

# Solihull Local Plan Review

## Pre-submission

Sustainability Appraisal: SA Report Non-Technical Summary

October 2020

## Quality information

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# 1. Introduction

## The Solihull Local Plan Review

1.1 Solihull Council is undertaking a review of its Local Plan. The current Local Plan, the 'Solihull Local Plan' (SLP) was adopted in December 2013 and covers the period 2011 to 2028. A review is required to identify an appropriate future supply of housing land, which will also support Birmingham City Council in meeting their needs within the wider Housing Market Area (HMA).

1.2 The following vision is established for the Local Plan Review:

*“By 2033, Solihull will have built on its distinct reputation as an attractive and aspirational place to live, learn, invest, work and play. It will have taken advantage of the unique opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area; reflecting the Borough’s location at the heart of the national rail and motorway network. In particular the opportunity will have been taken to ensure that the HS2 Interchange is well integrated to the Borough’s green infrastructure and key economic assets, including Birmingham Airport, the NEC and JLR to ensure they, and others, can capitalise on this potential. The Borough will play a part in meeting, in a sustainable manner, the needs of its housing market area so that its residents have access to a range and choice of quality accommodation. The Borough will retain its sense of identity, both in its urban and rural area (including appropriate protection of the Green Belt); and the quality of the environment that make it a special place.”*

1.3 In implementing this vision, 15 Local Plan objectives are identified:

- Reducing inequalities in the Borough
- Meeting housing needs across the Borough
- Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- Securing sustainable economic growth
- Protecting key gaps between urban areas and settlements
- Climate change
- To maintain a supply of gypsy and traveller sites
- Increasing accessibility and encouraging sustainable travel
- Providing sufficient waste management facilities and providing for sand and gravel aggregates
- Improving health and wellbeing for everyone
- Protecting and enhancing our natural assets
- Water quality and flood risk
- Maximising the economic and social benefits of the High Speed 2 rail link and the UKC Hub Area
- Mitigating the impacts of High Speed 2 and the growth associated with the UKC Hub area
- Providing infrastructure and securing developer contributions

## Sustainability Appraisal (SA) for the Solihull Local Plan Review

- 1.4 In line with procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), Local Development Documents (such as the Local Plan Review) must undergo a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.
- 1.5 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan Review's contribution to sustainable development.
- 1.6 This document is the Non-Technical Summary (NTS) of the Sustainability Appraisal Report (SA Report) that accompanies the 'Pre-Submission' version of the Local Plan Review (2020) for consultation under Regulation 19 of the Town and Country planning.
- 1.7 The SA Report and this NTS has been structured into three parts as follows;
  - **Part 1** introduces the SA process and initial steps that were taken to establish the focus and methodologies (i.e. Scoping).
  - **Part 2** provides an outline of plan making to date, in association with the parallel SA process. In particular, this part details the process of considering and appraising reasonable alternatives.
  - **Part 3** provides an assessment of the 'Pre-Submission' version of the Local Plan Review as a whole.

## 2. Part 1: The scope of the SA

### Introduction

- 2.1 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.
- 2.2 As such, these authorities were consulted on the scope of the Local Plan Review SA in October/ November 2016.
- 2.3 Following on from previous scoping exercises that been undertaken in support of the Local Plan, the scope of the SA has been established under four over-arching ‘themes’ (established in the UK Sustainability Strategy) as follows:
- Sustainable consumption and production;
  - Climate change and energy;
  - Natural resource protection and environmental enhancement; and
  - Sustainable communities.
- 2.4 **Appendix A** of the SA Report provides the full and detailed scoping information, which has informed the development of key sustainability issues and 19 different SA objectives across the four over-arching themes. **Appendix B** of the SA Report provides detail of the Scoping consultation responses received.

### Key sustainability issues

- 2.5 The key sustainability issues, as established under the four SA themes through scoping, are as follows:

#### **Sustainable consumption and production:**

- Performance indicators in the regeneration zone for North Solihull are lower the rest of the Borough.
- There is a relatively high level of small business start-ups.
- Continued growth and investment is expected to be experienced within Solihull over the Plan period.
- There is a need to support people with low levels of skills into employment.
- Despite some good public transport links, levels of car usage are higher than the national average.
- There is a need to reduce waste and increase reuse and recycling. However, the borough has relatively high rates of household waste.
- Abstraction of water is controlled; coupled with the need to reduce carbon emissions; there is a need to improve water efficiency.

#### **Climate change and energy:**

- Tackling climate change is a national and local priority. There is potential to increase the use of certain renewable and low carbon energy technologies.
- Businesses are at risk from the effects of climate change and energy security.
- There is potential for flooding from various sources including watercourses, surface water and groundwater.

- Climate change is predicted to lead to hotter summers and more extreme weather such as high winds.

**Natural resource protection and environmental enhancement:**

- It is possible that local wildlife species and habitats could be affected by development and opportunities for enhancement not realised.
- The distinctiveness of the Arden landscape is being eroded, and traditional buildings and agricultural features like hedgerows are declining.
- There is a need to improve the quality and/ or quantity of green and open space to better meet the recreational needs of the population.
- There is a need to protect and better reveal the significance of heritage assets. The character of historic farmland needs to be protected and restored.
- Creating a high quality and distinct built environment is a key objective.
- Local Plans have a key role to play in helping to ensure that air quality improves and exposure to pollution is minimised and reduced.
- Parts of the Borough are more exposed and vulnerable to sources of noise such as the Airport. There are areas of grade 2 agricultural land that should be protected from development.

**Sustainable communities:**

- Although Solihull is a broadly affluent area, the Borough is relatively polarised. There are pockets of deprivation with some LSOAs (to the north in particular) being within the most deprived 10% of the country.
- There is a need to meet identified housing needs for the full range of community groups.
- The population is predicted to live longer, which will result in a greater amount of elderly people living in the Borough.
- Rates of crime are fairly low, but there are hotspots of crime to the north and in urban centres.
- The Local Plan should seek to tackle any inequalities in access to employment, affordable housing, recreation and public services.

