

Solihull Local Plan Examination  
Matters, Issues and Questions identified by the Inspectors

Matter 1 – Procedural/legal requirements

Issue

Whether the Council has complied with relevant procedural and legal requirements.

Questions

*Plan preparation and scope*

- 1) Has the preparation of the Local Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
- 2) Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?
- 3) Has the preparation of the Local Plan complied with the Statement of Community Involvement?
- 4) How does it relate to existing plans and how will they be affected by the adoption of this Local Plan (Solihull Local Plan 2013, Gypsy and Traveller DPD 2014 and made Neighbourhood Plans)?
- 5) What existing and proposed Supplementary Planning Documents (SPD) are there? What is the intended relationship of SPDs with specific policies in the Local Plan and what purpose will they serve? Is this clear and appropriate? Are there any elements of existing or proposed SPDs that should properly be dealt with in the Local Plan itself?
- 6) What is the status and role of the Concept Masterplans? Is this sufficiently clear? Should the Concept Masterplans be included in the Local Plan itself?

*Sustainability Appraisal*

- 7) How has the Sustainability Appraisal (SA) informed the preparation of the Local Plan at each stage? How has the SA been reported? Has the methodology for the SA been appropriate?
- 8) Which options were considered through the SA for the following
  - a) the overall scale of housing and other growth
  - b) the broad distribution of development across the Borough
  - c) potential site allocations
  - d) policy approaches
- 9) What were the conclusions of the SA in relation to these options and how have they informed the preparation of the Local Plan?
- 10) What are the overall conclusions of the SA?

*Habitats Regulations Assessment*

- 11) How was the Habitats Regulations Assessment (HRA) carried out and reported and was the methodology appropriate?
- 12) What was the basis for determining that an Appropriate Assessment was not required and is this a justified conclusion?
- 13) Were any concerns raised about this conclusion and in particular what is the position of Natural England?

*Other matters*

- 14) Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? If so which?

## Examination of the Solihull Local Plan

- 15) Has the Council had regard to the other relevant specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
- 16) How have issues of equality been addressed in the Local Plan?

Matter 2 – The duty to co-operate

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan.

N.B. the duty to co-operate concerns the preparation of the Local Plan as far as it related to strategic matters. This covers the period up to, but not after the submission of the Local Plan and strategic matters are defined in S33A (4) of the Planning and Compulsory Purchase Act 2004. Issues of soundness are dealt with under other matters.

Questions

*Housing requirement, overall housing provision and unmet need in the wider Housing Market Area (HMA)*

- 1) Who has the Council engaged with in terms of these strategic matters? When did this engagement take place and what form did it take?
- 2) How has the Council co-operated to address the unmet need from Birmingham up to 2031 and what is the outcome of this?
- 3) What is the overall situation in the HMA for the period up to 2031? Is the issue of unmet need up to 2031 fully addressed?
- 4) What is the situation regarding potential unmet housing need in the wider HMA beyond 2031?
- 5) What is the Council's position regarding co-operation to resolve this issue and is this an appropriate approach? Is there sufficient basis to take an alternative approach at this stage? What are the implications of having a plan period to 2036?
- 6) What is the position of other authorities in terms of the Council's approach to unmet need up to 2031 and beyond? What specific concerns were raised through duty to co-operate discussions or representations on the Local Plan?
- 7) Specifically, what is the position of other authorities in terms of the Council's compliance with the duty to co-operate on these strategic matters?

*Economic growth/employment land provision*

- 8) What are the cross boundary issues relating to economic growth and employment land provision (including in respect of wider employment land needs, the overall scale of provision in the Borough, the UK Central Hub and sites UK1 and UK2)?
- 9) Who has the Council engaged with? When did this engagement take place and what form did it take?
- 10) What is the outcome of this engagement?
- 11) What is the position of other authorities in terms of the Council's approach to these issues? What specific concerns were raised through duty to co-operate discussions or representations on the Local Plan?
- 12) Specifically, what is the position of other authorities in terms of the Council's compliance with the duty to co-operate on these strategic matters?

*Other strategic matters*

- 13) Are there cross boundary issues relating to any of the site allocations such as in terms of infrastructure provision or transport?
- 14) Are there other strategic matters for example relating to transport or minerals?

## Examination of the Solihull Local Plan

- 15) If so, how have they been addressed through co-operation and what is the outcome?

### *Overall*

- 16) In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Matter 3 – The housing requirement/overall housing provision

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the housing requirement and overall housing provision.

