

22. In 2016 the Council established the UK Central Urban Growth Company (UGC) to lead the delivery of the project. In particular its aims are:
 - To focus on securing the necessary infrastructure, connectivity and infrastructure improvements to create the optimum environment for investment, new jobs and homes.
 - To co-ordinate planning, sequencing and delivery of the infrastructure and wider public transport connectivity across the UK Central Hub Area.
 - To work collaboratively with the land owners to inform the masterplan process to optimise financial, social and economic value.
 - To work commercially and to realise the development opportunity of the Arden Cross site and the wider benefits this will bring to the Hub.
23. The UGC has brought together the key stakeholders from The Hub area to develop a concept framework/high level plan that illustrates the key components and growth aspirations of the partners; together with an indication of the infrastructure needed to support delivery of the project.

GBSLEP Spatial Plan and Evidence

24. GBSLEP identifies UK Central as the principal international gateway and strongest performing economy in the West Midlands. Its importance is recognised in the GBSLEP

Strategy for Growth, and the Strategic Economic Plan. The significance of the HS2 Interchange and adjoining area as a key element of the UK Central Hub Area, the zone with the greatest potential for growth, is also recognised by GBSLEP and the Council.

25. With regard to strategic housing needs, the GBSLEP and Black Country Strategic Housing Needs Study has been prepared on behalf of the GBSLEP and Black Country Authorities by Peter Brett Associates. It is a staged study and formed the basis for identifying strategic housing need across the housing market area (HMA) for 2011 to 2031. The study looked at the shortfall in the provision for new housing and identified potential growth scenarios for meeting the housing shortfall.
26. The Stage 3 study looked at six scenarios for growth; intensification, urban extensions, public transport corridors, future jobs and enterprise, dispersed growth and new towns/settlements. It concluded that most of the strategic housing shortfall would need to be accommodated on green field sites, that the public transport corridor option offered significant capacity, mostly in the Green Belt, and that there was a need for a shared Green Belt evidence base across the housing market area. Additional urban extensions were considered to be the most likely option to contribute to meeting the shortfall, with the edge of the conurbation offering the most obvious potential. The HS2 rail link and interchange was highlighted, as presenting the market with a step change in demand for housing in the area, although it was recognised that the timing was dependent on the delivery of HS2 and the local infrastructure to better connect it to the wider area. Finally, the study recognised that exports beyond the housing market area could help to offset the shortfall, although no formal agreements existed and this would have economic implications for the Greater Birmingham housing market area.
27. The Sustainability Assessment of the Strategic Housing Needs Study Scenarios did not identify a clear best performing scenario, although Business as Usual arguably performed the worst. Urban extensions and new settlements resulted in the most significant positive benefits, and together with public transport corridors and the enterprise option, which includes UK Central, came closest to having similar numbers of positive and negative impacts. But the findings indicated significant uncertainty, unsurprising given the high level at which the assessment was taking place.

The Greater Birmingham HMA Strategic Growth Study

28. As a means to facilitate the Duty-to-Cooperate discussions, the 14 authorities in the HMA commissioned the Greater Birmingham HMA Strategic Growth Study (GBHMA). This considered the strategic housing market area need for Greater Birmingham and the Black Country to 2036 and provided evidence identifying a shortfall in provision for new housing across the HMA. The study considered the ways in which the shortfall might be addressed and identified possible 'Areas of Search' for strategic development which should be taken forward for further assessment through the plan-making process as having potential to contribute to meeting the shortfall. It also looked at options for 'proportionate dispersal' within and beyond the Green Belt and other small-scale development opportunities. The study also included a high level Strategic Green Belt review of all the Green Belt in the HMA area.
29. It is important to note that this is an independently prepared, objective study and not a policy statement. It simply provided an evidence base to take matters forward through the local plan review process and it is something the Council have taken into account.

West Midlands Combined Authority (WMCA)

30. The WMCA is made up of 7 'constituent' authorities: Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton. There are also a number of non-constituent Councils who are also members of the CA together with the three LEPs that cover the area (Black Country; Coventry and Warwickshire; and Greater Birmingham and Solihull).
31. The WMCA's Strategic Economic Plan (SEP) identifies the following four priority actions which are considered to address issues where joint working at a combined authority level adds real value:

HS2 growth: maximising the benefits of the largest infrastructure project in Europe

Skills for growth and employment for all: ensuring the skills needs of businesses are met and everybody can benefit from economic growth

Housing: accelerating the delivery of current housing plans to increase the level of house building to support increased level of growth

Exploiting the economic geography: making the most of the scale and diversity of the West Midlands' geography to enable economic growth and community wellbeing throughout the urban core and rural areas.

3. Local Plan Review

Introduction

32. Although the 2013 SLP it is a recently adopted plan and is up-to-date in many respects, there are three main reasons that have triggered the need for an early review.
33. The first is to deal with the legal challenge to the 2013 plan which resulted in the overall housing requirement for the Plan period being deleted, making it difficult to demonstrate that the Borough has a five-year housing land supply, as required by the NPPF.
34. The second is to ensure that Solihull's own housing needs are accommodated, as well as helping to address the housing shortfall occurring in the wider Housing Market Area (HMA).
35. Thirdly, the arrival of HS2 in the Borough – in particular the first station outside of London which is to be constructed on land opposite the NEC, marks a significant shift from the SLP. The proposed Local Area Plan¹ for the High Speed 2 Interchange and adjoining area highlighted the need to review the Green Belt boundary in this area to enable the interchange site to be allocated for development. An updated Local Plan addressing this matter is vital if the full potential of the High Speed 2 project is to be realised.

Scope, Issues and Options

36. The Scope, Issues & Options document was published for consultation from November 2015 to January 2016. It proposed rolling forward the Plan period to 2033 and set out the evidence to be collected, strategic matters, challenges and initial views on the level of growth needed and the options for accommodating the growth.
37. The consultation document recognised that a raft of evidence studies are required to support the development of the Local Plan Review, and indicated that work was commencing on commissioning or preparing the studies. These included new technical work or updates of existing studies for Strategic Housing Market Assessment, Strategic Housing and Employment Land Availability Assessment, Employment Land Study, Solihull Town Centre Study, Green Belt Assessment, Strategic Flood Risk Assessment and Viability Assessment.
38. A number of strategic issues were highlighted in the consultation document, covering housing growth, employment, transport, infrastructure, Green Belt and landscape character. The strategic importance of the vision in the UK Central Masterplan and the opportunity presented by the proposal for the HS2 rail link and interchange station was also recognised.
39. The consultation recognised that many of the Challenges and Objectives from the adopted Local Plan remained relevant, but proposed three additional challenges relating to the economic and social benefits of HS2, mitigating the impacts of HS2 and associated growth, and addressing the need for housing in the context of then shortfall across the Housing Market Area. Similarly, whilst many elements of the current vision and spatial strategy remained relevant, the consultation document recognised that the key test would be the appropriateness of the spatial strategy to meet the current challenges and level of growth faced. The consultation also set out the Council's views on the changes likely to be required to the existing Local Plan policies.

¹ This was a Local Area Plan published in November 2014, following which the Council decided to plan for this area through a review of the Local Plan, rather than pursue an area plan.

40. The consultation document indicated that as a minimum the Local Plan Review should seek to accommodate a housing target of around 13,500 dwellings for the period 2011 to 2033, which would require land for an additional 4,000 dwellings to be identified. It was recognised that this figure would increase if the objectively assessed housing needs for the Borough is higher and/or any of the shortfall occurring in the Housing Market Area is accommodated in the Borough.
41. The consultation document put forward the following seven broad options for accommodating the growth, based on the scenarios in the Strategic Housing Needs Study. These are described in more detail in Appendix A:
- Option A - High frequency public transport corridors and hubs;
 - Option B - Solihull Town Centre;
 - Option C - North Solihull/Chelmsley Wood;
 - Option D - Shirley Town Centre and the A34 corridor;
 - Option E -The UK Central hub area and HS2 interchange;
 - Option F - Limited expansion of rural villages/settlements; and
 - Option G - New settlements, large scale urban extensions or significant expansion of rural villages/settlements.
42. Views were also requested on any other reasonable options that should be considered.

Sustainability Appraisal of the Scope, Issues & Options

43. To support the Scope, Issues & Options, a sustainability appraisal was undertaken and published along with the consultation document. The appraisal covered the policy changes as well as the growth options. The appraisal found that Option E UK Central Hub/HS2 Interchange and Option B Solihull town centre growth options performed the best, with Option D Shirley town centre/A34 corridor and Option A public transport corridors/hubs options less well, and Option F the limited expansion of rural settlements and urban extensions/significant expansion of settlements least well. However, given the many permutations, further exploration of urban extensions around Elmdon and south of the A34 was recommended, along with expansion of Knowle/Dorridge, Hampton in Arden and Balsall Common.

Scope, Issues & Options Consultation Responses

44. The consultation invited responses to a number of questions and more generally on the review of the Local Plan. More than 170 representations were received.
45. More than a quarter of the representations on strategic issues supported the issues identified, with only a small percentage of views opposing. There was support for the updating of evidence, particularly for housing needs, and for the recognition of the strategic importance of UK Central, and the growth potential of the Airport, NEC and Birmingham Business Park. There was general support, too, for the additional challenges proposed.
46. There were mixed views on whether the existing spatial strategy remained valid, with about a fifth of respondents agreeing that it did. However, over a fifth of respondents considered that it was no longer appropriate, as it needed to be reviewed to reflect the increased emphasis on economic and housing growth. It was argued that the increased housing need

and the potential growth associated with UK Central and the High Speed 2 Interchange required a comprehensive Green Belt Review and significant Green Belt releases contrary to the existing spatial strategy.

47. A significant number of respondents considered that 13,500 dwellings was not the full objectively assessed housing need for the Borough. It was argued that further evidence was required on future jobs growth, market signals, suppression of household rates, historic building rates and affordability. Suggestions for the full objectively assessed housing need ranged from 15,300 to 23,700 dwellings. There was significant support for provision of additional housing to contribute to the wider Housing Market Area shortfall.
48. There was support for most of the growth options proposed, although concern that a number of them would have limited capacity, with significant support for the UK Central Hub Area and HS2 Interchange option. Whilst there was developer and landowner support for the new settlements, large scale urban extensions or significant expansion of rural settlements option, there was concern from residents about the loss of Green Belt, harm to character, increased car dependency and congestion, and impact on infrastructure and services.

