

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

Solihull Local Plan Review

Reg 19 Draft Local Plan:
Site Selection Process
Topic Paper

October 2020



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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. This topic paper focusses on the site selection process.
3. The Draft Submission Local Plan allocates sites which enables the Council to demonstrate how it is positively meeting its identified future housing and employment needs. This topic paper sets out the Council's approach to the selection of sites that have been identified to meet these requirements.

2. Background

4. In 2015 the Council resolved to undertake a review of the Solihull Local Plan. The first stage in undertaking the review was the publication of a "Scope, Issues and Options Consultation" which was consulted on from 30 November 2015 to 22 January 2016
5. The purpose of the consultation was to invite views on the scope of the review, consider what options there may be to accommodate the Borough's additional development needs and identify the issues that ought to be addressed¹.
6. Published alongside the Scope, Issues and Options consultation in November 2015 was an invitation for landowners, developers and any other interested parties to put forward sites they considered to be available for development. This is known as the 'call-for-sites' exercise.
7. All of the sites put forward through the November 2015 'Call for Sites' exercise and received by 13 May 2016 were published in a ['Schedule of Call for Sites Submissions'](#) in May 2016.
8. This first 'wave' of sites amounted to 247 submissions and they were assessed through the Strategic Housing and Employment Land Availability Assessment SHELAA (Nov 2016). The report and appendices are available on the Council's website. These sites were then considered for inclusion in the 'Draft Local Plan' (DLP) which was published for consultation from 5 December 2016 to 17 February 2017.
9. With the publication of the DLP, more site submissions (47) were made and these second wave sites were published in an [updated call-for-site schedule](#) in July 2017.
10. Since then further submissions have continued to be made; including those submitted through the DLP Supplementary Consultation in January 2019. However, in order to ensure that that any additional sites would be accounted for and fully assessed, a final date for the receipt of submissions was set at 24 April 2020.
11. In total, the Council has received over 380 Call for Sites submissions.
12. It is worth noting that the vast majority of sites that have been put forward as part of this process relate to sites located in the Green Belt. For instance the analysis undertaken for the 2016 SHELAA indicated that 96.5%² of the 'theoretical capacity' identified in the study would be in the Green Belt.

¹ A summary of the representations to the consultation and the Council's response to them can be found on the Council's website

² Paragraph 4.16 identifies that 29,995 dwellings out of a total of 31,085 would be on Green Belt land

3. Policy Context

National Planning Policy Framework (NPPF)

13. As outlined in the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development. The three overarching objectives are economic, social and environmental, which are interdependent and should be pursued in mutually supportive ways. It is therefore important that the site selection process adheres to these principles.
14. The Government is committed to significantly boosting the supply of housing, supporting economic growth and protecting and enhancing the natural, built and historic environment. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
15. The Local Plan must allocate sufficient land in appropriate locations to ensure that there is an adequate supply to address objectively assessed needs over the plan period. Paragraph 23 of the NPPF states that local planning authorities have a role in “planning for and allocating sufficient sites to deliver the strategic priorities of the area” and paragraph 67 sets out that strategic policy-making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment.
16. The NPPF also recognises the importance of making effective use of land and states that “strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land”. Paragraph 138 of the NPPF goes on to state that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport.
17. The NPPF requires Local Plans to be justified and provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. The consideration of reasonable alternatives is therefore one of the key tests of soundness and the site selection process. Assessing how sites perform against each other is therefore relevant to satisfying this test.

Planning Practice Guidance

18. The PPG requires local planning authorities to assess the future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach.
19. The guidance sets out that housing and economic land availability assessments are an important source of evidence to inform plan making and decision taking as they identify a future supply of land which is suitable, available and achievable for housing and economic development over the plan period. Whilst the land availability assessment does not in itself determine whether a site should be allocated for development, it provides information on the range of sites to meet the local authority's needs. It is the role of the development plan to determine which of those sites are the most suitable, having regard to other evidence and the spatial strategy.

20. Every local plan must also be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of proposals to be taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives.

4. Summary of Key Evidence and how this has been used

21. A range of evidence base sources have been used to inform the site selection process. These are detailed below:

Strategic Housing and Employment Land Availability Assessment

22. The Solihull SHELAA, undertaken by Peter Brett Associates was published in November 2016. It is a high level technical document that has informed the site selection process by providing an assessment of all of the sites submitted during the Call for Sites process between November 2015 and May 2016. In accordance with the NPPF and PPG it identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform the plan making and site selection process.