Relevant policy – P5

Questions

*Solihull's housing need*

- 1) Has the calculation of Local Housing Need (807 dwellings per year) been undertaken appropriately using the standard method and correct inputs?
- 2) Is the uplift in housing need for jobs growth at the UK Central Hub (to 816 dwellings per year) justified and appropriate, in particular in terms of the assumptions regarding baseline jobs growth, jobs growth to support the LHN figure, additional jobs growth as a result of the UK Central Hub and commuting patterns?
- 3) Are there any other factors which justify a higher housing figure for Solihull Borough itself such as affordable housing need?

*Unmet need in the wider HMA*

- 4) What is the scale of unmet housing need in the wider HMA up to 2031? Should this assessment relate only to Birmingham or also include the Black Country Authorities?
- 5) For Plans that have plan periods beyond 2031 (such as this Local Plan) should the contribution they make to unmet need up to 2031 be calculated on a pro rata basis?
- 6) What is the situation regarding potential unmet housing need in the wider HMA beyond 2031?
- 7) Should this Local Plan seek to address such need? Is there a clear basis to do this?

*Capacity of the Borough to accommodate housing*

- 8) Is the Council's capacity based approach justified? Is there any basis to take a different approach i.e. establish an appropriate contribution to unmet need in the HMA and then ensure adequate land is identified?
- 9) How has the Council assessed the overall capacity of the Borough to accommodate housing and therefore establish how much it can contribute to unmet need in the HMA? What were the key factors taken into account e.g. Spatial Strategy, Green Belt Assessment, other constraints etc.?
- 10) Taking each of the key factors in turn, what criteria were used and what judgements were made to select appropriate sites for allocation and therefore determine overall capacity?
- 11) Are the factors and criteria used appropriate and justified?
- 12) Have they been applied appropriately and consistently?
- 13) Is the conclusion that there is total capacity for 15,017 dwellings in the plan period (and therefore a contribution of 2,105 dwellings to Birmingham's unmet needs) justified?
- 14) Is there scope to identify more housing land to increase this contribution?
- 15) Is this actually necessary given likely supply from elsewhere in the HMA up to 2031?

*The housing requirement*

- 16) Notwithstanding the above questions, is it appropriate to set the housing requirement for the overall plan period to match exactly the overall estimated maximum capacity/supply of 15,017 dwellings? Should some flexibility be built in i.e. with a requirement below the maximum capacity/supply?
- 17) Is a stepped annual housing requirement justified in principle? What is the basis for the specific figures of 851 and 991 dwellings per year? Are they justified?
- 18) Should the stepped requirements be included in Policy P5 itself?
- 19) In overall terms is the approach to the housing requirement justified?
- 20) What is the basis for the housing requirements for Designated Neighbourhood Areas and are they justified?
- 21) What status do they have and how do they relate to Neighbourhood Plans?

Matter 4 – The Spatial Strategy

Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the Spatial Strategy.

N.B. Specific issues relating to economic growth, the UK Central Hub and sites UK1 and UK2 are dealt with under Matter 5

Questions

- 1) What are the options for accommodating growth and how have they been considered? Have all reasonable alternatives been considered?
- 2) What is the basis for the conclusions on each of the Growth Options and are these justified?
- 3) Has the potential for development within the urban area, the use of previously developed land and increased densities been optimised?
- 4) On a strategic, Borough wide level, does the scale of housing growth required and the limited opportunities within existing built up areas provide the exceptional circumstances to justify altering the Green Belt?
- 5) Should the Local Plan identify safeguarded land?
- 6) How has the option of new settlements been considered? In particular, how has the option of a new settlement around Balsall Common (as identified in the 2018 GBHMA Strategic Growth Study) been considered? Are the conclusions on this justified?
- 7) What factors were taken into account regarding the suitability of each of the rural villages/settlements to accommodate growth? What is the basis of the conclusions in each case and are these justified?
- 8) In overall terms, is the Spatial Strategy appropriate and justified, particularly in terms of the range and mix of locations identified for growth? Is it effective and consistent with national policy?
- 9) Is the Local Plan sufficiently clear in relation to the Spatial Strategy? Should it be set out in a policy?

Matter 5 – Sustainable economic growth

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to sustainable economic growth.

Relevant policies – P1 to P3, UK1 and UK2

Questions

*Local employment land requirements and provision*

- 1) Are the findings of the Housing and Economic Development Needs Assessment 2020 in respect of jobs growth and the requirements for and supply of land for offices and industrial use and warehousing justified?
- 2) Are existing allocations in the adopted Local Plan sufficient to meet local needs and provide adequate flexibility? What additional potential sources of employment land to meet local needs are there?
- 3) Does Policy P3 provide an effective and justified basis for the provision of an adequate supply of local employment land? Does it set out appropriate criteria for the protection of existing employment sites and the provision of new businesses? Are there implications due to the changes to the Use Classes Order which came into effect in September 2020 on the implementation and effectiveness of the policy?