Council's Response to Representations

49. The Council's response to the representations made on the Scope, Issues and Options was agreed in April 2016, and can be found at <http://www.solihull.gov.uk/lpr>. The Council has recognised the need to update the evidence to inform the review of the Local Plan. A Strategic Housing Market Assessment, a Strategic Housing and Employment Land Availability Assessment, and a Green Belt Assessment were undertaken with the output being published alongside the Draft Local Plan. The Council has also taken a lead in negotiations across the Housing Market Area to try and resolve the housing shortfall.
50. In responding to representations on the challenges facing the Borough, the Council recognised that appropriate provision will need to be made for housing and employment, and other types of development, having regard to all relevant influences. The additional challenges proposed in the Scope, Issues and Options document reflect the major changes since the adopted plan was prepared, notably and scale of the housing need in the Borough and the economic and social benefits that the HS2 rail link and Interchange station offer.
51. The Council also recognised the need to update the vision, and that the spatial strategy would need revisiting in the context of the growth the Borough will have to accommodate during the extended Plan period.

Draft Local Plan

52. The Draft Local Plan Review document was published for consultation from December 2016 to February 2017. It sought views on a whole plan review for the period 2018-2033 and included revised Policies P1-P21 from the adopted Local Plan, an updated housing requirement figure and testing a contribution of 2,000 dwellings to the Greater Birmingham HMA shortfall. The Plan set out the Council's preferred option for accommodating managed growth in a sustainable manner and included a spatial strategy which provided for 20 new allocations, including Green Belt boundary changes.

Interim Sustainability Appraisal

53. An Interim Sustainability Appraisal was carried out on the Draft Local Plan's strategy, policies and Call for Sites/site allocations. The SA framework continued with the same four main themes as for the Scope, Issues and Options, including 'climate change and energy.' Sites and policies were appraised against 19 SA objectives.
54. Whilst the Council identified a range of options in the Scope, Issues and Options document, none of these single options were considered capable of delivering the scale of growth and meeting needs across the Borough. There was insufficient capacity to meet the Borough's needs within the urban areas only, limited opportunity for urban renewal and increasing densities would have an adverse impact on the character of the Borough's residential areas.
55. The Interim Sustainability Appraisal identified and assessed 5 reasonable distribution options which combined a number of different spatial approaches to housing delivery as follows:
1. Focus on Urban Areas and Public Transport corridors and hubs
 2. Focus on Urban Areas and UK Central Hub and High Speed 2 Interchange area
 3. Focus on Urban Areas and Urban Extensions
 4. Focus on Urban Areas, New Settlements, and significant expansion of Rural Settlements (part Option G)
 5. Combination of spatial approaches
56. Combined with 3 alternative growth scenarios, the above distribution options resulted in 12 reasonable alternative strategies for housing growth and distribution which were appraised using the SA Framework. This is further explained as part of the 'Consideration of Alternatives' in Section 5.
57. The Councils preferred distribution strategy reflected option 5, the combination of spatial approaches. This provided a balanced approach to development, by dispersing growth to accessible locations but also taking advantage of the opportunities offered by the UK Central Area Hub Area and the High Speed 2 Interchange. The preferred approach has capacity to meet local housing needs as well as an element of the wider HMA shortfall. There are sites available under this strategy to contribute towards the housing supply in the short term.

Draft Local Plan Consultation Responses

58. The Summary of Representations to the Draft Local Plan was reported to Cabinet Member on 18th July 2017. There were 1750 respondents to the consultation, comprising over 6,300 representations.
59. The policies and issues attracting a measure of support included:
- 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

60. Policies and issues attracting a measure of opposition included:

- The spatial strategy
- Number of new homes to be built
- Location of new homes, including some site allocations
- Infrastructure requirements

Draft Local Plan Supplementary Consultation

61. Consultation on a supplementary update to the Draft Local Plan took place from January to March 2019. This purpose of this consultation was to:

- provide an update on local housing need following changes to national planning policy through the introduction of a standard methodology
- assess additional call-for-sites submissions that had been submitted since the DLP was published
- refine the site selection process for assessing which sites should be included in the plan and reassess all sites (c320) to ensure that the preferred sites were the most appropriate when considered against the spatial strategy, and existing/new or updated evidence (this is considered further in the Site Selection Process topic paper)
- publish concept masterplans for the principal allocations
- explore a different approach to calculating how affordable housing provision should be calculated on an individual site
- set out the role of the main settlements in the future and seek views on the existing pressures and future requirements for infrastructure provision

62. The consultation did not seek to:

- revise the contribution that the Council is making towards the HMA shortfall as this would be addressed through the draft submission version of the plan
- amend the overall spatial strategy set out in the DLP
- revisit the non-housing related parts of the DLP

Draft Local Plan Supplementary Consultation Responses

63. There were a total of 1092 respondents to the consultation, raising 3807 representations. A summary of the representations received is available in the [Draft Local Plan Supplementary Consultation - Summary of Representations \(July 2019\)](#).

64. There was a measure of support for the inclusion of a number of proposed brownfield sites around Balsall Common, as well as support for sites in Meriden and Kingshurst Village Centre. There was some support for the site selection process which was considered to accord with the NPPF, although there was some disagreement about how it has been consistently applied to certain sites. However, there was also criticism that the site selection

process was overly complicated and that the identification of 'amber' sites added little to the process.

65. A number of objections to proposed site allocations were made, along with the suitability of identified settlements to accommodate additional growth, including the capacity of local infrastructure. Further objections related to the identified local housing need, the contribution that the Council is making to the housing shortfall in the HMA, and criticism that not all reasonable alternatives had been examined, including the options put forward in the Greater Birmingham HMA Strategic Growth Study.

Draft Submission Plan 2020

66. The Draft Submission Plan is being published for representations from 30th October 2020 to 14th December 2020.
67. It includes a revised spatial strategy which provides an appropriate framework for the Local Plan to propose a broad area for growth around the location of the HS2 Interchange station, and site allocations to meet housing and employment needs which strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a 'balanced dispersal' approach. The strategy also seeks to focus significant developments in locations that are, or can be made, accessible and sustainable.
68. The Plan makes provision for some 15,000 dwellings over the plan period (2020-36) which accommodates the Borough's own needs and makes a meaningful contribution to the shortfall occurring in the Housing Market Area (HMA), as part of the statutory duty to cooperate requirement. To achieve the housing requirement, and having taken into account other elements of land supply, including that from windfall developments at a higher rate than previously included, 19 residential led allocations to accommodate around 5,300 dwellings are included in the plan.
69. A policy approach supporting development at the UK Central Solihull Hub Area to create a new mixed community providing up to 5,000 new homes and jobs that seeks to maximise the benefits of the impending arrival of HS2 to the Borough, is provided.
70. On top of existing employment land supply, the Plan makes provision for an additional 9ha of employment land as a minimum, through the strategically important sites at Damson Parkway and Arden Cross.
71. Although first priority has been given to brownfield opportunities in the urban area/settlements, to support the delivery of new homes, jobs and infrastructure, significant Green Belt release will be required. However, this includes 140ha of land that even without this plan would see development take place in the form of the HS2 Interchange and associated parking thus impacting on the Green Belt.

4. Summary of Key Evidence

72. In carrying out the review of the Local Plan, the Council has commissioned a raft of updated evidence. The full list of published available evidence is on the Evidence Base page of the Council's website at <https://www.solihull.gov.uk/lpr/evidence>. Some of the key evidence base documents are summarised below:

Housing and Economic Development Needs (SHMA 2016 and HEDNA 2020)

73. A Strategic Housing Market Assessment (SHMA) was undertaken on the Council's behalf by Peter Brett Associates. The SHMA provided an objectively assessed housing need figure for the Borough, which formed the basis for the housing target set out in the Draft Local Plan.
74. The Employment Land Study (ELS), also undertaken by Peter Brett Associates, provided evidence of the Borough's employment land need for the Plan period. The ELS figure forms the basis for the employment land target set out in the Draft Local Plan.
75. In 2019 Solihull Council commissioned a Housing and Employment Development Needs Assessment (HEDNA) to take into account the revised NPPF and introduction of the standard methodology. The 2020 HEDNA provides updated evidence on the housing and economic development needs in the Borough. Further details are provided in the Housing and Sustainable Economic Growth topic papers.

Strategic Housing and Employment Land Availability Assessment

76. A Strategic Housing and Employment Land Availability Assessment (SHELAA) has been undertaken by Peter Brett Associates, providing an assessment of all of the sites submitted during the Call for Sites process between November 2015 and May 2016. The study identifies suitable areas of land within the Borough for housing and employment land, assesses the sites/broad locations for their suitability, availability and achievability for development, assesses the contribution that windfall development could make towards the Borough's housing land supply, recommends sites for inclusion in the final SHELAA, and provides a full evidence base for the sites considered. The SHELAA has been updated to reflect additional site submissions that have been received since first publication.

Green Belt Assessment

77. A comprehensive Green Belt Assessment has been undertaken on the Council's behalf by consultant Atkins. This has divided the Borough's Green Belt in to refined parcels defined around the edge of the urban area and the rural settlements, with broad areas covering the remaining more remote Green Belt area. The boundaries of the parcels have been defined using recognisable and permanent physical features, in accordance with the NPPF. Each refined parcel and broad area has been assessed against the purposes of including land within the Green Belt, as set out in the NPPF. Purpose 5, to assist urban regeneration, is not assessed as all parcels are considered to perform equally in this respect.
78. The study concludes that most parts of the Borough's Green Belt perform moderately or highly against at least one Green Belt purpose, although a small number of parcels do not perform against purposes 1 to 4. Green Belt parcels in North Solihull generally perform less well than those in the south of the Borough, because they make little or no contribution to Purposes 2, 3 and 4. Much of the Meriden Gap, that part of the Borough between the urban areas of Solihull and Coventry, performs highly against all or most of the Green Belt

purposes. The findings have been used to inform the options for growth and the site selection Process.