23. Paragraph 3.78 of the SHELAA explains the site assessment process and describes how each site was placed into one of three category bands as follows:

Category	Performance
1	Sites which perform well against the suitability, availability and achievability assessments. Affected by fewest constraints and considered to be deliverable. Sites would be available within 5 years.
2	Sites with a limited level of constraints, such that they are likely to be available for delivery after the first five years. These ‘developable’ sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6 to 10-year time horizon.
3	Sites ‘not currently developable’ and have more significant constraints. For these sites to be considered appropriate it would have to be clearly demonstrated that the significant constraints affecting these sites – which could relate to suitability, availability or achievability factors, or a combination thereof – can be mitigated or overcome to make them deliverable.

24. How a site performs in the SHELAA, including which category band a site falls within, is considered as part of the site assessment process.

Accessibility Study

25. The Accessibility Study has assessed each of the Call for Sites submissions against criteria relating to local facilities including primary schools, food stores and GP surgeries, as well as access to bus and rail services. The study was first published in December 2016 and updated in January 2019 and again in September 2020.

26. Within the Accessibility Study, every site is given a score for its accessibility to each of the local facilities and to public transport. An overall accessibility score is also provided.

27. For the purposes of the site assessment process, the level of accessibility to a) each individual facility / rail or bus service and b) overall accessibility, has been considered for every site using the scores in the accessibility study as follows:

Level of accessibility for site assessment purposes	Accessibility to individual facility / rail or bus service	Overall accessibility
	Accessibility study score	Accessibility study score
Very High	100	351 - 400
High	80	301 – 350
Medium / High		251 – 300
Medium	60	201 – 250
Low / Medium	45 – 55	151 – 200
Low	30 – 40	101 – 150
Very Low	0 - 25	60 – 100

Green Belt Assessment

28. A comprehensive Green Belt Assessment (GBA), undertaken by Atkins was published in July 2016. This divides 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 first four purposes of including land within a Green Belt, as set out in the NPPF as follows:

- Purpose 1 – To check the unrestricted sprawl of large built up areas;
- Purpose 2 – To prevent neighbouring towns merging into one another;
- Purpose 3 – To assist in safeguarding the countryside from encroachment;
- Purpose 4 – To preserve the setting and special character of historic towns.

29. Purpose 5, to assist urban regeneration, is not assessed as all parcels are considered to perform equally in this respect.

30. The GBA provides a score for each Green Belt parcel depending on the extent to which it performs against each of the above purposes, in line with the criteria set out in the table below:

Score	Green Belt Performance
0	Refined Parcel / Broad Area does not perform against the purpose
1	Refined Parcel / Broad Area is lower performing against the purpose
2	Refined Parcel / Broad Area is more moderately performing against the purpose
3	Refined Parcel / Broad Area is higher performing against the purpose

31. The individual score for each purpose is also totalled to provide a combined score for each Green Belt parcel. The findings have been used to inform the site selection process where the combined Green Belt scores are interpreted as follows:

Combined score	Overall Green Belt performance for site assessment purposes
5 or less	Lower performing Green Belt
6 or 7	Moderately performing Green Belt
8 or more	Highly performing Green Belt

Landscape Character Assessment

32. 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.

Constraints and Opportunities

33. A plan showing the main constraints to development across the Borough has been prepared for each site. This includes 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.

Sustainability Appraisal

34. The Council have commissioned AECOM to undertake a Sustainability Appraisal in support of the Local Plan Review. Sites that have been submitted through the Council's Call for Sites exercise for potential inclusion in the Local Plan have been assessed as part of the SA.
35. A site assessment framework has been established to appraise site options. It is based largely on objective criteria and thresholds that allow for a consistent and fair comparison.
36. Each site that has been submitted through the Call for Sites exercise has been assessed according to how it performs against each of the SA objectives. Sites are assessed as having positive, neutral or negative effects consistent with the range below:
- Significant positive effects more likely
 - Positive effects likely
 - Neutral effects
 - Negative effects likely / mitigation necessary
 - Significant negative effects likely / mitigation essential
37. The SA site assessment framework is intended to be one of several factors that are taken into account in determining which sites to allocate or not. How a site performs against SA objectives therefore forms part of the site assessment process.

