

Planning for Solihull's Future Local Plan Review 2026 – 43

Issues and Options Consultation

January 2026



**Making Solihull a great place
to live, work, invest and enjoy**



Solihull
METROPOLITAN
BOROUGH COUNCIL

Contents

Contents.....	2
Foreword	4
Importance of a Plan Led System	5
How Could it Affect Me?	5
What will happen if we don't identify enough land for new development?.....	5
National Planning Context	7
Future Changes to National Planning Policy	8
Regional Planning Context	9
Duty to Cooperate (DtC).....	11
Solihull Planning Context.....	13
Local Development Scheme – November 2025	13
Updating the Local Development Scheme Further	14
Scope of the Intended Regulation 19 Plan	14
Relationship to Neighbourhood Development Plan (NDPs)	15
Challenges Facing the Borough.....	16
Vision for the Borough	17
A Vibrant Economy	19
How Should the Local Plan Put This into Practice?.....	19
Calculating Local Housing Need	21
Housing Requirement in the Solihull Local Plan 2020	22
Housing Requirement in the Emerging Local Plan.....	22
Existing Land Supply	24
Identifying Additional Housing Supply	26
Where Should Additional Land Supply Come From?.....	26
Additional Supply in Non-Green Belt Locations	28
Windfall Developments.....	28
Greater Density and/or Going Higher	28
Additional Supply in 'Existing' Green Belt Locations	30
Arden Cross.....	30
Sites Allocated in the 2020 Plan.....	31
Some Conclusions on Additional Supply	32
Spatial Strategy for the Emerging Plan	33
Spatial Strategy in the 2020 Plan.....	33
Spatial Strategy in the New Plan	35
How Should New Allocations Be Identified?	36



Site Typologies.....	37
Principles Relating to Potential Allocations	40
Importance of Infrastructure Delivery.....	52
National Planning Policy on Infrastructure Delivery	52
The Council's Intended Approach to Infrastructure Delivery	52
Physical Infrastructure	53
Social Infrastructure	55
Green Infrastructure	59
Other Infrastructure	62
Phasing Infrastructure.....	62
Infrastructure Funding	62
Cross Boundary Infrastructure	63
Shaping New Development.....	64
Comprehensive Developments	64
Biodiversity Net Gain	66
Housing Mix & Affordable Housing.....	67
Self & Custom Build	70
Climate Change.....	70
Sustainability Appraisal	72
What Will Happen Whilst a New Plan is Being Prepared?.....	73
Appendix A - Schedule of Sites Allocated in the 2020 Draft Submission Plan.....	76
Appendix B - Schedule of Policies Included in the Draft Submission Plan (2020)	78
Appendix C - Schedule of Local Plan Preparation by Other LPAs in the HMA.....	80



Foreword

1. This consultation has been prepared in order to consider the significant changes brought into effect by the amendments to the National Planning Policy Framework (NPPF) in December 2024. It therefore has a focus on housing numbers and how they could be accommodated. As the new local plan progresses there will be other subject areas that will need to be addressed in detail. The Council is keen to get a new local plan in place as soon as possible as this will provide certainty for our communities.
2. It's no accident that the Council's motto is "urbs in rure", which is Latin for town in the country. This reflects the significant natural environment and open spaces that the Borough has with an urban setting. This includes the significant Green Belt in Solihull, which amounts to around two thirds of the land in the Borough.
3. Much of the Green Belt forms the strategically important Meriden Gap – there are few other areas of Green Belt in the Country that separate such large cities as Birmingham and Coventry. This is what helps make Solihull and the West Midlands such an attractive place. But the Green Belt doesn't just help prevent these urban areas merging; it is also home to important and valuable biodiversity assets and areas for recreation.
4. Perhaps the most profound changes to national policy made in 2024 is in relation to Green Belts. In particular, the advent of the concept of Grey Belts – a sub-category of Green Belt that seeks to distinguish between poorly performing Green Belt and better performing areas. Some envisaged that Grey Belt would comprise of unattractive, brownfield sites that would benefit the Green Belt through being redeveloped. However, the national policy does not have such a narrow definition, and it potentially, draws into the definition attractive greenfield sites that sit on the edge of our rural villages.
5. Under the 2020 plan, the Council demonstrated it was prepared to make difficult decisions when considering the level of growth to be accommodated in the Borough, and the resultant impact on the Green Belt. Similar decisions will need to be made under this new plan too, and further Green Belt release is inevitable. However, we must ensure we get the balance right as we need to protect what makes Solihull, and the West Midlands, special. It will not be a case of development at all costs.
6. Planning policy is not just about 'the numbers' of new dwellings that may be required, but how development that will be coming to the Borough can be 'shaped' – i.e. ensuring it is of high quality, reflective of its surroundings and it delivers the type dwellings that our residents need. We are therefore seeking views on what sort of policies should be brought forward to help guide new development.
7. This Local Plan will be one of the tools the Council will use to achieve its ambition for Solihull as a *'great place to live, work, invest and enjoy'* – putting people first.

Councillor Andy Mackiewicz,

Cabinet Member for Climate Change and Planning



Importance of a Plan Led System

8. At the heart of planning is the need to plan positively for sustainable development. One of the principal ways this is achieved is by having a local plan to guide the development of an area. Having a local plan is key to delivering sustainable development that reflects the vision and aspirations of local communities. The aim is that local authorities should positively seek opportunities, through their local plan, to meet the development needs of their area. The Council's local plan addresses the spatial implications of economic, social and environmental change that is happening to the Borough, both now and in the future.



How Could it Affect Me?

9. The local plan as a whole sets out the future spatial strategy for the Borough and includes the allocation of sites to promote development. It also identifies land where development would be inappropriate because of its impact on, for instance, environmental or historic assets; and it also incorporates a strategy for enhancing the natural, built and historic environment.

What will happen if we don't identify enough land for new development?

10. National planning policy requires the supply of land for housing to be significantly boosted, and without an adequate supply of land for new dwellings, access to the homes that we all need becomes ever more difficult. Equally, land for commercial needs has to be managed to ensure that both existing businesses can flourish whilst also providing an opportunity to attract new business into the Borough. Of course, we also need to recognise the special place that Solihull is, and this plan seeks to ensure that the right balance is achieved between providing land for new development and protecting what makes Solihull special.



11. If the Council does not have an appropriate plan in place, it will be unable to demonstrate a rolling '5year land supply' and become increasingly exposed to speculative developments that may not be situated in the most sustainable or appropriate locations. This would mean that policies in the 2013 plan would be considered out-of-date and lead to less influence over the impact, including through inappropriate design, that some developments may have. The increased risk of speculative development proposals would likely lead to development and growth taking place in an unplanned manner, placing additional pressure on infrastructure without guaranteeing the opportunity to plan positively for measures that can mitigate the impacts. In addition, the Secretary of State could intervene in the Council's plan making powers thus taking away local choice about where development should be accommodated.



National Planning Context

12. Significant changes to national planning policy occurred with the publication of an amended National Planning Policy Framework (NPPF) in December 2024 and updated National Planning Practice Guidance (NPPG) in February 2025.
13. The most significant changes related to the following issues:
 - Local Housing Need
 - Green Belt policy

Local Housing Need

14. Changes to the standard methodology for calculating housing need with a departure from using household projections as the starting point and a significant rise in how the affordability ratio is applied. As detailed in a later chapter, this has significantly increased (by 63%) the Borough's housing need.
15. Given the changes to the methodology which are no longer based on household projections, it is perhaps a misnomer to refer to the figure as local need, but rather a housing number that a local planning authority is now expected to meet.

Green Belt Policy

16. Perhaps the biggest change to Green Belt since it was first a widespread feature of the planning system in the 1950's is the introduction of the concept of Grey Belt. Whilst it was previously clear about whether a site was in the Green Belt or not (it was either allocated on the policies map as such or not), now the approach to whether a site is considered to be Grey belt or not includes an opinion-based assessment.
17. Grey Belt sites are areas within the Green Belt that do not strongly perform against 3¹ of the 5 purposes of why land is designated as Green Belt. It should be noted that even if a site/area of the Borough is considered to be Grey Belt, it does not necessarily follow that the site should be allocated (or permission granted on a planning application²) as other key tests would need to be met. In particular, whether the site is in a sustainable location.
18. Whilst national planning has always allowed housing need to be taken into account when considering proposals for development in the Green Belt³, the NPPF now allows, in certain circumstances, housing need to 'trump' Green Belt policy.

¹ Checking the unrestricted sprawl of large urban areas, prevent neighbouring towns merging into one another and preserving the setting and special character of historic towns. These 3 purposes specifically exclude villages.

² The NPPF changes in relation to Grey Belt and planning applications creates a set of circumstances where Green Belt policy would not be an appropriate reason for refusal in relation to proposed development in the Green Belt.

³ Either through demonstrating 'exceptional circumstances' to change Green Belt boundaries (in a local plan), or via 'very special circumstances' when considering planning applications for proposals on Green Belt sites.



Future Changes to National Planning Policy

19. It is anticipated that further changes at the national and regional level are expected over the coming months. In preparation for this the following has occurred:
 - The Planning and Infrastructure Bill received Royal Assent on 18th December 2025 and is now therefore an [Act](#), albeit regulations will be required to bring into force many of its provisions.
 - [Draft revisions to the NPPF](#) were published on the 16th December 2025. The consultation on this draft remains open until 10th March 2026 and an amended NPPF is expected to be published thereafter.
 - Rollout of the new plan-making system - [draft guidance](#) on how the new plan-making arrangements are expected to operate⁴ was published on 27th November 2025 alongside a [Written Ministerial Statement](#) (WMS).

Implications of the Changes to National Planning Policy

20. The draft NPPF includes a set of national development management policies (which had been expected) and these feature in the document as ‘National Decision-Making Policies (NDMP).’ This will have implications for the nature and scope of policies that can be included in local plans since it is indicated that in preparing plans, Council’s should not “*duplicate, substantially restate or modify the content of national decision-making policies*”⁵.
21. The new plan-making system will put into practice a new 30-month process for producing a local plan. Any plans being produced under the current system (now being referred to as the ‘legacy’ system)⁶ will need to be in accordance with the 2024 NPPF, and will need to be submitted for examination by the end of December 2026.
22. For decision making, the new policies in the NPPF must be taken into account from the date of its publication, i.e. when the draft version is finalised after consultation.
23. The draft implementation provisions⁷ include the following:

“Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.”
24. This would mean that if policies in plans pursued under the 2024 NPPF would effectively be obsolete on adoption if they were inconsistent with the new NDMPs.

⁴ It states: “We have published this guidance now so that LPAs can see the direction of travel for the new plan making system. We will review the guidance and make any necessary revisions and updates as the new system is implemented, and related regulations and policy are confirmed.”

⁵ Proposed policy PM6 (c).

⁶ Based on the Planning & Compulsory Purchase Act 2004.

⁷ Annex A, paragraph 2.



Regional Planning Context

25. Until 2010 strategic planning was undertaken through the production of Regional Spatial Strategies, but these were then replaced with a duty-to-cooperate. This meant that Councils in the Housing Market Area⁸ (HMA) would work together so that individual local plans would address the area's needs, including the scale and distribution of growth.
26. The Government is working towards reintroducing formal strategic planning across wider areas than individual local plans and it is expected that, at least in part, this will be achieved through the production of a Spatial Development Strategy (SDS) for the West Midlands. The West Midlands Combined Authority (WMCA) will be responsible for producing this plan.
27. As the WMCA describes:

A SDS is a long-term plan that set outs where new homes, jobs, transport and green spaces should go across the whole region. Instead of each council planning in isolation, it joins things up, so growth is balanced and makes sense across towns and cities.

It helps protect important natural habitats and green spaces while guiding investment into highly sustainable locations.



28. In July 2025 the WMCA Board approved the initiation of the project which includes establishing governance and working arrangements, a public and stakeholder engagement plan and the adoption of eight guiding principles to inform the development of the SDS at each stage. The intended timescale for the SDS is as follows:
 - Summer 2025 – Spring 2026 – SDS initiation and scoping including: commissioning evidence base, establishing working groups and wider governance, and initial public & stakeholder engagement.
 - Spring – autumn 2026 – Issues and Options Consultation (following publication of regulations and guidelines).
 - Winter 2026 – Spring 2027 – Publication of draft SDS and public consultation.
 - Spring 2027 – Winter 2027 – Public examination.
 - Spring 2028 onwards – Adoption, monitoring and review.

⁸ Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire (also in Coventry & Warwickshire HMA), Redditch, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon (also in Coventry & Warwickshire HMA), Tamworth, Walsall and Wolverhampton.



29. The eight principles to guide the development of the SDS are as follows:
 - a. **Co-development and Equality of participation** - All LAs participate as equal partners with respect for different priorities and relationships.
 - b. **Timing and momentum** - To set firm timelines against each milestone in line with the Regulations, whilst allowing sufficient space and time for internal discussions on all aspects of the SDS.
 - c. **Infrastructure First** – growth must be supported by the guarantee of provision of transport, energy, green and blue infrastructure and social infrastructure. The SDS can make this explicit in terms of timing and costs associated with different growth options.
 - d. **Brownfield First** – the SDS must maximise the use of previously developed land consistent with national and local priorities. However, alternative sources of land supply will be required to be identified given anticipated levels of need and finite availability of sites within the existing urban area. There will need to be a consistent approach to any greenfield or Green Belt release activity, and an opportunity to give priority to suitable sites in highly sustainable locations.
 - e. **Enhancing the functions of green spaces** - the SDS must recognise the strategic importance of green open spaces in the West Midlands and establish a consistent and positive approach to Green Belt land beyond the principal planning purposes of preventing urban sprawl and the merging of towns. The SDS should seek to enhance the wider functions of green open spaces ,including giving priority to i) protecting and enhancing natural habitats and promoting biodiversity, ii) enabling access to recreational land, iii) protecting and establishing carbon-sequestering land uses, and iv) recognising that successful growth and the promotion of the region requires these spaces.
 - f. **Additionality to local plans** – the SDS must provide additionality to and not replicate the content of Local Plans produced by the local authorities. The SDS must also be sufficiently detailed to enable Local Plans to understand the implications of the SDS policies and proposals for application at the local level, for example in relation to the identification of growth areas and infrastructure.
 - g. **Evidence-led** – the SDS must be based on a comprehensive and robust evidence base, with all policies and proposals fully justified and capable of withstanding challenge at examination.
 - h. **Integration** – the SDS must be fully integrated with and support the delivery of key national, regional and local priorities and programmes, most significantly in relation to the Local Transport Plan, Regional Energy Strategy, Local Nature Recovery Strategy and the Local Growth Plan (regional industrial strategy).
30. Local plans within the area covered by the SDS will be expected to be in general conformity with it. This means that the scale of growth to be included in local plans will be largely determined by the SDS.
31. It is anticipated that an SDS would be adopted by a simple majority vote of the constituent authorities with the West Midlands Mayor having a casting vote in the event of a tie.



Duty to Cooperate (DtC)

DtC and Local Plans

32. Plans prepared under the current plan-making arrangements are required to fulfil both a legal and policy test in order to demonstrate that the Council has fulfilled its duty to cooperate obligations. Important updates with regard to the DtC have been given by way of letters from the Minister of State for Housing and Planning to the Planning Inspectorate dated 9th October 2025 and 27th November 2025.

33. This includes the following from the October letter:

“We have also been clear about the importance of effective strategic planning across local planning authority boundaries, both to support the effective distribution of housing across appropriate geographies and also provide high-level frameworks for infrastructure investment. I look forward to welcoming the development of Spatial Development Strategies across England following the passage of the Planning and Infrastructure Bill.

In advance of the new plan-making system and mechanisms for cross-boundary cooperation coming into force, the final set of local plans being delivered within the current system remain essential to facilitating the effective delivery of housing, jobs and infrastructure. It is therefore critical that Inspectors approach examinations of current system plans with the appropriate degree of flexibility. The evidencing of expectations to establish whether the legal and soundness tests have been met – including with respect to the Duty to Cooperate – should be proportionate to the context in which plans in the existing system are being prepared.”

34. This includes the following from the November letter:

“The new plan-making system provided by the Levelling Up and Regeneration Act 2023 does not include the Duty. Instead, the new system will rely on revised national policy and the new tier of strategic planning to ensure effective co-operation between plan-making authorities. The Regulations for the new system will also ‘save’ the current plan-making system for a period to allow emerging plans to progress to examination by 31 December 2026. Given the above, and to help drive local plans to adoption as quickly as possible and progress towards our objective of universal local plan coverage, we have decided not to ‘save’ the Duty, thereby removing this requirement for plans in the current system.

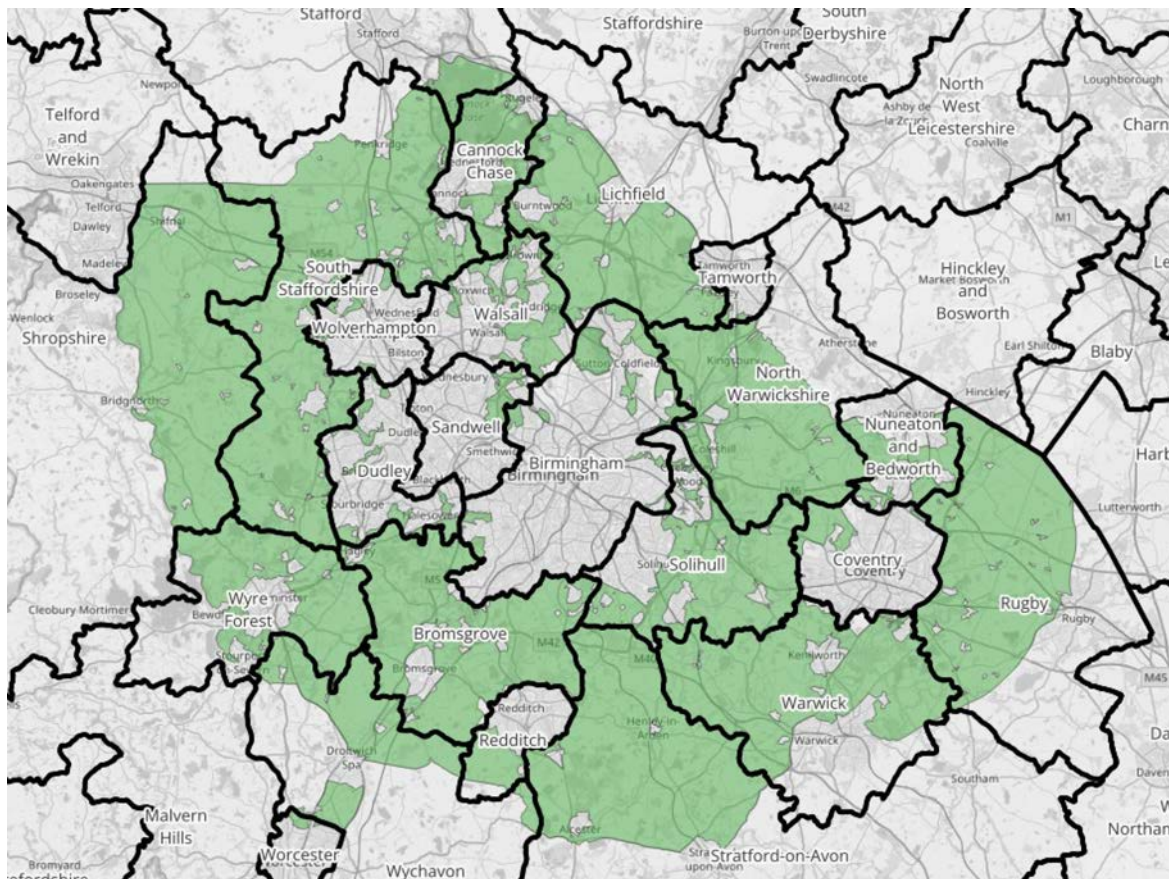
The Duty will therefore cease to apply when the Regulations come into force early next year, including for plans at examination at that point. On the basis of the government’s firm intention to abolish the Duty for the current system, examining Inspectors may wish to begin any necessary dialogue with LPAs in advance of the Regulations coming into effect, with reference to this letter. Of course, LPAs should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation’.”