Landscape Character Assessment

79. A Landscape Character Assessment has been undertaken for the Council by Waterman Infrastructure and Environment. The study is in three parts; a Character baseline report, the development of a Local Character Guide, and a comprehensive Landscape Character Assessment, incorporating an assessment of the sensitivities and capacity of each of the ten Character Areas. The findings have been used to inform the options for growth and the site selection process.

Brownfield Land Register

80. In 2017 Brownfield Land Register (BLR) regulations were introduced which require each LPA to publish a BLR identifying previously developed land (PDL) which is suitable, available and achievable for residential development.
81. Given that the Council needs to demonstrate “exceptional circumstances” if land is to be taken out of the Green Belt, it is necessary to identify all possible land supply that may be available through this source. With this in mind the Council pursued two non-statutory stages in producing a BLR as follows:
- A dedicated ‘call for sites’ exercise aimed at PDL. (July 2017)
 - The publication of a draft BLR register for consultation. A copy of which can be found [here](#).
82. By undertaking these additional steps, as well as updating the BLR on an annual basis, the Council has ensured that it has a robust position on the potential land supply from brownfield land.

Constraints and Opportunities

83. A map showing the main constraints to development across the Borough has been prepared. This includes allocations and constraints shown on the adopted Local Plan Proposals Map, statutory undertakings, flood zones, environmental designations and the Green Belt. Constraints have been considered as part of the options for growth and the site selection process.
84. The construction of the HS2 rail link and the Interchange station and the Council’s ambitions for the UK Central area in the Borough present a major opportunity for growth, and the UK Central Masterplan and HS2 Growth Strategy outline the potential and how this might be delivered.
85. In considering the options for growth, the potential for infrastructure improvements and community benefits has been considered. The constraints have been used to inform the options for growth and the site selection process.

Sustainability Appraisal

86. A sustainability appraisal of the Scope, Issues and Options was undertaken using information from the 2008 Scoping Report prepared for the adopted Local Plan. The Council recognised that this work needed to be updated, and a draft Scoping Report was prepared by AECOM and published for consultation with the statutory environmental agencies in October and November 2016.

87. Interim sustainability appraisals of both the Draft Local Plan and the site options assessment work considered in the 2019 Supplementary Consultation have also been completed, along with a final sustainability appraisal of the Draft Submission Local Plan.

5. How the Evidence has been used

Challenges and Objectives

88. To help shape the policies in the local plan it is useful to identify the challenges the Borough faces and what the objectives should be in addressing these challenges. This helps to ensure that the plan's policies are justified and that they will play a part in meeting these objectives.
89. Whilst the challenges identified in the Scope, Issues and Options consultation were based on the 2013 SLP, the subsequent consultations and additional evidence have enabled these challenges to be shaped and updated to ensure they are up-to-date and appropriate.
90. Progress on the HS2 rail link means that the potential economic and social benefits that the rail link and Interchange station offer and the need for careful mitigation are now key challenges for the Borough. The Scope, Issues and Options Sustainability Appraisal references the benefits that growth around the HS2 Interchange Area could provide.
91. The GBSLEP and Black Country Strategic Housing Needs Study, along with other housing evidence highlights the increased housing target that Solihull is facing. Together with the issue of the shortfall in new housing land across the Greater Birmingham Housing Market Area, it does indicate that meeting housing needs will be a significantly greater challenge for Solihull than in the past.
92. The Local Plan Review has also provided an ideal opportunity to ensure the Council's approach to planning matches its ambitions in responding to the climate change challenge. In recognition of the gravity of the climate change emergency the Council adopted a 'Climate Change Declaration' in October 2019. Action on many fronts is needed to address this challenge and through the Local Plan the Council will set, in a statutory framework, those aspects of the declaration's actions that can be addressed through the planning system. As the declaration states *"there needs to be a just transition for our residents and for business, taking them with us, so as to protect employment and avoid adverse effects on our people, our economy and our communities."*

Developing the Spatial Strategy

93. The 2013 Local Plan incorporated a spatial strategy that was based on a housing target that reflected the emerging requirements from the revisions to the Regional Spatial Strategy. This was a target that was 'constrained' and was not meeting the Borough's own needs. Furthermore, it did not accommodate any of the shortfall that was beginning to occur across the wider housing market area.
94. Additionally, at the time the 2013 plan was being prepared, the plans for HS2 had not reached an advanced stage. The plan acknowledged that the high speed rail link could play a key role in the future growth of the Borough, but at the time it would have been wrong to assume its development. Since then the HS2 Act has received consent, and following the issuing of the 'Notice to Proceed' in April 2020, construction has now started on the project.
95. The arrival of the high speed rail will have a profound effect on the Borough and the wider region, and this local plan review must address how its benefits can be maximised. This is in the context of the unique opportunity that is available to do so; with the interchange being located at the heart of the Borough's key economic assets and transport infrastructure.

96. Whilst consultation responses have expressed a level of support for maintaining the current spatial strategy, more respondents have argued that it was no longer appropriate. Representations made reference to the need to reflect the greater emphasis on economic and housing growth in national guidance, the opportunity presented by the UK Central initiative and HS2 Interchange in the Borough, and the need for a comprehensive Green Belt review and significant Green Belt releases to meet the Borough's housing and other needs.
97. The Council also recognise that the existing spatial strategy was developed in significantly different circumstances. The additional challenges and factors outlined above represent a considerable shift from the starting point of the 2013 plan. This has required the spatial strategy to be looked at afresh and in the context that to deliver the level of growth envisaged, will require significant releases of land from the Green Belt.
98. However, it would not be right to suggest that accommodating growth at all costs was an appropriate response. Rather, the balance between these potentially competing demands needed shifting towards accommodating additional growth – in a managed fashion; and provided an appropriate balance is maintained (by ensuring a sustainable pattern of development is achieved), this would be an acceptable approach.
99. In order to update the Spatial Strategy some 'strategic objectives' were developed. These were then used to help determine the locations where growth should be directed towards. As a supplement to these strategic objectives, some 'guiding principles' were also developed and used to assess whether individual sites or locations were suitable for allocation in the plan.

Strategic Objectives

100. The purpose of the strategic objectives was to ensure that a strategy was arrived at that makes effective use of land and creates a pattern of development that focusses significant development in locations that are, or can be made, sustainable.
101. The strategic objectives set out a sequential approach to directing growth in locations as follows:
- a. Non Green Belt:
 - i. Previously Developed Land – if highly or moderately accessible location.
 - ii. Greenfield - if not in reasonable beneficial existing use (e.g. avoid loss of open space, unless compensated for) - if highly or moderately accessible location.
 - b. Green Belt:
 - i. Previously Developed Land – if highly or moderately accessible location
 - ii. Greenfield - if highly or moderately accessible location and is being lost as a result of committed development.
 - iii. Greenfield – other.
102. This hierarchy was adopted to ensure that first preference is given to appropriate sites not located in the Green Belt, and only then sites that are located in the Green Belt. This also

has the advantage that most non-Green Belt land is likely to be in a highly or moderately accessible location (i.e. within the urban area or within an existing settlement²).

103. This reflects the guidance in the NPPF, particularly paragraphs 103, 117 and 138 which seek to ensure that significant development is focussed in locations which are or can be made sustainable; makes as much use as possible of previously developed land; and where Green Belt release is necessary, promote sustainable patterns of development giving first consideration to land which has been previously developed and/or is well served by public transport.
104. It was also recognised that that some further structure was needed to assess sites that fall within category (b)(iii). In doing so, it was important to strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations.
105. This balanced approach between concentration and dispersal has a number of advantages:
 - Concentration could support the UK Central masterplan and HS2 growth strategy, and the investment priorities in 'Solihull Connected';
 - Focussing on urban areas and sustainable urban extensions provides the best opportunity for achieving accessibility and delivering public transport improvements;
 - Larger scale developments offer the opportunity for significant infrastructure improvements;
 - Provision for some smaller sites will assist the early delivery of housing during the Plan period and support existing services;
 - A totally dispersed pattern of growth would be unlikely to deliver the scale of growth required and be more likely to result in adverse impacts associated with piecemeal development which would affect a greater area.
106. Therefore the following additional criteria were suggested for category (b)(iii) so that development will be focussed in locations which are:
 - Located adjacent to a highly accessible settlement or;
 - Located adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school) or;
 - Development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available within it (including a primary school).
107. This approach would thus discourage development that is:
 - Isolated from any settlement;
 - A disproportionate addition to a settlement that only has a limited range of facilities;
 - Occurs in relatively less accessible locations;

² Although the accessibility of settlements does differ (as does the range of services they provide), it is not anticipated that opportunities for significant development within their existing boundaries will come forward.

Guiding Principles

108. In addition to the strategic objectives outlined above, some guiding principles have been identified which have been used to help identify locations where development can be appropriately located, and locations where development should be discouraged. Both the strategic objectives and guiding principles were then used to assess broad options identified in the Scope, Issues and Option consultation, together with assessing the call for sites submissions/SHELAA outputs.
109. The guiding principles fall into two categories, either a consideration that may be in support of a particular location/site or one that would indicate that the location/site is not supported. Often there will be a balance to be struck and these considerations should be seen in the 'round' rather than simple isolated assessments.

Guiding Principles Generally in Support

- Enabling the delivery of the UK Central Masterplan and HS2 Growth Strategy, including the major growth opportunity and place making potential around the HS2 Interchange station;
- Releasing land from the Green Belt to maximise the growth potential from HS2;
- Recognising the longer time scales involved in delivering larger scale developments;
- Optimising opportunities to bring forward developments that address identified issues within communities and contribute to wider community benefits;
- Making sustainable use of natural resources, including waste and minerals;
- Designing and integrating new developments into existing communities so as to minimise longer term impacts; and
- Contributing to the health and well-being of communities.