5. Site Selection Process

Site Selection Methodology

38. The 2016 DLP set out a sequential approach used to direct growth to particular locations. This included setting an overall hierarchy to site selection that can be summarised as follows:

Priority	Category
1	Non Green Belt previously developed land
2	Non Green Belt greenfield if not in a reasonable beneficial existing use.
3	Green Belt previously developed land in a highly or moderately accessible location
4	Green Belt greenfield if highly or moderately accessible location and is being lost as a result of committed development.
5	Green Belt greenfield that is either (a) located adjacent to the urban area or a highly accessible settlement or (b) located adjacent to a settlement that although may be less accessible has a wide range of local services or (c) is a proportionate addition adjacent to an existing settlement that although is less accessible has a range of services available within it.
6	Low priority – i.e. none of the above

39. To support the Supplementary Consultation in January 2019 the site selection process for assessing which sites should be included in the plan was further refined. This sought to ensure that previously developed sites in the urban area were being given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority. The process also sought to introduce a way in which the specific circumstances and context of individual sites could also be addressed, looking at other considerations and using planning judgement.

40. As a result, the site selection methodology has been split into 2 steps:
- Step 1 Using a site hierarchy which gives highest priority to previously developed sites in the urban area and lowest priority to isolated greenfield Green Belt sites.

Step 2 Using other considerations and planning judgement to refine site selections.

41. The following 2 step site selection methodology has been used to assess all site submissions.

Step 1 – Site Hierarchy

42. The first stage in the site assessment process is to consider where in the Step 1 site hierarchy the site falls. This seeks to provide a balance and favours brownfield sites, accessible sites and sites which only impact on lower performing Green Belt to determine a sites potential. This approach reflects the advice in paragraph 138 of the NPPF³.

³ In so far as it relates to non-Green Belt, PDL and accessible locations.

43. The step 1 site hierarchy criteria is set out in the following table:

Priority	Category	Additional Description	RAG
1	Brownfield in urban area or settlement ⁴	Non Green Belt previously developed land (PDL) (i.e. brownfield in urban area/settlement)	G
2	Greenfield in urban area or settlement	Non Green Belt non PDL not in beneficial use (or where the impact on the beneficial use can be mitigated) (i.e. greenfield site in urban area/settlement)	G
3	Brownfield in accessible ⁵ Green Belt location	Green Belt PDL in highly/moderately ⁶ accessible location (i.e. located on edge of or in close proximity to urban edge/settlement boundary)	G
4	Greenfield in accessible Green Belt location with committed development	Green Belt non PDL in highly/moderately accessible location and being lost (or largely lost) as a result of committed development.	G
5	Greenfield in accessible lower performing Green Belt location	Green Belt non PDL in accessible location. Lower performing Green Belt will generally have a combined score of 5 or less in the Strategic Green Belt Assessment (GBA)	Y
6	Greenfield in accessible moderately performing Green Belt location	Green Belt non PDL in accessible location. Moderately performing Green Belt will generally have a combined score of 6 or 7 in the GBA	B
6a	Greenfield in urban area or settlement	Non Green Belt, non PDL in beneficial use (i.e. greenfield site in urban area / settlement with no or only limited potential to mitigate loss of the beneficial use.	B
7	Greenfield in accessible highly performing Green Belt location	Green Belt non PDL in accessible location. Higher performing Green Belt will generally have a combined score of 8 or more in the GBA	B
8	Brownfield in isolated Green Belt location	Green Belt PDL in isolated location, i.e. poorly accessible (other than by car) to retail, educational & medical services.	R
9	Greenfield in isolated lower/moderately performing Green Belt	Green Belt non PDL in isolated location. Lower/moderately performing Green Belt will generally have a combined score of 7 or less.	R

⁴ Within urban area/settlement in this context means non-Green Belt locations.

⁵ An accessible location is located either (a) on the edge of the urban area, (b) on the edge of a settlement that has a wide range of services including a primary school and range of retail facilities. In this context a broad approach to accessibility is used based on a sites location in/edge of urban area or settlement. A finer grain of accessibility is used at step 2.