35. This approach is particularly noteworthy for plans being brought forward under the legacy system as it signals a degree of pragmatism around the DtC and that, depending on circumstances, the role SDS’s will have with regard to ensuring cross boundary collaboration takes place.

DtC and Strategic Plans



36. An important part of the new plan-making arrangements will be how the DtC will work **between** SDS areas. This is particularly important in the West Midlands as the area to be covered by the SDS is only **part** of the functional Housing Market Area.
37. Appendix C to this document sets out the current position other Councils are at with their plan-making.



Solihull Planning Context

38. The current adopted Local Plan for the Borough was adopted in 2013⁹ and was intended to cover the period to 2028. In 2015 a local plan review process commenced to bring forward a replacement plan.
39. This review process culminated with the submission of the 2020 (Draft Submission Plan) for examination in May 2021. However, following significant changes to national planning policy during this period, the plan was withdrawn from examination in October 2024. Despite the Inspectors concerns about the land supply included in the plan, it was noted that the examination process established that:
 - That the duty-to-cooperate had been complied with.
 - The overall spatial strategy of the Plan was appropriate.
 - The housing allocations were, in principle, appropriate (and by implication this supports the site selection methodology).
40. Following withdrawal of the 2020 plan, work commenced on bringing forward a new plan with the launch of a call-for-sites exercise over the period November 2024 to February 2025.
41. A timetable for the new plan was set out¹⁰ as follows:
 - Winter 24/25 – launch Call-for-Sites exercise
 - Autumn 25 – publish a Regulation 18 Preferred Options Plan
 - Summer 26 – publish a Regulation 19 Draft Submission Plan
 - Autumn 26 – Submit plan for examination
 - Winter 26/27 – Examination hearings
 - Summer/autumn 27 – Plan adoption
42. It was recognised that this was a challenging timescale that would also be subject to external influences, for instance:
 - Planning reforms, including an updated NPPF, the emerging Planning & Infrastructure Bill and enactments of the Levelling-up and Regeneration Act (2023).
 - Potential changes to the duty-to-cooperate.

Local Development Scheme – November 2025

43. In November 2025 consideration¹¹ was given to whether this timescale was still appropriate. Changes to national planning policy and the emergence of formal regional (or at least sub-regional) planning outlined above led the Council to conclude that the timetable set in December 2024 should be updated.

⁹ The Solihull Local Plan (2013)

¹⁰ [Local Development Scheme \(December 2024\)](#).

¹¹ At Climate [Change and Planning Cabinet on 27th November 2025](#).



44. It had been hoped that the emerging plan would be produced, examined and adopted under the plan-making arrangements stemming from the 2024 Act. This would have required the plan to have been submitted for examination by December 2026. However, when consideration was given to updating the LDS it was believed that there was sufficient doubt about this timescale being met such that the Council may need to have switched to the new plan-making arrangements. Hence the decision to update the LDS to reflect the timetable as follows:
- Winter 2025/26: Issues and Options Consultation (informal stage outside the formal arrangements under the new 30-month plan-making arrangements).
 - Winter 2026/27: Mandatory Public Consultation no. 1 (under the new plan-making arrangements). There is potential for this to contain the level of detail typically found in a preferred option consultation.
 - Summer 2027: Mandatory Public Consultation no. 2. This is likely to be similar to the R19 draft submission plan stage and would be the version of the Plan the Council expects to submit for examination.
 - Winter 2027/28 - spring 2028: Examination
 - Spring 2028: Adoption

Updating the Local Development Scheme Further

45. Having reviewed progress to date, the Council believes there remains a possibility that this emerging local plan can still be completed under the legacy system. However, to do so it is recognised that meeting the December 2026 has clear timetable challenges and whilst the Council will seek to proceed on this basis, there may be circumstances beyond its control that may prevent this being achieved.
46. Nevertheless, it is prudent for the Council to be clear that this consultation is published as a formal consultation under regulation 18 of the Town & Country Planning (Local Planning) Regulations 2012, and representations should be made on this basis. The next stage will be for the Council to publish the Regulation 19 (R19) version of the plan, which it will seek to do so in late summer/early autumn 2026¹².
47. In due course the Council will update both its Local Development Scheme and Statement of Community Involvement to reflect the approach it is intending to take.

1. Do you have any views on the approach the Council is intending to take to continue to use the legacy plan-making arrangements and move from this consultation to a Regulation 19 plan later this year?

Scope of the Intended Regulation 19 Plan

48. Paragraph 72 of the NPPF sets out that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption of the plan and specific,

¹² In accordance with paragraph 49 of the NPPF, the Council can give weight to relevant policies in emerging plans according to: (a) the stage the plan has reached, (b) the extent to which there are unresolved objections to relevant policies and (c) the degree of consistency of the policies in the emerging plan to the NPPF.



developable site, **or** [emphasis added] broad locations for growth, for subsequent years (i.e. years 6-15). This means that the Council does have a choice when approaching the drafting of the R19 version of the plan and it needn't be specific about the sites needed in years 6-15 of the plan. The Council's preferred approach is that the flexibility offered by this paragraph of the NPPF will be exercised and it is intended to rely on this paragraph and identify broad locations for growth in years 6-15 of the plan rather than specific sites.

49. It is believed that this approach would be reasonable and proportionate given the SDS, which is emerging from the WMCA, and that a subsequent plan for Solihull will need to be prepared to reflect this.
50. In taking this approach, it is recognised that it should expect to demonstrate a five year supply of deliverable sites upon adoption of the plan.

2. Do you have any views on this approach the Council is intending to make regarding the likely scope of the subsequent Regulation 19 plan to identify broad locations for growth in years 6-15 of the plan rather than specific sites?

Relationship to Neighbourhood Development Plan (NDPs)

51. Neighbourhood Development Plans (NDP) are brought forward by local communities and following a successful examination and referendum they then become 'made' plans that are formally part of the development plan for the Borough. The following NDPs have been made:
 - Hampton in Arden – August 2017
 - Knowle, Dorridge & Bentley Heath – April 2019
 - Berkswell – September 2019
 - Balsall – June 2021
 - Meriden – June 2021
52. Some of these plans are in the process of being updated, and others may also come forward. They will be expected to be in conformity with the Local Plan.



Challenges Facing the Borough

53. When preparing a local plan, it is useful to have in mind what the plan is seeking to achieve, and this is usually expressed by identifying the challenges it is expected to address.

54. The 2020 Plan set out a comprehensive list of challenges it was seeking to address, and these have been used as the basis for this consultation. They are as follows¹³:

- Challenge A Mitigating and adapting to Climate Change.
- Challenge B Meeting the Borough's own housing needs.
- Challenge C Sustaining the attractiveness of the Borough for people who live, work, visit and invest in Solihull.
- Challenge D Securing sustainable and inclusive economic growth.
- Challenge E Protecting key gaps between urban areas and settlements, and between settlements.
- Challenge F Reducing inequalities in the Borough.
- Challenge G Maintaining a supply of Gypsy and Traveller sites and pitches.
- Challenge H Increasing accessibility and encouraging sustainable travel.
- Challenge I Providing sufficient waste management facilities and providing for sand and gravel aggregates.
- Challenge J Improving health and wellbeing for everyone.
- Challenge K Protecting and enhancing our natural assets.
- Challenge L Improving water quality and flood risk.
- Challenge M Maximising the economic and social benefits of the High Speed 2 rail link and the UKC Hub Area.
- Challenge N Mitigating the impacts of High Speed 2 and the growth associated with the UKC Hub area.
- Challenge O Providing infrastructure and securing developer contributions.

3. Do you believe these are the challenges that the local plan should be addressing? Are any included that you believe aren't necessary, or do you believe some are missing?

¹³ These are NOT expressed in any order or priority.



Vision for the Borough

55. Once the challenges that a plan is expected to address have been identified, it is helpful to set an overall vision for the plan. This is also a useful opportunity to link to the [Council Plan 2025-30](#) which was approved in July 2025. This states:

Our Council Plan sets out our vision for Solihull, the direction that we want to go in as a Council, how we aim to travel along that journey and what we want to see at the end of it.

This Plan for 2025-30 is based on a new vision ‘Solihull: a great place to live, work, invest and enjoy’, which seeks to capture what is best and most unique about Solihull. It builds on strong foundations and makes the most of what Solihull has to offer our residents, our partners, and our businesses.

56. The “Plan on a Page” is a visual summary of the Council Plan, demonstrating the Council’s priorities and the end outcomes it is seeking to achieve:



57. Whilst the Council plan includes ambitions and key activities that are not solely related to the function of a local plan (which is mainly a land use plan), it does have some content that is directly related and these components can be drawn out into a planning related vision for the Borough, as follows:

By 2043, 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 HS2 Interchange; reflecting the Borough’s location at the heart of the national rail and motorway network, and the role of UK Central as the international gateway to the West Midlands. In particular the opportunity will have been taken to ensure that HS2 Interchange is well integrated and key economic assets, including Birmingham



Airport, the NEC and JLR, are supported by privately and publicly funded transport infrastructure to unlock the full potential for economic growth.

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 protection of the Green Belt which contains the strategically important Meriden Gap); and the quality of the environment that make it a special place.

This vision will be underpinned by ensuring all relevant activities are underpinned and fully integrated with measures to tackle the Climate Change emergency; recognising that this has a cross-cutting dimension that extends across economic, social and environmental objectives.

Achieving this vision will contribute towards the ability for everyone to have an equal chance to be healthier, happier, safer and prosperous, through growth that creates opportunities for all.

4. Do you believe this is the right vision for the Borough, if not why not, and what would be the alternative?



A Vibrant Economy

58. One of the seven ambitions set out in the Council Plan is to ensure “a vibrant economy with increased access to opportunities.” This is supported by the Council’s Economic Strategy (2023-2032).

59. The Council Plan provides useful context to this subject area as follows:

“Solihull drives the West Midlands’ economy; we have the highest gross value added (GVA) per head in the West Midlands (£44,613) and the 8th highest outside London.

We have strong foundations to build upon. Solihull remains one of the UK’s strongest performing economies, as well as the gateway for the region. As a Council, we aim to drive the conditions for growth and to address inequalities within the borough. Our ‘UK Central Solihull’ brand promotes Solihull as one of the UK’s best-connected destinations for businesses, leisure and living, and a prime location for new investment.

UK Central focuses on three key areas of economic opportunity across the borough:

UK Central Hub represents a dynamic cluster of economic assets including Birmingham Airport, the NEC, Birmingham Business Park and Jaguar Land Rover. At the heart of The Hub, we are proud to host the £3.2bn Arden Cross development, which will support up to 27,000 jobs and up to 3,000 new homes, providing office spaces, cafes and public areas. This will also be complemented by a new Health Tech Campus led by the University of Warwick. Arden Cross will be transformed with the future arrival of the HS2 Interchange Station, which will act as a catalyst for investment, and deliver benefits for all of our communities. As one of the region’s strongest gateway assets, Arden Cross is set to feature prominently in the West Midlands Growth Plan.

Solihull town centre is an established and popular thriving commercial centre with an enviable reputation for the opportunity, connectivity and the lifestyle it offers. We are seeking to enhance the existing retail offer, visitor experience, and nighttime economy through the Solihull Town Centre Masterplan. One of the key projects within the masterplan is the regeneration of Mell Square. In March 2025, our preferred development partner, Muse Places Ltd, submitted a planning application for up to 1,600 homes as part of a new mixed-use neighbourhood which includes shops, cafes, bars, restaurants and public spaces.

North Solihull is strategically located next to the UK Central Hub and has a strong track record for regeneration activity in Solihull. Within this area, we are currently redeveloping Kingshurst village centre to create a high quality, sustainable and well-integrated community with enhanced potential to benefit from the Hub. The first phase of construction comprising of 25 new sustainable social rented homes was successfully completed in September 2024. We are currently moving on to phase two of the development which includes a new community, health and retail hub.”

How Should the Local Plan Put This into Practice?

60. The Council is updating its Housing and Economic Development Needs Assessment (HEDNA) that was last published in 2020. This will provide updated evidence on the need for additional



employment land, including for local needs. We are also working with neighbouring authorities in relation to the economic requirements identified through the SDS and supported the completion of the West Midlands Strategic Employment Land Study (2024).

61. It is envisaged that the strategy in relation to employment land will build upon the approach to date that has identified the UK Central Hub Area as a key cluster of the Borough's economic assets. Opportunities will be explored to support the continued success of the major employers in this area including:

- Birmingham Airport
- The National Exhibition Centre
- Jaguar Land Rover
- Arden Cross and the HS2 Interchange



5. How should the Council, through the Local Plan, seek to maximise the benefit these key economic assets make to the Borough?

62. The Borough's economic activity isn't solely related to these sites and therefore it will be necessary to ensure an appropriate framework is in place, through the plan, to help and encourage other commercial and employment activity throughout the Borough. For instance, other important areas accommodating economic activity includes Blythe Valley Park, Birmingham Business Park, and Solihull Town Centre.

6. How should the Council, through the Local Plan, seek to encourage and plan for other commercial and employment activity across the Borough?

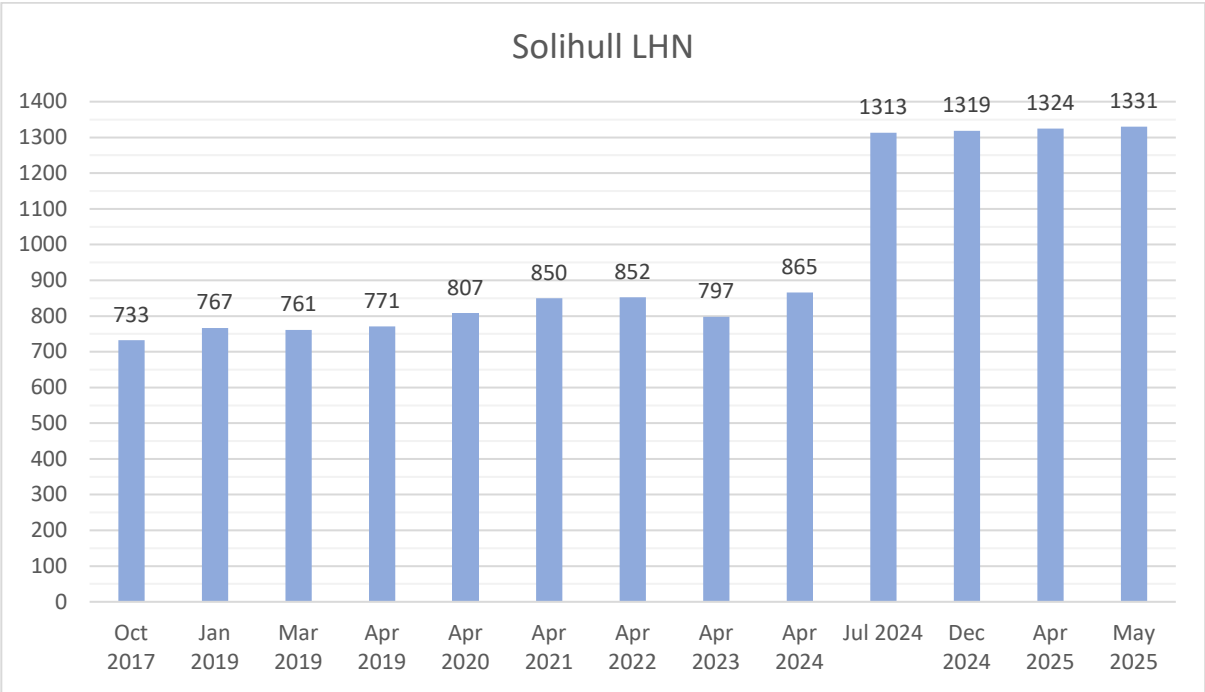


Calculating Local Housing Need

63. An updated standard method¹⁴ (SM) for calculating Local Housing Need (LHN) was included in the December 2024 NPPF. In making the changes the Government stated:

“We are therefore restoring mandatory housing targets. This means that local authorities must use the standard method as the basis for determining housing requirements in their local plans.”¹⁵

64. In the 2020 plan the local housing requirement was established at 816 dwellings per annum (dpa). **Under the new SM the LHN for the Borough would increase to 1,331¹⁶ dpa.** This represents an increase of 515 dpa (63%). Over the course of a typical plan period (18 years) this would increase the number of dwellings to be accommodated by around 9,270 dwellings. The graph below illustrates the changes to LHN over time¹⁷:



65. The following graph helps illustrate a comparison between the LHN figure now expected to be delivered, and past housing completions¹⁸.

¹⁴ The SM now uses a 0.8% increase in housing stock (per annum) as the starting point for calculating LHN. This replaces the household projections as the starting point under the old method. An affordability uplift (based on a comparison between median house prices and median workplace-based earnings) remains a part of the method, but with an increased uplift. Over the period 2017 to 2014 the uplift varied between 22% and 34%. It is now 73%.