*Blythe Valley Business Park*

- 4) What is the background to the Blythe Valley Business Park and the current situation regarding planning permissions and development on the ground?
- 5) Does Policy P1A provide an effective and justified approach?

*National Exhibition Centre (NEC)*

- 6) Does Policy P1 provide a justified and effective basis for the future development of the NEC site?
- 7) What is the basis to assume 2,240 dwellings will be provided at the NEC in the plan period? Are there clear proposals to achieve this, how will it be delivered and is it realistic?
- 8) Is the timescale and annual rate of delivery of housing envisaged in the housing trajectory realistic? What is the basis of this?
- 9) Given the scale of housing envisaged and the importance of it to the overall Borough supply, should Policy P1 include more detail on residential development and the implications of it?
- 10) What social and community infrastructure would be required to support this scale of new housing? Is this sufficiently clear? How would it be provided?
- 11) Would there be requirements for other infrastructure/mitigation, such as in relation to transport?
- 12) What effect would there be on the function and operation of the NEC as a whole?

*Birmingham Airport*

- 13) Does Policy P1 provide an effective and justified approach for future development at Birmingham Airport?
- 14) Does the Local Plan provide an effective basis for the operation of the airport, including in relation to aerodrome safeguarding?



*Birmingham Business Park*

- 15) Does Policy P1 provide an effective and justified approach for future development at Birmingham Business Park?

*Jaguar Land Rover (existing site N.B. UK2 dealt with below)*

- 16) Does Policy P1 provide an effective and justified approach for future development at the existing Jaguar Land Rover site?

*Arden Cross and HS2 Interchange*

- 17) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 18) What would be the effect of developing the site on the purposes of the Green Belt?
- 19) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
- 20) What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?
- 21) What is the basis for the scale and types of uses envisaged?
- 22) Should Policy UK1 be clearer as to the mix and scale of different uses?
- 23) What are the implications in terms of employment land/floorspace provision and overall jobs growth? How would this contribute to employment land requirements/jobs growth outside of the Borough and what cross boundary issues does this raise? How have such issues been addressed?
- 24) How do the proposals compare with the basic HS2 Interchange Station scheme in terms of land take and built form?
- 25) How will they ensure that the essential function of the Interchange Station remains effective? What is the position of HS2 Ltd on the Local Plan and how have they been involved in the process? Are there any significant issues or concerns that need to be addressed?
- 26) What is the current situation regarding progress with the HS2 Interchange Station?
- 27) What is the basis to assume 500 dwellings will be provided in the plan period? Are there clear proposals to achieve this, how will it be delivered and is it realistic?
- 28) Given the scale of housing envisaged and the importance of it to the overall Borough supply, should Policy UK1 include more detail on residential development and the implications of it?
- 29) What is the background to the specific policy requirements in Policy UK1? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 30) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 31) What is the status and role of the Hub Framework Plan and Arden Cross masterplan? Is this sufficiently clear?
- 32) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
- 33) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
- 34) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

- 35) What is the expected timescale and rate of development and is this realistic?

*Land at Damson Parkway*

- 36) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 37) What would be the effect of developing the site on the purposes of the Green Belt? What would be the specific effect on the area of remaining Green Belt to the north west?
- 38) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they? Should a distinction be made between those parts of the site that are now developed and those that are not?
- 39) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
- 40) What are the implications in terms of employment land/floorspace provision and overall jobs growth? How would this contribute to employment land requirements/job growth outside of the Borough and what cross boundary issues does this raise? How have such issues been addressed?
- 41) Is Policy UK2 justified in referring to the potential for a relocated household waste and recycling centre and depot? What is the Council's current position on this?
- 42) If the reference were to be removed from Policy UK2, what would be the effect on the delivery of site allocation SO2?
- 43) What would be the effect on the implementation of Policy P12 and the overall provision of suitable and adequate waste and recycling facilities in the Borough?
- 44) What is the background to the specific policy requirements (see Part 2 of the policy)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 45) What is the current situation with the Concept Masterplan?
- 46) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 47) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
- 48) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest? How will existing uses on the site be affected and how will any issues be addressed?
- 49) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 50) What is the expected timescale and rate of development and is this realistic?

*Town Centres*

- 51) What evidence is there in terms of the need for additional floorspace for main town centre uses? How would such needs be met?
- 52) Does the Local Plan define an appropriate hierarchy of town, district and local centres (see also Policy P19)?
- 53) Is the approach to Solihull Town Centre justified, effective and consistent with national policy? What are the particular issues facing it and how will these be addressed? What is the intended role of the Town Centre Masterplan and how does this relate to Policy P2? Is the reliance on the Masterplan appropriate?

