

## Matter 1 - Legal/Procedural Requirements

### Introduction

- 1.1.1. This representation should be read in conjunction with the previous Regulation 19 representations, Stage 1 Hearing Statements and representations to the additional Local Plan Examination consultation made by the Raby Estate (ref: A0149).
- 1.1.2. The Raby Estate is promoting a site in the village of Cressage for development. The Estate is concerned that Shropshire Council are not meeting the legal and procedural requirements set out in paragraphs 31 and 32 of the NPPF to ensure that the Local Plan is sound. This is as a full reassessment of all reasonable options has not been conducted, per the Inspectors' requirements (ID36), unresolved issues relating to the delivery of sites within the Clun Catchment, and the proposed plan period not reflecting the requirements of paragraph 22 of the NPPF. This is explored further in these Hearing Statements.

### **Question 1 – Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the updated Sustainability Appraisal (SA)?**

- 1.1.3. As detailed in our representations to the consultation on additional material (ref: A250), there was a failure to comprehensively review and update the SA. While an initial assessment of the reasonable options was conducted for the preparation of SD006 (Sustainability Appraisal for the Regulation 19 Pre-Submission Draft of the Local Plan), this has not been updated in response to the soundness concerns of the Inspectors, with the same conclusions made on spatial strategy and site assessment in GC44 as previous iterations of the SA (GC29 and SD006). Therefore, this aspect of the draft Local Plan is inconsistent with NPPF Paragraph 35 in that it is not based on up-to-date evidence, rendering it ineffective and unjustified.
- 1.1.4. Therefore, the updated SA has not still shown evidence of updating the assessment of the likely environmental, social and economic effects of the Plan from previous versions of the document (GC29 and SD006), and fails to draw substantiated conclusions from this assessment. This needs updating before the Plan can be considered sound.

### **Question 2 – Does the updated SA test the Plan against the preferred options chosen and all reasonable alternatives?**

- 1.1.5. It is unclear how the likely effects of options assessed in the updated SA (GC44) are linked to the conclusions made in each section. The weight applied to the likely environmental, social and economic effects of the reasonable options assessed is ambiguous; there is not a clear link between the overall scoring of options and those chosen as the development strategy. Section 10 of GC44 considers options to accommodate the uplift in Shropshire's housing requirement by 500 dwellings, concluding that windfall allowances should be increased (Option 1), as it is the most appropriate balance across social, economic and environmental sustainability (GC44 paragraph 10.61).
- 1.1.6. Despite this, paragraph 8.20 of the Housing and Employment Topic Paper (HETP) (GC45) notes that options that provide greater certainty about the proportion of uplift to the housing requirement direct to urban areas achieve more positive impacts on social, economic and environmental factors (and are therefore inherently more sustainable). The very nature of windfall development means that how and where they come forward for development is uncertain and therefore the conclusions made in the SA to progress with a strategy that relies heavily on windfall is inconsistent with the findings of the HETP and not sustainable.

- 1.1.7. Section 10 of the SA (GC44) considers the options to accommodate an uplift in Shropshire's housing requirement by 500 dwellings. Despite the Council recognising the potential to achieve the proposed uplift in housing requirement through Option 3 (allocating new sites), however indicate that it was not selected due to the increased certainty regarding the urban focus of development with Option 1 (increasing windfall allowances). We dispute this conclusion as Option 1 offers the least certainty, especially as Paragraph 10.63 of GC44 states that none of the reasonable options would result in significant negative impacts or require mitigation measures; there is no clear benefit of Option 1 over Option 3. This is echoed by Paragraph 8.75 of GC45 which recognises "it is difficult or even impossible to identify potential windfall development opportunities before they arise."
- 1.1.8. Furthermore, the reasonable alternatives assessed in the updated SA (GC44) are not substantially different to those of GC29. Paragraph 018 of the Planning Practice Guidance (PPG) on Strategic Environmental Assessment and Sustainability Appraisal states that reasonable alternatives are different realistic options considered by the plan-maker, and should be sufficiently distinct to highlight the different sustainability implications of each so that meaningful conclusions can be made.
- 1.1.9. In Sections 6 and 8 of the SA consider the reasonable options for contributing towards the unmet housing needs of the Black Country and options for the housing requirement, respectively, and both conclude that the highest contribution/growth option is the most appropriate. However, this conclusion is made without an assessment of a higher option, thus lacking an assessment against reasonable alternatives to test that this scale is the most suitable. There is therefore a need to test a greater range of options in order to draw meaningful conclusions, per Paragraph 018 of the PPG. While the conclusions made in Sections 6 and 8 of the SA are positive in that they choose the highest option, this is only within the context of the options assessed. The SA is not necessarily positively-prepared, and will not be until a further reasonable option is tested.
- 1.1.10. As the Association of Black Country Authorities (ABCA) welcomed the contribution of 1,500 dwellings as a 'starting point' (EV041), Section 6 should consider the impacts of a higher contribution towards the Black Country's unmet need. Shropshire (GC4m) propose that the wording of Policy SP2 is changed from 'around' to 'a minimum of', reflecting ABCA's view of the 1,500 dwellings as a minimum. In recognising this, the potential effects of this should be assessed, to ensure that this is the most appropriate scale of contribution, as well as to support the proposed amendments to the policy wording.

**Question 3 – Have any concerns been raised about the updated SA methodology and what is the Council's response to these?**

- 1.1.11. GC52 provides the Council's summary of consultation responses to the further consultation on additional material in response to the Inspectors' Interim Findings, and provides a response from the Council to these. While several concerns regarding the updated SA methodology were raised across representations, with the Council recognise as comments on the updated material, GC52 lacks a comprehension of these concerns and reiterates the approach of GC44, rather than providing a counterargument and clarifying the soundness of their approach. While it is understood that the purpose of GC52 is to summarise each party's representations, these are over-simplified and do not reflect the scale of concern regarding the SA methodology and the conclusions that this has produced.