Guiding Principles Generally Not in Support

- Protecting the strategic purposes of the Green Belt;
- Areas of the Green Belt that perform well against the purposes of including land in the Green Belt,
- Protecting, conserving, enhancing and restoring environmental assets;

Assessing the Broad Options for Growth and Development

110. The Scope, Issues and Options consultation set out 7 broad growth options for accommodating growth as follows:
 - Option A - High frequency public transport corridors and hubs;
 - Option B - Solihull Town Centre;
 - Option C - North Solihull/Chelmsley Wood;
 - Option D - Shirley Town Centre and the A34 corridor;
 - Option E -The UK Central hub area and HS2 interchange;
 - Option F - Limited expansion of rural villages/settlements; and

- Option G - New settlements, large scale urban extensions or significant expansion of rural villages/settlements.
111. Ideally, seeking to accommodate development needs close to where they arise is a sensible starting position and given that around 75% of the Borough's population live within the urban areas, then these areas should be the initial focus for accommodating development. This approach would support potential developments that fall within options A to D described above which are within the urban area. Appropriate development opportunities under these options are therefore preferred.
112. However, there is extremely limited land available that could contribute towards options A to D and therefore the Council has had to look at options E, F & G (which will require land to be released from the Green Belt). For options E, F & G an exercise which looked at the options for accommodating growth against the objectives and principles identified above was undertaken.
113. Using the LPR evidence base (including the Green Belt Assessment, accessibility mapping and constraint mapping), areas of opportunity for development in accordance with options E, F & G have been assessed. This included looking along the urban edge for opportunities for a large scale urban extension; and looking around the edge of the settlements in the rural area for either limited or significant expansions of them. Furthermore the evidence is able to indicate for those settlements that could accommodate an expansion, which side or sides of the settlement should be the focus for the growth.
114. This assessment is outlined in more detail in Appendix A.
115. In considering options E, F and G the Council has sought to strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a 'balanced dispersal' approach.
116. The strategy also seeks to focus significant developments in locations that are, or can be made, accessible and sustainable. These locations will typically be on the edge of the urban area or within the rural settlements that have a greater range of services. This will be achieved by focussing development in the following locations:
- Located adjacent to the urban edge/a highly accessible settlement or;
 - Located adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school)³ or;
 - Development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available within it (including a primary school)⁴.
117. This approach will have the following advantages:
- Concentration could support the UK Central masterplan and HS2 growth strategy, and the investment priorities in 'Solihull Connected';
 - Focussing on urban areas and sustainable urban extensions provides the best opportunity for achieving accessibility and delivering public transport improvements;

³ This includes Balsall Common and Knowle/Dorridge/Bentley Heath

⁴ This includes Hampton-in-Arden, Hockley Heath and Meriden

- Larger scale developments offer the opportunity for significant infrastructure improvements;
- Provision for some smaller sites will assist the early delivery of housing during the Plan period and support existing services;
- A totally dispersed pattern of growth would be unlikely to deliver the scale of growth required and be more likely to result in adverse impacts associated with piecemeal development which would affect a greater area.

118. This approach would thus discourage development that is:

- Isolated from any settlement;
- A disproportionate addition to a settlement that only has a limited range of facilities;
- Occurs in relatively less accessible locations;

Site Allocations and the Site Selection Process

119. Complementary to the spatial strategy is the approach to site selection. To inform decisions on site allocations, there is a need to appraise all reasonable site options on a consistent basis.
120. Throughout the Local Plan review process, landowners, developers and any other interested parties have put forward over 380 sites that are considered to be available and suitable for development.
121. More detail on the Council's approach to site selection is provided in the Site Selection topic paper. However, the principles of it are essentially that when assessing individual sites, a higher priority is given to brownfield opportunities in the urban area/settlements and the least priority is given to isolated greenfield sites in highly performing areas of the Green Belt. The process also seeks to take into account other considerations (e.g. site constraints, and the spatial strategy) to give a finer grain analysis to the submitted sites. This element requires more site specific planning judgment to arrive at a view on whether a site should be allocated or not.
122. In addition to the SHELAA, which has assessed a site's suitability, availability and achievability for development, various other evidence has been used to assess whether a site should be included in the Plan.
123. The Green Belt Assessment provides evidence of how different areas of the Borough perform against the purposes of including land in the Green Belt. The assessment divides the Borough's Green Belt into refined parcels defined around the edge of the urban area and the rural settlements (where most of the site submissions are located), and assesses their contribution to the Green Belt.
124. The Landscape Character Assessment highlights the sensitivity of different areas of the Borough to development. The Accessibility study assesses each of the Call for Sites submissions against criteria relating to local facilities; primary schools, food stores and GP surgeries, and public transport services.
125. How each site performs against each of the objectives outlined in the sustainability appraisal has also been considered, along with any constraints to development, opportunities for growth, and the contribution that potential sites would make to the proposed spatial strategy.

126. The Site Assessments document 2019 includes an assessment of all the sites received and has been updated to reflect more recent submissions.
127. By applying the spatial strategy and the site selection methodology, results in development opportunities coming forward across a range of the options that were identified 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 north, 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

Consideration of Alternatives

128. The Scope, Issues & Options consultation document set out 7 broad options for growth, with the opportunities and challenges associated with each of the options. The paragraphs above and Appendix A set out how the preferred approach was developed and reviews the options for large scale urban extensions, significant expansion of highly accessible settlements and/or those settlements with a wide range of services, limited expansion of other settlements with a limited range of services, and other settlements.
129. The Sustainability Appraisal of the Draft Local Plan included the consideration of alternatives for the spatial strategy and five reasonable distribution options were identified:
1. Focus Urban Areas and Public Transport corridors and hubs
 - This approach would support strategic priorities in Solihull Connected and offers potential for sustainable locations and improvements to public transport services.
 - This approach could meet local needs, but would not make the most of the UK Central Masterplan or HS2 Growth Strategy.
 2. Focus on Urban Areas and UK Central Hub and High Speed 2 Interchange area

- Would support strategic priorities around UK Central/High Speed 2 Growth Strategy
 - May not have sufficient capacity to deliver higher levels of growth.
3. Focus on Urban Areas and Urban Extensions
- There is significant potential capacity to meet local and wider HMA needs under such an approach.
4. Focus on Urban Areas, New Settlements, and significant expansion of Rural Settlements (part Option G)
- There is significant potential capacity to meet local and wider HMA needs under such an approach.
5. Combination of spatial approaches
- Scope, issues and options (A, D, E & G) offers greatest potential for significant growth, and Option F for meeting local needs.
 - This approach has significant potential capacity to meet local needs, and wider HMA needs.
 - Would support strategic priorities around UK Central/High Speed 2 Growth Strategy and Solihull Connected.
 - Would make contribution towards housing land supply in the short term
130. Combined with 3 alternative growth scenarios⁵, the above distribution options resulted in 12 reasonable alternative strategies for housing growth and distribution which were appraised using the SA Framework.
131. Each alternative under Growth Scenario A was rejected as they would not make any contribution to the wider housing market area shortfall in housing. This would likely result in a failure of Duty to Cooperate, and would not maximise the strategic opportunities offered by the UK Central Hub and HS2 Interchange.
132. Each alternative under Growth Scenario C was also rejected. At this level of growth, there could be disproportionate social and environmental effects in the Borough, as identified in the SA. Furthermore, there may be more appropriate locations for growth around the conurbation and beyond.
133. The Council's preferred distribution strategy reflected option 5, the combination of spatial approaches using growth scenario B. This provides a balanced approach to development, by dispersing growth to accessible locations but also taking advantage of the opportunities offered by the UK Central Area Hub Area and the High Speed 2 Interchange. The preferred approach has capacity to meet local housing needs as well as an element of the wider HMA shortfall. There are sites available under this strategy to contribute towards the housing supply in the short term.
134. Distribution options 3 and 4 were discarded as neither would make the most of the UK Central Masterplan or HS2 Growth Strategy which seek to maximise economic and social benefits of major growth opportunities within the UK Central Hub Area. These alternatives

⁵ Growth Scenario A: Meeting Borough needs only. Growth Scenario B: Meeting Borough needs plus an additional 2000 dwellings. Growth Scenario C Meeting Borough needs plus an additional 4000 dwellings.

would not necessarily support strategic priorities in Solihull Connected or enable public transport improvements.

Sustainability Appraisal of the Draft Submission Plan

135. The Sustainability Appraisal of the Draft Submission Plan again tested alternative growth and distribution configurations. This was considered necessary to account for:
- Changes to the methods to calculate housing need that have been introduced.
 - To address cross-boundary issues more explicitly in relation to unmet housing needs from Birmingham in particular.
 - Updates to the evidence base and the emergence of new options for strategic growth across the HMA.
136. A fresh set of reasonable alternatives taking into account these factors was therefore identified. Following on from previous options work and to help inform the Draft Submission Local Plan, the Council has identified a variety of locations where additional growth could reasonably be accommodated (either alone or in combination depending upon the scale of growth). These combine a number of different spatial approaches to housing delivery considered at previous stages, as well as those identified in the Greater Birmingham HMA Growth Study. They are as follows:
- Focus on urban areas, urban extensions and limited expansion of smaller settlements and significant expansion of larger settlements along public transport corridors and hubs at Whitlocks End and Berkswell rail stations.
 - Additional growth focused at UK Central Hub and High Speed 2 Interchange area
 - Further limited expansion of settlements (amber sites)
 - Extension south of A45
 - New settlement at Balsall Common
137. Based on a series of alternative growth options, a total of 13 reasonable alternatives were identified. Each option starts with 'Option 1A' (13,000 homes using the existing Local Plan sites plus limited Green Belt release) as a 'baseline' position and then adds additional growth in a range of locations (including the UKC Hub area, land south of the A45, further development around Balsall Common, as well as a combination of all of these) to achieve the higher housing targets. Therefore, common to every option is the following:
- Focus on Solihull Town Centre, North Solihull/ Chelmsley Wood, the A34 Corridor and support strategic priorities in Solihull Connected.
 - Sustainable locations in the Green Belt, close to public transport corridors/ hubs, including urban extensions south of Shirley, and limited to significant expansions of villages/ settlements of Dickens Heath, Knowle and Balsall Common.
138. Having assessed the alternatives, the preferred approach correlates with the Option which includes a housing growth target of 15,017 dwellings and builds upon the draft Local Plan approach but increases growth at the UK Central Hub (Option 2a in the sustainability appraisal). The sustainability appraisal sets out the potential adverse consequences of higher levels of growth over and above the level chosen. It also recognises that whilst the Local Plan Review includes an employment allocation on land at Damson Parkway south of

the A45 (site UKC2), further growth in this area would have an adverse impact on landscape and biodiversity.