## SA objectives

2.6 As a result of the scoping work and identification of key issues, 19 SA objectives have been created to guide the subsequent assessment. These are:

**Sustainable consumption and production:**

1. To contribute to regeneration and economic development initiatives that benefit the Borough's communities; especially those identified as deprived.
2. To reduce the number of people experiencing difficulties in accessing employment, education and training opportunities.
3. To ensure that the location of development can be accommodated by existing and/ or planned infrastructure and reduces the need to travel.
4. Minimise the use of natural resources such as land, water and minerals, and minimise waste, whilst increasing reuse and recycling.

**Climate change and energy:**

5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation.
6. To assist businesses in the adaptation they need to become more resource efficient and resilient to the effects of a changing climate.

7. Manage, maintain and where necessary improve the drainage network to reduce the negative effects of flooding on communities and businesses.
8. To ensure that development provides for adaptation to urban heating, the effects of high winds and assists in promoting positive behaviour change.

**Natural resource protection and environmental enhancement:**

9. Protect the integrity and connectivity of ecological sites and ensure that enhancement for habitats and species are not prejudiced.
10. To manage the landscape effects of development in recognition of the European Landscape Convention as well as the risks and opportunities associated with measures to address climate change.
11. To facilitate the delivery and enhance the quality of areas providing green infrastructure.
12. To conserve and enhance the historic environment, heritage assets and their settings.
13. To deliver improvements in townscape and enhance local distinctiveness.
14. Minimise air, soil, water, light and noise pollution.

**Sustainable communities:**

15. Reduce social exclusion and disparities within the Borough.
16. Improve the supply and affordability of housing (particularly in the areas of greatest need).
17. To fully integrate the planning, transport, housing, cultural, recreational, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles.
18. Reduce crime, fear of crime and anti-social behaviour.
19. Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all.

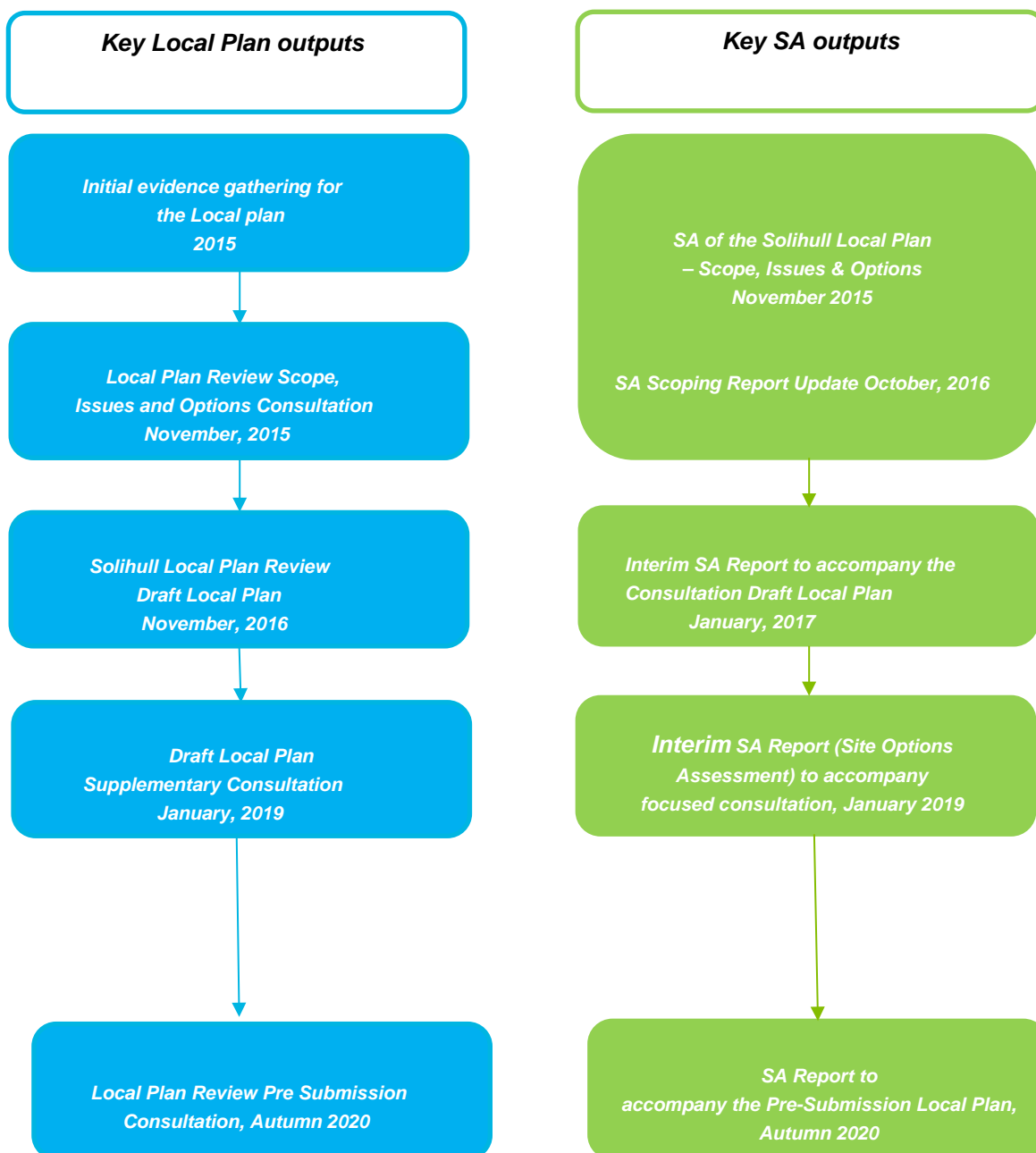


# 3. Part 2: What has plan-making/ SA involved so far?

## Introduction

3.1 The aim of Part 2 of the SA Report is to explain work undertaken between 2015 and 2020 to develop and then appraise the Local Plan strategy and any reasonable alternatives. This work follows on from previous iterations of the SA, which are summarised in **Figure 3.1** below.

**Figure 3.1: Key outputs of the Solihull Local Plan 2020-2036 and accompanying SA process to date**



- 3.2 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the plan “*and reasonable alternatives taking into account the objectives and geographical scope of the Plan.*”
- 3.3 A focus of reasonable alternatives work has been with respect to the spatial strategy and the allocation of land in Solihull. Specifically, Part 2 seeks to explain how the Local Plan’s spatial strategy has been developed in terms of housing numbers and distribution.