- 1.1.12. Paragraph 8.60 of GC45 confirms that it would be feasible to assess opportunities to identify additional site allocations (including through the early release of proposed safeguarded land and the identification of new strategic site allocations). While in the SA some sites are reassessed, the explicit exercise to explore new strategic allocations, or the exploration of mechanisms to facilitate the early release of safeguarded land has not been assessed or considered any further. This needs to be undertaken to address the current concerns with the SA and the Council's approach to this.

#### Reasonable Assessment Geography

- 1.1.13. The Raby Estate raised significant concerns regarding the reasonable assessment geography identified to consider which site(s) would meet the need of the Black Country within paragraphs 2.2.54 to 2.2.68 of the representations to the additional material (ref. A250). Figures 12.1-12.4 used Place Plan Areas to understand spatial variation in factors indicating dependencies between Shropshire and the Black Country, resulting in overgeneralised conclusions which identify whole Place Plan Areas as suitable. This is an inappropriate assumption, and conclusions of suitable sites should not be based on a geography of this scale.
- 1.1.14. As per our answer to question 2, concerns for the updated SA methodology are reflected in the conclusions drawn from the SA, feeding into the updated Housing and Employment Topic Paper (GC45). While it is recognised that the updated SA studies the likely effects of a contribution of 1,500 dwellings to the Black Country separately to Shropshire's own housing requirement, as required by the Inspectors per ID37, the conclusions made in GC44 are unchanged from those made in GC29, and no sites have been identified to specifically meet this; these sites were previously identified to meet part of Shropshire's housing requirement. It is apparent that the chosen site allocations have been selected as the most suitable of the existing list of proposed site allocations, as per the Inspectors' concerns in paragraph 15 of ID36.
- 1.1.15. Within GC52 the Council disregarded this concern, citing the Inspectors' approval of the reasonable assessment geography chosen within paragraph 7.1 of ID37. The Council also note that no objection to the consultation was received from ABCA. While the general methodology may not be a concern, the use of this methodology has not been linked to the overall Site Assessment process; it appears a convenience that sites previously identified in GC29 fall within the broad assessment geography, thus seeming reasonable for the sites to be concluded as the most suitable within GC44. The exercise has been carried out, but the nuance of the conclusions that should be made from this have not been carried forward to the overall conclusion of the sites to contribute towards the unmet needs of the Black Country.

#### GC4m – Updated Schedule of Proposed Main Modifications

- 1.1.16. As previously noted, the summaries of representations received to the further consultation on additional material (GC52) are over-simplified. The updated schedule of Main Modifications (GC4m) continues this, lacking changes in response to concerns received in representations to the consultation, instead acting upon the concerns of the Inspectors within ID37 and ID38.
- 1.1.17. The proposed Main Modifications include the addition of requirements of reports (e.g. Transport Assessments, per MM063) to support future planning applications for proposed site allocations. This recognises the concerns raised in representations and flagged within the Site Assessment process for proposed allocations, but defer consideration of how this will be mitigated until after the plan is adopted, contrary to paragraph 35 of the NPPF. For these sites to be sufficiently assessed at application stage, these would be a validation requirement, regardless of the policy requirement.

These proposed changes are therefore unnecessary, rather flagging the Council's site-specific concerns that should be recognised through the Site Assessment process of the SA.

**Question 5 – What is the latest position in relation to nutrient neutrality and are there any outstanding objections from Natural England or the Environment Agency to the Plan proposals? If so, what are these and how is the Council working to overcome them?**

- 1.1.18. The Council's latest position within the proposed Main Modifications (GC4m SD003.02) is one of deferral, citing (ref. MM046) that mitigation measures to support development in achieving nutrient neutrality or a reduction will be set out in a Supplementary Planning Document.
- 1.1.19. While the Government are potentially seeking to relax nutrient neutrality rules<sup>1</sup>, this is not yet agreed. As such, the proposal for an SPD to guide mitigation and restoration measures is a deferral of the issue, and does not demonstrate that the plan is effective, and thus sound, per paragraph 35 of the NPPF. In the case that this is not possible, the plan will be ineffective and unable to deliver on the local housing requirement.
- 1.1.20. The latest position statement on nutrient neutrality from Natural England (ref. OD007, dated 28 August 2024) supports the updated policy DP14 (previously DP13), stating they have high confidence that the restoration plan will be in place for the delivery of the allocated sites. However, it is also acknowledged that should the allocations prove to be undeliverable, the Local Plan should be reviewed. As such, to ensure the plan is effective (per NPPF paragraph 35), reserve sites and a trigger mechanism should be identified to secure the ability to act on the possible non-delivery of proposed allocations within the Clun catchment.

**Question 6 – Is the Local Plan's approach to nutrient neutrality justified, effective and consistent with the National Planning Policy Framework (the Framework) and the requirements of HRA?**

- 1.1.21. As per our answer to question 5 above, the Local Plan's approach to nutrient neutrality is not yet justified, and is a deferral of the issue. There is not yet enough evidence, such as an adopted restoration plan and SPD, to provide guidance for proposed sites located within the Clun catchment, meaning their inclusion within the plan should be reviewed. To ensure the plan is effective (per NPPF paragraph 35), alternative sites should be identified, and/or reserve sites and a trigger mechanism should be identified to ensure sufficient sites can be delivered.