139. Furthermore, although a number of housing sites are proposed around Balsall Common, the sustainability appraisal recognises that additional significant growth in this area would have negative impacts on the Green Belt and the strategically important Meriden Gap, increasing the need to travel and on landscape and the historic environment.
140. Having considered the alternatives, the spatial strategy proposed is therefore based on developing the potential of each part of the Borough to contribute to the growth agenda. This involves:
- realising the full potential of the UK Central Solihull Area to drive growth;
 - recognising the needs and growth potential of all communities in the Borough;
 - balancing the need for growth with the importance of protecting character and distinctiveness; and
 - recognising the importance of the Green Belt, especially the strategically important parts in the Borough.

6. Duty to Cooperate

Introduction

141. The duty to cooperate was introduced by the Localism Act 2011, and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.
142. The Duty to Cooperate is both a legal test and soundness test, and is usually the first consideration at a Local Plan examination. The NPPF sets out that local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (NPPF, para 24). It makes clear that the Duty is a process of collaboration, and requires effective and ongoing joint working to ensure the production of a positively prepared and justified strategy (para. 26).
143. Statements of Common Ground (SoCG) should be prepared to demonstrate effective and on-going joint working which document the cross boundary matters being addressed and the progress in cooperating to address these issues.

Duty to Cooperate Around the Solihull Local Plan 2013

144. Historically, the Council has worked collaboratively with its neighbouring authorities and other partners. Paragraph 1.4 of the Solihull Local Plan 2013 provides a summary of the collaborative working that took place in the development of the adopted plan. This was complemented by the Duty to Cooperate Background Paper published in November 2012 (SLP Examination library reference PSC4), which provided more detail of the processes and the outcomes of joint working.

Duty To Cooperate During the Local Plan Review - Housing Market Area (HMA)

145. Solihull is one of 14 authorities that make up the Birmingham & Black Country HMA, the others being:
 - Birmingham CC
 - Bromsgrove DC
 - Cannock Chase DC
 - Dudley MBC
 - Lichfield DC
 - North Warwickshire DC (also located with the Coventry & Warwickshire HMA)
 - Redditch DC
 - Sandwell MBC
 - South Staffordshire DC
 - Stratford upon Avon DC (also located with the Coventry & Warwickshire HMA)
 - Tamworth DC
 - Walsall MBC
 - Wolverhampton CC

146. Through membership of the West Midlands Combined Authority, the following authorities also have a relationship with Solihull MBC:
- Coventry CC
 - Nuneaton & Bedworth DC
 - Rugby DC
 - Shropshire C
 - Telford & Wrekin C
 - Warwick DC
 - Warwickshire CC

Housing Need

147. Solihull MBC have been active members of the GBSLEP HMA Technical Officers Group since it was created and have contributed to all discussions relating to the delivery of unmet housing need with the HMA. This has resulted in a number of HMA wide position statements being agreed amongst the relevant authorities, these were published as follows:
- Position Statement no. 1 – February 2018
 - Position Statement no. 2 – September 2018
 - Position Statement no. 3 – September 2020
148. The Council is seeking to enter into SoCG with HMA partners and consider that the position statements noted above provide a basis for establishing common ground.
149. This engagement has been ongoing and effective in so far as it has resulted in unmet housing need (to 2031) within the HMA being reduced from 37,572⁶ dwellings in 2015 to 2,597⁷ dwellings as at 2019.
150. The 2,597 shortfall noted above represents the position using land supply as at 1st April 2019, and as such does not yet include contributions towards the shortfall from authorities that have published plans or emerging plans since then. This includes both Lichfield and South Staffordshire. These authorities have plans that are seeking to make contributions to the HMA of 4,500 (2018-40) and up to 4,000 (2018-38) respectively⁸. Less than a third of this provision would need to be made by 2031 to see the overall HMA shortfall to 2031 having been dealt with.
151. Solihull MBC has made a commitment to test accommodating 2,000 dwellings towards the unmet housing need for the HMA, but recognise that the final details of that contribution must be tested through a Local Plan process in accordance with national guidance. This is primarily associated with the need to release land from the Boroughs Green Belt to support any contributions it makes. This 2,000 contribution has been taken into account in arriving at the 2,597 shortfall (as at April 2019) noted above
152. It is noted that in December 2019 Birmingham City Council published an updated Local Development Scheme (LDS) , which concluded that an early review [of the 2017 BDP] was not required. This stated that *“the Local Planning Authority will start scoping out the work needed to undertake this in 2020 and set out a timetable for any BDP update, if necessary, in*

⁶ Strategic Housing Needs Study Stage 3 (PBA August 2015)

⁷ HMA Position Statement No. 3 September 2020 – Table 5 to reflect the position as of the Apr 2019 base date.

⁸ HMA Position Statement No. 3 September 2020 – Appendix 2

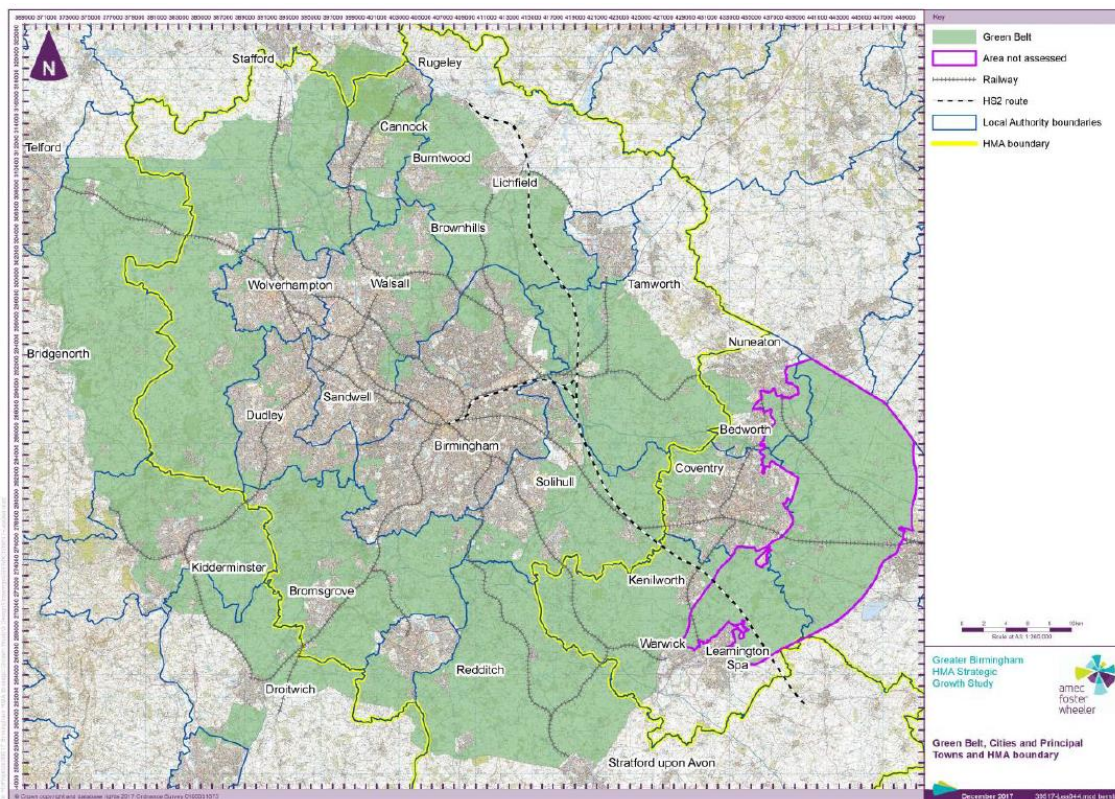
the next version of the LDS by January 2022." At this early stage Birmingham CC has not made any request to any LPA within the HMA to help with housing need beyond 2031, nor has it set out what any extent of shortfall beyond 2031 may be.

153. On the 4th August 2020 The Association of Black Country Authorities wrote to all members of the HMA regarding the challenges facing the Black Country Joint Plan review in so far as they related to matters of Housing and Employment land supply. This letter supports the ongoing duty to cooperate process in so far as it relates to the Black Country Joint Plan, but also plan preparation and review for recipient authorities (extent subject to stage of plan making). The letter identified that the Black Country Authorities are preparing a Draft Plan for consultation in summer 2021, with an aim to produce a Publication Plan in summer 2022 and adopt the Plan in early 2024. Despite initial work around urban capacity and potential Green Belt release within the Black Country area, there remains a significant level of unmet need in the order of at least 4,500 - 6,500 homes and up to 292 ha-570ha of employment land up to 2039.
154. Given the timetable it is the view of SMBC that there remains a significant amount of work to be undertaken to evidence this shortfall and review the overall need in light of recent government changes to the Standard Methodology which, given the timeframes involved, will affect the continued development of the Black Country Plan. Any final shortfall will also be subject to testing through further consultation and public examination. SMBC therefore commits to continuing to work alongside the Black Country Authorities and other members of the wider HMA to review the evidence which supports the unmet need but notes that any outstanding need retains significant uncertainty and is also likely to be relevant towards the latter part of the Plan Period (post 2031 for example). Given the likelihood of a Local Plan review within SMBC prior to 2031 the Council is of the view that this issue can be managed further as part of its next Local Plan review.

Housing Opportunities in the Urban Area or Beyond the Green Belt

155. From the onset of the Boroughs Local Plan Review in 2015 it has been clear that significant housing pressures existed across the HMA, and beyond. Prior to the onset of the Plan review, SMBC notes that the development and examination of the BCC Local Plan which, following the publication of the Inspectors report in 2015, confirmed a significant shortfall in housing need that was required to be met within the wider HMA. In part of reaching this decision BCC were deemed to have demonstrated exceptional circumstances to justify the release of Green Belt land. In the proceeding 5 years SMBC have also noted the development and examination of other Local Plans across the HMA (for instance Bromsgrove) that exceptional circumstances were demonstrated to justify the release of Green Belt land to meet housing needs.
156. In addition, SMBC are active members of the Coventry, Solihull and Warwickshire Planning Officers Group and engaged actively with the respective authorities in relation to the development and adoption of their Local Plans and the Memorandum of Understanding that underpinned them. This is a further important step as each authority demonstrated exceptional circumstances to justify the release of land from the Green Belt to meet the housing needs of the HMA. In the case of Stratford and North Warwickshire (where this matter remains subject to a live EIP), active proposals are also made to support the GBBC HMA.