⁶ In this context, moderately accessible includes PDL sites that are adjacent to settlements that may only contain a limited range of facilities.

	location		
10	Greenfield in isolated highly performing Green Belt location	Green Belt non PDL in isolated location. Higher performing Green Belt will generally have a combined score of 8 or more.	R

- G – Allocation
- Y – Potential allocation
- B – Unlikely allocation
- R – No allocation

44. This step 1 assessment is on the basis of the site as a whole and in some circumstances (particularly with large sites) may result in a site being considered as being accessible because it one part of it adjoins a settlement, but due to the size of the site, the furthest extreme would not be close to the settlement boundary and may not therefore be as accessible.
45. It is considered that sites that fall within priorities 1 to 4 should generally be considered suitable for inclusion in the plan (‘green’ sites). However there may be some exceptional reasons why they shouldn’t and these will be identified where necessary. Sites that fall within priorities 8 to 10 should be considered unsuitable for inclusion (‘red’ sites), but as with the previous category, there may be some exceptional justification why they should nevertheless be included and this will be identified where appropriate.
46. Sites that fall within priorities 5 to 7 are considered to have potential to be included. Some will only have limited potential for inclusion, others will have a greater potential. It should be noted that sites in these priorities will still have an impact, not least of which on the purposes of including land in the Green Belt, and they should not be seen as ‘impact free’. However for this first step, these sites are judged to fall within two categories: priority 5 sites as potential inclusions (‘yellow’ sites) and priority 6 and 7 sites as unlikely inclusions (‘blue’ sites).
47. Step 2 of the site selection methodology includes refinement criteria, looking at other considerations including the evidence base identified in Section 4 and planning judgement to determine whether or not a site should be taken forward as an allocation.

Step 2 – Site Refinement

48. The second step is then 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.
49. The factors set out in the table below identify the considerations that will be taken into account as the results from step 1 above are refined. Higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded, and for sites not performing well in the hierarchy they will need more significant justification to be included.

Factors in favour	Factors against
<ul style="list-style-type: none"> • In accordance with the spatial strategy⁷. • Any hard constraints only affect a small proportion of the site and/or can be mitigated. • Site would not breach a strong defensible boundary to the Green Belt. • Any identified wider planning gain over and above what would normally be expected. • Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt. • If finer grain accessibility analysis⁸ shows the site (or the part to be included) is accessible. 	<ul style="list-style-type: none"> • Not in accordance with the spatial strategy. • Overriding hard constraints⁹ that cannot be mitigated. • SHELAA category 3¹⁰ sites unless demonstrated that concerns can be overcome. • Site would breach a strong defensible boundary to the Green Belt. • Sites that would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt. • If finer grain accessibility analysis shows the site (or the part to be included) is not accessible. • If the site is in a landscape character area that has a very low landscape capacity rating. • If the SA identifies significant harmful impacts.

50. This second step refines the starting position established by the site hierarchy in step 1 so that it results in the following categories:

- **Green** – To be included in the plan as an intended allocation. This will mean the development of the site has either no or only a low impact on relevant considerations¹¹.
- **Red** – Not to be included in the plan. This means that the development of the site has severe or widespread impacts that are not outweighed by the benefits of the proposal.

51. For the 2019 Draft Local Plan Supplementary Consultation a similar process was followed, but included an extra category – amber sites. These weren’t included as preferred sites in the plan, but were highlighted as being ‘less harmful’ than the red sites and were published as such in order that more focussed comment on their exclusion could be made. For the submission plan, this amber category has not been used as for the final plan it is considered that sites either should be either included or not.

⁷ Including only proportional additions to lower order settlements (i.e. those without secondary school or not located close to urban edge)