## SA of the Solihull Local Plan Strategic Housing Options (2015)

- 3.4 The SA of the Solihull Local Plan – Scope, Issues and Options (November 2015) considered the following strategic six strategic housing Options.<sup>1</sup>
- Option A: Public transport corridors;
  - Option B: Solihull Town Centre;
  - Option C: North Solihull/Chelmsley Wood;
  - Option D: Shirley Town Centre and the A34 corridor;
  - Option E: UKC Hub and HS2;
  - Option F: Limited expansion of rural villages/settlements; and
  - Option G: New settlements/large scale urban extensions or significant expansion of rural villages.
- 3.5 Perhaps not surprisingly, the options that performed best were Option E (the UK Hub & HS2) and Option B (Solihull Town Centre). Both did well against the sustainable consumption and production theme. The Solihull Town Centre Option also performed best in terms of the sustainable communities theme as its central location enables a wider community to benefit.
- 3.6 The options performing less well were Option F (Limited Expansion of Rural Settlements) and Option G (the Urban Extensions or Significant Rural Expansions). However, given the many different permutations that could be developed within both of these options, it was considered unwise to dismiss the exploration of expansion of some of the rural settlements such as Knowle/Dorridge, Hampton in Arden and Balsall Common. Of the urban edge opportunities for urban extensions, Elmdon Park and South of Stratford Road were considered to merit further examination.
- 3.7 Of note at this stage was that the Urban Extensions / Significant Rural Expansion (Option G) are likely to give rise to a major adverse outcome. This arises partly due to the loss of open land, the anticipated need for highway improvements and the additional demands placed upon education, health and social care services. These effects are however, considered to be more apparent with the Eastern Rural and South West Rural settlements.

## SA of the Solihull Local Plan Strategic Housing Options and draft Policies (2017)

- 3.8 Following on from the issues and options stage, additional work was undertaken to develop the spatial strategy. Further consideration of reasonable alternative options was undertaken by combining a range of distribution and growth scenarios.
- 3.9 The SA of the Solihull Local Plan Review (January 2017) considered three growth levels across 5 different distribution options, appraising a total of twelve alternative approaches to the delivery of housing growth and distribution for the Borough.

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<sup>1</sup> [https://www.solihull.gov.uk/Portals/0/Planning/LPR/Sustainability\\_Appraisal\\_Scope\\_%20Issues\\_%20Options.pdf](https://www.solihull.gov.uk/Portals/0/Planning/LPR/Sustainability_Appraisal_Scope_%20Issues_%20Options.pdf)

3.11 The three growth levels were as follows:

- Growth Scenario A; meeting needs (12,905 homes)
- Growth Scenario B; meeting needs + (14,905 homes)
- Growth Scenario C; meeting needs++ (16,905 homes)

3.12 Where land supplies allowed, the three growth levels were considered across the following five distribution options:

- Option 1; Focus on urban areas and public transport corridors and hubs
- Option 2; Focus on urban areas and UK Central Hub and High Speed 2 Interchange area
- Option3; Focus on urban areas and urban extensions
- Option 4; Focus on urban areas, new settlements and significant expansion of rural settlements
- Option 5; Combination of spatial approaches

3.13 At this stage of the Plan making process, each alternative under Growth Scenario A was rejected. The primary reason for this was that 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.

3.14 Each alternative under Growth Scenario C was also rejected by the Council. 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.

3.15 At the draft Plan stage, the preferred rate of housing growth is that identified under Growth Scenario B. The housing land provision target of 14,905 net additional dwellings (2014-2033) reflected the full objectively assessed housing need (OAN) for the Borough, a contribution to the wider HMA shortfall and an allowance to ensure consistency with the Strategic Housing Needs Study for the period 2011-14. This target was weighed against the Borough's capacity for growth over the plan period.

3.16 The Council's preferred distribution strategy at this stage reflected Option 5. 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.

3.17 Options 3 and 4 were discarded as neither alternative 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 would not necessarily support strategic priorities in Solihull Connected or enable public transport improvements.

3.18 A set of draft policies were included within the draft Local Plan to support the spatial strategy and deal with other important issues. Each policy was appraised against the SA Framework individually and collectively, to understand the effects of the Local Plan Review 'as a whole'. At this stage, recommendations were made through the SA to mitigate identified negative effects and to promote enhanced positives.

## The Greater Birmingham HMA Strategic Growth Study and accompanying SA (2018)

- 3.19 Following the SA work on spatial options described above, further work was undertaken across the HMA with implications / relevance to the spatial strategy for Solihull.
- 3.20 The Study first considers areas within the HMA, but beyond the Green Belt, which could potentially accommodate strategic development. These areas were not within Solihull Metropolitan Borough Council. Following this, the study considered potential areas of search in the Green Belt which was subject to a Strategic Green Belt Review.
- 3.21 The Study recommends a number of ‘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 housing needs shortfall; together with the areas where ‘Proportionate Dispersal’ is identified as potentially appropriate within and beyond the Green Belt and other small-scale development opportunities.
- 3.22 In appraising the ‘Areas of Search’ identified, the consultancy team considered a range of factors including; the ability to meet housing needs and the unmet housing need, particularly that of “the conurbation” and thus the geographic relationship to the conurbation and distance of locations from this. The Sustainability Appraisal sought to identify the best performing locations and exclude those with ‘significant negative outcomes’ against one of more of the SA objectives. The accessibility to public transport and particularly to the rail network is a particularly important consideration within the wider sustainability of different development options.
- 3.23 The ‘Areas of Search’ for Strategic Development which the study recommended should be taken forward for future assessment through the plan-making process in Solihull Metropolitan Borough Council include the following;
- 19. Around Balsall Common – New Settlement
  - 22. South of Birmingham Airport & NEC – Employment-Led
- 3.24 The SA of the Areas of Search for ‘19. Around Balsall Common’ indicated the following;
- The area is within 5km of the conurbation but beyond 2.5km and will therefore help to meet a relatively significant proportion of the need;
  - Wholly within an area making a Principal Contribution to Green Belt purposes;
  - Negative outcome overall from Sustainability Appraisal;
  - Around 2km to the nearest train station with a journey time of 20 minutes to Birmingham New Street; and
  - More modest highways infrastructure potentially required for this location relative to others however utilities infrastructure likely to be significant. Strong market and residential values, and relationship to employment centres. Scoring takes account of funding potential with major growth.
- 3.25 The SA of the Areas of Search for ‘22 South of Birmingham Airport & NEC’ indicated the following;
- This area is within 2.5km of the conurbation and will therefore directly help to meet the need;
  - Wholly within an area making a Principal Contribution to Green Belt purposes;
  - Positive outcome overall from Sustainability Appraisal;
  - Around 1km to the nearest train station with a journey time of 10 minutes to Birmingham New Street; and

- Modest additional highways works required together with modest additional utilities infrastructure. Area of higher residential values. Major development in this area will support infrastructure provision.