- 157. Notwithstanding the above approximately 67% of the Boroughs land area is covered by Green Belt with significantly limited brownfield opportunities within the urban area or the rural settlements. As part of developing the Solihull Local Plan the Borough have been active participants in the HMA Strategic Growth Study, which included looking at options of density and brownfield land as a primary option ahead of releasing land from the Green Belt. In this respect SMBC have sought to maximise the efficiency and deliverability of land within its existing urban areas.
- 158. Lastly, the plan below shows the extent of Green Belt coverage across the West Midlands Area. SMBC are mindful that a key part of the NPPF, and draft proposals for the future national planning system, is the principle of Sustainable Development and conversely the importance of meeting development needs as close as possible to where they arise. The above summary therefore clearly demonstrates that it would be unsustainable and inappropriate not to plan positively for meeting local housing needs within the Borough and where possible any of the unmet need within the wider HMA. This therefore provides part of the justification for exceptional circumstances in Solihull and demonstrates how SMBC have engaged with and supported the wider HMA in considering the most sustainable options for meeting development needs.



The West Midlands Green Belt and Greater Birmingham HMA (Figure 24 from Strategic Growth Study (GL Hearn Feb 2018))

UK Central

- 159. The UKC Hub area is recognised as being of strategic importance to the local, regional and national economy. It will provide for an effective and efficient use of land associated with the development of HS2 and facilitate future and long term economic growth for the area. This will also include significant connectivity improvements with other areas both to the

north and south east. The development proposal is supported by the WMCA and Mayor for the West Midlands.

Minerals

160. SMBC has been an active member of the West Midlands Aggregates Working Party, which provides a forum for discussion of strategic matters relating to minerals, and for agreeing Local Aggregate Assessments.
161. SMBC was actively involved in the preparation of the West Midlands Metropolitan Area Local Aggregates Assessment 2015, which sets out the annual apportionment for sand and gravel for the sub-region. An update to the LAA 2015 is being prepared. The LAA makes clear that Solihull is the principal contributor to the sub-regional apportionment figure for sand and gravel aggregates of just under 0.5 million tonnes per annum (which amounts to over 90% of the supply from the sub-region).
162. Discussions have taken place with Warwickshire County Council in May 2019 and with WCC and Walsall MBC in February 2020. Walsall is the only other source of primary sand and gravel aggregates in the Metropolitan Area. These discussions have resulted in a draft SOCG prepared by WCC for its EIP. The draft SOCG acknowledges that there will be some sterilisation of mineral resources in Solihull due to HS2, but indicates that SMBC is not currently seeking compensation from WCC for the potential loss through any Plan requirement.

Areas Subject to Ongoing Discussion

163. The only area of outstanding discussion relates to the delivery of homes to meet unmet housing need within the HMA beyond 2031. This need is likely to arise from Birmingham and the Black Country and will be the subject of on-going duty to cooperate discussions.

Relevant Notable Events/Timeline

- **2014**

164. November – Publication of the Strategic Housing Needs Study Stage 2 (Peter Brett & Associates (PBA)). This study considered both geographies and needs/supply across the study area and was commissioned by the Greater Birmingham and Solihull LEP⁹ and the 4 Black Country authorities.

- **2015**

165. January – Inspectors interim report into the Birmingham Development Plan confirming the appropriateness of the HMA geography.
166. August - Publication of the Strategic Housing Needs Study Stage 3 (PBA). This provided an update to the stage 2 study and noted the BDP Inspectors comments on the HMA geography. The housing need/supply balance across the HMA was noted to result in a shortfall of 37,572 dwellings¹⁰.

⁹ Although it was noted that some authorities in the LEP are not part of the HMA, and some authorities not part of the LEP are part of the HMA.

¹⁰ Table 2.2

167. September – HMA Housing Conference (hosted by SMBC at the NEC). The conference was attended by representatives of all 14 HMA authorities and typically included a relevant Cabinet Member, Director/Head of Service and Heads of Policy. It was agreed:
- That the housing shortfall (37,500) is a shared problem for the HMA authorities;
 - To collaborate as part of our duty to co-operate to find a solution;
 - To share resources, expertise and provide mutual support towards a solution;
 - To establish HMA Technical officer group.
168. November – SMBC publishes Scope, Issues and Options consultation.
- **2016**
169. January - HMA Housing Conference (hosted by SMBC at Solihull College).
170. March – Inspectors final report into the Birmingham Development Plan issued. The Inspector took into account the Strategic Housing Needs Study (both stage 2 and 3). He concluded that the city had a need for 89,000 dwellings and a supply of 51,100, leaving a shortfall of 37,900 dwellings.
171. November SMBC publishes Draft Local Plan consultation.
- **2017**
172. January – Birmingham Development Plan adopted, thus quantifying (at 37,900 dwellings¹¹), through an adopted plan, the extent of the Birmingham shortfall which is the principal cause of the HMA shortfall. The plan recognises that the “Council will also play an active role in promoting, and monitor progress in, the provision and delivery of the 37,900 homes required elsewhere in the Greater Birmingham Housing Market Area to meet the shortfall in the city.” Furthermore policy TP48 goes onto state that if other local authorities do not submit plans that provide an appropriate contribution to the shortfall, then the Council needs to consider the reasons for this and determine whether it is necessary to reassess Birmingham’s capacity by means of a full or partial BDP review after three years.
173. March – GL Hearn commissioned by the 14 HMA authorities to produce the Strategic Growth Study
- **2018**
174. February – Publication of the Strategic Growth Study (GL Hearn).
175. February – HMA Position Statement No. 1 – Issued alongside the publication of the Strategic Growth Study. The statement noted:
- That the Strategic Growth Study *“is an independently prepared, objective study and not a policy statement. It does not in any way commit the participating authorities to development of any of the geographic areas referred to (nor does it exclude the testing of alternatives), but it is a thorough evidence base to take matters forward through the local plan review process.”*
 - That there is a minimum shortfall of 28,150 to 2031, but that higher densities might increase supply on identified sites by up to 13,000.

¹¹ To 2031

176. September - HMA Position Statement No. 2

- **2019**

177. January – SMBC publishes Draft Local Plan Supplementary Consultation.

- **2020**

178. September - HMA Position Statement No. 3

7. Conclusion

179. This Paper has highlighted the pressures that the Borough is facing for additional housing growth and for the expansion of major businesses, such as the Airport and Jaguar Land Rover. These pressures, along with the opportunities and impacts associated with the proposed HS2 rail link and the need to incorporate the Council's climate change declaration into a statutory plan, have been recognised in the Challenges and Objectives in the Draft Local Plan.
180. The spatial strategy in the adopted local plan was developed in the context of the Regional Spatial Strategy and lower growth in the Borough which did not meet all local need, and is no longer fit for purpose. The proposed spatial strategy recognises the unique opportunity presented by the HS2 rail link and Interchange station for economic growth and job creation. It also acknowledges the significantly higher level of housing that is faced by the Borough and provides an appropriate strategy to ensure that the need can be addressed.
181. The revised spatial strategy provides an appropriate framework for the Local Plan to propose a broad area for growth around the location of the HS2 Interchange station, and site allocations to meet housing and employment needs strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a 'balanced dispersal' approach. The strategy also seeks to focus significant developments in locations that are, or can be made, accessible and sustainable.
182. Some of the key elements of the Plan include:
- Provision of some 15,000 dwellings over the plan period (2020-36) which accommodates the Borough's own needs and makes a meaningful contribution to the shortfall occurring in the Housing Market Area (HMA), as part of the statutory duty to cooperate requirement.
 - A policy approach to support development at the UK Central Solihull Hub Area to create a new mixed community providing up to 5,000 new homes and jobs that seeks to maximise the benefits of the impending arrival of HS2 to the Borough. These ambitious aspirations are over a long term, some of which will be delivered beyond the plan period.
 - To achieve the housing requirement, and having taken into account other elements of land supply, including that from windfall developments at a higher rate than previously included, 19 residential led allocations to accommodate around 5,300 dwellings are included in the plan.
 - On top of existing employment land supply, the Plan makes provision for at least an additional 9ha of employment land, through the strategically important sites at Damson Parkway and Arden Cross.
 - Although first priority has been given to brownfield opportunities in the urban area/settlements, to support the delivery of new homes, jobs and infrastructure approximately 574ha of land will be removed from the Green Belt. This includes 140ha of land that even without this plan would see development take place in the form of the HS2 Interchange and associated parking thus impacting on the Green Belt.

APPENDICES

A. The Spatial Strategy and Options for Growth

1. The Scope, Issues and Options consultation set out 7 broad growth options for accommodating growth. These are described in more detail as follows:

Growth Option A – High Frequency Public Transport Corridors & Hubs

2. This option focussed on corridors and hubs within the urban areas of the Borough, but also included rail stations in the rural area. It would take advantage of brownfield land opportunities in the urban area which are accessible to public transport and other facilities, although this is unlikely to deliver significant capacity for growth. Within the rural area, opportunities are around stations serving Balsall Common, Earlswood, Hampton in Arden, Knowle/Dorridge, Monkspath, Tidbury Green and Whitlock's End, which could deliver significant capacity, but will require incursions into the Green Belt.

Growth Option B – Solihull Town Centre

3. The Town Centre is the most accessible location in the Borough, containing a wide range of facilities and services and the Borough's main transport hub. Growth would take advantage of brownfield land opportunities and would not involve incursions into the Green Belt. However, delivering the growth allocated in the Local Plan 2013 is yet to be fully realised, although there may be scope to vary the amount of specific uses from that currently proposed through the updated Town Centre Masterplan.

Growth Option C – North Solihull/Chelmsley Wood

4. This option includes the previous North Solihull Regeneration Area where growth has been focussed through the Local Plan 2013, including some adjustments to Green Belt boundaries. Chelmsley Wood is a major hub for bus services and offers a wide range of facilities and services. However, most of the opportunities have been delivered or are in the pipeline, so the area is unlikely to deliver further significant capacity for growth.