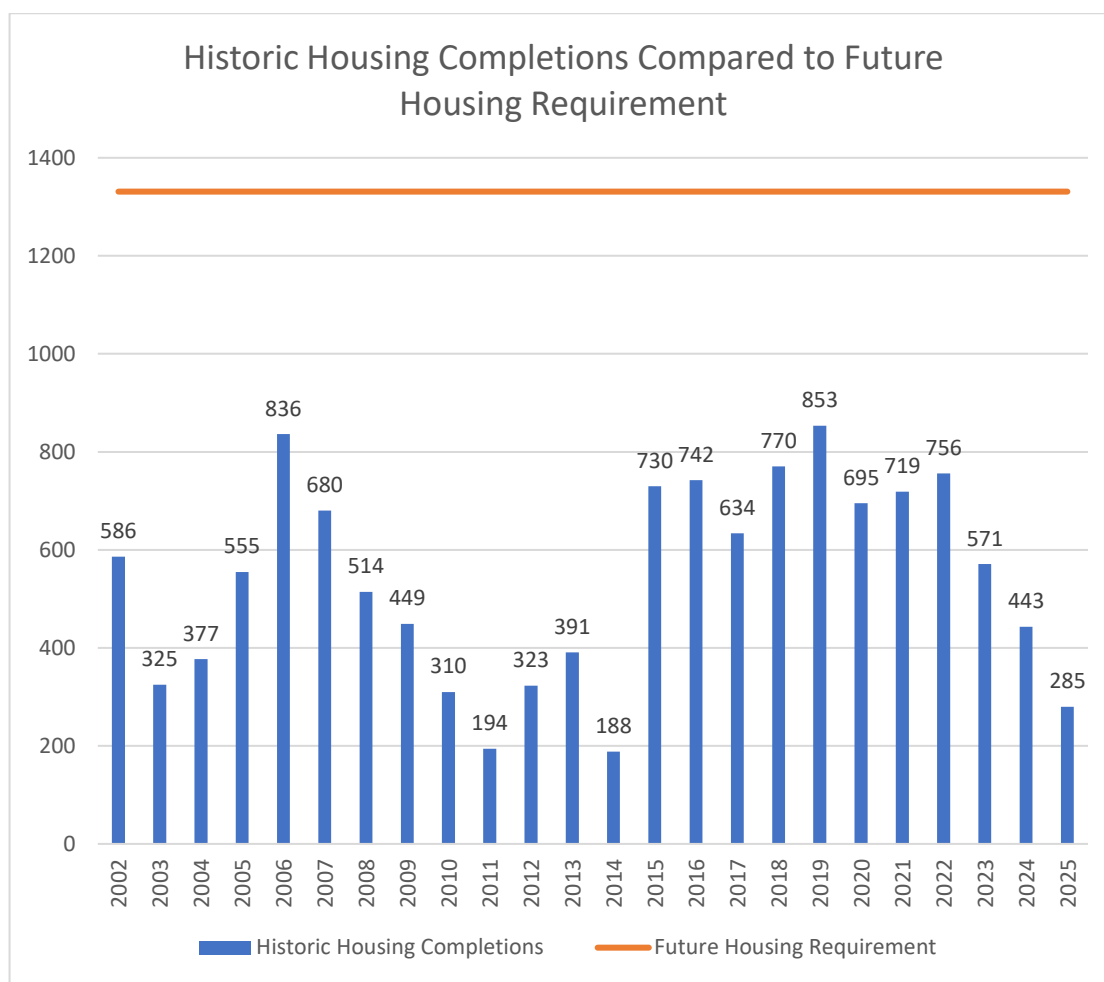
¹⁵ “Building the homes we need” - [Statement](#) made by Matthew Penncook (Minister of State for Housing and Planning) on 12 December 2024

¹⁶ This uses affordability data as of April 2025 and housing stock figures as of May 2025.

¹⁷ The timescales used are a combination of dates that represent both changes to the standard methodology and changes to the data inputs, hence it’s not a uniform linear scale.

¹⁸ Year ending 31st March.





Housing Requirement in the Solihull Local Plan 2020

66. The now withdrawn plan was based on a Local Housing Number (LHN) of 816¹⁹ dpa. It also included a c2,000 contribution towards meeting unmet needs of Birmingham.
67. The plan period was to be 2020-36 (i.e. 16 years) and would have provided for 15,017 dwellings.
68. During the examination, the Council was requested to extend the plan period to 2037 (making the plan period 17 years) and this made provision for a revised housing requirement of **15,873** (i.e. average of 934 dpa), which was accepted by the Inspectors.

Housing Requirement in the Emerging Local Plan

69. It is anticipated that the plan period for the new plan will run from 2025 to 2043 (i.e. a period of 18 years). This is on the basis that evidence being used/prepared for the new plan will have a base date of April 2025; and if the plan is to be adopted in 2028 then it should have a 15-year time span post adoption, thus running up to 2043. Based on a plan period of 18 years, the housing requirement would be **23,958** dwellings²⁰.
70. Whilst there is certainty about what the LHN figure produces, there is current uncertainty about how this figure will be influenced by the West Midlands Spatial Development Strategy

¹⁹ 807 dpa as a result of the standard method with a modest increase to reflect growth aspirations at UK Central Hub.

²⁰ LHN of 1,331 dpa x 18 years.

(SDS). In this respect the SDS may result in a lower figure for Solihull; or it may conclude that it is appropriate for Solihull to accommodate just its own needs; or it may seek that Solihull provides for more than its own needs.

71. Furthermore, plan preparation by other Council's, both in the CA area and wider Housing Market Area may have implications in this respect. For instance, some of the Black Country authorities have indicated that they will be unable to accommodate all of their own growth, whereas Birmingham City Council's latest plan appears to indicate a surplus²¹.
72. As noted in an earlier chapter, the approach to the duty-to-cooperate is likely to change for plans being brought forward under the legacy system with the legal test falling away; and the greater flexibility Inspectors are encouraged to take. This is in the context that the new plan-making system will rely on the new tier of strategic planning to ensure effective co-operation between plan-making authorities.



73. It is in this context that the Council's preferred approach is that the plan to be brought forward under the legacy plan-making system will be one that accommodates its own needs only. The Council will continue to positively engage with other authorities, both within the WMCA area and wider Housing Market Area, to bring forward the first SDS for the West Midlands. It is believed that this would be the most appropriate mechanism for addressing any unmet needs that can't be met in situ in other areas, in a consistent, comprehensive and more robust manner.
74. Whilst at this stage the Council cannot be more certain about the level of growth that will need to be included in the emerging plan, it is keen to get stakeholders views on this issue.

7. Do you believe it is appropriate for the Council, through this plan-making process, to just seek to accommodate its own needs with any necessary redistribution of housing needs to be addressed through the emerging West Midlands Spatial Development Strategy, if not why?

²¹ Currently it's not yet clear whether this is a surplus that could offset unmet need arising elsewhere, or whether the Council will incorporate it as a buffer to their supply.



Existing Land Supply

75. When the Council prepares the preferred option version of the plan next year, it will include a detailed breakdown of the land supply at that point in time²² so that the most up-to-date figures can be included in the plan going forward. For present purposes for an issues and options consultation, an alternative approach is being used to give a **broad indication** of the likely scale of additional allocations that may be required.

76. Although the 2020 plan was withdrawn, the Inspectors did consider that, in principle, the residential allocations were acceptable in principle. A number of planning applications have been submitted in relation to these sites, and some have now either been approved, or have a resolution to grant permission from Planning Committee. This followed the adoption of a process in July 2023²³ that set out how such applications would be considered. This approach was endorsed by [Full Council in October 2024](#) when a decision was taken to withdraw the 2020 plan.

77. The following sites from the 2020 plan now either have planning permission, or Planning Committee have resolved to grant permission subject to a S106 being entered into:



Site	Settlement/Area	Capacity
BC2 Frog Lane	Balsall Common	110
BC4 Catchams Cortner	Balsall Common	18
BC4 Pheasant Oak Farm	Balsall Common	250
BL1 West of Dickens Heath (north)	Blythe	86
BL2 South of Dog Kennel Lane (east)	Blythe	550
BL2 South of Dog Kennel Lane (west)	Blythe	700
HA2 Oak Farm	Hampton in Arden	85
KN2 South of Knowle (Kler Group)	Knowle/Dorridge	450
KN2 South of Knowle (Inspired Villages)	Knowle/Dorridge	170
KN2 South of Knowle (Taylor Wimpey)	Knowle/Dorridge	200
ME1 West of Meriden	Meriden	75
SO1 East of Solihull (north of Lugtrout Lane)	Solihull	50
Total		2,744

²² This will include completions, sites under construction and sites with planning permission that may have occurred since April 2025.

²³ [Climate Change and Planning Cabinet Decision Session.](#)

78. Having already been included in a plan considered to be sound by the Council, and with the Inspectors considering the sites to be acceptable in principle, the Council believe it is a reasonable starting point to carry forward these allocations into the new plan. There may be limited situations where a material change in circumstances may have since occurred that would suggest that this is not a reasonable assumption on a case-by-case basis. The Council is keen to hear stakeholders' views if this has been the case with any of the proposed allocations.
79. If any of the proposed allocated sites in the 2020 Plan do not come forward, then the capacity from the sites not being carried forward would need to be added to the shortfall.

8. Should all of the allocated sites from the 2020 plan be carried forward into the emerging plan? If not, why not (for instance has there been a material changes in circumstances with one or more of the allocated sites), if so, please state which site(s) and how circumstances may have changed)?

80. As will be seen from appendix C, most of the allocated sites are now the subject of planning applications, and 12 applications have now either got the benefit of a planning permission, or a resolution to grant permission. This will mean that, compared with the typical approach of plan allocations then moving to permissions, that these sites are likely to deliver earlier in the plan period than would otherwise have been the case.



81. On the basis that all allocations (and other land supply assumptions) in the now withdrawn 2020 plan are carried forward to the new plan, it is anticipated that around **9,270²⁴ additional dwellings** will need to be identified. Later sections of this consultation explore how this additional supply could be identified.

²⁴ 515 dpa difference in LHN x 18-year plan period.



Identifying Additional Housing Supply

Where Should Additional Land Supply Come From?

82. The NPPF is clear at paragraph 147 that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council will need to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes:
- Making as much use as possible of suitable brownfield sites and underutilised land.
 - Optimising density – including town centres and other locations well served by public transport.
 - Whether neighbouring authorities could accommodate some of the need.
83. Paragraph 148 of the NPPF goes on to state that where it is necessary to release Green Belt land for development, plans should give priority as follows:
- Previously developed land
 - Grey Belt (which is not previously developed)
 - Then other Green Belt locations
84. In considering these options, the need to promote sustainable patterns of development should determine whether a site's location is appropriate.
85. Effectively, when taken together, these paragraphs of the NPPF indicate a hierarchy of potential locations as follows:

	Category	Examples/Comments
Non-Green Belt	PDL/under-utilised land	Land at the NEC.
	Optimise Density (especially town centres or other locations well served by PT)	Solihull Town Centre
	Other Councils meeting Solihull's housing need in their administrative area	Through DtC and/or SDS explore scope for options beyond the Green Belt
Green Belt	PDL	Would need to be located in a sustainable location, or a location that could be made sustainable.
	Grey Belt	
	Other Green Belt locations	



86. The following sections will identify the issues and options regarding additional supply in non-Green Belt locations and then Green Belt locations.



Additional Supply in Non-Green Belt Locations

Windfall Developments

87. A windfall assumption of 200 dwellings per annum was included in the 2020 plan and it was implied that this was accepted by the Inspectors.
88. The 2020 plan had an end date of 2037 whereas the new plan will have an end date of around 2043 (i.e. an additional 6 years), therefore an additional 6 years' worth of windfall could be assumed. This would add 1,200 units.

9. Is there evidence to suggest that this windfall rate should be lower, it's about right, or that it should be higher?

Greater Density and/or Going Higher

89. Additional capacity could be achieved by 'going higher' in urban locations (e.g. town centre & NEC) and/or higher densities on allocated sites.
90. Land supply expectations following the examination of the 2020 plan included the following:
 - Town centre developments: 1,100²⁵ dwellings.
 - NEC: 500²⁶ dwellings.

91. A planning application [ref no. PL/2025/00547/MAJFDW] has now been submitted for Mell Square. It incorporates some flexibility over the balance of land uses to be provided in the redevelopment, including up to 1,600 residential units. This would represent an additional capacity at the site of up to 1,087 dwellings. As the final capacity of the completed development will depend upon the balance of commercial/residential



floorspace of the scheme, it has been assumed that 800 additional dwellings would be a reasonable assumption to use at this time.

92. Recently, Birmingham City Council has resolved to dispose of their freehold interest in the NEC. It is understood that under these new arrangements market testing of the development

²⁵ This included 1,000 dwellings in Solihull town centre (513 of which would be from Mell Square) and 100 dwellings in Chelmsley Wood.

²⁶ The plan was submitted on the basis of 2,240 dwellings being provided as part of the Phase 1 development at the NEC. However, due to concerns over scale and rate of delivery in the plan period, the Inspectors believed only 500 was a reasonable assumption.



opportunity at the NEC is now underway and an update on potential plans will be expected next year.

93. The Council will wish to see updated evidence to review the scale and pace of delivery at the site. If it could be demonstrated that during the plan period a minimum of 1,500 dwellings could be delivered at the site, then this would represent an additional 1,000 dwellings being added to the land supply when compared to the recommendations made by the previous Inspectors.

10. Are there more opportunities in the town centre or at the NEC to identify additional capacity, if so, how much more?

11. If you favour 'going higher' in locations such as the town centre or Arden Cross/the NEC, do you have any views on how high (i.e. the number of storeys) new buildings could be?

94. It is particularly important that assumptions around land supply from these sources are reasonable and are evidence based. They must be capable of being demonstrated as **deliverable** or developable in the plan period.

12. Are there any other non-Green Belt opportunities that should be considered? If so where, what do you think the capacity would be and what evidence is this based on?



Additional Supply in ‘Existing²⁷’ Green Belt Locations

Arden Cross

95. Under the 2020 plan it was proposed (under policy UK1) to release 140ha of land from the Green Belt to accommodate the HS2 Interchange. However to remove the site from the Green Belt simply to accommodate the station and associated parking would have been a lost opportunity and therefore a fundamental component of the strategy for the area was to set out a framework for a mixed-use development across the site to produce a well-planned and vibrant new place.



96. The 2021 Masterplan for the site sets out a series of urban quarters through which the following key components will be delivered:
- Residential Community - The creation of a new residential community delivering up to 3,000 new homes incorporating a mix of tenure, type and density.
 - Innovation district - incorporating research and development facilities and high value manufacturing as well as opportunities for a higher education campus.
 - Transportation Hub Plaza – incorporating Station square access to the interchange station, leisure, retail and cultural at ground floor and commercial offices/hotels and residential above.
 - Central Avenue – a thoroughfare to enable movement between the Interchange Station and the wider UK Central area which will feature a high-quality streetscape with retail and leisure frontages.
 - Car free gateways and a Sustainable Transport Network.
 - Parkland – network of interlinked landscaped areas with the 10ha Hollywell Brook nature corridor at the centre.

²⁷ By existing locations, this refers to sites that were already acknowledged as appropriate in principle for being released from the Green Belt.

97. It was noted that development would take place over an extended time scale and delivery would be towards the end of, and beyond the plan period.
98. In terms of the residential component, the plan assumed 700 dwellings would be delivered by 2037. When the Council provided updated evidence to support extending the plan period, it used an assumption of 100 dwellings per annum as additional supply at Arden Cross.
99. If the same assumptions were carried forward into the new plan (which would have a plan end date of 2043 (i.e. 6 additional years of delivery compared to the 2020 plan) then this could yield an additional 600 dwellings being provided in the plan period (making a total of 1300 dwellings). These assumptions will be subject to further testing.
100. The HS2 [reset](#) process (which is currently taking place) is fundamental to understanding the timings for release of land at Arden Cross, and therefore dates for development delivery. The focus is on ensuring early land release and joint working to enable the earliest possible development around the interchange station.

13. What would be an appropriate and justifiable housing supply that could be delivered at Arden Cross in the plan period, and what is the evidence for this number?

Sites Allocated in the 2020 Plan

101. During the examination of the 2020 plan, the capacities from the allocated sites were adjusted to reflect latest evidence from emerging planning applications and densities were optimised where possible. Therefore, it is likely to be the case that little additional capacity for this source will be possible. Appendix A is a schedule of sites allocated in the 2020 plan.

14. Is there evidence to suggest that any additional capacity for the allocated sites is possible?



Some Conclusions on Additional Supply

102. Based on the preceding paragraphs it is considered reasonable that the land supply in the Borough to 2043 can be increased by 3,600 dwellings over and above that included in the 2020 plan. This is from the following sources:
- Windfall – 1,200 dwellings.
 - Solihull town centre – 800 dwellings.
 - NEC – 1,000 dwellings.
 - Arden Cross - 600 dwellings.
103. Earlier in this consultation document it was identified that to meet its own needs, the new plan would need to identify around 9,300 additional dwellings. Without allocating additional sites, 3,600 dwellings can be identified from the sources listed above. **This would leave some 5,700 dwellings to be identified from new allocations on land that is currently located in the Green Belt.**
104. The following chapters in this document start to explore the issues and options around how additional allocations could be identified.



Spatial Strategy for the Emerging Plan

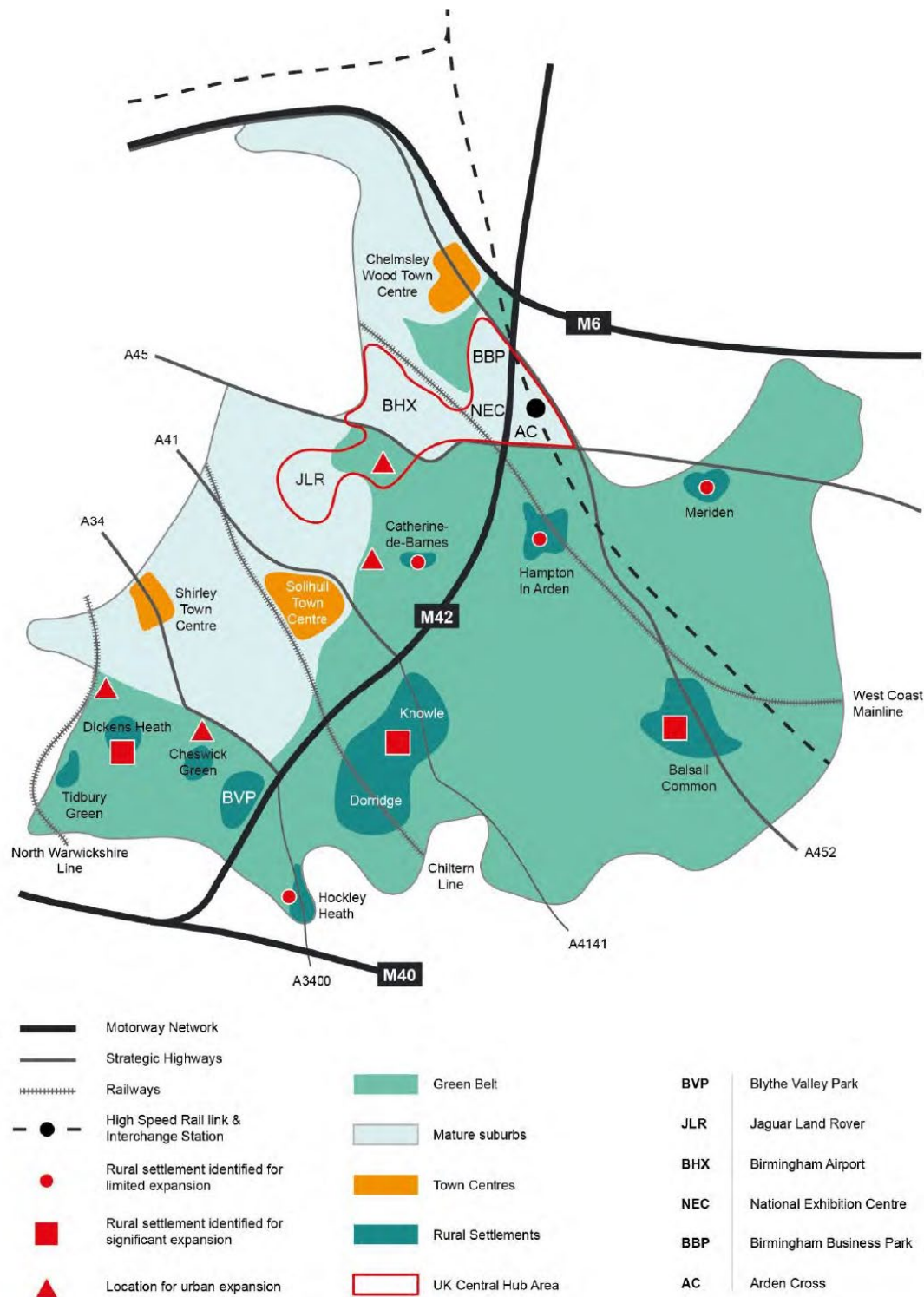
105. The emerging plan should be guided by a spatial strategy. In considering what that should be it is useful to review the strategy included in the 2020 plan, which is explored in the following paragraphs.