## Examination of the Solihull Local Plan

- 54) Is the approach to Shirley Town Centre justified, effective and consistent with national policy? What are the particular issues facing it and how will these be addressed?
- 55) Is the approach to Chelmsley Wood Town Centre justified, effective and consistent with national policy? What are the particular issues facing it and how will these be addressed?
- 56) Overall is Policy P2 justified, effective and consistent with national policy? Is the approach to impact assessment and floorspace thresholds appropriate? Are there implications due to the changes to the Use Classes Order which came into effect in September 2020 on the implementation and effectiveness of the policy?

### *Main modifications*

- 57) Are any main modifications to Policies P1, P1A, P2, P3, UK1 and UK2 necessary for soundness?

Matter 6a – Housing site allocations – Balsall Common

Issue

Whether the proposed housing site allocations at Balsall Common are justified, effective and consistent with national policy.

Relevant policies – BC1 to BC6

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following proposed site allocations individually in turn:

- BC1 – Barratt’s Farm
  - BC2 – Frog Lane
  - BC3 – Windmill Lane/Kenilworth Road
  - BC4 – Pheasant Oak Farm
  - BC5 – Trevallion Stud
  - BC6 – Lavender Hall Farm
- 1) What is the background to the site allocation and how was it identified?
  - 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
  - 3) What would be the effect of developing the site on the purposes of the Green Belt?
  - 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
  - 5) What is the basis for the scale of development proposed and is this justified?
  - 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
  - 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
  - 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
  - 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council’s response should address key issues raised in representations
  - 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 12) What is the expected timescale and rate of development and is this realistic?
  - 13) Are any main modifications necessary for soundness?

Matter 6b – Housing site allocations – Hampton in Arden

Issue

Whether the proposed housing site allocations at Hampton in Arden are justified, effective and consistent with national policy.

Relevant policies – HA1 and HA2

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following proposed site allocations individually in turn:

- HA1 – Meriden Road
  - HA2 – Oak Farm
- 1) What is the background to the site allocation and how was it identified?
  - 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
  - 3) What would be the effect of developing the site on the purposes of the Green Belt?
  - 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
  - 5) What is the basis for the scale of development proposed and is this justified?
  - 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
  - 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
  - 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
  - 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
  - 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 12) What is the expected timescale and rate of development and is this realistic?
  - 13) Are any main modifications necessary for soundness?

Matter 6c – Housing site allocations – Solihull

Issue

Whether the proposed housing site allocations at Solihull are justified, effective and consistent with national policy.

Relevant policies – SO1 and SO2

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following proposed site allocations individually in turn:

- SO1 – East of Solihull
- SO2 – Moat Lane Depot

- 1) What is the background to the site allocation and how was it identified?  
*Questions 2-4 for Site SO1 only*
- 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 3) What would be the effect of developing the site on the purposes of the Green Belt?
- 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
- 5) What is the basis for the scale of development proposed and is this justified?
- 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 8) For site SO1 only, what is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
- 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
- 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
- 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 12) What is the expected timescale and rate of development and is this realistic?
- 13) Are any main modifications necessary for soundness?

Matter 6d – Housing site allocation – Meriden

Issue

Whether the proposed housing site allocation at Meriden is justified, effective and consistent with national policy.

Relevant policy – ME1

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

For the following proposed site allocation:

- ME1 – West of Meriden
- 1) What is the background to the site allocation and how was it identified?
  - 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
  - 3) What would be the effect of developing the site on the purposes of the Green Belt?
  - 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
  - 5) What is the basis for the scale of development proposed and is this justified?
  - 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
  - 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
  - 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
  - 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
  - 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 12) What is the expected timescale and rate of development and is this realistic?
  - 13) Are any main modifications necessary for soundness?

Matter 6e – Housing site allocations – Blythe

Issue

Whether the proposed housing site allocations at Blythe are justified, effective and consistent with national policy.

Relevant policies – BL1 to BL3

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following proposed site allocations individually in turn:

- BL1 – West of Dickens Heath
- BL2 – South of Dog kennel Lane
- BL3 – Whitlock's End farm

- 1) What is the background to the site allocation and how was it identified?
- 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
- 3) What would be the effect of developing the site on the purposes of the Green Belt?
- 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
- 5) What is the basis for the scale of development proposed and is this justified?
- 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
- 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
- 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
- 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
- 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
- 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
- 12) What is the expected timescale and rate of development and is this realistic?
- 13) Are any main modifications necessary for soundness?



Matter 6f – Housing site allocation – Hockley Heath

Issue

Whether the proposed housing site allocation at Hockley Heath is justified, effective and consistent with national policy.