Growth Option D – Shirley Town Centre & the A34 Corridor

5. Shirley Town Centre has benefitted from significant development in the Parkgate scheme and through the former Powergen site. There may be further opportunities for some recycling of land, but the urban area is unlikely to deliver significant capacity for growth. The A34 Corridor offers more opportunity, but this will require incursions into the Green Belt.

Growth Option E – The UK Central Hub Area & HS2

6. This option focussed on the area around the proposed HS2 Interchange station and opportunities within the NEC boundary, but also includes opportunities in the wider Hub Area presented by growth of the Airport, JLR and Birmingham Business Park. It offers an exceptional opportunity for major growth to meet wider strategic needs, with unrivalled connectivity, although this will involve significant incursions into the Green Belt.

Growth Option F – Limited Expansion of Rural Villages/Settlements

7. This option could help to meet local or only limited needs for housing but would involve adjustments to Green Belt boundaries. It is unlikely to deliver significant capacity or to generate sufficient development benefit to improve public transport, other infrastructure or services.

Growth Option G – New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements

8. There are very limited opportunities for new settlements in the Borough. A small number of options were identified through the Call for Sites exercise which were isolated from the urban area and would involve a significant incursion into the Green Belt. The option identified urban extensions on the edge of Solihull and Shirley, and to the south of Chelmsley Wood, which could provide significant capacity close to facilities and services, but would require incursions into the Green Belt. It also identified a number of options for significant growth around settlements, although again these would involve incursions into the Green Belt and may put pressure on limited facilities and services.

Assessing the Broad Options for Growth (options E, F and G)

9. Given that there is limited land available that could contribute towards options A to D, the Council has had to look at options E, F & G (which will require land to be released from the Green Belt).
10. Using the LPR evidence base (including the Green Belt Assessment, accessibility mapping and constraint mapping), areas of opportunity for development in accordance with options E, F & G have been assessed. This included looking along the urban edge for opportunities for a large scale urban extension; and looking around the edge of the settlements in the rural area for either limited or significant expansions of them. Furthermore the evidence is able to indicate for those settlements that could accommodate an expansion, which side or sides of the settlement should be the focus for the growth.
11. This exercise is undertaken in the paragraphs that follow, firstly by considering potential locations for a large scale urban extension¹² and then reviewing expansions of the rural settlements. In seeking views on option G at the Scope, Issues and Options stage, the indicative map showed extensions along most of the urban edge¹³; for the present purposes this is now broken down into 6 areas:
- Area A – South east of Chelmsley Wood
 - Area B – East of Solihull between the A45 and the canal
 - Area C – East of Solihull between the canal and the A41
 - Area D - South east of Solihull between the A41 and the A34/A3400
 - Area E – South of Shirley between the A34 and Tanworth Lane
 - Area F – South of Shirley between Tanworth Lane and Borough boundary
12. Following a review of the urban extension options, the expansion of the rural settlements is considered in two parts as follows:
- Significant expansion of highly accessible settlements and/or those settlements with a wide range of services¹⁴:
 - Balsall Common

¹² This makes a greater contribution to accommodating the need closer to where it arises (75% of the Borough's population is located within the urban area) and the advantages of locating development in accessible locations.

¹³ Not all was included under this option as, for instance, an urban extension east of the NEC was the subject of an option in its own right.

¹⁴ Including a secondary school.

- Cheswick Green
- Dickens Heath
- Knowle/Dorridge/Bentley Heath
- Limited expansion of other settlements that have a limited range of services¹⁵:
 - Hampton-in-Arden
 - Hockley Heath
 - Meriden

Large Scale Urban Extensions

Area A – South east of Chelmsley Wood

13. **Accessibility** - This area is generally accessible, with most sites being of high or medium accessibility in the Accessibility Mapping study.
14. **Green Belt** - Whilst the area performs relatively poorly in Green Belt terms, excepting the land to the north-east of the A452, with parcels generally scoring 3 to 5 in the GBA, it does provide a strategic link between the wider Green Belt east of the Borough and the Green Belt extending into Birmingham. If this were severed it would undermine the integrity of the Green Belt that extends into the conurbation.
15. **Constraints & Opportunities** - The area includes parks, local wildlife sites and local nature reserves which would constrain capacity.
16. **Capacity** - The area does not present an appropriate opportunity to accommodate a significant growth option.
17. **Deliverability** - The SHELAA indicates that most sites in North Solihull have poorer marketability and/or viability issues.
18. **Conclusion** - The impact on the integrity of the wider Green Belt, problems with viability, and the lack of capacity means that despite its accessibility this area is not suitable for major growth.

Area B – East of Solihull between the A45 and the Canal

19. **Accessibility** - This area is less accessible, with sites to the north of the area being of medium accessibility and sites further south low accessibility in the Accessibility Mapping study.
20. **Green Belt** - The land west of Damson Parkway, parcel RP14, performs relatively poorly in the GBA, whilst the land to the east is moderately performing, reflecting the existence of some urban influences. The land to the east of Hampton Coppice is highly performing, being part of the wider Meriden Gap.
21. **Constraints & Opportunities** - The western part includes Elmdon Park, a Local Wildlife Site and a Local Nature Reserve. These designations mean this area is unsuitable for growth as they are important facilities for the local community. The area either side of Damson Parkway is less constrained although there is land safeguarded for a Gypsy and Traveller site. To the east, at Castle Hills, lies the most extensive area of Local Wildlife Site in the Borough. Further south, the urban edge is constrained by Hampton Coppice, an important

¹⁵ Including a primary school and some retail services.

urban fringe woodland and Local Wildlife Site. The Landscape Character Assessment (LCA) identifies limited capacity in the Solihull Fringe/M42 corridor without impact on character. The UKC Masterplan identifies the area north-east of Jaguar Land Rover (JLR) for potential growth to meet JLR needs.

22. **Capacity** - This area could deliver employment land growth associated with JLR but has limited capacity for housing growth
23. **Deliverability** - The SHELAA identifies commercial development in the area as being attractive.
24. **Conclusion** - The low to moderate impact on the Green Belt, medium accessibility and the lack of constraints around the northern section of Damson Parkway indicates that this land

Area C – East of Solihull between the canal and the A41

25. **Accessibility** - The western part of this area, to Field Lane, is generally accessible, with most sites being of high or medium accessibility in the Accessibility Mapping study, whilst those east of Field Lane and around the M42 junction are of low accessibility.
26. **Green Belt** - The area performs relatively poorly in the GBA with scores of 4 to 5 up to Catherine de Barnes and Ravenshaw Lane, reflecting the existence of urban influences, especially the ribbon development along Hampton Lane. The land to the east is highly performing, being part of the wider Meriden Gap.
27. **Constraints & Opportunities** - The area is affected by a number of Local Wildlife Sites, and further south, the flood risk zone either side of the River Blythe, which is a Site of Special Scientific Interest where there is concern about declining water quality, and the corridor of an oil pipeline. The draft LCA identifies limited capacity in the Solihull Fringe/M42 corridor without impact on character, with particular pressures around the A41/M42 junction.
28. **Capacity** - The area presents an opportunity for moderate/significant growth, but is limited by the constraints.
29. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
30. **Conclusion** - The low to moderate impact on the Green Belt and the medium to high accessibility to Field Lane indicate that this land is suitable for consideration for growth, although any development would need to ensure no loss in biodiversity.

Area D – South east of Solihull between the A41 and the A34/A3400

31. **Accessibility** - This area is less accessible with the area around the M42 junction being of low accessibility and the land further south-west medium accessibility in the Accessibility Mapping study.
32. **Green Belt** - The area performs moderately in the GBA with scores of 6 to 7, although the golf course adjacent the urban area is lower performing. However, this area performs an important Green Belt function in maintaining a gap between the urban area and Knowle/Dorridge.
33. **Constraints & Opportunities** - This area is heavily constrained by the M42, the flood risk zone either side of the River Blythe, which is a Site of Special Scientific Interest where there is concern about declining water quality, the corridor of an oil pipeline, Local Wildlife Sites and a Local Nature Reserve. The LCA identifies the sensitivity of this land to development

leading to coalescence between Solihull and Dorridge and to particular pressures around the M42.

34. **Capacity** - There is limited capacity in this area, which means it does not present an appropriate opportunity to accommodate a significant growth option.
35. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
36. **Conclusion** - The significance of the gap between the urban area and Knowle/Dorridge, the heavy constraints and low to medium accessibility means that this area is not suitable for major growth.

Area E – South of Shirley Between the A34 and Tanworth Lane

37. **Accessibility** - This area is generally accessible, with most sites being of high/medium accessibility and the TRW employment site of high accessibility in the Accessibility Mapping study.
38. **Green Belt** - The area performs moderately in the GBA with scores of 5 to 7, although excessive development in some areas could lead to the loss of the gaps between the urban area and Cheswick Green/Blythe Valley Park (BVP).
39. **Constraints & Opportunities** - The area around the M42 junction is subject to significant constraints with the flood risk zone either side of the River Blythe, which is a Site of Special Scientific Interest where there is concern about declining water quality, the corridor of an oil pipeline, and Local Wildlife Sites. Further to the north-west this area is largely constraint free.
40. **Capacity** - The area presents an opportunity for significant growth.
41. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
42. **Conclusion** - The moderate impact on the Green Belt and the medium to high accessibility indicate that this land is suitable for consideration for growth, although any development would need to ensure that meaningful gaps to settlements are retained and avoid the higher flood zones. Where impact on Green Belt is more than limited, this is balanced by the higher accessibility that the area has.

Area F - South of Shirley between Tanworth lane and the Borough Boundary

43. **Accessibility** - This area is generally accessible, with most sites being of medium to high accessibility in the Accessibility Mapping study.
44. **Green Belt** - The eastern part of this area performs moderately in the GBA with scores of 6, with the western part of the area, parcel 70, being moderate to high. Development in some areas could lead to the loss of the gaps between the urban area and Dickens Heath.
45. **Constraints & Opportunities** - This area is largely constraint free, although there is a Local Wildlife Site towards Whitlock's End. The draft LCA identifies the sensitivity of this area to pressure for development close to the urban edge of Solihull and Dickens Heath.
46. **Capacity** - The area presents an opportunity for significant growth.
47. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.