Spatial Strategy in the 2020 Plan

106. The spatial strategy in the 2020 plan was a ‘balanced dispersal’ approach that struck a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations.
107. The strategy sought to focus significant developments in locations that are, or could be made, accessible and sustainable. These locations were typically on the edge of the urban area or within the rural settlements that have a greater range of services. This was achieved by focussing development on the following locations:
- Located adjacent to the urban edge/a highly accessible settlement or;
 - Located adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school) or;
 - Development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available within it (including a primary school).
108. This approach was described as having the following advantages:
- Concentration could support the UK Central masterplan and HS2 growth strategy, and the investment priorities in ‘Solihull Connected’;
 - Focussing on urban areas and sustainable urban extensions provides the best opportunity for achieving accessibility and delivering public transport improvements;
 - Larger scale developments offer the opportunity for significant infrastructure improvements;
 - Provision for some smaller sites will assist the early delivery of housing during the Plan period and support existing services;
 - A totally dispersed pattern of growth would be unlikely to deliver the scale of growth required and be more likely to result in adverse impacts associated with piecemeal development which would affect a greater area.
109. This approach would thus discourage development that is:
- Isolated from any settlement;
 - A disproportionate addition to a settlement that only has a limited range of facilities;
 - Occurs in relatively less accessible locations.

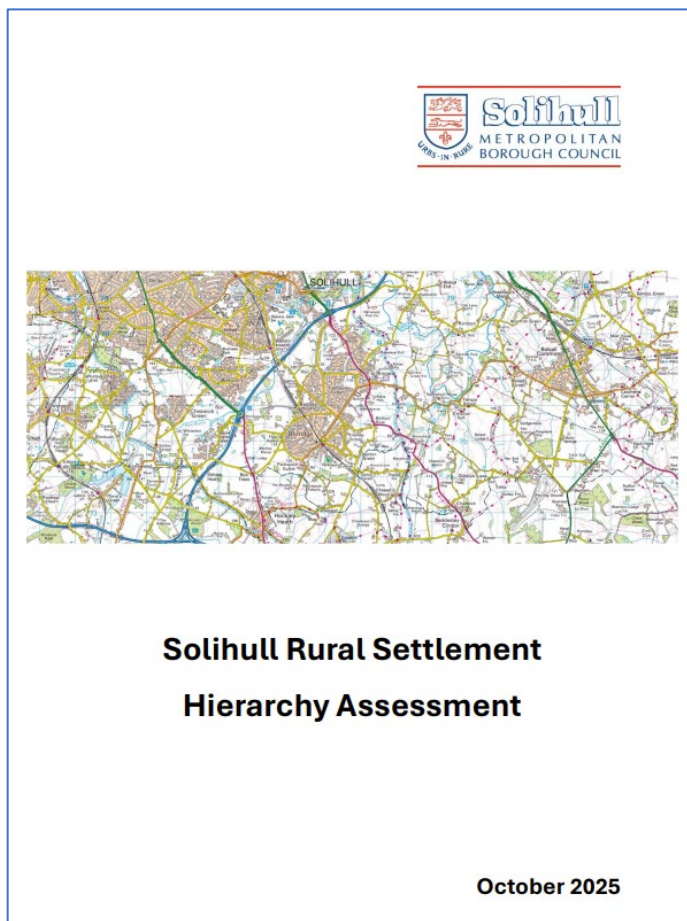


110. The spatial strategy in the 2020 plan was illustrated as follows:



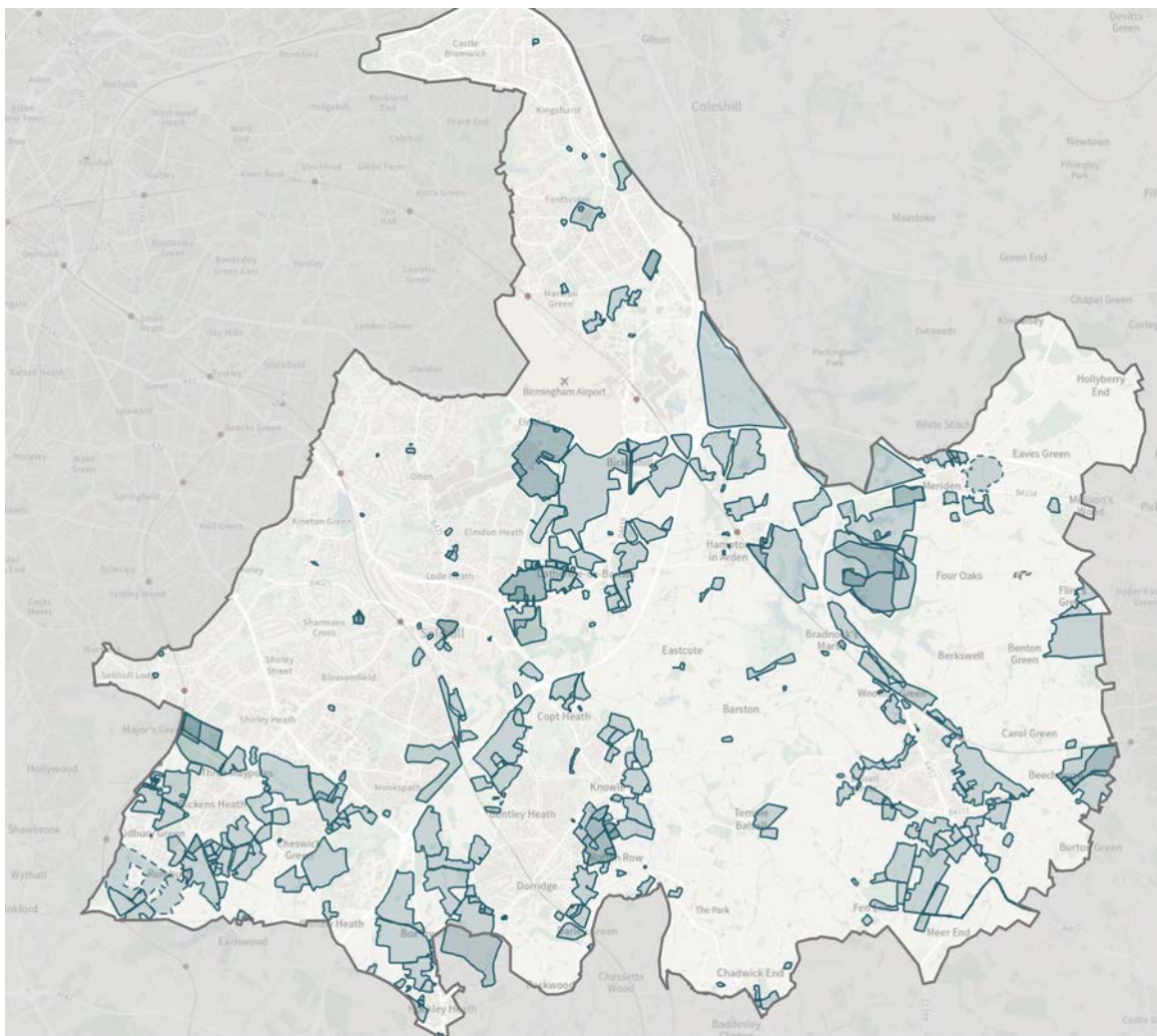
Spatial Strategy in the New Plan

111. The key question to start this consideration is what changes in circumstances since the spatial strategy was developed have occurred.
112. Following the update to the NPPF in December 2024, and the new Green Belt guidance in the NPPG (which explicitly excluded villages from the ability to contribute towards purposes A, B and D of including land in the Green Belt), the Council undertook an exercise to determine whether any of the rural settlements in the Borough ought to be considered to be towns rather than villages.
113. This work culminated with the adoption of the [Solihull Rural Settlement hierarchy Assessment \(October 2025\)](#) that designates Knowle, Dorridge & Bentley Heath; and Balsall Common as towns.
114. Thus, the overall hierarchy for the Borough is as follows:
- **Urban area** – The contiguous built-up area on the edge of the conurbation that is formed by Solihull, Shirley, Monkspath, Olton. Lyndon, Elmdon, NEC, Marston Green, Chelmsley Wood, Kingshurst, Fordbridge, Smiths Wood and Castle Bromwich.
 - **Rural towns** – Knowle, Dorridge & Bentley Heath and Balsall Common.
 - **Smaller rural settlements**, including Dickens Heath, Hockley Heath, Meriden, Hampton in Arden, Chadwick End, Tidbury Green, Cheswick Green, Barston, Bickenhill, Catherine-de-Barnes.
115. Some of the smaller rural settlements have more facilities than others, and those that include a primary school and a convenience store include Dickens Heath, Cheswick Green, Meriden, Hockley Heath and Hampton in Arden which some would describe as the larger villages. It is also acknowledged that in terms of population at least Dickens Heath is close to meeting at least some of the criteria that could define it as a rural town.
116. The Council is keen to hear views on whether and to what extent the spatial strategy should be amended for the new plan, and the following sections look at different ways this could be achieved and/or what guiding principles should be included in it.



How Should New Allocations Be Identified?

117. The Call-for-Sites exercise undertaken in winter 2024/25 resulted in over 300 sites being put forward as being available. As noted at the time, just because a site was promoted through this exercise does not mean that it is a suitable site, particularly as most submissions related to land in the Green Belt. An [interactive map and schedule of sites](#) submitted was published soon after the exercise closed. The map extract below shows those submitted across the Borough as a whole²⁸.



118. Around 300 sites were promoted with housing as a preferred land use and these amounted to an overall area of 2,381 ha, with an average size of 7.93 ha²⁹. Using the estimated capacities provided by the promoters, this totals 54,309 dwellings. **It should be stressed that these estimates have not been tested, nor should it be taken that the sites are suitable and/or deliverable.**

²⁸ The submission process allowed those promoting a site to indicate the land uses they believed the site was available for including housing, employment, biodiversity, renewable energy and minerals. The map extract provided here shows all potential uses, not just residential.

²⁹ There will be some overlapping of proposals and this area would not represent a developable area. Where an estimate of developable area was provided this reduced the area to 2,224 ha.

Site Typologies

119. The following paragraphs look at some of the advantages and disadvantages of different site typologies being used to contribute towards the land supply.

New Settlement (5,000 plus dwellings)

120. Alongside changes to national policy, the government have also consulted on and identified a range of new town options. Only one of these is identified within the wider West Midlands, but it introduces a concept of creating new settlements to help meet housing needs.
121. The creation of a new settlement has not previously been considered within the Local Plan Spatial Strategy. It is acknowledged that it would likely require significant infrastructure investment, and its location would need to be carefully considered having regard to existing landscape character, Green Belt implications and infrastructure capacity. Options may exist though and in planning terms a new settlement could include a sizeable expansion of an existing hamlet for example to form a new village. The Council are aware that similar approaches have been taken in South Warwickshire for example.
122. It is important to note that any new settlement would not be a ‘silver bullet’ to meet the remaining housing requirement as only a limited number of dwellings would be delivered in the plan period³⁰. However, similar in a way to Arden Cross and the NEC it could provide a longer-term housing land supply option that extends beyond the plan period.

15. Should the spatial strategy be amended to accommodate at least 1 new settlement? If so, where could this settlement be located and how many homes could it deliver in the plan period?

Large, Infrastructure Led Development (500 plus dwellings)

123. Infrastructure led development in the context of the Council’s Local Plan can be characterised by identifying what infrastructure may be required in an area and using this to help determine where residential development could then take place in order to support the delivery of the infrastructure as part of the development itself.
124. For instance, as an illustration, if development were to be directed towards the edge of a settlement then as part of an ‘infrastructure led development’ the proposals could include provision for the principal vehicle access serving the development to be provided in the form of a road linking two key radial routes into the settlement thus avoiding additional traffic having to move through the centre of the settlement. However, the development would need direct and convenient routes for pedestrians and cyclists to access the centre of the settlement. An illustration of this is how the principal access to the Barratt’s Farm development would be provided as an ‘outer’ route that connects Station Road to Wate Lane.

³⁰ This is especially the case as no new settlements have been promoted by landowners or a consortium of interested parties, and therefore proposals would need to be put together ‘from scratch’, and with such a long lead in period completions would only occur at the end of the plan period.



125. This type of development would normally be expected to occur on the edge of the urban area or adjacent to rural settlements that are well served by facilities, such as the Borough's rural towns, i.e. Balsall Common and Knowle, Dorridge & Bentley Heath.
126. Similar to the new settlement option, the lead in time needed to plan for such developments generally means they deliver few dwellings early in the plan period, but unlike that option they do generally get completed by the end of the plan period.

16. Do you believe there are other examples where large scale development could take place if integrated infrastructure were provided as part of the development proposals? If so, where should they be located and what is the leading infrastructure that would need to be provided?³¹



Medium Sized Sites (50 – 500 dwellings)

127. This type of development could be accommodated in similar locations as that for the larger infrastructure led developments noted above but could also be accommodated in some of the smaller rural settlements too. This would be dependent upon being located in a sustainable location which is explored in a later chapter.
128. Whilst developments of this size, particularly towards the lower end of the scale, are unlikely to generate the need for large scale infrastructure to support them coming forward, they will

³¹ A later chapter of this consultation looks at other forms of infrastructure that may be needed, for instance education provision.

have infrastructure needs that occur as a result of a number of cumulative developments occurring in an area. For instance, improvements to education facilities. This is also explored in a later chapter.

129. Delivery on sites of this size often occurs relatively quickly so that they can make an immediate contribution towards land supply, at least in part.

Small Sites (10 – 50 dwellings)

130. This form of development can occur in most settlements that are able to provide basic levels of services. They can occur as infill developments, or ‘rounding off’ of an existing pattern of development.
131. Like the previous example, they are unlikely to need to be supported by large scale infrastructure, but their cumulative impact will need to be taken into account.
132. Being smaller developments means that they can be completed much quicker than the larger sites such that they are likely to play an important part in making sure there is a supply of land immediately available.

A Balance of Typologies

133. The emerging plan is likely to require a balance of sites to be included as allocations to ensure that upon adoption of the plan the Council is able to demonstrate a five-year land supply for new housing. Due to the lead in times for larger developments this will mean that a number of smaller sites will be needed.

17. What are your views on the emerging plan including a balance of site typologies? What are the advantages and/or disadvantages of incorporating large, medium or small sites in the land supply?

134. Evidence submitted during the examination of the 2020³² included delivery rates (i.e. the number of new dwellings built per year) on the sites to be allocated, and this generally fell into three types of sites:
- Large sites of over 500 dwellings that would be capable of supporting multiple housebuilders – 70 to 90 dwellings per annum would be built at these sites.
 - Small sites of less than 500 that are generally built out by a single housebuilder – 50 dwellings per annum.
 - Specialised developments (for instance at sites like the NEC) that can include a greater range of housing products that could be marketed towards traditional house builders and the buy-to-rent market³³ – 100 – 120 dwellings per annum.

³² For instance document reference SMBC026 – Council’s Updated Housing Land Supply Position and Other Updates.

³³ These often include apartments which get completed and made available for occupation on a block by block basis.



18. Are the delivery rates outlined above reasonable assumptions to be used in calculating a housing trajectory over the course of a plan?

Principles Relating to Potential Allocations

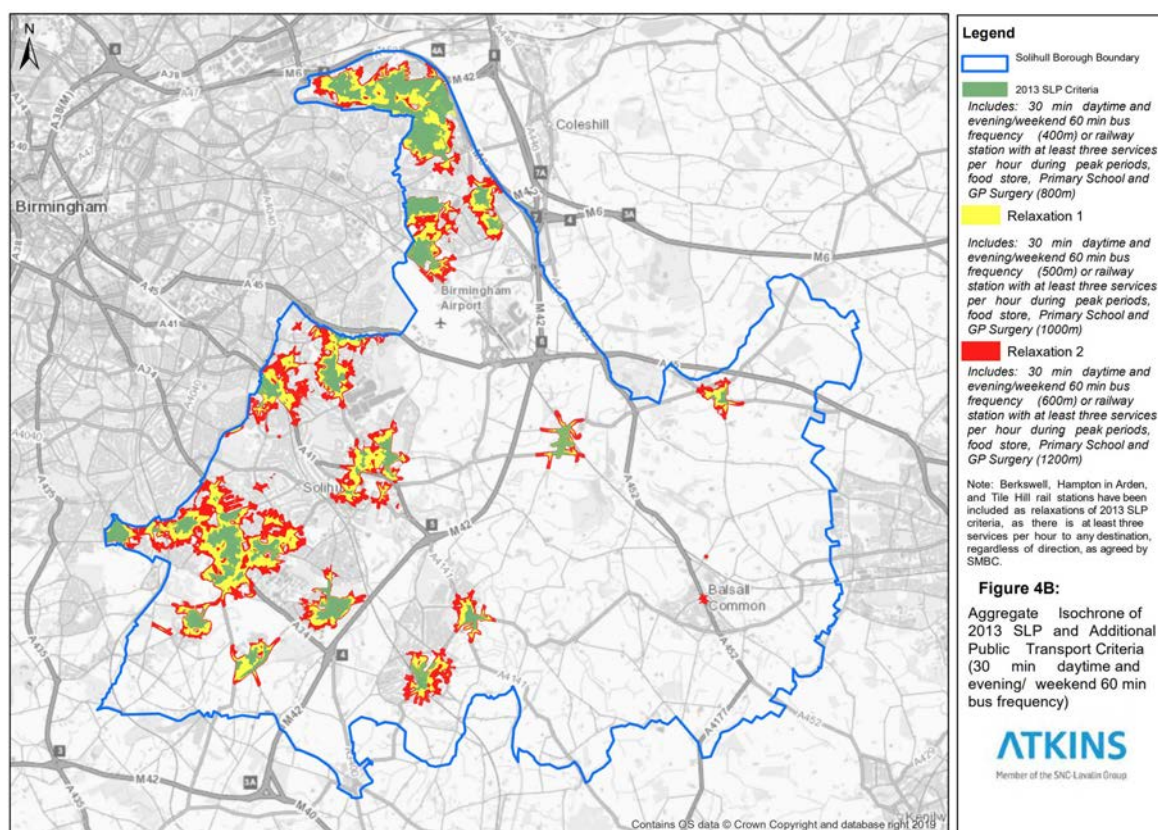
135. When considering how the spatial strategy should be updated, it is useful to explore some principles that could be taken into account. These include the following:
 - Sustainable Locations.
 - Green Belt Impacts (including cumulative effects).
 - Protecting Vulnerable Gaps.
 - Protecting Rural Services.