## Reasonable alternatives in 2020

3.26 At this stage, the Council have considered it necessary to review spatial options 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.

## Housing growth

3.27 The starting point to identify an appropriate level of growth is to seek to establish the Local Housing Need Figure using the New Standard Methodology introduced by the revised National Planning Policy Framework in July 2018.

3.28 Using 2020 as the base date, and 2036 as the end date (on the basis that if the plan is adopted in 2021 and it has a 15 year time span post adoption) the total Local Housing Need figure (just for the Borough's own needs) would be 12,912 new dwellings (i.e. 807 dwellings per annum over the 16 year period from 2020 to 2036).

3.29 Under the Duty-to-Cooperate the Council has been working with its partners to address an identified shortfall that is occurring within the wider Housing Market Area. The Draft Local Plan included a commitment to test the implications of accommodating 2,000 dwellings from the shortfall identified in the Birmingham Development Plan. Using the same contribution, the overall housing requirement to be addressed in the Local Plan Review would, using the standard methodology, be 14,912 dwellings over the period 2020 to 2036, or 932 dwellings per year.

3.30 As a means to facilitate the Duty-to-Cooperate discussions the 14 HMA authorities commissioned the Greater Birmingham HMA Strategic Growth Study (GBHMA). This is an independently prepared, objective study and not a policy statement. It simply provides an evidence base to take matters forward through the local plan review process.

3.31 The GBHMA analysis indicated that based on supply assumptions at the time of the Study, and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Greater Birmingham HMA. An agreed position statement across the 14 authorities confirmed that a significant shortfall exists across the HMA. However, an update position statement in September 2020 indicates that the shortfall to 2031 has been substantially reduced to around 2,600 dwellings, but that there will be a shortfall to 2036 (although the scale of this shortfall is not known).

3.32 Previous alternatives in relation to housing growth were also reviewed, and many were disregarded as unreasonable at this stage (see paragraph 5.2.7 of the main SA Report).

## Housing distribution

3.33 Following on from previous options work, and to help inform the Pre-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 and in the Greater Birmingham HMA growth study and 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

## Combining growth and distribution alternatives

3.34 To give the growth options context, they have been combined with the reasonable forms of distribution identified above. This gives rise to 13 alternative approaches to the delivery of housing growth and distribution for the Borough. Each options 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 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.

3.35 The 13 alternative options are presented in **Table 3.1** below, and the summary appraisal findings for the options are presented in **Table 3.2**.

**Table 3.1: The refined reasonable alternatives in 2020**

Alternatives	1A	1B	2A	2B	2C	3A	3B	3C	4A	4B	5A	5B	6A
<b>Growth Scenarios</b>	1. 13,000		2. 15,000			3.16,000			4. 19,000		5. 22,000		6. 25,000
Alternatives, what is being compared?	<b>Reasonable Alternative 1a:</b> Existing Local Plan plus limited Green Belt release.  <b>Reasonable Alternative 1b:</b> Existing Local Plan and Local Plan Review Urban sites. Removes UKC Hub from site allocations to show comparison with baseline with some Green Belt release		<b>Reasonable Alternative 2a:</b> Existing Local Plan plus limited Green Belt release AND <b>2,000</b> at UKC Hub.  <b>Reasonable Alternative 2b:</b> 2,000 at South of A45;  <b>Reasonable Alternative 2c:</b> 2,000 at Balsall Common (1 of 3 broad locations surrounding settlement).			<b>Reasonable Alternative 3a</b> 2,500 at UKC Hub AND 700 at Amber Sites  <b>Reasonable Alternative 3b</b> 2500 at South of A45 AND 700 at Amber Sites  <b>Reasonable Alternative 3b</b> 2500 at Balsall common AND 700 at Amber Sites			<b>Reasonable Alternative 4a</b> 2,500 at UKC Hub, AND 700 at Amber Sites AND 3,000 at South of A45.  <b>Reasonable Alternative 4b</b> 3,000 at Balsall Common (1 of 3 broad locations surrounding settlement, or mixture of all 3).		<b>Reasonable Alternative 5a</b> 2,500 at UKC Hub, AND 700 at Amber Sites AND 3,000 at South of A45 AND 3,000 at Balsall Common.  <b>Reasonable Alternative 5b</b> 6,000 at Balsall Common		<b>Reasonable Alternative 6a:</b> 2,500 at UKC Hub, AND 700 at Amber Sites AND 3,000 at South of A45 AND 9,000 at Balsall Common.
Windfall (2022-2036)	2800	2800	2800	2800	2800	2800	2800	2800	2800	2800	2800	2800	2800
Urban Area Focus (Commitments / SHELAA / Local Plan sites) <sup>2</sup>	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400	4,400
Urban Area Focus (Local Plan Review Sites) <sup>3</sup>	450	450	450	450	450	450	450	450	450	450	450	450	450
<i>SUBTOTAL</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>	<i>7,650</i>
Limited Green Belt release (Local Plan)	5,380	0	5,380	5,380	5,380	5,380	5,380	5,380	5,380	5,380	5,380	5,380	5,380

<sup>2</sup> Existing commitments (from 2020 not 2021): Planning permission, Local Plan Sites, SHELAA, BLR sites