**Question 7 – Is the Local Plan period of 2016 to 2038 consistent with national policy? If not, is there justification for these?**

- 1.1.22. Within GC24, the Council considered it was unnecessary to change the plan period as there were a number of disadvantages, including that it may cause unnecessary confusion, and the evidence base is predicated on a 2016 start date. This was in response to ID28, where the Inspectors stated that during the hearing sessions of Matter 1 of Stage 1 of the Examination, the Council agreed to

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<sup>1</sup> <https://www.planningresource.co.uk/article/1881640/labour-government-seeks-change-nutrient-neutrality-rules-unblock-160000-homes>



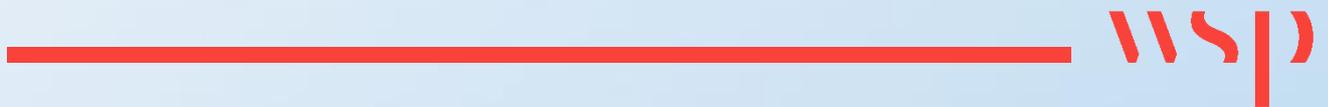
consider whether the Plan period and LHN assessment should be aligned. This demonstrates that there is an outstanding concern relating to the plan period.

- 1.1.23. Paragraph 22 of the NPPF requires strategic policies to look ahead over a minimum 15-year period from the point of adoption. The proposed 22-year plan period of 2016-2038 for Shropshire would not account for this, due to the delays experienced with the examination, and remains based upon the Local Development Scheme adopted in June 2023 (GC37), which assumes adoption in June 2024. Therefore, the plan period will need to be extended to account for this delay, to ensure the strategic policies can sufficiently anticipate and respond to long-term requirements and opportunities.
- 1.1.24. The plan was submitted for examination in September 2021, and produced in line with the expected timescale of adoption per the Local Development Scheme (GC37). There have been a number of changes in circumstance that were not apparent at the time of submission, rendering the plan ineffective and unsound at the start of the examination.
- 1.1.25. The need to extend the plan period has been recently recognised by Solihull Council (SMBC026 – Appendix A), whose plan (submitted May 2021) has experienced a substantial pause in the examination, and it has now been recommended for withdrawal by the Inspectors (ref. SMBC011). Despite this, it was agreed by the Inspectors that the plan period would need to be extended, dependent on timescales for progress. There is, therefore, a precedent for the need to extend the proposed plan period in response to changes to external circumstances over the time the plan has been under examination. This should therefore be the case for the draft Plan currently at examination.

Word count – 2,344 (excluding questions)

# Appendix A

**SMBC026 - SOLIHULL COUNCIL'S  
RESPONSE TO INSPECTORS,  
AUGUST 2024**



# Reviewing the Plan for Solihull's Future

Solihull Local Plan Review

**Examination of the Solihull Local Plan**

**Council's Updated Housing  
Land Supply Position and  
Other Updates**

August 2024



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<b>1.</b>	<b>Contents</b>	
1.	Contents.....	3
2.	Background .....	4
3.	Components of the Land Supply (Part 1) .....	5
4.	Components of the Land Supply (Part 2) the Allocated Sites .....	9
5.	Conclusions on Land Supply .....	12
6.	Extending the Plan Period .....	14
7.	Update on Duty-to Cooperate .....	18
8.	Potential for a Review Trigger .....	21
9.	Comparison to Other Local Plan Examinations .....	23
10.	Conclusion.....	26
	<b>Appendices</b>	
A.	Site Allocation Capacity Updates .....	29
B.	Schedule of Planning Applications on Allocated Sites .....	33
C.	Revised Housing Trajectory .....	37
D.	Housing Trajectory of Site Allocations from Site Promoters/Applicants .....	38
E.	Housing Trajectory of Site Allocations as Moderated by the Council .....	41
F.	Implications for the Stepped Requirement.....	43
G.	Appendix - Report to Planning & Climate Change Cabinet July 2023.....	44
H.	Appendix - Examination of the Wirral Local Plan – Inspectors’ Note.....	45

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## 2. Background

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1. The examination (EiP) of the Solihull Local Plan has effectively been paused since the end of 2022 as a draft NPPF was published in December 2022. An amended NPPF was then formally issued in December 2023.
2. Since the EiP was paused there have been a number of changes in circumstances that the Council believes should be brought to the attention of the Inspectors. These include:
  - An updated land supply position.
  - An updated position on development management activity regarding the site allocations, that will help justify the land supply position.
  - An extension to the plan period that is in recognition of the pause to the examination.
  - An update to the duty-to-cooperate discussions, including agreement with Birmingham City Council regarding the re-profiling of the HMA contribution in the plan.
  - The potential for an early review trigger.
3. This note sets out the latest position on the above matters.
4. Shortly before this statement was submitted, the Government [published](#) draft revisions to the NPPF on the 30<sup>th</sup> July 2024, alongside a suite of other documents and announcements. For the avoidance of doubt, this statement has not been prepared as a response to the draft NPPF as the Council was keen that the submission of this statement was not held up pending an analysis of the new material.

### 3. Components of the Land Supply (Part 1)

5. The latest evidence on land supply submitted to the EiP was in the form of the following documents:
  - [SMBC011](#) – Extending the Plan Period to 2037 (Mar 2022). This was a note in response to the Inspectors Action Point 12.5 in relation to extending the plan period. This note included revised capacities for a number of the site allocations.
  - [SMBC013](#) - Local Plan Sites, Stepped Requirement and 01.04.22 Five Year Land Supply (Apr 2022). This was a note in response to the Inspectors Action Point 12.3, 12.4 and 12.6. The note included a revised housing trajectory using the updated site capacities identified in SMBC011.
  - [M12-011](#) – The Council’s hearing statement for Matter 12 – Housing Land Supply (October 2021)
6. This note seeks to provide an initial updated housing supply figure and trajectory based on that provided in Apr 2022 as amended due to changes in circumstance that have since occurred. It therefore focuses on where there have been known changes.
7. Monitoring work is underway to set out the position as of 1<sup>st</sup> April 2024, but at the time of writing this has not been completed. Therefore, the position as of 1<sup>st</sup> April 2023 (unless otherwise stated) is set out below. This still represents a two-year update on the last evidence submitted to the EiP.