Sustainable Locations

136. Promoting sustainable transport has a number of components to it, including:
 - Locating development in sustainable locations.
 - Ensuring there is safe and suitable access to developments for all users.
 - Any significant impacts from the development in terms of capacity and congestion can be mitigated to an acceptable degree.
137. In this respect the NPPF advocates the use of a ‘vision-led’ approach. Through the emerging Local Plan, the Council can set out what its vision is for delivering well-design, sustainable and popular places.
138. Under the current Local Plan, policy P7 (Accessibility and Ease of Access), residential development should be:
 - Within 800m walk distance of a primary school, doctor’s surgery and food shop selling fresh food.
 - Within 400m walk distance of a bus stop with a high frequency bus service providing access to employment opportunities and retail facilities; and/or within 800m walk distance of a rail station providing high frequency services.
139. The accessibility work³⁴ undertaken for the 2020 plan assessed which parts of the Borough met the criteria in Policy P7 of the 2013 plan and tested how accessibility varied where relaxations to the criteria were to be made. This was illustrated as follows:

³⁴ [Solihull Accessibility Mapping - Methodology Report \(September 2020\).](#)





140. It is interesting to note how Inspectors have used the 2013 policy, and two examples are provided below with the Inspectors comments and conclusions on accessibility being reproduced.
141. The first example relates to an appeal for 95 dwellings on land at 722 Kenilworth Road, Balsall Common³⁵. Here the Inspectors comments on accessibility were as follows:

49. Local Plan Policy P7, requires that development meets specified accessibility criteria unless justified by local circumstances. In particular, development should be within specified distances of services including a primary school, doctors' surgery, shops, a bus stop and rail station both of which should have high frequency services.

50. The submitted Transport Assessment sets out that the required distances to schools and a bus stop are met, although Councillor Burrow on behalf of local residents sets out greater distances to these facilities. It is clear however that the distance from the site to a number of the local facilities is greater than specified in the policy. In addition, bus and rail services do not meet the specifications for a high frequency service set out in the policy.

51. Nonetheless, the proposed development would be no further from the facilities in the village than existing dwellings both on Albany Lane and to the east of Kenilworth Road. There are footpaths and pedestrian crossing facilities from the site access northwards into the village which would allow access to facilities on foot, albeit at some distance. Furthermore, the development proposes improvements to local walking measures in the form of a pedestrian crossing on Kenilworth Road to the north of the site.

³⁵ APP/Q4625/W/24/3351230 – 27th February 2025.



52. Bus services are available from the village to Solihull and Coventry with two services per hour. The nearest bus stop is on Kelsey Lane which is within walking distance of the site. The nearest railway station is around 2.2Km to the north with train services to Birmingham, London and Northampton.

53. A Travel Plan is also proposed which aims to reduce vehicular trips and encourage the use of more sustainable modes of transport. In the longer term the Package, to which the development will contribute, is also to include active travel measures including improved cycling and walking infrastructure on Kenilworth Road.

54. Having regard to the above factors, and to the housing land supply situation addressed in greater detail below, I am satisfied that in this case, local circumstances would justify allowing development in a location which is further away than recommended from the facilities in the village. In this context, I agree with the Council that there would be no conflict with Policy P7.

142. The second example relates to an appeal for 2 dwellings on land south of Destiny Cottage, Friday Lane, Catherine-de-Barnes³⁶. Here the Inspectors comments on accessibility were as follows:

24. Catherine de Barnes is the nearest settlement with services and facilities. The shop in the village, albeit not a large food store, would be less than 800m walk from the appeal site and would, therefore, comply with the distance requirement of the first bullet point of Policy P7a) of the LP. However, the policy seeks to ensure that housing development is within the indicated distances of all of the services and facilities listed, so as to provide a sustainable location.

25. Although the proposed site would be within 800m of a small shop I have no compelling evidence that it would be within 800m of a school, doctor's surgery, or rail station. It is also further than 400m to the nearest bus stop. The development of the appeal site for housing would, therefore, be contrary to Policy P7.

26. Moreover, the walk would be along a country lane where the wide grass verge, which is provided outside the existing houses, narrows significantly between the housing and the village. There are no pavements and no street lighting. Albeit that the walk would be on fairly level ground, the journey would be likely to take more than 10 minutes. It is unlikely that residents of the development would walk between the site and the nearby settlement for day-to-day facilities and unlikely that the residents would walk to Catherine de Barnes to catch a bus to facilities in other settlements. Cycling would be a reasonable option for travel between the site and the larger settlement, though residents are unlikely to cycle for shopping trips.

27. Given the location of the site, beyond the settlement, there are limited opportunities for sustainable transport modes or for residents to undertake many activities without the use of the private car. In my judgement, the occupants of the future development would be likely to rely on the private car for the majority of journeys. Even if the occupants had low emissions vehicles, as suggested by the appellant, the scheme would not promote sustainable modes of transport.

³⁶ APP/Q4625/W/24/3356348 – 9th June 2025.



28. Furthermore, I have no compelling evidence that the development of the 95 dwellings, nearer to Catherine de Barnes, would improve the public transport or pedestrian linkages of the appeal site.

29. Policy P7 sets an exception for proposals of fewer than three dwellings in urban areas west of the M42 and in rural settlements. I have already found that the site is not within a rural settlement, it is also not within an urban area. Therefore, this exception would not apply.

30. There is nothing within Policy P7 that limits it to major developments or even suggests that the policy seeks to target major developments, as the appellant asserts. The wording of the Policy refers to all new development, thereby encompassing even single plots. The aim of the policy is to provide development in areas with access to services and facilities and to encourage a shift to sustainable forms of travel. I have, therefore, given full weight to Policy P7 and the appeal proposal fails to comply with the requirements of the policy.

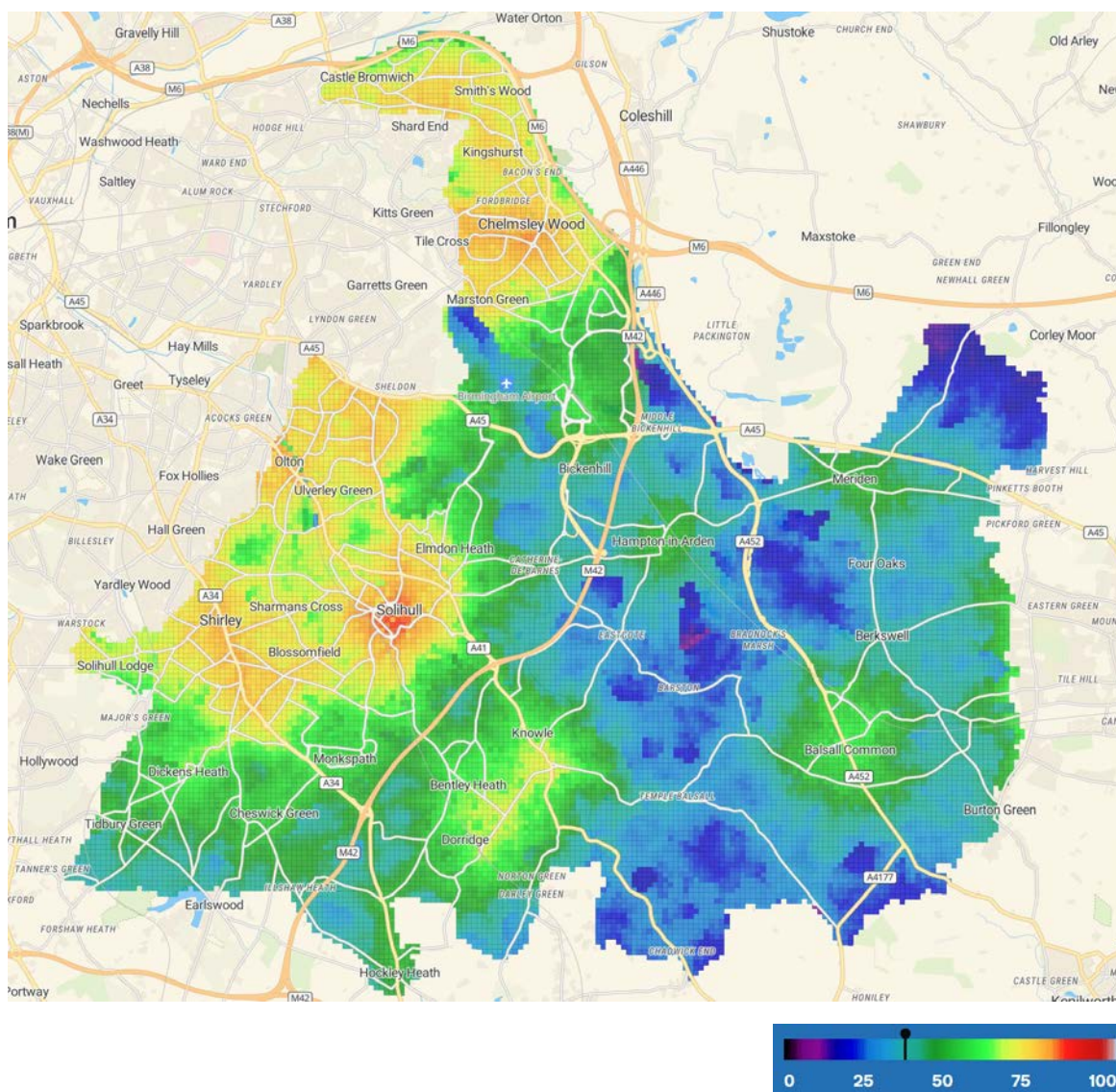
31. I do not have the full details of the other developments referred to by the appellant or whether they were justified by the circumstances of each scheme, as is accepted as exception to the requirements of Policy P7 of the LP. Nevertheless, I have considered the appeal before me based on the submitted evidence.

32. For the above reasons, I find that the site is not a suitable location for housing, having regard to the accessibility of services and facilities and would be contrary to Policies P5 and P7 of the LP which, taken together, seek to resist new housing in locations where accessibility to employment, centres, and a range of services and facilities is poor, and seek to ensure that all development is focused in the most accessible locations through meeting the accessibility criteria listed, unless justified by local circumstances.

143. From these examples it seems that although the proximity to services envisaged by Policy P7 isn't always met, what Inspectors have been keen to ensure is that pedestrian access to the nearest settlement can be made along safe and convenient routes.



144. The Department for Transport have been working on producing a connectivity tool³⁷. This displays how any location in England and Wales is connected to everyday services by walking, cycling and public transport, but this does risk over simplifying what is a more complex situation. An example map for the Borough from this tool is as follows. This shows connectivity in Solihull within a national context:



145. This is a useful example to help illustrate how accessible (to services) all parts of the Borough are, or aren't, as the case may be. Of course, this, and the Council's own 2020 accessibility work, measured current circumstances, and through development proposals, some locations can be made more accessible, e.g. by providing facilities within the development or improving public transport accessibility to the site.
146. Linking potential developments to existing active travel networks can also assist in improving the accessibility of sites. This would align with existing and anticipated strategies/plans, for instance:
- Solihull Connected and/or the forthcoming West Midlands Local Transport Plan 5. The West Midlands LTP5 seeks to achieve 6 Big Moves and includes a focus on Accessible and

³⁷ <https://www.gov.uk/guidance/connectivity-tool>.

Inclusive Places. This means careful planning of development with accessibility in mind and improving sustainable transport to allow people to access opportunities without needing a car.

- The [Cycling and Walking Strategy](#)³⁸ (2021) is another such example, and this can be incorporated into the Council’s vision-led approach to promoting sustainable transport – i.e. seeking new developments to link up with the Borough’s cycling & walking network. The latest guidance for new cycling infrastructure should be considered on top of this, including the Department for Transport’s LTN1/20 Guidance.

19. What should the Council include in its vision-led approach to promoting sustainable transport?

147. One factor to consider is the travel patterns and car movements that will take place from development sites, and evidence will be prepared to help inform such choices. This could include influencing where around a settlement development should take place. For instance, if there’s evidence that traffic from the Council’s rural towns will tend to move in a northwest direction (i.e. towards Solihull and/or UK Central), should that development be located on the northwest side of the settlement? This would be instead of to the southeast of the settlement with the result that vehicles would have to travel through the centre of the settlement.

20. Should development be focused on the northwest of the Borough’s rural towns, even if this means that more vulnerable Green Belt land may have to be released?

Railway Stations

148. Proximity of potential developments to railway stations is expected to become a focus of further national planning reforms following a recent joint announcement³⁹ by the Housing Secretary and Chancellor of the Exchequer. It indicates that:

“Housebuilding near well-connected train stations will receive a default “yes” in future if they meet certain rules, ensuring more high-quality, affordable homes are built in and around our key towns and cities, saving commuters time and boosting access to housing.

Planning reforms to give greater certainty and strength for development around well-connected rail stations, including trains and trams, will be proposed through a new pro-growth and rules-based National Planning Policy Framework, which will be consulted on later this year.

Recognising the significant benefits for jobs and growth that can be unlocked by building around train stations, these rules will extend to land within the Green Belt, continuing

³⁸ The strategy outlines the overall strategic approach to active travel in Solihull. The document supports the National Cycling and Walking Plan, adopted in July 2020 and sets a clear standard for cycling and walking infrastructure. It aims to embed cycling and walking initiatives into local policy and ensures major developments consider integrating active travel infrastructure from the start. Alongside the comprehensive new strategy, a [Local Cycling and Walking Infrastructure Plan](#) (LCWIP) was also approved.

³⁹ [Housebuilding around train stations will be given default “yes” - GOV.UK](#) – 18th November 2025.



efforts to ensure that a designation designed in the middle of the last century is updated to work today.”

149. This has now been incorporated into policy S5 (Principle of development outside settlement) and policy GB7 (Development which is not inappropriate in the Green Belt) in the draft NPPF (2025). Regardless of whether there is unmet housing need or not, development would not be inappropriate if it meets these criteria:

- i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment;
- ii. be physically well-related to a railway station or a settlement within which the station is located;
- iii. be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;
- iv. not prejudice any proposals for long-term comprehensive development in the same location;
- v. in the case of major development, comply with policy GB8 (the Golden Rules).



150. This is likely to mean that the Council will need to consider what scope there is for developments around the rural rail stations in, or close to, the Borough, including the following locations:

- Berkswell
- Dorridge
- Earlswood
- Hampton in Arden
- Tile Hill



- Whitlock's End
- Widney Manor
- Wythall

151. Under the draft NPPF, the expectation is that densities of development around railway stations that are 'well connected' should be 50 dpa.
152. Although the draft NPPF does not specify what a reasonable walking distance is, a distance of 800m is often used in such circumstances⁴⁰. In terms of frequency of service, the draft NPPF does provide the following:

"Well-connected rail stations ... which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains per hour in any one direction."

21. Is 800m an appropriate measure to use to define a 'reasonable walking distance' of a railway station, if so why do you believe so, or if not why not and what alternative would you suggest?

Protecting Rural Services

153. New development can often make an important contribution towards rural services that may be in decline or are otherwise vulnerable to being lost through lack of a population to keep the services viable.
154. One example of this principle is in relation to Temple Balsall school which has suffered falling pupil numbers and has a limited local population to draw pupils from. The call-for-sites exercise has indicated that development opportunities are available nearby⁴¹, and whilst this location may not be as accessible as others, it could have the benefit of enabling a valuable local service to be sustained. This could also include benefits in supporting public transport through the settlement and potential links to Berkswell station.

22. Should the Spatial Strategy in the new plan take into account the benefit developments can have to make rural services viable, even if they are located in less accessible locations?

Green Belt Impacts (including cumulative effects).

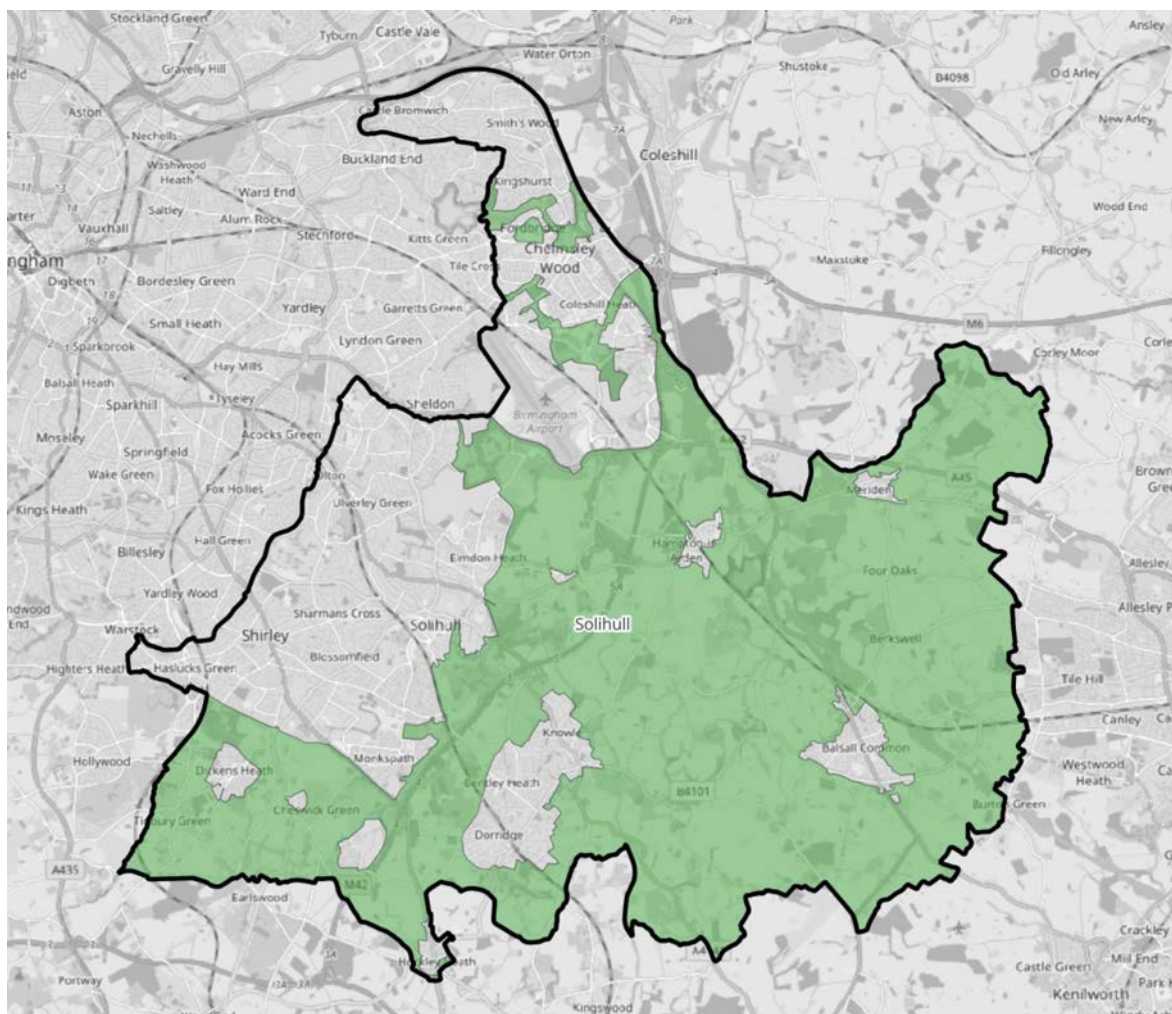
155. The concept of Green Belts has been a feature of national planning policy since the 1950's and its fundamentals have remained pretty constant, including:
- The importance of openness and permanence.

⁴⁰ # add source

⁴¹ For instance, site references CFS/24/151 and CFS/24/145 (a capacity of around 140 dwellings).