48. **Conclusion** - The moderate impact on the Green Belt and the medium to high accessibility indicate that this land is suitable for consideration for growth, although any development would need to ensure that meaningful gaps to settlements are retained. Where impact on Green Belt is more than limited, this is balanced by the higher accessibility that the area has.

Significant Expansion of Rural Settlements

49. Option G included the potential for significant expansion of rural villages and settlements into the Green Belt to accommodate the anticipated growth. The Scope, Issues & Options consultation identified the settlements inset, or partially inset from the Green Belt under this option. Of these, the following settlements either have a high level of accessibility or have a wide range of local services (including a secondary school):

Dickens Heath

50. **Accessibility** - This settlement is generally accessible, with most sites being of medium to high accessibility in the Accessibility Mapping study.
51. **Green Belt** - The areas around the settlement perform moderately in the GBA with scores of 6 to 7, although land to the north-west in parcel RP70 is higher performing. Development in some areas could lead to the loss of the gaps between Dickens Heath and the urban area /Tidbury Green. The Stratford on Avon canal provides a strong Green Belt boundary to the north-east and east.
52. **Constraints & Opportunities** - There are Local Wildlife Sites to the north-west, south-west and south-east, and a Local Nature Reserve to the south of the settlement. The draft LCA identifies the sensitivity of the rural area to urban edge development, particularly between Dickens Heath and Tidbury Green.
53. **Capacity** - The area around the settlement presents an opportunity for significant growth.
54. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
55. **Conclusion** - The moderate impact on the Green Belt and the medium to high accessibility indicate that this settlement is suitable for consideration for growth, although any development would need to take account of the higher performing Green Belt to the north-west and ensure that key gaps to adjacent settlements and the urban area are protected. Development to the west of the settlement would be within walking distance of the rail station, avoid the key gaps, and maintain separation to the settlement of Major's Green in Bromsgrove District

Cheswick Green

56. **Accessibility** - This settlement is generally accessible, with most sites being of medium to high accessibility, with the land to the south-east particularly accessible, in the Accessibility Mapping study.
57. **Green Belt** - The areas around the settlement perform moderately in the GBA with scores of 5 to 7, with the land to the south-west being higher performing. Development in some areas could lead to the loss of the gaps between Cheswick Green and the urban area/Dickens Heath. Tanworth Lane and Creynolds Lane could provide a strong Green Belt boundary to the west, and south-east .
58. **Constraints & Opportunities** - The main constraint around this settlement is the flood risk zone either side of Mount Brook and the River Blythe, which is a Site of Special Scientific

Interest where there is concern about declining water quality. The LCA identifies the sensitivity of the rural area to coalescence, particularly around Salter Street, to the south-west of the settlement.

59. **Capacity** - The area around the settlement presents limited opportunity for significant growth.
60. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
61. **Conclusion** - The moderate impact on the Green Belt and the medium to high accessibility indicate that this settlement may be suitable for consideration for growth, but the flood zones, the higher performing Green Belt to the west, the need to retain gaps between settlements and the urban area, and the impacts on the landscape and other constraints limit the potential such that the area is not considered suitable for large scale growth under this option.

Knowle/Dorridge/Bentley Heath

62. **Accessibility** - This settlement is generally accessible, with most sites being of medium to high accessibility, although the land further to the east is less accessible, in the Accessibility Mapping study.
63. **Green Belt** - The areas around the settlement perform moderately in the GBA with scores of 5 to 7, with two areas, the golf course to the north and parcel 40 to the east of Dorridge performing less well. The land to the east either side of Kenilworth Road performs highly being an important part of the wider Meriden Gap. The areas to the west of Knowle/Dorridge perform an important Green Belt function in maintaining a gap between the settlement and the urban area. Earlswood Road and Four Ashes Road provide a strong Green Belt boundary to the south-west and west.
64. **Constraints & Opportunities** - There are Local Wildlife Sites around the settlement, particularly to the west and the south/ south-east of Dorridge, where the Park and Local Nature Reserve are located. Other Sites exist to the north-east and east. The LCA identifies the sensitivity of this area to encroachment and the limited capacity within the M42 corridor without impact on character.
65. **Capacity** - The area around the settlement presents an opportunity for significant growth.
66. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
67. **Conclusion** - The low to moderate impact on much of the Green Belt and the medium to high accessibility indicate that this settlement is suitable for consideration for growth, although any development would need to ensure that the key Green Belt gap to the urban area is protected. Growth is therefore best focussed to the north-east, and south/south-east, of Knowle, but should avoid the higher performing Green Belt around Kenilworth Road and would need to ensure no loss in biodiversity. Whilst the golf course is a lower performing Green Belt area, this land has not been submitted for consideration through the Call for Sites process.

Balsall Common

68. **Accessibility** - This settlement varies in accessibility, with sites to the east being of medium to high accessibility, sites to the west of medium accessibility and sites to the north and south of low accessibility, in the Accessibility Mapping study.
69. **Green Belt** - Much of the edge of the settlement is low to moderately performing in the GBA, with scores of 4 to 6, with two areas, parcel 51 to the north-west and parcel 58 to the south moderate to high performing. Parcel 57 is lowest performing reflecting the presence of existing sporadic development. Land further from the settlement is generally high performing.
70. **Constraints & Opportunities** - There are few constraints around the settlement with the Park being a Local Nature Reserve, and the mineral safeguarding area affecting the eastern part unlikely to prevent expansion of the settlement. The LCA identifies the impact of expansion on the edge of Balsall Common on rural character, and the sensitivity of the area around Carol Green/Catchems Corner to development encroaching on the rural area. There may be an opportunity for growth to contribute towards a by-pass if required as part of the infrastructure improvements for the growth associated with UK Central/HS2.
71. **Capacity** - The area around the settlement presents an opportunity for significant growth.
72. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
73. **Conclusion** - The low to moderate impact on the Green Belt and the medium to high accessibility indicate that this settlement is suitable for consideration for growth. Development to the east of the settlement would be within walking distance of the rail station and could assist infrastructure provision, and development to the south and south-east would, although be less accessible, be on land that either performs least well in Green Belt terms or provides strong defensible boundaries.

Limited Expansion of Rural Settlements

74. The following settlements are either less accessible or only have a more limited range of facilities, (but including a primary school), and may be suitable for limited expansion(s):

Hampton in Arden

75. **Accessibility** - This settlement varies in accessibility, with sites to the west being of high accessibility, sites to the north-east of medium accessibility and sites further north of low accessibility, in the Accessibility Mapping study.
76. **Green Belt** - Much of the edge of the settlement is moderately to high performing in the GBA, with scores of 6 to 9, with two areas, to the north and east lower performing. There is an established Green Belt boundary to the north of the settlement, with no obvious Green Belt boundary further to the north. The boundary to the east of the settlement has been adjusted to accommodate limited growth in successive development plans.
77. **Constraints & Opportunities** - The Conservation Area, historic environment and Local Wildlife Site provide constraints to the west, whilst the River Blythe, which is a Site of Special Scientific Interest where there is concern about declining water quality, and its flood zones are constraints to the east. The former ammunition depot, currently in use for storage is a brownfield site which could be developed alongside the Site 24 in the Local Plan 2013, providing alternative provision is made for open space.

78. **Capacity** - The settlement presents an opportunity for some limited growth to meet local needs.
79. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
80. **Conclusion** - The lower performing Green Belt land to the north and east and the medium to high accessibility present an opportunity for limited growth. Development to the east would enable the use of a brownfield site in conjunction with an allocated site that has yet to be developed, and provide a firm Green Belt boundary, whilst avoiding the higher flood zones.

Meriden

81. **Accessibility** - This settlement is generally accessible, with sites being of medium to high accessibility in the Accessibility Mapping study.
82. **Green Belt** - Land to the south-west is highly performing in the GBA, being part of the Meriden Gap. Two areas, to the west which is largely developed, and to the south, occupied by Meriden Hall and a mobile home park, perform poorly, whilst the land to the north and east of the settlement perform moderately. The former is clearly defined to the north by the A45 and Borough boundary. The latter is less well defined to the east, but a limited part of the Green Belt parcel is enclosed by ribbon development to the north and south.
83. **Constraints & Opportunities** - The main constraint around the settlement is the mineral safeguarding area, for sand and gravel to the west, and for coal to the east, although the latter is unlikely to prevent expansion of the settlement. The LCA identifies the limited capacity of the area north-east of Meriden without impact on character through coalescence.
84. **Capacity** - The settlement presents an opportunity for some limited growth.
85. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.
86. **Conclusion** - The moderate impact on the Green Belt to the west and the high accessibility indicate that this settlement is suitable for consideration for limited growth, which could be focussed in an area to the west close to services and public transport.

Hockley Heath

87. **Accessibility** - This settlement is less accessible, with sites to the north and west being of low accessibility and those to the south, closer to the settlement centre having higher accessibility.
88. **Green Belt** - Much of the edge of the settlement is low to moderately performing in the GBA, with scores of 5 to 7,
89. **Constraints & Opportunities** - The main constraint here is the Borough boundary, which means that development within the Borough is largely restricted to land to the north and west.
90. **Capacity** - The settlement presents limited opportunities for growth.
91. **Deliverability** - The SHELAA indicates generally good marketability/viability for sites assessed in this area.

92. **Conclusion** – Given that it is a less accessible settlement overall and has restricted development opportunities, other than a very limited and proportionate expansion of the village in the most accessible village locations, it is not suitable for growth.

Smaller Settlements

93. The Borough contains a number of smaller settlements where limited expansion is generally considered to be unsuitable, because of their size, inaccessibility, lack of services and/or Conservation Area status. Some of these settlements may be suitable for limited infilling within the defined settlement boundaries, whilst infilling is considered to be inappropriate in others.
94. The following settlements are considered suitable for limited infilling:
- Chadwick End
 - Millison's Wood
 - Tidbury Green
95. Infilling is considered to be inappropriate in the following settlements:
- Barston
 - Berkswell
 - Bickenhill
 - Temple Balsall

B. HMA Position Statements

96. The three position statements are provided as appendices to this topic paper and have been supplied as separate documents.
- Position Statement no. 1 – February 2018
 - Position Statement no. 2 – September 2018
 - Position Statement no. 3 – September 2020

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