#### Completions

8. SMBC013 noted that completions for 2020/21 stood at 760 dwellings. The figures for 2021/22 and 2022/23 are now available and are 828 and 608 respectively. **Therefore, completions for the 3 years 2020/21 to 2022/23 is 2,196.**
9. The stepped housing requirement (set out in the Inspectors’ letter dated 5<sup>th</sup> September 2022) for the period was 2,151<sup>1</sup>.

#### Planning Permissions

10. Data for planning permissions (both started and not started) are now available for the position as of 1<sup>st</sup> Apr 2023. **These are 813 and 616 respectively.**

#### Land Availability Assessments

11. **Land supply from sites identified in land availability assessments is slightly reduced from 315 dwellings to 310 dwellings.**

#### Brownfield Land Register (BLR)

12. **The land supply from dwellings included on the BLR is now expected to be 23 units.** In the land supply produced in April 2022, this was expected to be 77 dwellings. The amendment reflects the change in status of sites on the BLR, for instance those that have now got planning permission and are now counted in that component of the supply and those that may have had permission that have expired.

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<sup>1</sup> Compromising of 537 for 2020/21, 807 for 2021/22 and 807 for 2022/23.

13. It should be noted other sites that remain on the BLR may be included in the land supply as allocations, and only those with a reasonable prospect of being available and could be viably developed within the plan period have been included.

### **Town Centre Sites**

14. Land supply from town centres was indicated to be 1,093 units – 933 related to Solihull town centre and 100 for Chelmsley Wood town centre.

#### ***Chelmsley Wood Town Centre***

15. Consultation on an updated masterplan for Chelmsley Wood town centre was undertaken in February 2023 and progress has been made with the preparation of a planning application for phase 1 of the development. Residential development is expected in later phases of the development. No change is being made to the anticipated capacity of 100 dwellings.

#### ***Solihull Town Centre***

16. The Solihull town centre capacity was based on the Solihull Town Centre Masterplan ([EiP document reference 105](#)) which was published in 2020.
17. The Council completed purchase of Mell Square in April 2021 and since then has, following a competitive exercise, now appointed Muse<sup>2</sup> as the Council's developer partner for the Mell Square redevelopment<sup>3</sup>. Agreement in principle for the development agreement has been reached and authority to formally enter into the agreement is expected from the Council's Cabinet shortly.
18. Muse commenced public consultation in March 2024<sup>4</sup> on bringing forward the redevelopment proposals for the scheme, the first phase of which could begin as soon as autumn 2025<sup>5</sup>.
19. Previous submissions indicated an expected capacity of 513 units as a result of the Mell Square redevelopment.
20. Work by Muse has now indicated that the Mell Square redevelopment can support a revised capacity of at least 663 units. As a mixed-use scheme, the initial masterplan provides flexibility over the life of the development between commercial, leisure and residential uses subject to market economics prevailing at the time of each phase of development is brought forward. If a largely residential approach were to be adopted, then the scheme has the capacity to extend the yield as far as 1,450 residential units.
21. At the time of writing, and reflecting the essential need to maintain flexibility between land uses until the planning application and subsequent phase reserved matters applications have been prepared, the Council has used a revised capacity for the scheme of 850 units for the benefit of this exercise<sup>6</sup>. This compares with 513 units included in M12-011 – a 337 unit increase.

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<sup>2</sup> Muse is a part of Morgan Sindall, a group of specialist businesses that deliver construction and regeneration across the UK for the public, commercial and regulated sectors - [About Us - Muse \(museplaces.com\)](#)

<sup>3</sup> SMBC News Release 31<sup>st</sup> October 2023: [Mell Square set for radical revamp with major developer on board | solihull.gov.uk](#)

<sup>4</sup> [Mell Square, Solihull - MUSE \(mellsquaresolihull.co.uk\)](#)

<sup>5</sup> MUSE (via FAQs on web site noted in previous footnote) March 2024.

<sup>6</sup> This represents less than 25% of the potential uplift from 663 units to 1,450 units, i.e. a 187 increase from 663 (to 850) compared with the likely limit of a 787 increase (from 663 to 1,450).

22. **The land supply from town centre sites has therefore been amended from 1,093 to 1,430 (an increase of 337 units).**

### **Solihull Local Plan (2013) Allocations**

23. The land supply produced in April 2022 indicated that 3 allocations (totalling 350 dwellings) from the 2103 adopted plan were still to be bought forward; namely:
- Simon Digby – 175 dwellings
  - Riddings Hill – 65 dwellings
  - Meriden Road – 110 dwellings
24. The site at Meriden Road now has planning permission and so is now counted in that source of supply.
25. The Council has gone through a selection process for a developer partner to deliver the Simon Digby scheme. The development agreement is expected to be signed shortly and will be followed by a formal announcement. It is anticipated that a planning application will be ready to submit by the end of the year. This is currently expected to show a small increase (to 177 dwellings) in the capacity of the site.
26. No changes are currently expected for the Riddings Hill site.
27. **The changes noted above will mean that this component of the land supply will now deliver 242 dwellings.**

### **Windfall**

28. No change is being made to the annual rate for windfall developments that has been examined. Within the land supply the 200 units for each of the years 2023/24 and 2024/25 is being removed to avoid double counting with the windfall developments that will now be in the land supply as permissions.

### **UKC Hub**

#### **Arden Cross**

29. Following a competitive exercise, Arden Cross Limited selected Muse as its development partner to bring forward the development<sup>7</sup>. Muse are in the process of updating the masterplan for the site. In the meantime, they are continuing to attract future occupiers, including the University of Warwick who are progressing a ‘HealthTech Campus’ at the site.