- Green Belt serving five purposes⁴².
- Changes to Green Belt boundaries only in exceptional circumstances.
- Planning permission being granted for development in Green Belts only in very special circumstances.



156. As described in paragraph 16, one of the main changes to Green Belt policy is the introduction of Grey Belt sites. And national policy does mean that where it is necessary to release Green Belt land for development plans should prioritise Grey Belt before other Green Belt locations⁴³.
157. The Council has therefore commissioned Arup to produce a fresh Green Belt Assessment (GBA) that will be produced in accordance with the updated Green Belt policy in the NPPF and follows the national [Planning Practice Guidance on Green Belts](#) that was updated in February 2025. This GBA will replace that produced by [Atkins in 2016](#) that was used to inform the 2020 plan. The Arup assessment will be published in due course⁴⁴.

⁴² a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

⁴³ If brownfield options aren't sufficient to deliver the level of growth needed.

⁴⁴ It is not believed necessary for the GBA to be published alongside this consultation as it will be evidence (not policy) that will support the iteration of a plan that identifies sites for development as part of a preferred option.

158. The NPPF advice includes the following⁴⁵:

“Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”

159. The NPPG gives some further guidance as follows:

“Considering the impact on the remaining Green Belt in the plan area.

How can the impact of releasing or development on the remaining Green Belt in the plan area be assessed?

A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”

160. Given the changes to the NPPF, the emerging SDS and the need for local plans to be reviewed every 5 years, this does create tensions with ensuring that only the minimum Green Belt release occurs (to address needs) with the desire to maintain one of the acknowledged characteristics of Green Belts being their permanence.
161. This does allow, through the plan-making process, the cumulative effects of significant Green Belt land release to be taken into account. This consultation gives an opportunity for stakeholders to indicate how the Local Plan should take this NPPF and NPPG advice into account.

23. What factors should the Council take into account when assessing whether its approach to Green Belt land release would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan?

Maintaining the Openness of Green Belt for Other Reasons

162. National policy takes quite a narrow view on the importance of Green Belts (for the 5 purposes noted above⁴⁶), but it is important to recognise that land designated as Green Belt also provides other benefits to being kept open. This is recognised is one of the guiding principles for the SDS (set out earlier) that states:

⁴⁵ Paragraph 146.



Enhancing the functions of green spaces - the SDS must recognise the strategic importance of green open spaces in the West Midlands and establish a consistent and positive approach to Green Belt land beyond the principal planning purposes of preventing urban sprawl and the merging of towns. The SDS should seek to enhance the wider functions of green open spaces ,including giving priority to i) protecting and enhancing natural habitats and promoting biodiversity, ii) enabling access to recreational land, iii) protecting and establishing carbon-sequestering land uses, and iv) recognising that successful growth and the promotion of the region requires these spaces.

163. Through this consultation, the Council is keen to hear views on how this can be achieved.

24. The Green Belt has potential to provide other benefits that extend beyond the 5 purposes of including land in the Green Belt. What do you believe these additional benefits could be and what evidence do you believe there is, or there could be, to support this approach?

Protecting Vulnerable Gaps

164. Whilst Green Belt policy has preventing towns from merging as one of its five purposes, the Council is keen to explore whether this fully reflects the disposition of all of the Borough's rural settlements, or whether further policy is required, and if so whether there is evidence to justify this approach.

165. The Borough's smaller rural settlements have a sense of identity and character that sets them apart from their neighbours which are often located in a different parish, yet the physical gaps between the settlements can be quite narrow and vulnerable to development that could see them merge into one amorphous conglomeration that would result in the loss of identity and character.

166. This is particularly the case in the Blythe area (west of the M42 and north of the M40) that accommodates four settlements (Blythe Valley, Dickens Heath, Cheswick Green and Tidbury Green) in close proximity to each other that are separated by short distances⁴⁶. To the east of the M42 there are also vulnerable gaps to the northeast and northwest of Hockley Heath. In other areas the gaps between settlements are larger and less vulnerable.

167. A strategic gap policy could be developed that would seek to protect the individual sense of identity and character of these settlements by preventing development in the vulnerable gaps between them. If so, which gaps ought to be protected? As a starting point to consider which gaps, it is useful to set out which settlements were considered through the [Solihull Rural Settlement Hierarchy Assessment](#) (2025), namely:

- Balsall Common
- Barston
- Berkswell
- Bickenhill

⁴⁶ This pattern continues further west with settlements in Bromsgrove.



- Blythe Valley Park
- Catherine-de-Barnes
- Chadwick End
- Cheswick Green
- Dickens Heath
- Eastcote
- Hampton-in-Arden
- Hockley Heath
- Illshaw Heath
- Knowle, Dorridge and Bentley Heath (KDBH)
- Meriden
- Millisons Wood
- Temple Balsall
- Tidbury Green

25. Should the Council develop a Strategic Gap Policy to protect vulnerable gaps between settlements, and if so why (or why not)?
26. What evidence do you believe may justify this approach?
27. If a Strategic Gap Policy were to be developed, which gap or gaps do you believe it should cover and why?

Other Guiding Principles for the Spatial Strategy

28. Should the principles outlined in this chapter be incorporated into the Spatial Strategy, if not, why not, and are there any other principles that should be included?



Importance of Infrastructure Delivery

National Planning Policy on Infrastructure Delivery

168. Providing supporting infrastructure is at the heart of achieving sustainable development, this is recognised in the NPPF⁴⁷:

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.

The Council's Intended Approach to Infrastructure Delivery

169. The Council recognises that if it is to accommodate the level of development anticipated, it is important that it is supported by the infrastructure necessary to support the new homes, businesses and jobs that will be created in the Borough. This should be through **infrastructure led development**.
170. Infrastructure led development means that any new homes or jobs that come forward must be supported by the delivery of infrastructure that is necessary to ensure they are 'sustainable'. This can be delivered in advance, in parallel or after development is completed having regard to site and case specific circumstances. The need for infrastructure should inform new development proposals though and be met through appropriate and proportionate developer contributions, either through in-kind delivery, S106 contributions and/or Community Infrastructure Levy – secured as part of a planning decisions. The delivery of such infrastructure is a key component of the NPPF's golden rules⁴⁸ and is therefore essential to achieving sustainable development across the Borough and meeting the Boroughs housing and employment land requirements. Without the necessary infrastructure these requirements cannot be met, and permission may need to be refused.
171. In this context it is worth setting out the types of infrastructure that may be required, and this consultation is an opportunity for residents and stakeholders to identify any other facilities that may be appropriate. In due course this will be captured in an updated Infrastructure Delivery Plan (IDP) that will be an important piece of evidence that will support later stages in the plan-making process. The IDP will also ensure that infrastructure requirements are linked to possible development sites. But, for now, we are seeking to highlight the broad areas that we currently expect to be covered, and this will enable us to identify specific facilities at later stages.
172. It is useful to note here that there are some legislative tests⁴⁹ that must be met before the Council can require infrastructure to be provided (either directly or via a commuted sum that the Council would use to provide the specified facility). These tests are as follows:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.

⁴⁷ Paragraph 7.

⁴⁸ Paragraph 156.

⁴⁹ AS set out in Regulation 122(2) of the Community Infrastructure Regulations (2010) as amended.

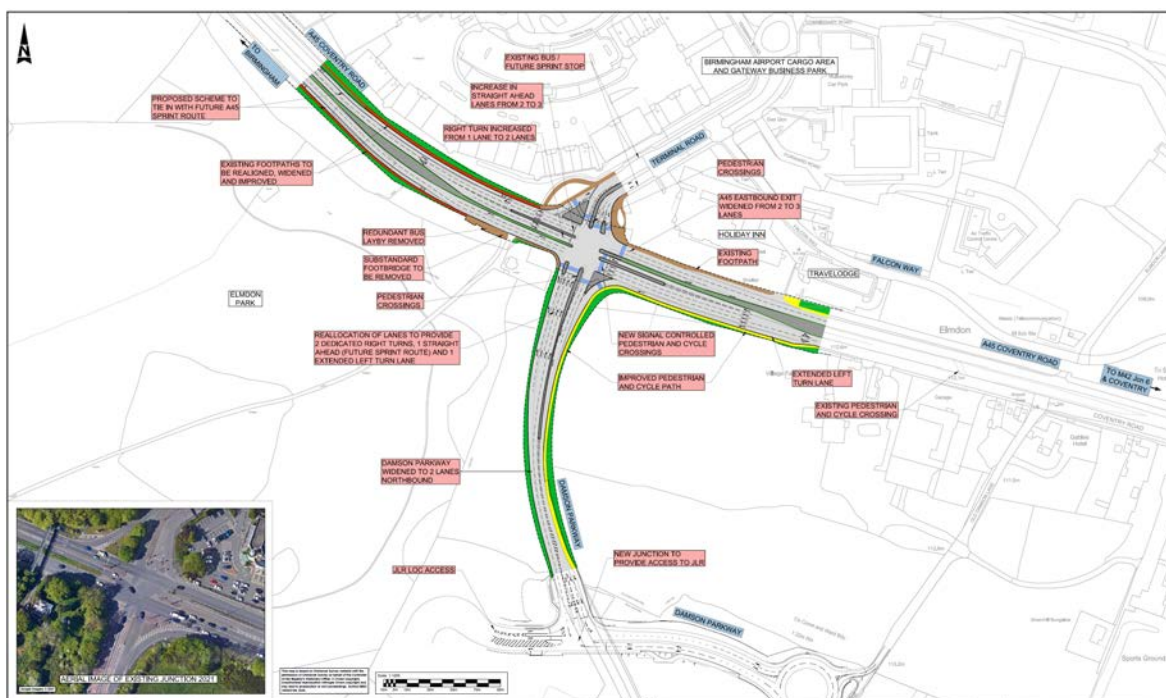


173. In part, it can be summarised that through the planning system Councils can insist that ‘essential’ facilities are provided, but there is less or no scope to require ‘desirable’ or ‘nice-to-have’ facilities.
174. Typically, infrastructure requirements tend to fall under the following headings, and these are explored in the following paragraphs:
- Physical – e.g. transport and flood related.
 - Social – e.g. education and health.
 - Green – e.g. parks, open spaces and areas for biodiversity.
175. When considering what infrastructure may be required, the Council is interested in understanding what **specifically** stakeholders may believe is missing or inadequate. If specific examples can be provided, then this will enable the Council to take the issues into account in a more informed manner, and this is preferable to generalised comments about infrastructure being inadequate.

Physical Infrastructure

Transport

176. Through the spatial strategy in the plan and its subsequent allocations, new development will need to promote sustainable patterns of development. This will include ensuring development is provided in a sustainable location, or one that could be made sustainable. In addition, the NPPF expects new developments to be planned, where possible, to limit the need to travel and offer a genuine choice of transport modes which can help reduce congestion and emissions and improve air quality and public health.



177. Evidence will be prepared to test the overall levels of growth that will be taken forward as the plan progresses, and this will need to consider strategic issues, for instance, the capacity of the M42 to accommodate the additional growth.



178. At a more local or site level, it will be necessary to consider what sort of transport infrastructure may be needed to serve a development, and how access to it could be provided. An example of this was provided earlier in this document when reference was made to a scenario that if development were to take place to the NW of Balsall Common then through the development itself provision could be made to link Kenilworth Road with Balsall Street.
179. Other physical infrastructure at the site/settlement level will be the need to ensure not just that there are pedestrian and cycle links from the development to nearby services, but also how the development could connect to the wider cycleway network. This will form part of the NPPF's expectation of a vision led approach to planning transport infrastructure.
180. Locating new development in close proximity to rail stations may be an appropriate approach to seeking to maximise sustainable locations and this is a clear aim of national policy. Notwithstanding, it will be important to consider what frequency of service is available and if (through the development) this would need to be improved. This would also hold true for the bus network.

29. Do you believe there are opportunities to improve the transport infrastructure serving the Borough, if so, what are they and how do you think they could be delivered?

Flood related.

181. Locating new development will follow the sequential approach set out in the NPPF and will be supported by appropriate Flood Risk Assessment (FRA) evidence. However, even at this early stage it is important to remember that new development has the potential to provide 'betterment' – i.e. in making provisions for new development a scheme will need to take into account any existing issues that could then be incorporated into a mitigation scheme that deals with both.
182. The drainage strategy for new developments often requires the provision of a Sustainable Urban Drainage Scheme (often known as SUDS) which incorporates a number of techniques to prevent flooding both on the site being developed and areas downstream. One way this is achieved is through restricting run-off rates from a development to 'greenfield' run off rates and holding water back in balancing pools. This is instead of storm water running straight from driveways and roads in the new development straight into the main drainage system serving the wider area. This is one area where through responding to matters of Climate Change we may need to consider what volume of run-off rates should be planned for and whether there is justification for exceeding national expectations. The Council will consider this matter in detail alongside partners such as the Lead Local Flood Authority and the Environment Agency.
183. Some recent experiences of flooding have resulted from short duration, high intensity storms, leading to localised pluvial⁵⁰ flooding. Through updated Flood Risk Assessment work this will explore what rainfall events should be taken into account and views on this matter at this stage will help shape the work to be undertaken. This will include existing and proposed topography;

⁵⁰ **Pluvial** flooding occurs when the amount of rainfall exceeds the capacity of urban storm water drainage systems or the ground to absorb it. This excess water flows overland, ponding in natural or man-made hollows and low-lying areas or behind obstructions. This differs from **fluvial** flooding, when levels in a river, or stream rise, allowing water to flow onto surrounding land.



sufficient SUDS requirements; property level protection and permeable surfacing along with the utilisation of water harvesting if possible/practicable.

30. How do you believe that new development could be designed to ensure there is no increase in surface water flood risk on site, or elsewhere.

Digital Infrastructure

184. Digital infrastructure in the form of full fibre broadband connections and next generation of mobile technology (such as 5G) is essential for economic growth and social well-being. As such the Council is keen to understand where current gaps in provision may exist so that work can be undertaken with providers and/or site developers to improve network coverage.

31. Are you aware of any significant gaps in broadband and/or mobile coverage in the Borough that need to be addressed, if so, where are they, and are there any other technologies that the Council should be taking into account?

Social Infrastructure

185. When considering what social infrastructure ought to be provided as a result of new developments it should be noted that it will have a capital cost to it, and an on-going revenue component. The capital costs will relate to the physical side of the provision – i.e. the building to accommodate a service. The revenue costs will usually relate to the operational costs (including staff costs) of providing a service.
186. It is a reasonable expectation that the capital costs in providing social infrastructure should be funded via the development, but the on-going revenue costs are usually beyond the scope of being the development's responsibility. These would be expected to be funded via public funding, for instance directly from the Government or Local Authority funds. In this way a school building could be provided for by a development, but the on-going costs of paying for the teaching staff would be publicly funded. In the same way a medical centre could be funded through a new development, but the costs of the doctors/nurses etc would be publicly funded.

Education

187. As part of the 2020 plan, it was identified that the scale and distribution of new housing development would generate the need for 4 new primary schools. These would be located in Balsall Common, Blythe area, Knowle/Dorridge and Arden Cross. Subsequent planning applications have included these within the proposals⁵¹
188. A similar process will be followed for the new plan once it is established how much housing growth will be accommodated, and where it will be located. It is normally assumed that for every 100 houses they will be occupied by 18 children of secondary school age and 34 children of primary school age. This helps to determine (on a development-by-development basis) the number of school places that would arise from a development. Pupil yield increases with the levels of affordable homes a development provides so this may vary depending on an increase in the level of affordable housing to be provided. If capacity doesn't exist at a school, then the

⁵¹ References for Balsall Common, Dog Kennel Lane, but Knowle???



developments will be expected to fund the additional places created, either a new school or by extending an existing one. A rule of thumb is that if 2,000 new houses are to be provided, this would require a new two form entry primary school. Generally speaking, the delivery of new schools is expected to be located in a way that means they are directly accessible by the catchment they intend to serve and encourage active travel or public transport to help remove the reliance on car usage. This also creates wider health benefits in terms of mobility and air quality for example.



189. The scale and distribution of growth under the 2020 plan was not expected to immediately give rise to a new secondary school⁵², and existing establishments were expected to be able to be expanded as necessary. This may not be the case with the emerging local plan, and it is thought that the Blythe area of the Borough and development at Arden Cross may need to be a particular focus for seeking to identify where a new secondary school could be accommodated. A similar rule of thumb for a secondary school is that 4,000 – 6,000 new houses across a secondary school planning area, are required to support a new school. In considering the need for a new secondary school we must also have regard to opportunities to promote active travel to and from school sites – ensuring new schools provide a focal point for local communities and where possible supporting more than just educational infrastructure.
190. In addition, to ensure infrastructure is in place across the wider education need, the Council will also need to seek contributions for SEND provision, post-16 and early years' needs and where necessary to support the school transport requirement.

32. Do you believe the Council's approach to dealing with educational needs as a result of new development that was set out in the 2020 plan is appropriate in principle for taking forward in the new plan? If not, why not and what alternative would you suggest?

Health

⁵² Although it was noted that in the Aarden Cross/NEC area a new secondary school may have been required towards the end of the plan period, or beyond, depending on the housing mix of development to be accommodated in the area.

191. The Council has been working with the Birmingham & Solihull Integrated Care Board⁵³ (BSOL ICB) in order to seek health infrastructure to support the development in the 2020 plan. This has resulted in developing a model that predicts the level of demand⁵⁴ for these services that would occur from a development:
- Primary care (GPs).
 - Community care.
 - Mental health.
 - Acute outpatients.
 - Acute emergency.
192. This level of demand is then translated into the physical space needed at health establishments and this drives the financial contribution that is sought from developments, so that the physical health estate can accommodate the additional demand. As for schools/teachers, it is then for staffing costs for doctors/nurses etc to be publicly funded.



⁵³ Integrated care boards (ICBs) are NHS organisations responsible for planning health services for their local population. They manage the NHS budget and work with local providers of NHS services, such as hospitals and GP practices.

⁵⁴ For instance the number of GP contacts would arise from a typical development using contact rates for under 16, 16 – 65 and over 65's.



193. The Council will continue to work directly with the BSOL ICB⁵⁵, as the co-ordinator/commissioner of health services, rather than individual health care providers such as hospital trusts and individual GP practices. This relationship would not prevent these service providers from commenting on how services should be provided, but it will be expected that this will be undertaken through the ICB.
194. Some developments in the Borough may result in health services for the Borough's future residents being provided beyond the area covered by BSOL ICB, for instance in Coventry/Warwickshire. To provide consistency and an efficient Development management process, it has been agreed with BSOL ICB that it will act as a single point of contact to coordinate health service responses to planning applications. It then it will seek to collaborate⁵⁶ with any relevant adjacent ICBs to ensure funds are used where they are required as a result of the development taking place.

33. Do you believe the approach set out in the above paragraphs for seeking health related infrastructure to support new development is the correct approach, if not why and what alternative would you suggest.

34. Are there any significant existing gaps in health infrastructure provision that you are aware of that the Council should take into account?