<sup>3</sup> The following are non Green Belt sites: 7, 15, 17, 18 = (450)

review sites + Green Belt SHLAA) <sup>4</sup>													
HS2 Growth – Site 19 (Arden Cross)	/		500			1000			1000	1000	1000	1000	1000
UK Central Hub – (NEC site in BLR)	/		1500			1500			1500	1500	1500	1500	1500
SUEs - Amber Sites <sup>5</sup>	/	/	/			500	500	500	500	500	500	500	500
GL Hearn Urban Expansion - South of A45	/	/	/	2000			2500		3000		3,000		3,000
GL Hearn New Rural Settlement – Balsall Common	/	/	/		2000 (N/W/E)			2500 (N/W/E)		3,000 (N/W/E)	3,000 (N/W/E)	6,000 (N/W/E)	6,000 (N/W/E)
<b>TOTAL</b>	13,030	7,650	15,030	15,030	15,030	16,030	16,030	16,030	19,030	19,030	22,030	22,030	25,030
<b>TOTAL</b>	<b>Local Housing Need</b>		<b>HMA Allowance</b>			<b>Needs +</b>			<b>Needs ++</b>		<b>Needs +++</b>		

<sup>4</sup> The following are Green Belt sites: 1, 2, 3, 4, 6, 8, 9, 10, 12, 16, 21, 22, 23, 24, 25, 26 = (5,220) = Green Belt Sites (160)

<sup>5</sup> This is actually more like 700 dwellings, but for the sake of rounding it's included as 500



**Table 3.2: Summary of appraisal findings for the reasonable alternatives in 2020**

Topic	Table 4.4 Summary of Options Assessment	Option 1 13,000 dwellings Meet Needs		Option 2 15,000 dwellings HMA allowance			Option 3 16,000 dwellings HMA allowance +			Option 4 19,000 dwellings HMA allowance ++		Option 5 22,000 dwellings HMA allowance +++		Option 6 25,000 dwellings HMA allowance ++++
		1a	1b	2a	2b	2c	3a	3b	3c	4a	4b	5a	5b	6
Sustainable consumption	1. Regeneration	✓	-	✓✓	✓✓?	✓	✓✓	✓✓	✓	✓✓✓	✓✓	✓✓✓x?	✓✓x?	✓✓✓xx?
	2. Employment	✓✓	-	✓✓	✓✓	✓✓?	✓✓	✓✓	✓✓?	✓✓✓	✓✓x	✓✓✓x	✓✓xx	✓✓✓xx
	3. Transport and infrastructure	✓	✓✓	✓ x	✓ x	✓ x	✓ x	✓ x	✓ x	✓x	✓x	✓xx	✓xx	✓ xxx?
	4. Resource efficiency	-	✓	-	-	-	x	x	x	xx	xx	xxx	xxx	xxx
Climate change and	5. Greenhouse gases	-	-	?	-	-	?	-	-	? x	? x	? xx	? xx	? xx
	6. Business resilience to climate	?	?	?	?	?	?	?	?	?	?	?	?	?
	7. Flooding	-	-	?	?	?	?	?	?	x?	x	x?	x?	x?
	8. Climate change adaptation	-	-	-	-	-	-	-	-	x?	x?	x?	x?	x?
Natural resource protection and	9. Biodiversity	x	-	✓?	xx	-	✓?	xx	-	✓? xx	✓?	✓? xxx?	✓? x	✓? xxx
	10. Landscape	x	✓?	x	x	x	x	x	x	xx	x	xx	xx	xxx
	11. Green Infrastructure	✓x	-	✓ x	✓x	✓x	✓x	✓x	✓x	✓✓?xx?	✓? x?	✓✓?xx?	✓✓? xx?	✓✓? xx?
	12. Historic Environment	x	-?	xx	xx?	x	xx	xx	xx	xx?	xx?	xxx	xxx	xxx
	13. Built environment	✓?	-	✓✓?	✓✓?	✓?	✓✓?	✓✓?	✓?	✓✓✓?	✓✓?x	✓✓✓?x	✓✓?xx	✓✓✓?xx
14. Pollution	✓x	✓	✓x	✓x	✓x	✓x	✓x	✓x	✓xx?	✓xx	✓xx	✓xxx	✓xxx	
Sustainable Communities	15. Social inclusion	✓	-	✓✓	✓✓?	✓	✓✓	✓✓	✓	✓✓✓	✓✓	✓✓✓x?	✓✓ x?	✓✓✓xx?
	16. Housing	✓✓	xx	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓✓	✓✓✓	✓✓✓x?	✓✓✓x?	✓✓✓x?
	17. Health	✓	-	✓✓?	✓✓?	✓x?	✓✓x?	✓✓	✓x?	✓✓✓x?	✓✓ x?	✓✓✓x?	✓✓ x?	✓✓✓xx?
	18. Crime	✓x?	x	✓x?	✓x?	✓x?	✓x?	✓x?	✓x?	✓✓?x?	✓ x?	✓✓?x	✓ x	✓✓? x
	19. Accessibility	✓✓	✓✓?	✓✓✓?	✓✓	✓✓	✓✓✓?	✓✓	✓✓x	✓✓✓	✓✓x	✓✓✓x	✓✓✓xx	✓✓✓xx

## Outline reasons for the selection of the preferred approach

- 3.36 The spatial strategy correlates with Option 2a. The housing growth target is therefore 15,017 dwellings, which builds upon the draft Local Plan approach, but increases growth at the UK Central Hub.
- 3.37 The spatial strategy proposed is 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.
- 3.38 Broad options for growth were set out in the Scope, Issues and Options document in 2015, based on the GBSLEP Spatial Plan for Growth, and each of the options have been investigated to deliver the housing and other growth proposed. Options E, F and G were explored in further detail in the Options for Growth and Site Selection Topic Paper published in 2016, which sets out the reasons for taking forward or rejecting various areas.
- 3.39 Various Growth Options have been considered, as set out in the SA, which take account of recommendations for further work in the GBBCHMA Strategic Growth Study, 2018. The SA sets out the potential adverse consequences of higher levels of growth over and above the level chosen.
- 3.40 Distribution of growth has focussed on centres and areas of opportunity, notably the UK Central Solihull Hub Area and the area around the HS2 Interchange Station, which has been highlighted nationally as having significant potential to drive growth. In addition, opportunities have been found around transport hubs, including rail stations at Berkswell, Dorridge, Shirley and Whitlock's End. Urban extensions to Solihull and Shirley, and significant expansion of larger settlements at Balsall Common, Knowle/Dorridge and Dickens Heath are also proposed. A number of smaller sites within the urban area and extending smaller settlements are also included.
- 3.41 The SHELAA assesses the potential a large number of Call for Sites submissions across the Borough, although the vast majority are located in the Green Belt, and many are remote from existing settlements and services. These have informed the site allocations and a handful of sites are expected to be suitable for development and have been counted in the land supply. The Site Assessment document 2019 includes an assessment of all the submissions received and is being updated to reflect more recent submissions.
- 3.42 The GBBCHMA Strategic Growth Study recommended investigating options for growth south of the A45 and around Balsall Common.
- 3.43 The Local Plan Review includes an employment allocation, Site 20, off Damson Parkway but further growth in this area would have an adverse impact and landscape and biodiversity.
- 3.44 A number of housing sites are proposed around Balsall Common, but additional more significant growth would have an adverse impact on the Green Belt and the strategically important Meriden Gap, increasing the need to travel and on landscape and biodiversity.