*“The Campus will form part of a wider Innovation District at the heart of the £3.2bn regeneration opportunity, facilitated by the HS2 Interchange station in Solihull.*

*The HealthTech Campus will bring together the public, private, and academic sectors to foster an advanced life sciences cluster anchored by the University of Warwick.*

*Sitting at the heart of Arden Cross, the Campus will form part of a new community with homes, retail, public spaces, and wider employment opportunities. Muse, the*

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<sup>7</sup> Arden Cross Ltd News Release 9<sup>th</sup> November 2022 - [Arden Cross Selects Muse as Development Partner - Arden Cross, UK Central](#)

*national placemaker, has been named preferred regeneration partner by Arden Cross Ltd<sup>8</sup>.*

30. The additional evidence submitted to the examination (paragraphs 7 – 9 & 15 of SMBC011 and SMBC 013 paragraph 8) indicated that the supply during the plan period at Arden Cross would be 700 dwellings. At the time of writing, there is no further evidence to suggest that this number should be amended.

**NEC**

31. Birmingham City Council own the freehold of the NEC site and as such need to give approval for the NEC to formally commence the process of selecting a developer partner to bring forward development at the site. The City Council was due to consider a report on the matter last autumn, but before it could do so it issued a [section 114 notice](#) on 5th September 2023. The notice relates to the financial position of the authority, and this has delayed the authority giving authorisation for the NEC to formally seek a developer partner. This is expected imminently.
32. In the meantime, the NEC have been undertaking soft market testing of the opportunity and have indicated significant interest from major developers with a history of substantial regeneration projects. It has been indicated that the attractiveness of the site includes its non-Green Belt location and that it is part of a larger site already serviced.
33. The programme submitted to the examination by the NEC ([SMBC016](#) and [SMBC017](#)) indicated that the developer appointment would be completed by mid-2023 and that the programme included a nine-month contingency. It then went on to show a development programme that would lead to the first completions in 2027/28.
34. A detailed update to the programme from the NEC hasn't (yet) been provided, but given the circumstances outlined above the first completions may be expected at the site in 2028/29. However, the housing supply and trajectory included in this note uses the 500 dwellings from 2031/32 onwards that the Inspectors set out in their letter dated 7<sup>th</sup> September 2022.

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<sup>8</sup> Muse news release 14th March 2024: [University of Warwick to support the delivery of healthtech campus at Arden Cross - Muse \(museplaces.com\)](#)

## 4. Components of the Land Supply (Part 2) the Allocated Sites

35. The most significant change regarding the 18 non-UKC related residential allocations (as listed in the table at paragraph 226 of the [Draft Submission Plan \(2020\)](#)) in that the majority have now been the subject of submissions to the Council’s Development Management team. These submissions can be summarised as follows:
- Fifteen planning applications have been submitted in relation to 11 of the allocations, i.e. over half of them now have formal submissions.
  - The 15 planning applications include proposals for 3,527 dwellings.
  - In addition, 11 pre-application submissions have been lodged for 10 of the allocations.
  - The 11 pre-application submissions include proposals for 2,268 dwellings.
36. **In summary, the Council now has formal applications or pre-application submissions for 17 of the 18 allocations, which in total propose 5,795 dwellings.**
37. Whilst the above relate to submissions and not determinations, they do reflect what applicants/prospective applicants/site promoters believe to be an appropriate capacity for the sites. Whilst these numbers may get amended through the development management process, they do represent an evidential basis for updating the site capacity expectations. A schedule of the planning applications is provided as an appendix to this note.

### July 2023 Cabinet Report

38. As a result of planning applications being submitted, the Council decided to set out its intended approach as to how it would deal with applications given the uncertainty around the adoption of the emerging local plan. The approach was set out in a [report](#) to the Climate Change and Planning Cabinet on 25th July 2023.
39. The report was not seeking to amend or create any additional policy, but to set out a process to enable relevant applications to be considered on a consistent basis whilst the emerging plan was being examined.
40. The executive summary of the report included the following:

*“This report provides an update on the continued progress of the Local Plan Review – Draft Submission Plan (LPR). It is set in the context of the Local Planning Authority having a number of applications to determine and others which may be submitted in advance of the LPR’s adoption which relate to the site-specific policies. As such, this report focuses on how specific policies within the LPR will be applied in the decision-making process in the context of demonstrating Very Special Circumstances and Sustainable Development. This has regard to the Inspectors’ correspondence to date and a recent appeal decision at Tandridge. It is not establishing new policy and it is important to note that any relevant application will be reported to Planning Committee for their decision. All decisions will continue to be made in accordance with national planning legislation and guidance.*

*As part of the Inspectors’ correspondence, however, they have specifically signalled their support in principle (in their interim conclusions) for the Council’s approach to the overall spatial strategy. Further, with the exception of KN2, the Inspectors have indicated that the other residential allocations are “in principle appropriate”. The*

*Inspectors have also supported the council’s housing need calculations and trajectory (in principle) and indicated that the Council has satisfied the Duty to Cooperate.*

*This report intends to help manage some of the uncertainty arising out of the pause in the Local Plan process. It promotes a consistent approach to the interpretation and application (so far as possible) of relevant draft policies of the LPR, in the light of national and local policy on Green Belt, including the demonstration of Very Special Circumstances and Sustainable Development (as identified in national policy and the adopted Local Plan (2013)). This Report sets out a process whereby the Local Planning Authority will work with site promoters and developers of proposed site allocations in advance of the LPR being adopted. This includes a number of specific ‘tests’ that would be applied in a consistent way. They would be focused on: compliance with draft policy; production of agreed masterplans or compliance with initial concept masterplans that support the LPR; delivery of appropriate infrastructure; and overall deliverability of the site in question having regard to the allocation as a whole and early delivery of new homes. If all such tests can be satisfied it is likely this would be afforded significant weight in the planning balance when considering Very Special Circumstances. This Report is, therefore, setting out an objective framework against which a subjective planning judgment can be expressed on a reasonably consistent basis.”*

41. The first of the planning applications for one of the allocated sites that is currently in the Green Belt was reported to Planning Committee in May 2024. It was resolved to grant permission subject to a S106 and the application not being called in following referral of it to the National Casework Unit. It has now been confirmed that the application is not to be called in the permission will be issued once the S106 has been concluded.
42. Informal feedback from site promoters is that the Cabinet report has been received positively, encouraging proposals to be brought forward.