Relevant policy – HH1

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking the following proposed site allocation:

- HH1 – Land South of School Road
- 1) What is the background to the site allocation and how was it identified?
  - 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
  - 3) What would be the effect of developing the site on the purposes of the Green Belt?
  - 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
  - 5) What is the basis for the scale of development proposed and is this justified?
  - 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
  - 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
  - 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
  - 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
  - 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 12) What is the expected timescale and rate of development and is this realistic?
  - 13) Are any main modifications necessary for soundness?

Matter 6g – Housing site allocations – Knowle

Issue

Whether the proposed housing site allocations at Knowle are justified, effective and consistent with national policy.

Relevant policies – KN1 and KN2

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking each of the following proposed site allocations individually in turn:

- KN1 – Hampton Road
  - KN2 – South of Knowle
- 1) What is the background to the site allocation and how was it identified?
  - 2) What are the conclusions of the Solihull Strategic Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?
  - 3) What would be the effect of developing the site on the purposes of the Green Belt?
  - 4) Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?
  - 5) What is the basis for the scale of development proposed and is this justified?
  - 6) What is the background to the specific policy requirements (see Part 2 of the policy and the Concept Masterplan)? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?
  - 7) Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?
  - 8) What is the basis for the proposed Green Belt enhancements? Are they justified and appropriate and how will they be delivered?
  - 9) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
  - 10) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 11) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 12) What is the expected timescale and rate of development and is this realistic?
  - 13) Are any main modifications necessary for soundness?

Matter 6h – Housing site allocation – North of the Borough

Issue

Whether the proposed housing site allocation North of the Borough is justified, effective and consistent with national policy.

Relevant policy – NS1

N.B. In responding to the questions below, the Council should identify and address specific key concerns raised in representations e.g. in terms of site selection, adverse impacts and delivery etc.

Questions

Taking the following proposed site allocation:

- NS1 – Kingshurst Village Centre
- 1) What is the background to the site allocation and how was it identified?
  - 2) What is the basis for the scale of development proposed and is this justified?
  - 3) What is the status of the site in terms of planning applications/permissions?
  - 4) In light of this, is it appropriate/necessary for the site to be allocated in the Local Plan?
  - 5) Does Policy NS1 provide sufficient guidance regarding the development of the site?
  - 6) What is the status and role of the Concept Masterplan? Is this sufficiently clear? Should the Concept Masterplan be included in the Local Plan itself?
  - 7) Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations
  - 8) Is the development proposed viable and deliverable within the plan period? What is the situation in relation to land ownership and developer interest?
  - 9) How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?
  - 10) What is the expected timescale and rate of development and is this realistic?
  - 11) Are any main modifications necessary for soundness?

Matter 7 – Providing homes for all

Issue

Whether the approach to providing homes for all is justified, effective and consistent with national policy.

Relevant policies – P4A to P4E, P5 and P6

Questions

*Affordable housing*

- 1) What is the evidence in terms of affordable housing need and what does it show?
- 2) What are the past trends in affordable housing delivery in terms of completions and housing forms? How is this likely to change in the future?
- 3) Does the Local Plan make appropriate provision for affordable housing?
- 4) Is Policy P4A consistent with national policy?
- 5) What evidence is there regarding the viability of delivering affordable housing as part of market housing schemes? What does it show and does it justify the percentages sought in the Policy?
- 6) Is Policy P4A sufficiently flexible?
- 7) Overall, is Policy P4A effective, justified and consistent with national policy?

*Rural exceptions*

- 8) Is Policy P4B consistent with national policy?
- 9) What evidence is there on the viability of rural exception sites for housing?
- 10) Should Policy P4B enable an element of market housing where it is required to facilitate the delivery of rural exception housing schemes?
- 11) Overall, is Policy P4B justified, effective and consistent with national policy?

*Market housing*

- 12) What is the evidence base for the specific requirements set out in section 3 of Policy P4C? Are the requirements justified and how would they affect viability?
- 13) Is Policy P4C sufficiently flexible?
- 14) Could part 2 of Policy P4C conflict with part 3 of the policy? If so how would this be resolved?
- 15) Overall, is Policy P4C effective, justified and consistent with national policy?

*Self and custom housebuilding*

- 16) Are requirements of Policy P4D justified? What evidence is there to support a requirement of 5% on a threshold of 100 units or more?
- 17) Would the requirements of Policy P4D effect the delivery of allocated sites?
- 18) Is 12 months an appropriate revision time where plots are unsold? What evidence is there to support this?
- 19) What evidence is there on the viability of Policy P4D? What does it say and is it robust?
- 20) Is Policy P4D sufficiently flexible?
- 21) Should the Council identify specific sites for self and custom build housebuilding?
- 22) Is Policy P4D effective and consistent with national policy?