## Appraisal of broad locations

3.45 As part of the Local Plan Review Solihull Metropolitan Borough Council is considering additional broad locations for development over the plan period 2020-2036. The study identified several broad locations for growth within the Solihull Borough. These are as follows:

- South of the A45
- Balsall Common South
- Balsall Common North
- Balsall Common East

3.46 Each broad location has been assessed against the 19 objectives of the SA framework and a summary of the overall effects is provided in Table 3.3 below.

**Table 3.3: Summary of overall effects for the appraisal of broad locations**

SA objective	South of the A45	Balsall Common South	Balsall Common North	Balsall Common East
1. To contribute to regeneration and economic development initiatives that benefit the Borough's communities; especially those identified as deprived.	Moderate positive	Neutral	Minor positive	Minor positive
2. To reduce the number of people experiencing difficulties in accessing employment, education and training opportunities.	Minor positive	Neutral	Neutral	Neutral
3. To ensure that the location of development can be accommodated by existing and/ or planned infrastructure and reduces the need to travel.	Positive	Minor negative	Minor negative	Moderate negative
4. Minimise the use of natural resources such as land, water and minerals, and minimise waste, whilst increasing reuse and recycling.	Moderate negative	Minor negative	Minor negative	Moderate negative
5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation.	Minor negative	Minor negative	Minor negative	Minor negative
6. To assist businesses in the adaptation they need to become more resource efficient and resilient to the effects of a changing climate.	Neutral	Neutral	Neutral	Neutral
7. Manage, maintain and where necessary improve the drainage network to reduce the negative effects of flooding on communities and businesses.	Neutral	Neutral	Minor negative	Minor negative
8. To ensure that development provides for adaptation to urban heating, the effects of high winds and assists in promoting positive behaviour change.	Neutral	Neutral	Neutral	Neutral
9. Protect the integrity and connectivity of ecological sites and ensure that enhancement for habitats and species are not prejudiced.	Minor negative	Moderate positive	Moderate positive	Moderate positive
10. To manage the landscape effects of development in recognition of the European Landscape Convention as well as the risks and opportunities associated with measures to address climate change.	Minor negative	Minor negative	Significant negative	Significant negative
11. To facilitate the delivery and enhance the quality of areas providing green infrastructure.	Positive	Minor positive	Minor positive	Minor positive
12. To conserve and enhance the historic environment, heritage assets and their settings.	Neutral	Minor negative	Minor negative	Moderate negative
13. To deliver improvements in townscape and enhance local distinctiveness.	Unknown	Minor negative	Minor negative	Minor negative
14. Minimise air, soil, water, light and noise pollution.	Minor negative	Minor negative	Minor negative	Minor negative

SA objective	South of the A45	Balsall Common South	Balsall Common North	Balsall Common East
15. Reduce social exclusion and disparities within the Borough.	Minor positive	Neutral	Neutral	Neutral
16. Improve the supply and affordability of housing (particularly in the areas of greatest need).	Major positive	Moderate positive	Moderate positive	Moderate positive
17. To fully integrate the planning, transport, housing, cultural, recreational, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles.	Minor positive and minor negative	Minor positive	Minor positive	Minor positive
18. Reduce crime, fear of crime and anti-social behaviour.	Neutral	Neutral	Neutral	Neutral
19. Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all.	Major positive	Minor positive	Minor positive	Minor positive

## Appraisal of sites

- 3.47 To support the consideration of which sites to potentially allocate through the Local Plan, various site assessments have been undertaken through the plan-making and SA process
- 3.48 A 'Call for Sites' commenced in November 2015 and remained open until April 3rd 2020. In total, approximately 350 sites were submitted for consideration and various iterations of appraisal have been undertaken.
- 3.49 The sites have been assessed individually, though a number of site options were initially amalgamated to larger site areas to reflect the broad areas for sustainable urban extensions or settlement expansion. The clustering of sites drew criticism from some stakeholders who wished to see each individual site be appraised separately. In response, the Council disaggregated site clusters and undertook individual assessments for each site too. This would allow for the implications of smaller scale developments to be better understood before ruling out locations on the basis of a combined assessment of sites.
- 3.50 As part of the sustainability appraisal in support of the Local Plan Review AECOM has undertaken and presented site options assessments at several stages including;
- (2017) - Interim SA Report (2017)
  - (2019) - Interim SA Report
  - (2020) - additional sites that were received prior to the pre-submission plan being finalised.
- 3.51 The findings for the site assessments at all stages are collated within the SA Report and summarised graphically in **Section 7**. A detailed proforma for each site is provided in **Appendix D**.

## Outline reasons for the proposed allocation of housing sites

- 3.52 The Spatial Strategy for the Local Plan Review was based on 7 broad options for accommodating growth, set out in the Scope, Issues and Options consultation 2015.
- 3.53 These demonstrate that there is limited opportunity for housing growth outside the Green Belt. The focus has been on the UK Central masterplan and HS2 growth strategy, larger scale developments providing opportunities for significant infrastructure improvements, and smaller scale sites to ensure early delivery of housing supply.
- 3.54 Details of the approach are set out in the Reviewing options for growth and site selection process topic paper published in 2016.

- 3.55 The detailed Site Selection Methodology is set out in the Supplementary Consultation 2019. This gives priority to brownfield sites, sites outside the Green Belt, and accessible locations in lower performing Green Belt locations. All sites submitted for consideration have been through this process and the findings are set out in the detailed site assessments.