### **A note on Capacities of the Allocated Sites**

43. The note in response to the Inspectors questions about extending the plan period (SMBC011) made the following observations on site capacities of allocated sites, and this still remains the case:
  10. *The table at paragraph 226 of the Draft Submission Plan (document reference 001) sets out anticipated capacities at the allocated sites. As noted in paragraph 240 of the plan:*

*“The eventual capacity of sites will depend on various factors, many of which will need to be addressed at application stage, including detailed design and layout.”*
  11. *As such the capacities should not be seen as either minimum nor maximum, rather they are anticipated capacities based on an understanding of the sites’ opportunities and constraints. The Council has noted that a significant number of the hearing statements from site promoters of allocated sites have suggested that they believe a greater capacity can be achieved on their sites. This would indicate that the Council’s assumptions incorporated into the draft plan could be considered cautious and there is therefore some potential for this to be revisited.*

44. Appendix A sets out an explanation for any changes to individual sites capacities of the site allocations since SMBC011 was produced. **This has resulted in the site capacity from allocated sites to be increased from 5,744 dwellings<sup>9</sup> to 6,593 dwellings, an increase of 849 dwellings.**
45. It should be noted that the figure of 6,593 dwellings does not include the capacity from site NS1 (Kingshurst Village Centre) as it is now included in the supply as a site with planning permission. Were it to be included (to make a more accurate comparison with the April 2022 position) the supply from allocated sites would be 6,642, an increase of 898 dwellings.

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<sup>9</sup> Paragraph 13 of SMBC011.

## 5. Conclusions on Land Supply

46. **Bringing the above together results in an updated land supply of 15,561 dwellings.** This is summarised in the following table and shows a comparison to the land supply produced in April 2022:

### COMPARISON OF HOUSING SUPPLY BETWEEN APR 2022 AND AUG 2024

Changes to Land Supply (2020-37)		Apr-22	Aug-24	Diff
Completions		760	2,196	1,436
Sites with planning permission (started)		1,153	813	-340
Sites with planning permission (not stated)*		1,113	616	-497
Sites identified in land availability assessments*		315	310	-5
Sites identified in Brownfield Land Register*		77	23	-54
Town Centre sites*		1,093	1,430	337
Solihull Local Plan (2013) allocations*		350	242	-108
Less 10% discount of components marked with *		-295	-262	33
<b>Sub total of above</b>		<b>4,566</b>	<b>5,368</b>	<b>802</b>
Windfall		2,800	2,400	-400
UKC Hub - UK1		700	700	0
UKC Hub - NEC		2,240	500	-1,740
Allocated sites (see schedule below)		5,744	6,593	849
<b>Total Supply</b>		<b>16,050</b>	<b>15,561</b>	<b>-489</b>
<b>Site Allocations</b>				
BC1	Barratt's Farm	963	1,158	195
BC2	Frog Lane	110	110	0
BC3	Windmill Lane / Kenilworth Road	132	120	-12
BC4	Pheasant Oak Farm	220	268	48
BC5	Trevallion Stud	253	310	57
BC6	Lavender Hall Farm	80	90	10
BL1 north	West of Dickens Heath	100	90	-10
BL1 south	West of Dickens Heath	285	450	165
BL2	South of Dog Kennel Lane	1,100	1,250	150
BL3	Whitlocks End Farm	330	450	120
HA1	Meriden Road, Hampton in Arden	100	100	0
HA2	Oak Farm, Catherine-de-Barnes	105	95	-10
HH1	School Road	99	100	1
KN1 north	Hampton Road	138	138	0
KN1 south	Hampton Road	60	55	-5
KN2	South of Knowle	660	855	195
ME1	West of Meriden	95	85	-10
NS1	Kingshurst Village Centre	45	0	-45
SO1	East of Solihull	770	770	0
SO2	Moat Lane Depot	99	99	0
<b>Sub total of above</b>		<b>5,744</b>	<b>6,593</b>	<b>849</b>

47. In SMBC011, the Council set out a land supply of 16,050. However, as a result of the Inspectors' views on the capacity of the NEC, the putative land supply emerging from the examination would be reduced to 14,310<sup>10</sup>.
48. Thus, compared with the adjusted figure as a result of the Inspectors concerns, the revised land supply set out in this note would be an additional 1,251 dwellings.
49. **This updated land supply of 15,561 dwellings compares to a housing requirement of 15,873<sup>11</sup> – i.e. just a 312 shortfall.**

### Housing Trajectory

50. A revised trajectory for the components of the land supply and allocated sites is provided in the appendices.
51. In order to prepare this submission, the Council has engaged with site promoters/applicants and they were requested to provide an indication for the delivery trajectory for their sites. This is reflected in the trajectory of promotor submissions.
52. However, when reviewing the submissions the Council was not convinced all would represent a reasonable expectation for the site, and so it has moderated the submissions into the Council's expected trajectory.

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<sup>10</sup> A difference of 1,740 dwellings as the capacity at the NEC was reduced from 2,240 to 500.

<sup>11</sup> Paragraph 4 of the Inspectors' letter dated 5<sup>th</sup> September 2022.