*Housing for older and disabled people*

- 23) Is Policy P4E consistent with national policy?
- 24) What evidence is there to justify the requirements of Policy PE4 in requiring housing for older and disabled people?
- 25) What evidence is there to justify the requirements of point 2 of Policy PE4?
- 26) What evidence is there to justify the threshold and requirements of point 3 of Policy P4E?
- 27) Does part 4 of Policy P4E conflict with part 5?
- 28) Should part 5 of Policy P4E include a suitability criteria e.g. vulnerability to flooding, site topography?
- 29) What evidence is there to justify the thresholds and requirements of point 6 (iv) of Policy PE4?
- 30) What does the viability assessment of Policy P4E say and is it robust?
- 31) Should the Plan allocate specific housing sites for older and disabled people?

*Space standards and density*

- 32) Is there justification for the use of the Nationally Described Space Standard in Policy P5 in terms of evidence of need and viability?
- 33) Is the indicative densities table in the supporting text of Policy P5 effective in explaining what will be expected in different locations within the Council area? What is the basis of the indicative densities and are they justified?
- 34) Should the densities identified in the supporting text be included in the Policy? Why?
- 35) Is Policy P5 sufficiently flexible with regards space standards and density?
- 36) Overall, is Policy P5 effective, justified and consistent with national policy?

*Provision of accommodation for Gypsies and Travellers*

- 37) Having regard to the latest evidence provided in the Gypsy and Traveller Accommodation Assessment (March 2021), are the conclusions on the needs of Gypsies, Travellers and Travelling Showpeople justified?
- 38) Does Policy 6 make appropriate provision for Gypsy and Traveller sites, having regard to the evidence of need contained in the most up to date evidence?
- 39) Is the approach to meeting needs set out in Policy 6 justified and consistent with national policy?

*Main modifications*

- 40) Are any main modifications to Policies P4A, P4B, P4C, P4D, P4E, P5 and P6 necessary for soundness?

Matter 8 – Improving accessibility and encouraging sustainable travel

Issue

Whether the approach towards improving accessibility and encouraging sustainable travel is justified, effective and consistent with national policy.

Relevant policies – P7 to P8A

Questions

- 1) Is it intended to apply Policy P7 to all development, regardless of scale and type? If not, is this sufficiently clear?
- 2) In other respects, is Policy P7 justified, effective and consistent with national policy?
- 3) Is the terminology in Policy P8 sufficiently clear and effective i.e. reference to the Council supporting or being unlikely to support developments?
- 4) In other respects, is Policy P8 justified, effective and consistent with national policy?
- 5) Is it intended to apply part 2 of Policy 8A to all development regardless of scale and type? If not, is this sufficiently clear?
- 6) Is the policy justified in seeking contributions towards SPRINT or METRO from development within or adjacent to the corridors? How would these contributions be calculated and is this clear? Is it clear which land is covered by these corridors? Are they defined and should they be shown on the Policies Map?
- 7) In other respects, is Policy P8A justified, effective and consistent with national policy?
- 8) Are any main modifications to Policies P7, P8 and P8A necessary for soundness?

Matter 9 – Protecting and enhancing our environment

Issue

Whether the approach to protecting and enhancing our environment is justified, effective and consistent with national policy.

Relevant policies – P9 to P14A

Questions

*Mitigating and Adapting to Climate Change*

- 1) Is part 2 of Policy P9 effective and justified?
- 2) Has it been demonstrated that part 3(viii) (electric charging points) of Policy P9 is deliverable?
- 3) Is part 3 of Policy P9 justified, effective and sufficiently flexible?
- 4) Is Part 4 of Policy P9 effective?
- 5) Is the approach to renewable energy development in the Green Belt in Policy P9 justified and consistent with national policy?
- 6) **Should 'net zero carbon' be defined within the Plan?**
- 7) Are the differences between energy reduction and carbon reduction made clear within Policy P9?
- 8) Is part 5 of Policy P9 effective?
- 9) What effect will Policy P9 have on viability and what evidence is there to support this?
- 10) Overall, is Policy P9 positively worded, effective and justified?

*Natural Environment*

- 11) Is the wording of Policy P10 effective in ensuring the protection of biodiversity?
- 12) **Is reference to a 'net gain' in biodiversity of at least 10% compared with the pre-development baseline justified and effective?**
- 13) Is use of the Warwickshire, Coventry and Solihull Impact Assessment calculator justified?
- 14) Is Policy P10 effective in its treatment of Sites of Special Scientific Interest, ancient woodland/ veteran trees?
- 15) Should Policy P10 refer to water quality and groundwater resources, in addition to the references in Policy P11 and Policy P14?
- 16) Does part 16 of Policy provide adequate protection to tranquil areas? Have tranquil areas within the Borough been identified and how would impact be measured?
- 17) Should Policy P10 make reference to the use and protection of soil?
- 18) Overall, is Policy P10 effective, justified and consistent with national policy?