Police

195. It is unlikely that the scale of growth that may be incorporated into the local plan will be of a sufficient size or distribution that would generate the need for an additional police station, or extending existing premises. Notwithstanding, the way the police operate with seeking to provide a presence in communities could be affected by new development. This may generate the need for supporting facilities (e.g. car charging points) to be provided in new developments and/or more equipment to support out of station working.
196. As with other social infrastructure, there may be a role for contributions from developments to be used to improve the police estate, but it is unlikely to be justified that such contributions are used to support revenue operations (e.g. staffing).

35. What physical infrastructure to support police operations should the Council plan to take into account?

Other Social Infrastructure

197. Are there any other types of social infrastructure that should be considered, for instance community or recreational facilities? If so, the Council would need to ensure there is evidence of need to support an argument that it is necessary and that there is a clear plan in place for

⁵⁵ The 11 Integrated Care Boards in the Midlands are in the process of being grouped as clusters with one being the NHS Birmingham, Black Country and Solihull. (see [NHS England — Midlands » How the NHS structure in the Midlands is changing](#)). In due course, these clusters are likely to lead to formal mergers, but this is not expected until April 2027.

⁵⁶ With the Council's agreement.



delivery – i.e. which organisation would be responsible for the facility and would there be a sufficient population to support the viability of the facility in the future.

198. Some types of infrastructure that could fall into this category could be provided as a commercial opportunity if market conditions were right, for example convenience retail facilities that would serve a new residential area.

36. Are there any other examples of social related infrastructure that the Council should be considering?

Green Infrastructure

199. One of the seven ambitions in the 2025 Council Plan is that Solihull is an attractive and aspirational place. It noted:

“Given that two thirds of the borough’s land is green belt, we need to ensure that future developments maintain respect for the environment. This includes maintaining space for nature and providing a biodiversity net gain and ultimately protecting and complementing the beauty of our borough.”

200. Green infrastructure is defined in the NPPF as:

“A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.”

201. Green infrastructure can therefore provide for a mix of uses and activities; some of which will prioritise public accessibility and others may need to be set aside for wildlife to enjoy without disturbance.

Adaptation to the effects of Climate Change

202. Well-designed green infrastructure can contribute to ‘nature-based solutions’, an alternative to hard engineering when tackling the impacts of climate change. Planted areas can slow water flows, decrease surface run-off, even out temperature fluctuations, trap pollution and encourage biodiversity.



Parks and Open Spaces

203. New and enhanced open spaces are important as they provide opportunities for recreation, physical activity and enjoying nature on your doorstep.



Design

204. Care and attention must be taken at the design stage to ensure the new buildings are integrated into their surroundings not just ‘dropped in’, and how open space and soft landscaping is treated in and around the development is key to this process.

Areas for biodiversity

Linear green infrastructure such as hedgerows and waterways can be important wildlife corridors. Walking and cycling paths can also be created alongside these corridors with wildlife stepping stones in between such as ponds, copses and wildflower meadows.

205. Biodiversity Net Gain is discussed in more detail below.

Natural Capital Investment Strategy

206. The [Natural Capital Investment Strategy](#) (NCIS) sits alongside our existing initiatives and strategies and is our delivery mechanism for responding to the biodiversity crisis, by protecting, restoring and enhancing nature in a sustainable way for all.
207. The NCIS sets out a series of actions from assessing the natural capital value of all relevant Council assets – especially parks and open spaces – to producing a natural capital database including an infrastructure assets map.



37. What components of Green Infrastructure do you believe that should be prioritised for inclusion in the local plan?

Playing Pitches

208. Planning policy has a role to play in ensuring that there are sufficient facilities for more formal recreational, such as playing pitches. The Council has adopted⁵⁷ a Playing Pitch & Outdoor Sports Strategy⁵⁸ which includes aims to ‘protect’, ‘enhance’ and ‘provide’ facilities, and it supports the approach to requiring developments to contribute towards new facilities⁵⁹. This work was undertaken in collaboration with Sport England and the National Governing Bodies of the sports involved.



209. Rather than these new facilities being provided in a piecemeal fashion where each development site that may be large enough to accommodate a single playing pitch does so, a more comprehensive approach to delivery has been pursued through seeking to identify potential locations for new ‘sporting hubs’. Providing facilities in a hub fashion allows a more critical mass to be provided and allows sharing of facilities (car parking and changing rooms) that enables the facilities to be more sustainable in the long term.
210. Through work based on the 2020 plan it was identified that hubs would be required in Balsall Common, Blythe, Knowle/Dorridge and east of Solihull⁶⁰. Site identification and feasibility work has since been undertaken. Under the new plan it’s likely that hubs will continue to be required in these locations, but they may need to be designed to be larger (i.e. accommodate

⁵⁷ In [June 2024](#).

⁵⁸ [December 2023](#).

⁵⁹ Based on Sport England’s Playing Pitch Calculator that essentially converts the number of dwellings proposed at a site into the number of playing pitches that would be required to satisfy the additional demand.

⁶⁰ This is not to say that sporting and recreational facilities elsewhere in the Borough aren’t important, rather it is an approach to seek to provide additional facilities where new development is expected to take place.



more pitches) as a result of the additional growth expected to be required in the new plan or across additional locations.

211. The Council is also in the process of refreshing the Indoor Sports Facility Strategy.

38. Do you believe that the Council should seek to provide new sporting facilities in a hub type model, and if not why and what alternative would you suggest?
39. If sporting hubs are to be developed in Balsall Common, Blythe, Knowle/Dorridge and east of Solihull, are there are sites or suggestions you wish to make regarding where they could be accommodated?

Other Infrastructure

40. Are there any other types of infrastructure where you believe there are gaps in provision that the Council should be taking into account? If so, what are they?

Phasing Infrastructure

212. In some cases, the infrastructure required in connection with development will need to be in place before the new houses are occupied. This will particularly be the case for the physical infrastructure needed to support the development but will be informed by site/case specific considerations. However, some infrastructure provision will be phased so that although it may not be in place as the first houses are occupied, arrangements will be in place for it to be provided at an appropriate time.
213. This is best illustrated by way of an example. As noted above, a new development of 2,000 dwellings would require a new primary school. A development of this size would take at least 10 years, and possibly longer, to be 'built out' and it would be impractical to require the new school to be open as soon as the first dwelling is occupied. What it will require is a phased approach so that once the right critical mass of dwellings have been completed (and thus enough children at the school to make operating it viable) the school will be ready.
214. This approach may require some transitional arrangements to be put in place that will be determined on a case-by-case basis. This could include initially operating a school on the basis of a one form entry, before moving to two form entry.

Infrastructure Funding

215. It is anticipated that most infrastructure needed as a result of new development will be funded privately via the development itself, and ultimately this is usually reflected in the land prices that developers pay for the land itself. It should be noted that funding from this source is finite and there may be cases where to ensure development remains viable it will not be possible to fund all infrastructure asks. Plan-wide viability evidence will be updated in this respect.
216. The Council adopted a Community Infrastructure Levy (CIL) charging schedule in 2016. Alongside the plan-wide variability evidence noted above, the Council will review its charging schedule. The Council will also explore a S106 or tariff approach in areas of significant growth.



217. It may be necessary to explore public funding opportunities, especially if infrastructure of a more strategic scale is required. It may be the case that organisations such as the Department for Transport or West Midlands Combined Authority⁶¹ may be approached to assist with funding solutions.
218. As highlighted above, the council is keen to explore opportunities where infrastructure can be provided ‘in kind’ to help link the necessary infrastructure directly to the delivery of new homes. Stage 2 of the Balsall Common Relief Road is a prime example as part of the current Barratts Farm proposals. The Council considers this offers an efficient and viable option to ensure delivery and maximise benefits for new residents and the existing communities. Similarly, it will be important to understand where capacity may already exist in local infrastructure provisions (such as primary schools for example) where the delivery of new homes could help ensure their long-term viability and benefit to the community.

Cross Boundary Infrastructure

219. In some instances, developments may take place close to the Borough boundary but will rely on infrastructure facilities in an adjacent Council area. This could be developments being constructed in Solihull, but reliant on facilities in an adjacent area; or developments in an adjacent area that are reliant on facilities in Solihull.
220. As an example of the latter case, if development were to take place in another authority’s area (but remote from that area’s settlement hierarchy), but in close proximity to a settlement or facilities in Solihull; this would naturally cause residents of the new development to seek to use the facilities in Solihull as they would be closest, for instances to access a school. Furthermore, most of the traffic movements would be likely to take place in and around the settlement in Solihull. Whilst utilising local infrastructure may also support a more effective and sustainable approach helping reduce environmental impacts caused by increased travel, this would place additional infrastructure demands on the Council’s services.
221. To address these potential eventualities, the Council will work with adjacent local authorities, including through the production of Statements of Common Ground⁶², to agree that in the event that permissions are granted, the authority that is expected to accommodate the infrastructure strain will receive the associated mitigation through S106 agreements and Community Infrastructure Levy payments (as appropriate on a case by case basis).

⁶¹ Particularly if the strategic infrastructure is required in order to deliver its Spatial Development Strategy.

⁶² A Statement of Common Ground (SCG) should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues. The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address them. It is the means by which authorities can demonstrate that their plans are based on effective and ongoing cooperation and that they have sought to produce strategies that as far as possible are based on agreements with other authorities.



Shaping New Development

222. This consultation has considered the implications of changes to national planning policy since the 2020 plan was drawn up, and therefore it has focussed on issues regarding the number of new dwellings to be provided in the Borough and options for how they can be accommodated. This section starts to explore some of the other key policy areas that will help shape new development, and whilst it does not provide detailed wording, it does seek to set out policy directions that ought to be taken forward. **These are not set out in any priority order.**
223. In this context it is important to consider how policies in local plans will be influenced by National Decision-Making Policies being introduced through an updated NPPF. In particular the Government's intension that *"all plan makers should, in preparing plans ... not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this framework."*
224. It is also important to consider that a significant degree of work went into informing the draft policies that were included in the 2020 Local Plan Review. Subject to the content of the NDMPs and ongoing update of the local evidence base, these policies may still provide a solid platform from which to bring forward the new Local Plan. A schedule of these policies is set out in an appendix to this document.
225. As the Council continues to bring forward a local plan, evidence base studies will be updated as appropriate. This will then provide an important evidential basis for determining the content and drafting of new/amended policies. Some of the issues explored below will need to take into account this new evidence as it is prepared. For instance, how housing mix and affordable housing will be addressed by new policy will be based on an updated Housing and Economic Development Needs Assessment (HEDNA). However, this issues and options consultation is an opportunity to seek stakeholders' views so that when the Council does have the updated evidence available for future consultations it can put forward a preferred option that is based on stakeholders' views and evidence.

Comprehensive Developments

226. When the Call-for-Sites exercise was launched, the Council noted:

"Call-for-Sites submissions are often driven by the land that may be available that happens to be in a single ownership. This can create smaller more inward facing developments that may be poorly connected to, or isolated from, the settlement that they should be a part of.

To avoid this situation, it may be necessary to look beyond the potentially artificially created boundaries caused by historic ownership patterns and put forward a larger site that can take advantage of looking at an area more comprehensively. We encourage promoters to work with other landowners and promoters to ensure submissions are made on a comprehensive basis and welcome joint submissions.

If individual submissions are made in relation to parcels of land that the Council believe should be considered together or more comprehensively, or parcels of land that ought to be included are omitted, the Council will, early in the evaluation, identify which parcels should be considered on a joint and comprehensive basis. In these circumstances it will be expected that those submitting proposals will identify a lead promotor between themselves and all parties should agree to the principle of joint working. To assist this



process the Council may share contact details with other promoters, and this should be borne in mind when completing the submission form.

For sites to reach the allocation stage, the Council will need to be satisfied that adequate arrangements are in place for sites with multiple ownership to ensure that they can be delivered on a comprehensive basis to avoid piecemeal development.

Evidence of joint working can include landowner/promotor agreement to a collaborative approach including, if necessary, an equalisation agreement that covers a comprehensive approach to infrastructure provision and mitigation delivery. Whilst this agreement is not necessary at the Call-for-Sites submission stage, it will be required before a site will be included as an allocation in a draft plan, and so we encourage site promoters to give early consideration to such matters.”

227. This approach signalled the Council’s intent to maximise the links between various landowners and ensure the most efficient and effective delivery of sites. The Council considers this a key component of supporting infrastructure delivery and meeting both local and strategic needs. Where the Council identify the need for landowners to come together to produce a comprehensive approach it will require promoters to:
- Individually agree to the principle of joint working.
 - Select a lead promotor/spokesperson/point of contact that the Council can liaise with.
 - Agree that if the Council were to give an indication that the wider site may be included as an allocation in the emerging plan, that the parties will provide a signed memorandum of understanding between the parties that sets out the joint collaboration arrangements that will be followed.
228. Such information will likely be key to demonstrating robust and deliverable site allocations as part of the plan making process.

41. Do you believe the Council ought to seek comprehensive developments in this way, if so why (or why not)?
42. Do you believe that if site promoters and/or developers can’t demonstrate that a comprehensive approach has been followed that the site or sites should not be allocated?



Biodiversity Net Gain

229. Biodiversity net gain (BNG⁶³) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.
230. In England, BNG is mandatory⁶⁴ and developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.



231. The Council is keen to explore whether BNG should be extended to require a greater net gain, of for instance 15% or 20%, and what evidence may be required to justify this approach.

43. Do you believe that the Council should seek to explore additional net gain, if so by how much, and what evidence do you believe would be needed to justify this approach?

⁶³ <https://www.gov.uk/government/collections/biodiversity-net-gain>

⁶⁴ Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Housing Mix & Affordable Housing

232. It is important that the right sort of housing is provided, both in terms of dwelling sizes that match the needs of the Borough's residents; how young residents in particular can access housing; and how those in need of help can be accommodated.
233. As noted earlier in this consultation, the Council will be updating its Housing and Economic Development Needs Assessment, and this will provide the evidence necessary to bring forward detailed policy in this area. However, in the meantime the Council would welcome stakeholders' views on how to address housing mix and affordable housing requirements.

Housing Mix

234. Housing mix will vary from some sites to others, particularly those in town centre locations and other urban locations that are particularly well served by public transport⁶⁵ (such as the NEC and Arden Cross) which may accommodate a greater proportion of apartments which means that other sites (on the edge of the urban area or rural settlements) are likely to have a greater proportion of dwellings.
235. The 2020 plan was seeking (a Borough wide) provision of the following for market dwellings:
- 1 or 2 bedrooms – 30%.
 - 3 bedrooms – 50%.
 - 4 or more bedrooms – 20%.
236. As part of the approach to housing mix it is appropriate to consider what role '**starter homes**⁶⁶' could play as part of the housing supply that will be provided. In this context the term starter homes cover smaller house types that although may still be available as market housing products⁶⁷ would be at a price and availability that would make them attractive to, amongst others, those purchasing a house for the first time.

44. What approach to housing mix in new developments do you believe the Council should take?

Affordable Housing

237. The NPPF states at paragraph 63 that the housing needed for different groups in the community "should be assessed and reflected in planning policies". Paragraph 64 goes on to state "Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required." NPPF annex 2 defines affordable housing as

"Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:"

⁶⁵ Either now or in the future.

⁶⁶ The terms starter home is not defined in the NPPF.

⁶⁷ As opposed to discounted market products which could fall within the definition of affordable housing (which is dealt with in the following section).



- Social rent.
 - Other affordable housing for rent.
 - Discounted market sales housing.
 - Other affordable routes to home ownership.
238. The Council's approach has been to secure a 40% contribution to affordable housing in the form of 65% social rent and 35% shared ownership.
239. The Council will consider whether to encourage a different affordable housing product, especially one that could deliver smaller dwellings that would be attractive to those purchasing a property for the first time. This could be beneficial in locations where those leaving home have found it difficult to access a property in the communities they wish to remain and thus enjoy the support of family members.



First Homes Discounted Market Sales Housing

240. 'First Homes' may be an affordable housing product that could fulfil this requirement and may be pursued instead of shared ownership. Key features of First Homes are as follows:
- Discount: A minimum of 30% discount off the market value is required, with the local authority able to set a higher minimum discount (up to 50%) to ensure affordability locally.
 - Eligibility: Homes are sold to eligible first-time buyers and key workers, who must meet specific criteria including an income cap.
 - Price cap: The first sale is capped at a maximum of £250,000 after the discount is applied. Lower caps can be set by local authorities.
 - Perpetuity: The discount remains with the property and is passed on with every subsequent sale. A legal restriction is registered on the title at HM Land Registry to enforce this.



- Primary residence: The property must be the owner's sole or main residence.
 - Planning requirement: Before the 2024 NPPF update, First Homes were required to form at least 25% of affordable housing units secured through developer contributions. This specific requirement is no longer in place, although First Homes can still be delivered through planning obligations.
241. Discounted market sales housing is that sold at a discount of at least 20% below market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
242. Whilst First Homes and Discounted Market Sales have some similarities, it is noted that there are more criteria that must be fulfilled for dwellings to be considered as First Homes. This may also have implications when subsequent onward sales of houses take place, and this could lead to an additional administrative burden to the Council.
243. There is unlikely to be a need for both First Homes and Discounted Market Sales and so the Council is keen to hear views from stakeholders that if this sort of product is to be included as part of the affordable housing provision, which it should be.

45. Do you believe that the Council should include discounted housing as part of the affordable housing mix it seeks to have included on new developments, if so, which is preferred, First Homes or Discounted Market Sales?

46. What should the discount be for this type of product, 20% (as a minimum), 30%, 40%, or 50% (as a maximum)? Or some other figure between 20% and 50%.

244. In considering this issue, it should be remembered that requiring affordable housing as a proportion of new developments will remain the principal way that such provision will be made. Furthermore, it will only be provided where new development takes place, which may not always be the same locations that give rise to such needs. Affordable housing will therefore remain a Borough wide issue, and this should include retaining a requirement for social rented accommodation for those in need who can't afford to buy a property.

Level of Affordable Housing and its Split between Different Products

245. Since the 2013 Solihull Local Plan, the Council has sought 40% of new housing on new developments to be affordable and has been pretty successful in achieving this level. The 2024 NPPF requires 50% of new housing on Green Belt sites to be provided if the Golden Rules of the NPPF are to be met.
246. With potentially three different types of affordable housing being provided, this will have implications for the current 65% social rent/ 35% shared ownership split currently sought on developments and views are requested on what would be an appropriate split.

47. What level of affordable housing should be provided on development sites?

48. What should be the percentage split of affordable housing products be, between social rented, shared ownership and first homes/discounted market sales?



247. It is acknowledged that final decisions on many of the affordable housing policies will need to be informed by an updated HEDNA, but in advance of this being available the Council is keen to hear stakeholders' views at this stage.

Self & Custom Build

248. Through the preparation of the 2020 plan, the Council consulted on what would be an appropriate approach to the delivery of self & custom build plots. The choices were to either require all sites over a threshold to provide a percentage of plots for self/custom build, or to concentrate plots on a small number of sites.
249. Although response was mixed, it was judged that in the absence of a large enough site, or a small number of sites that could have accommodated the demand, that delivery was more certain by requiring a small number of plots to be provided on all sites over 100 dwellings. This has been the approach in applications that have come forward to date.