## 6. Extending the Plan Period

53. The Draft Submission Plan (October 2020) was submitted on the basis of having a plan period from 2020 to 2036 (i.e. 16 years).
54. As part of action point 12.5 from the examination the Council were asked to consider the implications of extending the plan period to 2037 to give a 15-year period from adoption. The Council's response was provided in SMBC011 and indicated a plan period of 2020 to 2037, i.e. 17 years. This was on the basis of the plan being adopted in 2022/23.
55. The LHN used when preparing the plan was 816 dpa (see paragraph 221 of the Draft Submission Plan), and this figure was used by the Council when extending the plan period from 2036 to 2037 in SMBC011.
56. As a result of the pause in the examination, the plan could now be adopted in 2024/25 thus adding an addition two years to the plan period to that envisaged when SMBC011 was prepared in March 2022.
57. Through main modifications the plan period could be amended to cover the period 2020-2039 (i.e. 19 years). If this were the case the housing requirement would need to be adjusted.
58. The Inspectors' letter dated 5<sup>th</sup> September 2022 (INS007) indicated at paragraph 4 that through a stepped requirement, the overall requirement should be 15,873. The same letter at paragraph 2 also included the following:

*“The Council's position is that the housing need for Solihull is 816 dwellings per year. This is based on the standard methodology calculation (807 dwellings per year) plus a modest uplift to accommodate the additional employment growth arising from the UK Central Hub proposals. We have concluded that this is justified.”*

59. Thus if 816 dpa is used again in extending the plan period, the revised overall housing requirement would become 15,873+ (816 x 2) = **17,505 dwellings**<sup>12</sup>.

### Additional Housing Supply

60. In line with the approach taken in SMBBC 011 which considered extending the plan period to 2037, consideration has been given to potential additional supply in the period 2037/38 and 2038/39.
61. Previously the following sources of supply were considered:
  - Windfalls.
  - Arden Cross
  - Additional capacity from existing allocations
62. Following the approach taken in SMBC011, an additional two-years of windfall supply can be included. This amounts to 400 dwellings.
63. Arden Cross can be expected to provide an additional 2 years of completions amounting to 200 dwellings.

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<sup>12</sup> This figure includes all of Solihull's own needs (LHN at 816 dpa x 19 years = 15,504 plus the 2,000 contribution towards meeting unmet needs arising in the HMA).

64. The capacities of the existing allocations have already been reassessed, as described in earlier sections of this submission, and no further capacity is included under this section.
65. In addition to the above, consideration has been given to whether supply at the NEC over and above the 500 identified by the Inspectors could be achieved in the extended plan period. The Inspectors concluded that the 500 to be delivered from 2031/32 onwards could form part of the land supply. They also noted that *“redevelopment of the NEC site for housing is in principle an appropriate and justified element of the Local Plan<sup>13</sup>”* and *“the policy associated with the allocation [of the NEC] could still refer to the potential for a higher number of dwellings and there would be no policy restriction on the amount of housing development that could come forward up to this higher number.<sup>14</sup>”*
66. On the basis of the above a further two years supply at the NEC could reasonably be expected to yield 200 dwellings. At 100 dwellings per annum this is broadly in line with the supply the Inspectors concluded could come forward at the end of the originally amended plan period.

#### **Overall Additional Supply 2037-39**

67. The table below provides a summary of additional supply that can be expected to come forward from these sources.

Source	Additional Supply
An additional two years of windfalls developments in 2037/38 and 2038/39	400
An additional two years of completions at Arden Cross in in 2037/38 and 2038/39	200
An additional two years of completions at the NEC in in 2037/38 and 2038/39	200
<b>Total</b>	<b>800</b>

68. This additional supply would result in a land supply over the 17-year plan period (2020-39) of 16,361<sup>15</sup>.

#### **Comparison of Supply to Requirement**

69. **Using a figure of 17,505 dwellings as the housing requirement over the plan period and a revised supply of 16,361, produces a shortfall of 1,144 dwellings.**

<sup>13</sup> Paragraph 17 of 5<sup>th</sup> September 2022 letter.

<sup>14</sup> Paragraph 19 of 5<sup>th</sup> September 2022 letter.