*Water and Flood Risk Management*

- 19) Is the wording in Policy P11 on flood risk reduction effective?
- 20) Is use of the optional water efficiency standard in Policy P11 justified? On what basis has the water consumption target of 110 litres per head per day been set and is it realistic? How has the effect of this standard on viability been taken into account?
- 21) Is adequate weight given to the protection of groundwater resources within Policy P11?
- 22) Is Policy P11 effective in protecting water courses?
- 23) Overall, is Policy P11 effective, justified and consistent with national policy?

*Resource Management*

- 24) Will Policy P12 be effective in managing waste by seeking to ensure waste arising in the Borough is managed within the Borough?
- 25) Is the use of a sequential approach to determine the location of new waste management facilities appropriate?
- 26) Should Policy P12 make provision for hazardous waste and the management of secondary and recycled materials?
- 27) Should Policy P12 also reference biogenic waste, use of anaerobic digestion and new sources of energy generation?
- 28) Overall, is Policy P12 effective, justified and consistent with national policy?

*Minerals*

- 29) Is Policy P13 positively prepared and consistent with national policy?
- 30) Have the mineral safeguarding areas been appropriately defined?
- 31) Should Policy P13 include a sand and gravel aggregate mineral production target?
- 32) Should Policy P13 include guidance on the management of buffers between mineral sites and rivers?
- 33) Overall, is Policy P13 effective and justified?

*Amenity*

- 34) Should Policy P14 safeguard existing waste uses from sensitive receptors?
- 35) Should Policy P14 address matters related to contamination and the protection and remediation of controlled waters?
- 36) Is Policy P14 sufficiently flexible?
- 37) Does Policy P14 adequately address consideration of noise and vibration?
- 38) Will Policy P14 safeguard the operation of existing businesses?
- 39) Should Policy P14 identify how air quality impacts and noise pollution from the Strategic Road Network will be monitored and managed?
- 40) Overall, is Policy P14 effective, justified and consistent with national policy?

*Policy P14A Digital Infrastructure and Telecommunications*

- 41) Should Policy P14A place greater emphasis on sharing telecommunications sites?
- 42) Will Policy P14A be effective in enabling the delivery of broadband infrastructure?
- 43) Overall, is Policy P14A effective, justified and consistent with national policy?

*Main modifications*

- 44) Are any main modifications to Policies P9, P10, P11, P12, P13, P14 and P14A necessary for soundness?



Matter 10 – Promoting quality of place

Issue

Whether the approach to promoting quality of place is justified, effective and consistent with national policy.

Relevant policies – P15 to P17A

Questions

*Securing Design Quality*

- 1) Is Policy P15 effective?
- 2) Is Policy 15 sufficiently flexible?
- 3) Should Policy P15 include a section on the phasing of construction on larger allocations?
- 4) Overall, is Policy P15 effective, justified and consistent with national policy?

*Conservation of Heritage Assets and Local Distinctiveness*

- 5) Does Policy P16 provide an appropriate framework for conserving and enhancing the historic environment which is consistent with national policy?
- 6) Should Policy P16 acknowledge that further field evaluation may also be necessary where desk based assessments are insufficient?
- 7) Does Policy P16 provide adequate protection for heritage assets that are unidentified prior to development?
- 8) Overall, is Policy P16 effective?

*Countryside and Green Belt*

- 9) Is safeguarding of the best and most versatile agricultural land in the Borough justified?
- 10) Is the approach to infill development in Policy P17 appropriate?
- 11) Is part 5 of Policy P17 consistent with the NPPF?
- 12) Should Chadwick Green, Cheswick Green, Millison's Wood and Tidbury Green be removed from the Green Belt?
- 13) Should sports hubs be referenced as not being inappropriate development in the Green Belt?
- 14) Is Policy P17 effective, justified and consistent with national policy?

*Green Belt Compensation*

- 15) Should Policy P17A set out what compensation measures will be expected where Green Belt is released for development and how it will be calculated?
- 16) Is there text missing at the end of bullet point 1 of Policy P17A?
- 17) Should part 4 of Policy P17A make reference to viability?
- 18) Overall, is Policy P17A justified, effective and consistent with national policy?

*Main modifications*

- 19) Are any main modifications to Policies P15, P16, P17 and P17A necessary for soundness?