Climate Change

250. The Council has an aspiration that the Borough is net zero by 2041⁶⁸ and how new development takes place has a role to play in achieving this ambition. Policy P9 – Mitigating and Adapting to Climate Change was the policy in the 2020 that sought to directly address the challenges of climate change. It included the following policy approaches:
251. At a strategic level, measures to reduce carbon emissions and transition to a low carbon economy will be applied including: locating development where it minimises the need to travel, particularly by private vehicles; promote and attach significant weight to the installation of district, low carbon and renewable energy schemes and promoting connections to existing or planned district energy and/or heat networks.
252. At a site level, applying the pursuing layouts (including orientation) and design that enhances natural ventilation and lighting and minimises the need for energy for heating and cooling, such as Passivhaus.
253. For buildings, apply the 'energy hierarchy' focusing on a fabric-first approach to reduce energy demand for heating, lighting and cooling and minimise Greenhouse Gas emissions. This includes moving towards all new dwellings to be net zero carbon.
254. Promoting renewable and low carbon energy for all residual energy needs and if necessary, once all other options have been exhausted, apply in setting and carbon offsetting schemes.
255. Since the 2020 plan was drawn up, the [Energy Act 2023](#) was enacted, and provides the powers for government to implement heat network zoning in England through regulations. Heat network zones are explained as follows⁶⁹:

"Heat network zoning will fundamentally transform the development of new heat networks in towns and cities across England. By designating geographic zones where heat networks are expected to be the lowest cost solution for decarbonising heat, it will give local communities the tools to accelerate the development of heat networks and ensure that more homes and businesses can have access to greener, cheaper heat."

⁶⁸ [Net Zero Action Plan \(NZAP\)](#)

⁶⁹ [Heat network zoning: overview.](#)



Through heat network zoning, certain types of buildings and low carbon heat sources can be required to connect to a network within a prescribed timeframe. By identifying, and ultimately connecting, the largest consumers of heat within a given area, a critical mass can be reached and provide the certainty needed to support long-term investment in heat networks.”

256. It is anticipated that there will be heat network zone(s) designated in the Borough.



257. In the meantime, the Council is working with partners to develop an innovative and reliable new district [Energy Network](#) that will deliver heat and hot water into the taps, radiators, and heating systems of connected town centre buildings. This Energy Network will provide low carbon heat and power (electricity) to a range of public and private sector customers within Solihull town centre, including Council owned buildings, education campuses and commercial offices.

49. Are the approaches set out in Policy P9 Mitigating and Adapting to Climate Change in the 2020 plan, still the correct ones to incorporate into local plan policy moving forward, or should any other approaches be followed?



Sustainability Appraisal

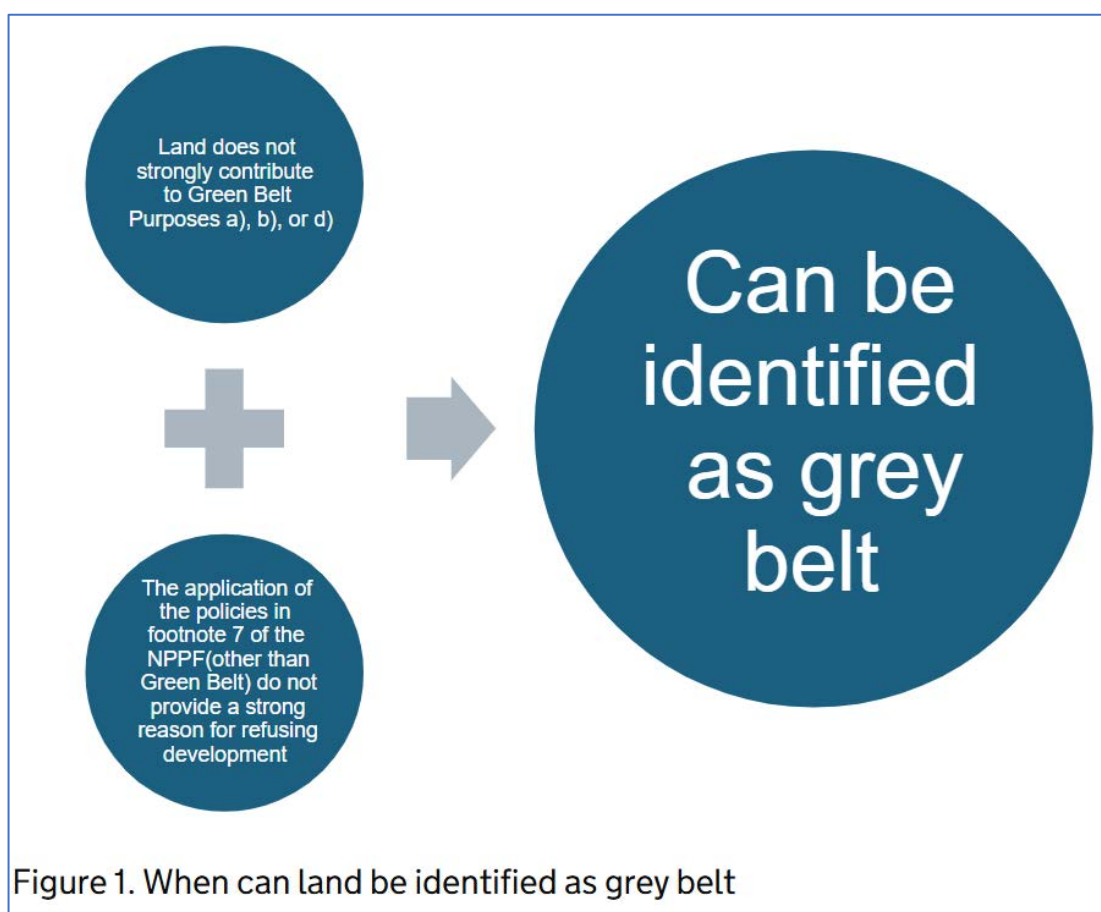
- 258. Sustainability Appraisal is an integral part of the plan-making process, and the local authority is legally required to carry out a sustainability appraisal of a plan's proposals during its preparation.
- 259. The Council has commenced work on the Sustainability Appraisal and drafted a Stage A – Scoping Report, which has been sent to statutory consultees for comment.
- 260. In accordance with national planning guidance⁷⁰, the scoping report seeks to identify relevant sustainability issues and objectives from plans and policies, as well as evaluate the baseline information on existing environmental, economic and social characteristics of the Borough. These in turn have informed a revised sustainability appraisal framework and objectives, against which potential alternative options and policies will be assessed as the plan moves forward.

⁷⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Sustainability-appraisal-process>



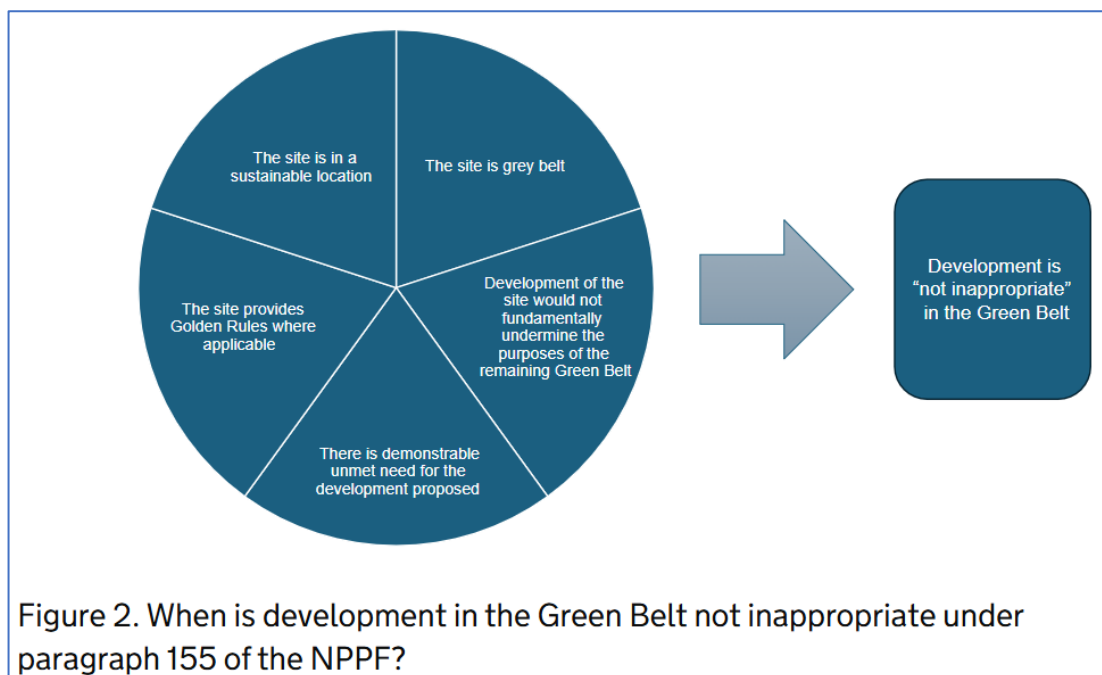
What Will Happen Whilst a New Plan is Being Prepared?

261. Whilst the plan remains under preparation the Council has received, and expects to continue receiving, planning applications for new development within the Borough. Since the publication of the NPPF and NPPG in 2024/2025 there has been an upturn in major applications for development within the Green Belt, often claiming to be 'Grey Belt' land and aiming to satisfy the 'Golden Rules'. A number of these applications have been determined, with the majority thus far relating to sites previously proposed for allocation in the now withdrawn Local Plan Review.
262. However, just because land may be identified as Grey Belt, it does not follow that it should be developed. Effectively, there is a two-stage process, as illustrated in the NPPG⁷¹:



⁷¹ The reference to compliance with the Golden Rules 'where applicable' in figure 2 is due to the fact that the rules only apply to major housing development, and therefore it excludes other forms of development.





263. As a Local Planning Authority (LPA), the Council has a legal duty to determine any planning application that is submitted to it. National guidance recommends that such decisions should be made within prescribed timescales, however there is scope to agree extended time periods with an applicant, and this is common, especially when considering the complex and sensitive nature of larger applications within the Green Belt. Nevertheless, failure to determine an application can lead to an applicant appealing against non-determination meaning the Council loses the right to decide the application locally and it is instead determined through the Planning Inspectorate. National Performance markers mean that if this happens too often or the Council experiences a high proportion of decisions allowed on appeal, then applicants can apply directly to the Planning Inspectorate and the council lose the right to make its own decisions.
264. In this context, the LPA will continue to assess and determine planning applications as appropriate. Such decisions will have regard to the adopted development plan (including the 2013 Local Plan and Neighbourhood Plans) as well as the NPPF and NPPG (as required by planning law). The new Plan will not apply to planning applications until it becomes more advanced. Where an application meets specific requirements, it will be presented to the Councils Planning Committee to determine. This is common with larger development sites within the Green Belt.
265. Further to the above, should the Council refuse an application, then it is important to note that the applicant has the right to appeal that decision to the Planning Inspectorate. This could lead to the Council's decision being upheld or overturned.
266. Whilst the Council will continue to encourage applicants to first promote speculative development options through the Local Plan process, as referenced above this is not something the Council can enforce, and any application that's submitted must be considered on its own merits and determined accordingly. In some cases, an argument may be made that an application is premature. This concept is referenced within Para 50 and 51 of the NPPF. This states:

“...in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.”*

267. The reference to “advanced stage” in the NPPF, normally means the Plan has been submitted for examination. As a result, prematurity is unlikely to be a reason for refusal within the Borough unless the impacts of the proposed development are so substantial that it would prejudice the outcome of the plan making process.
268. The Council is aware of concerns raised within local communities regarding piecemeal development and the potential impacts on local infrastructure. Although this could give the appearance of development being uncoordinated, the Council will always use all opportunities within the NPPF and NPPG to secure:
- Comprehensive and aligned developments; and
 - Coordinated contributions towards necessary infrastructure provision.
269. In this respect, and when considering multiple applications within a specific area the Council will always seek to have regard to cumulative impacts of developments, in accordance with national policy and guidance. In order to allow for cumulative considerations to be taken into account though, the sites in question must have a degree of certainty that they will be delivered. This will include any sites already under construction or granted planning permission or normally those which are under assessment as part of a live application. It can also include any sites that are allocated within an adopted or advanced⁷² plan in a neighbouring area.
270. In all cases where a planning application for new homes is granted permission (either by the Council or on appeal), this will count towards the Council’s housing land supply during the Plan Period referenced within this paper.

1. ⁷² By “advanced” this would normally mean proposed for allocation as part of a plan submitted for examination.



Appendix A - Schedule of Sites Allocated in the 2020 Draft Submission Plan

271. The table below is a schedule of sites from the 2020 plan, many of which have now reached the planning application stage. This means there is a more up-to-date position on their capacity. For comparison purposes, the present capacity is compared with that provided to the examination in April 2022 (document reference SMBC011). This formed the basis of the Inspectors conclusions on land supply whereas a later update in August 2024 (document reference SMBC026) wasn't assessed by the Inspectors in detail.

Site Ref	Site	Status	Present Capacity	Capacity 2022	Difference
BC1a	Barratt's Farm	Planning application	970	963	97
BC1b	Oxhayes Close	Planning application	90		
BC2	Frog Lane	Planning permission	110	110	0
BC3	Kenilworth Lane	Planning applicatin	80	132	-52
BC4a	Catchams Corner	Planning permission	18	220	48
BC4b	Pheasant Oak Farm	Planning permission	250		
BC5	Trevallion Stud	Pre-application submission	310	253	57
BC6	Lavender Hall Farm	Planning application	92	80	12
BL1a	West of Dickens Heath (north)	Resolution to grant	86	385	151
BL1b	West of Dickens Heath (south)	Planning application	450		
BL2a	South of Dog Kennel Lane (east)	Resolution to grant	550	1,100	150
BL2b	South of Dog Kennel Lane (west)	Resolution to grant	700		
BL3	Whitlocks End	Planning application	450	330	120
HA1	Meriden Road	Planning application	100	100	0
HA2	Oak Farm	Planning permission	85	105	-20
HH1	School Road	Planning application	100	99	1
KN1a	Hampton Road (north)	Pre-application submission	114	198	-29
KN1b	Hampton Road (south)		55		
KN2a	South of Knowle (Inspired Villages site)	Planning permission	170	660	195
KN2b	South of Knowle (Kler Group site)	Planning permission	450		
KN2c	South of Knowle (Taylor Wimpey site)	Resolution to grant	200		
KN2d	South of Knowle (PDR Developments)	Pre-application submission	35		
ME1	West of Meriden	Planning permission	75	95	-20
SO1a	East of Solihull (north of Lugtrout Lane)	Resolution to grant	50	770	55



Site Ref	Site	Status	Present Capacity	Capacity 2022	Difference
SO1b	East of Solihull (south of Lugtrout Lane)	Pre-application submission	775		
SO2	Moat Lane Depot		99	99	0
Total			6,324	5,699	765

272. Notes on status:

- Pre-application submission – Proposals have been the subject of a pre-application submission (shaded yellow).
- Planning application – Proposals are the subject of a planning application which is currently been considered (shaded orange).
- Resolution to grant – Proposals are the subject of a planning application which has been reported to Planning Committee and Members have resolved to grant permission subject to a S106 agreement being entered into. At the time of writing the agreement is in the course of being prepared (shaded light green).
- Planning permission – Proposals are the subject of a planning application that has been approved (shaded dark green).

273. Some sites have been sub-divided in this table to reflect that in some circumstances applications have been submitted for part of the overall site.



Appendix B - Schedule of Policies Included in the Draft Submission Plan (2020)

Sustainable Economic Growth

- P1 UK Central Solihull Hub Area
- P1A Blythe Valley Business Park
- P2 Maintaining Strong, Competitive Town Centres
- P3 Provision of Land for General Business and Premises

Providing Homes for All

- P4A Meeting Housing Needs – Affordable Housing
- P4B Meeting Housing Needs – Rural Exceptions
- P4C Meeting Housing Needs – Market Housing
- P4D Meeting Housing Needs – Self & Custom Housebuilding
- P4E Meeting Housing Needs – Housing for Older and Disabled People
- P5 Provision of Land for Housing
- P6 Provision of Accommodation for Gypsies and Travellers

Improving Accessibility and Encouraging Sustainable Travel

- P7 Accessibility and Ease of Access
- P8 Managing Travel Demand and Reducing Congestion
- P8A Rapid Transit

Protecting and Enhancing our Environment

- P9 Mitigating and Adapting to Climate Change
- P10 Natural Environment
- P11 Water and Flood Risk Management
- P12 Resource Management
- P13 Minerals
- P14 Amenity
- P14A Digital Infrastructure and Telecommunications

Promoting Quality of Place

- P15 Securing Design Quality
- P16 Conservation of Heritage Assets and Local Distinctiveness



- P17 Countryside and Green Belt
- P17A Green Belt Compensation

Health and Supporting Local Communities

- P18 Health & Wellbeing
- P19 Range & Quality of Local Services
- P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure

Delivery & Monitoring

- P21 Developer Contributions and Infrastructure Provision



Appendix C - Schedule of Local Plan Preparation by Other LPAs in the HMA

274. Local Plan status for each of the Local Authorities⁷³:

Local Authority	Date of Local Plan Adoption	Plan period of Adopted Plan	Status of Emerging Plan & latest consultation stage	Plan period of Emerging Plan
Birmingham	Jan 2017	2011-2030	Ongoing – Focussed Preferred Options Consultation Oct-Dec 2025	2020-2042
Bromsgrove	Jan 2017	2011-2030	Ongoing – Draft Development Strategy Consultation Jun-Oct 2025	Up to 2043
Cannock Chase	June 2014	2006-2028	Undergoing examination	2018-2040
Dudley	Black Country Core Strategy – Feb 2011	2006-2026	Undergoing examination	2024-2041
Lichfield	Local Plan Strategy – Feb 2015 Local Plan Allocations – July 2019	2008-2029	Ongoing – Issues and Options Consultation Oct-Dec 2024	2022-2043
North Warwickshire	Sep 2021	2019-2033	Review has started	Unknown
Redditch	Jan 2017	2011-2030	Ongoing – Issues and Options Consultation and Call for Sites May-Jul 2025	Up to 2043
Sandwell	Black Country Core Strategy – Feb 2011	2006-2026	Undergoing examination	2024-2041
Solihull	Dec 2013	2011-2028	Ongoing – Call for Sites Nov 2024-Jan 2025	2025-2043
South Staffordshire	Core Strategy – Dec 2012 Site Allocations document – Sep 2018	2012-2028	Undergoing examination	2023-2041
Stratford-on-Avon	Jul 2016	2011-2031	Ongoing – joint Local Plan with Warwick District Council (South Warwickshire Local Plan). Preferred Options Consultation Jan-Mar 2025	2025-2050
Tamworth	Feb 2016	2006-2031	Ongoing – Issues and Options Consultation Sep-Nov 2022	2022-2043
Walsall	Black Country Core Strategy – Feb 2011	2006-2026	Ongoing – Issues and Preferred Options	2027-2042

⁷³ Table 1 from West Midlands Strategic Growth Study (in prep.)



Local Authority	Date of Local Plan Adoption	Plan period of Adopted Plan	Status of Emerging Plan & latest consultation stage	Plan period of Emerging Plan
			Consultation Nov-Dec 2025	
Wolverhampton	Black Country Core Strategy – Feb 2011	2006-2026	Undergoing examination	2024-2042



Solihull MBC

PO Box 11652

Solihull

West Midlands

B91 9YA.

psp@solihull.gov.uk