## Developing the employment strategy

- 3.56 The economic strategy for the Plan (review) is driven by the unique opportunities that the UK Central proposals present. This location is a nationally significant scheme that will contribute to the economic growth aims of the Council, the WMCA and the GBSLEP.
- 3.57 Given the importance of the UK Central area and The Hub (which encompasses proposed HS2 interchange), the Council do not consider that there are other alternative strategies for the delivery of such growth.
- 3.58 Site 19 provides the opportunity to make more efficient use of the land required for the station, by using multi-storey parking rather than surface parking as proposed by the HS2 Company.
- 3.59 This creates the opportunity for significant employment land within the UK Central Hub Area building on the advantages presented by the proximity of the Airport, NEC, Jaguar Land Rover (JLR) and Birmingham Business Park. It is acknowledged that the jobs provided will meet wider needs across the sub-region.
- 3.60 Local employment needs, as evidenced in the Housing and Economic Development Needs Assessment 2020, and those specifically relating to Jaguar Land Rover are being addressed through existing commitments and the allocation of Employment Site 20.
- 3.61 Whilst this site was primarily aimed at JLR needs in the Draft Local Plan, much of these needs have been addressed by permissions within the site area. The Local Plan Review indicates that the site will meet local employment needs more generally. As well as being close to JLR and the Airport, Site 20 is within the area identified in the GBHMA Strategic Growth Study for further investigation for employment led growth.

## 4. Part 3: Appraisal of the Pre-Submission Local Plan Review

- 4.1 In **Section 9** of the SA Report, each Policy within the Plan has been appraised against all nineteen objectives in the SA Framework. For each policy, a summary of the appraisal findings is presented in the form of a 'spider' diagram. To assist in the interpretation of the diagrams (and to provide justification for forecast effects) a discussion is also provided if moderate or major effects are identified. A summary of all the effects is also provided, which includes consideration of potential mitigation and enhancement measures. Cumulative effects and conclusions are then considered in **Section 11** of the SA Report. The Plan appraisal summaries for each of the 4 over-arching themes are provided below.

### Sustainable Consumption and Production

- 4.2 The Plan is predicted to have major positive effects with regards to prosperity, with policies 1, 1a, 9 and 21, in particular, bringing significant benefits in relation to the creation of employment and investment; which could benefit deprived communities. A range of plan policies are predicted to have positive effects, and in combination, the significance of these in terms of regeneration and access to employment ought to be major. The plan also places the majority of new homes in locations that should have good access to employment and education. Only policies 10 and 14 (which seek to promote environmental protection and secure amenity) give rise to minor negative effects as the policy requirements could possibly hamper development in certain locations.
- 4.3 With regards to travel and infrastructure, the Plan could generate some negative effects by placing growth in locations that will likely lead to increased car usage on busy networks. However, new infrastructure could possibly be supported and there are a range of plan policies seeking to encourage public transport usage, and increased walking and cycling. Overall, mixed effects are predicted. On one hand, increased car usage in areas of substantial growth are proposed. This could put pressure on infrastructure. However, the scale of development would support enhancements, and the pattern of growth should also help to reduce the length of trips and support modal shift. Therefore, both minor positive effects and minor negative effects are predicted
- 4.4 With regards to resource efficiency, the Plan will lead to an increase in the use of natural resources and the generation of wastes (during construction and operation). Though previously developed land forms a part of the strategy, there will be a loss of greenspace. However, there are a range of policies that seek to minimise such effects and in combination ought to ensure that the effects overall are neutral.

### Climate change and energy

- 4.5 With regards to greenhouse gas emissions, several policies associated with the strategic approach to growth could lead to an increase in emissions. In particular this includes the economic growth policies. In combination, a moderate negative effect in terms of emissions is generated. However, other plan policies counterbalance these effects by seeking to reduce transport based emissions. Policy 9 in particular should also help to ensure that new buildings are of a much higher environmental performance, which could speed up the move towards carbon neutrality. As a result, the overall effect of the Plan with regards to greenhouse gas emissions is predicted to be a minor positive effect.
- 4.6 There is little in the plan that would directly affect the resilience of businesses to climate change specifically. As a result, neutral effects are likely.
- 4.7 With regards to flooding, the strategy broadly avoids areas at risk of flooding, and includes numerous policies that seek to support green infrastructure and flood management. As a result, a minor positive effect is predicted.

- 4.8 A similar picture exists for climate change adaptation, with policies 9 and 15 in particular possibly bringing about major positive effects in relation to the design of new development (which needs to demonstrate measures that will adapt new developments to climate change).

## Natural resource protection and environmental enhancement

- 4.9 The majority of plan policies bring about minor positive effects with regards to biodiversity, as there is a focus throughout on the protection and enhancement of the natural environment. The requirement to deliver net gain in particular is likely to bring about a major positive effect in the longer term, especially when it is considered alongside all other plan policies. However, whilst new development could present opportunities for net gain, it is important to recognise that some minor negative effects could occur during the short term, due to disturbance from construction, increased urbanisation and recreation.
- 4.10 The Plan takes a positive approach to landscape protection through its supporting policies. This creates a range of minor positive effects. However, there will be unavoidable impacts upon landscape character in several locations across the district. Mitigation measures ought to ensure that significant effects can be avoided, especially given the strategic scale of sites and the potential to implement buffer zones. Overall though, minor to moderate negative effects remain in terms of landscape.
- 4.11 In terms of green infrastructure, there will be a substantial loss of greenfield land, which constitutes negative effects on the GI network. However, a range of plan policies seek to protect and enhance the GI network, and this is perhaps more easily achieved through opportunities offered from new development. As a result, a neutral effect is predicted overall.
- 4.12 The historic environment is likely to be affected by the Plan, with moderate negative effects predicted in relation to the housing and employment strategy. This is due to the large scale development proposed in locations where the setting of heritage assets and the character of settlements could be altered. Whilst the plan seeks to minimise such effects through other policies, minor to moderate negative effects on the historic environment remain. Conversely, the Plan offers the potential to improve townscapes in areas that are in need of regeneration and in gateway locations. These are minor positive effects.
- 4.13 Though new development could have some polluting activities, the Plan contains the necessary policies to ensure that pollution can be avoided and minimised. As a result, a neutral effect is predicted overall.