Matter 11 – Health and supporting local communities

Issue

Whether the approach to health and supporting local communities is justified, effective and consistent with national policy.

Relevant policies – P18 to P20

Questions

*Health and Wellbeing*

- 1) Is requirement 2(vii) of Policy P18 justified with evidence?
- 2) Should Policy P18 refer to specialist housing and care accommodation for older people and those with disabilities?
- 3) Should Policy P18 promote the co-location of community facilities?
- 4) Is the approach to hot food takeaways in Policy P18 justified and supported by evidence? How were the thresholds and distances determined?
- 5) Should Health Impact Assessments be required where development will result in a loss of community and cultural facilities?
- 6) Overall, is Policy P18 justified, effective and consistent with national policy?

*Range and Quality of Local Services*

- 7) What is the basis of Policy P19? Would it provide an effective approach to the provision and retention of local services which is justified and consistent with national policy?
- 8) Is Policy P19 effective in supporting local shopping facilities?
- 9) Are the boundaries of the district and local centres defined? Should they be shown on the Policies Map? How will part 2 of Policy P19 be implemented?
- 10) Is the wording of Policy P19 on community and social infrastructure effective?

*Provision for Open Space, Children's Play, Sport, Recreation and Leisure*

- 11) Is Policy P20 effective in protecting open space?
- 12) **In part 3 of Policy P20 how would facilities 'of value to the local community' be identified and value measured?**
- 13) Does part 3(iv) of Policy P20 offer sufficient flexibility?
- 14) Should open spaces, play, sport, recreation and leisure facilities be identified on the Policies Map?
- 15) Is part 7 of Policy P20 justified? What evidence is the thresholds based on?
- 16) Should the requirements of Policy P20 apply to care homes for older people?
- 17) Should Policy P20 set out the size and quality requirements for children play areas?
- 18) Should Policy P20 make reference to sports hubs in the Green Belt?
- 19) Is the designation of land between Old Waste Lane and Waste Lane, Balsall Common and land south of Shirley as Local Green Spaces justified? What evidence is there to support this?
- 20) How have the standards **for the provision of new public open space, children's play, sports and recreational facilities** been determined? Are they justified and would they be effective?
- 21) Is Policy P20 effective in ensuring adequate provision of playing pitches? What evidence is there to support this, what does it say and is it robust?
- 22) Overall, is Policy P20 effective, justified and consistent with national policy?

*Main modifications*

- 23) Are any main modifications to Policies P18, P19 and P20 necessary for soundness?

Matter 12 – Housing land supply

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing land supply.

Questions

- 1) What is the up to date situation regarding housing completions so far in the plan period?
- 2) For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, timing and annual rates of delivery? What is the basis for these assumptions and are they realistic and justified?
  - a) Sites with planning permission and under construction
  - b) Sites with planning permission and not started (split by outline and full permissions)
  - c) Sites identified in land availability assessments
  - d) Sites identified in the brownfield land register
  - e) Town Centre sites
  - f) Local Plan 2013 allocations without planning permission
  - g) Windfall sites
  - h) Site UK1
  - i) NEC
  - j) Housing site allocations in this Local Plan
- 3) What is the basis for a 10% discount from categories b) to f)? Is this justified?
- 4) Would there be an adequate supply of housing land for the whole plan period?
- 5) Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare?
- 6) In terms of a five year supply and paragraph 73 of the NPPF, is a 5% buffer appropriate?
- 7) Taking 1<sup>st</sup> April 2021 as the base date, what would be the five year requirement (assuming the stepped annual requirement and adding any shortfall in delivery since 2020 before applying a buffer)?
- 8) What would be the supply for this period (in total and by each source of supply)?
- 9) Are the assumptions on the sources of supply for this period realistic and justified?
- 10) Would there be a five year supply of housing land (from 1<sup>st</sup> April 2021)?

Matter 13 – Delivery, infrastructure and monitoring

Issue

Whether the approach to delivery, infrastructure and monitoring is justified, effective and consistent with national policy.

Relevant policies – P21 and monitoring indicators

Questions

- 1) How has viability been taken into account in preparing the Local Plan and setting policy requirements etc.? What are the conclusions in terms of the realistic delivery of the proposals within the Local Plan?
- 2) Is the approach that the Local Plan takes to viability and the application of policy requirements sufficiently flexible?
- 3) What are the key requirements in terms of infrastructure?
- 4) What mechanisms will there be to ensure necessary infrastructure is provided?
- 5) Is the approach to developer contributions justified?
- 6) How will the Local Plan be monitored? Will this be effective and how would any issues arising from monitoring be addressed?
- 7) What is the intended approach to a review of this Local Plan?
- 8) Are any main modifications to Policy P21 necessary for soundness?