⁸ Including output from the Accessibility Study

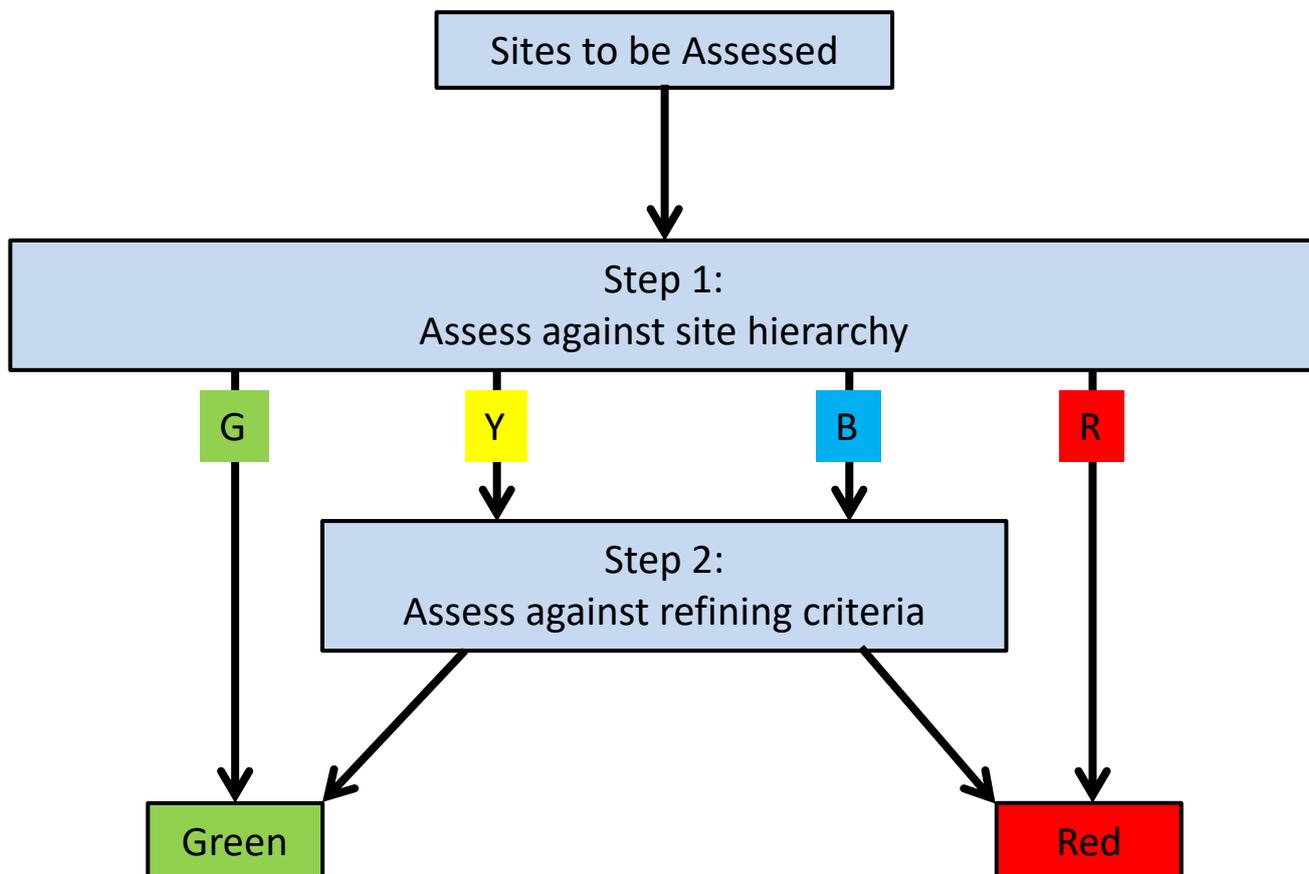
⁹ E.g. flood risk, biodiversity, heritage

¹⁰ Paragraph 3.78 of the 2016 SHELAA describes the category bands used, Category 1 perform well against suitability, availability and achievability assessments and are therefore affected by fewest constraints, these are considered deliverable sites. Category 2 sites have a limited level of constraints and are classed as deliverable. Category 3 sites are classed as ‘not currently developable’ and have more significant constraints.

¹¹ Or it has a more severe impact that can be mitigated against. This may include reducing the size of the site to avoid the most harmful impacts.

- 52. The analysis in step 2 has been used principally to confirm whether 'potential' allocations in step 1 (yellow) should be included as green sites, and whether 'unlikely' allocations (blue) should be included as red sites in the site assessment process.

Summary Illustration of Site Selection Process:



- 53. A full assessment of each submitted site is contained in the Site Assessments document.

6. Conclusion

54. The Draft Submission Local Plan includes site allocations which enables the Council to demonstrate how it is positively meeting its identified future housing and employment needs. This topic paper has sets out the Council's approach to the selection of sites that have been identified to meet these requirements.
55. Having regard to national planning policy guidance and the evidence base used to support the preparation of the Local Plan Review, over 380 sites have been assessed.
56. A two stage site selection methodology has been developed:
 - Step 1 Using a site hierarchy which gives highest priority to previously developed sites in the urban area and lowest priority to isolated greenfield Green Belt sites.
 - Step 2 Using other considerations and planning judgement to refine site selections.
57. The individual assessments for each submitted site is included in the Site Assessments document.
58. Using the site selection methodology, those sites that are considered appropriate for inclusion are identified as 'green sites' and are allocated in the Draft Submission Plan. These are considered appropriate having regard to the reasonable alternatives.
59. The majority of sites submitted are not included as a compelling case for their inclusion has not been made; largely because they are located in the Green Belt and releasing them for development would not result in a sustainable pattern of development and/or there are other considerations that indicate they are not suitable for inclusion. These are identified as 'red sites'.

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