## Sustainable Communities

- 4.14 By seeking to meet identified housing needs for the borough and a proportion of unmet needs from Birmingham; the Plan is predicted to have major positive effects with regards to housing, regeneration and health inequalities.
- 4.15 The location of growth is broadly sustainable in terms of access to jobs and services, and the strategy ought to help continue regeneration efforts in North Solihull. Supporting policies which provide details on the types of housing to be sought, supporting infrastructure, community facilities and high-quality design should also ensure that health inequalities are addressed over the longer term and improvements to the public realm are secured.
- 4.16 There are very few effects predicted in terms of crime, with some minor positive and negatives for particular policies. The overall picture in terms of the Plan are neutral. In terms of accessibility, and ensuring a strong link between jobs, houses and social infrastructure, the strategy places development in locations that could support sustainable travel and shorter trips.



## 5. Monitoring

- 5.1 There is a requirement to outline the measures envisaged to monitor the predicted effects of the Plan. In particular, there is a need to focus on the significant effects that are identified. It is important to track predicted effects to ensure that positive effects are actually realised and to identify any unforeseen negative effects that may occur.
- 5.2 **Table 5.1** below sets out monitoring measures under each SA topic which are intended to be used to monitor any significant effects and to track the baseline position more generally. At this stage the monitoring measures have not been finalised, as there is a need to confirm the feasibility of collecting information for the proposed measures. Wherever possible, measures have been drawn from the Local Plan monitoring framework to reduce duplication.
- 5.3 The monitoring measures will be finalised once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.

**Table 5.1: Monitoring the effects of the Plan**

SA Topics	Proposed Monitoring Measures
<p><b>Prosperity</b></p> <p><b>Major Positive Effects</b> are predicted due to employment growth in strategic locations that could benefit a range of communities.</p>	<p>Quantum and Type of floorspace developed</p> <p>Extent to which development is linked to local employment needs</p>
<p><b>Climate Change Adaptation</b></p> <p><b>Major Positive Effects</b> are predicted in relation to new development being designed to high standards</p>	<p>No. of new homes that are built to Future Homes Standard (from 2021) and zero carbon (from 2026).</p> <p>% of new homes with net reduction of surface water run off</p>
<p><b>Biodiversity</b></p> <p><b>Major positive effects</b> are predicted in relation to the requirement for net gain.</p>	<p>No. of new trees planted per year under WMCA scheme. Amount of accessible natural green space created/enhanced each year.</p> <p>% of developments achieving 10% (or more) net gain in biodiversity in accordance with policy P10.</p> <p>Total % net gain achieved through new development.</p>
<p><b>Landscape</b></p> <p>Potential <b>moderate negative effects</b> could occur in relation to large scale development on the urban fringes.</p>	<p>Loss of land (ha) classified as medium – high in terms of landscape sensitivity.</p> <p>Loss of Green Belt to Development.</p> <p>Development outside of defined settlements on non-allocated sites.</p>



SA Topics	Proposed Monitoring Measures
<p><b>Historic environment</b></p> <p>Potential <b>moderate negative effects</b> could occur as a result of large scale development affecting the setting and character of heritage assets and settlements</p>	<p>Number/proportion of heritage assets at risk (Grade I, II* and II Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and Conservation Areas).</p> <p>Number/proportion of Conservation Areas with up-to-date Conservation Area Appraisals and Management Plans.</p>
<p><b>Regeneration</b></p> <p><b>Major positive effects</b> are predicted to reflect opportunities to continue regeneration in North Solihull.</p>	<p>Change in Index of Multiple Deprivation.</p> <p>Employment rate and trends between most and least deprived LSOAs.</p> <p>% of benefit claimants by LSOA.</p>
<p><b>Housing</b></p> <p><b>Major positive effects</b> are predicted as the required amount, types and locations of housing ought to be delivered through the Plan.</p>	<p>Number of affordable dwellings delivered through the planning system.</p> <p>Mix of market housing reflecting the likely profile of household types requiring market housing as evidenced by the HEDNA</p> <p>Dwellings completed per annum as a proportion of the Plan target.</p>
<p><b>Health inequalities</b></p> <p><b>Major positive effects</b> are predicted as the Plan seeks to achieve improvements to social infrastructure, green space and through new jobs and homes.</p>	<p>New and improved open space, sport, recreation and children's play facilities.</p> <p>Contributions made towards healthcare and education.</p> <p>Number/proportion of developments achieving at least 10 out of 12 'green lights' measured against Building for Life 12 Standard.</p>

## 6. Mitigation and enhancement

6.1 Mitigation and enhancement measures have been considered throughout the SA process. In particular, this has involved:

- Acknowledgement of how the effects for each spatial option could be mitigated and potential for enhancements.
- Initial recommendations for mitigation and enhancement were made to help inform the development of plan policies at the Issues and Options stage. Some of these factors were addressed as the Plan progressed, whilst others were considered unnecessary or became less relevant in a changing context.
- Further recommendations made at the most recent stage of appraisal (Reg19).

6.2 The latest recommendations are;

- **Policy 5 Housing Land:** A detailed strategy for delivering green infrastructure networks on strategic housing sites would be beneficial and help to mitigate potential negative effects in terms of natural greenspace.
- **Policy 9 Climate Change:** By identifying specific opportunity areas for renewable energy (particularly wind), there would be more certainty of a significant shift towards carbon neutrality.
- **Policy 10 Natural Environment:** Develop a supporting strategy that identifies habitat opportunity areas to allow off-site net gain to be achieved where appropriate.

## 7. Next steps

- 7.1 This document is a Sustainability Appraisal Report that accompanies the latest stage of work in relation to the Solihull Draft Local Plan Review 2020.
- 7.2 The SA Report draws together previous SA work (i.e. interim SA Reports) as necessary, as well as re-considering reasonable alternatives for the spatial strategy, updating policy appraisals, and establishing potential monitoring measures.
- 7.3 The most recent timetable moving towards Adoption of the Local Plan is set out in **Table 7.1** below.

**Table 7.1: Timetable**

Date	Milestone
Current stage (Autumn 2020)	Publication of Submission Draft
Winter/ Spring 2020-2021	Submission to the Secretary of State
Summer/ Autumn 2021	Examination of the Plan
Winter 2021	Adoption of the Local Plan Review

- 7.4 At each of these stages, it may be necessary to undertake additional iterations of SA to take account of changes and modifications to the Plan.