<sup>15</sup> 15,561 + 800

## A New Stepped Housing Requirement

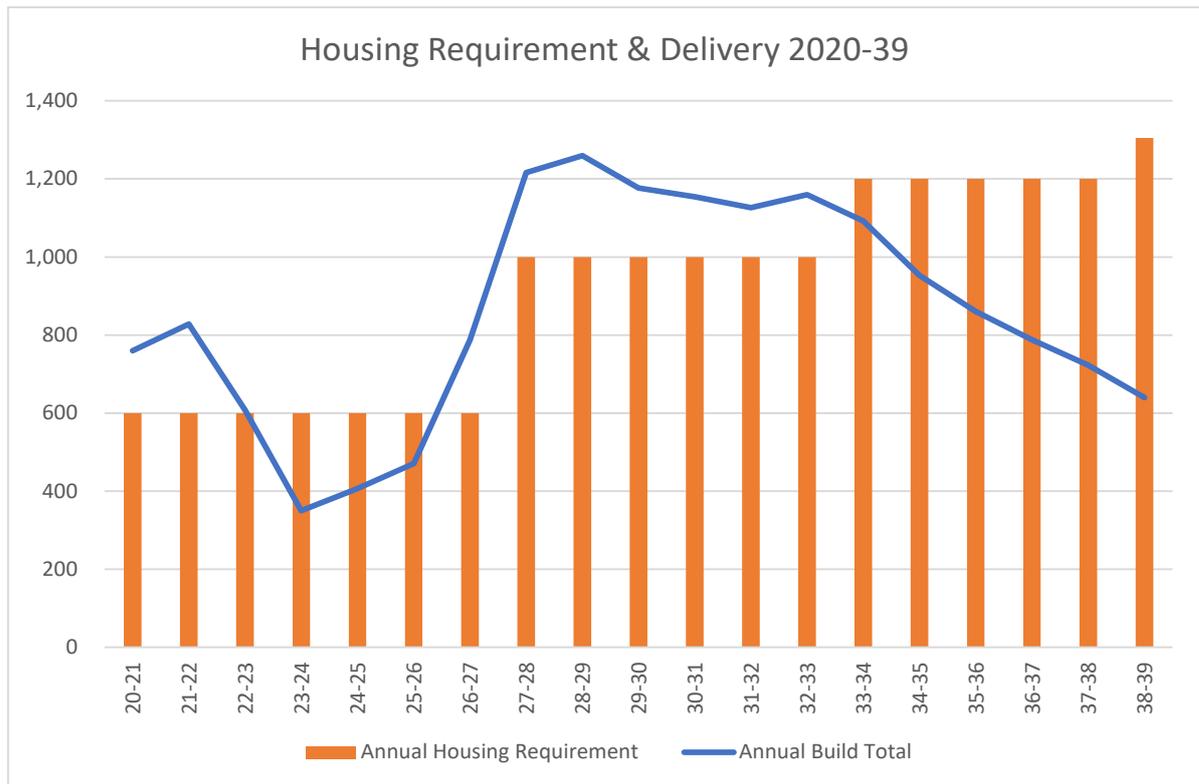
70. The Council’s submission in SMBC013 set out a stepped housing requirement and this was confirmed as acceptable in the Inspectors’ letter dated 5<sup>th</sup> September 2022 (INS007). One of the drivers behind the stepped requirement was that a significant element of the land supply would be from allocations on Green Belt sites. This remains the case, and given the delay in the examination and the likely subsequent impact on site delivery from the allocations, it is considered necessary to amend the stepped requirement to the following:

Delivery Phase	Stepped Requirement	Annualised Requirement
I – 2020-27 (Y1-7) (7 years)	4,200	600
II – 2027-33 (Y8-13) (6 years)	6,000	1,000
III – 2033-38 (Y14-18) (5 years)	6,000	1,200
IV – 2038-39 (Y19) (1 year)	1,305	1,305
<b>Total</b>	<b>17,505</b>	<b>921<sup>16</sup></b>

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<sup>16</sup> As rounded

71. The chart below sets out this annual stepped requirement and compares it with the annual build totals:



## 7. Update on Duty-to Cooperate

### Solihull's 2,000 dwelling contribution to the Housing Market Area

72. The Inspectors' letter dated 11<sup>th</sup> February 2022 (INS005) indicated:
- “As we explained at the last of the scheduled hearing sessions held on 3 February 2022, we have concluded that the Council has complied with the duty to co-operate in the preparation of the Local Plan.”*
73. The Inspectors letter dated 5<sup>th</sup> September (INS007) indicated:
- “The Council has a longstanding commitment to contribute approximately 2,000 dwellings to unmet need in the wider Housing Market Area up to 2030/31, on the basis of the shortfall established in the adopted Birmingham Development Plan. This is made clear in the submitted Local Plan and formed a key element in duty to co-operate discussions and statements of common ground with relevant local planning authorities. The Council has maintained this position throughout the examination. We have concluded that this commitment is necessary to ensure that the Local Plan is positively prepared and justified.”*
74. It remains the case that the Council still intends to include a 2,000 contribution to unmet needs in the wider HMA but has taken the opportunity to explore whether this would need to be provided by 2030/31, particularly as a result of the pause to the examination.
75. As the shortfall being addressed was as a result of the shortfall occurring in Birmingham, discussions have been held with Birmingham City Council and they have agreed the following statement:
- “BCC recognise the current situation regarding the examination of the Solihull Local Plan. BCC notes that the Inspectors have confirmed (letter dated 11th February 2022) that the Council has complied with the duty to co-operate in the preparation of the Local Plan. This is on the basis that the 2,000 dwelling contribution towards the HMA shortfall is met by 2031. Whilst BCC's preferred option is that this position is maintained, it recognises that by re-profiling the stepped housing requirement and housing trajectory, that this may give SMBC additional flexibility in satisfying the Inspectors current concerns. Therefore BCC would not raise an objection to this position as it recognises that it is preferable to have an adopted plan that includes a contribution to the HMA shortfall than having the plan found unsound.”*
76. At the examination hearings, 5 other local planning authorities appeared (or were represented) to make representations on the approach Solihull was taking to the duty-to-cooperate, these were:
- Black Country Authorities (Dudley MBC, Sandwell MBC, Walsall MBC and Wolverhampton CC)
  - South Staffordshire DC
77. Following agreement with Birmingham CC noted above, the same text was presented to the other authorities to seek their feedback.
78. The Black Country Authorities (BCA) responded with this statement:

*“Dudley MBC, Sandwell MBC, Walsall Council and City of Wolverhampton Council (Black Country Councils), recognise the current situation regarding the examination of the Solihull Local Plan. The authorities note that the Inspectors have confirmed (letter dated 11th February 2022) that the Council has complied with the duty to co-operate in the preparation of the Local Plan. This is on the basis that the 2,000 dwelling contribution towards the HMA shortfall is met by 2031. Whilst the Black Country Councils’ preferred option is that this position is maintained, it recognises that by re-profiling the stepped housing requirement and housing trajectory, that this may give SMBC additional flexibility in satisfying the Inspectors’ current concerns. Therefore the Black Country Councils would not raise an objection to this position, provided that the 2,000 contribution is maintained and that this is achieved within the Plan period to 2037, as they recognise that it is preferable to have an adopted plan that includes a contribution to the HMA shortfall than having the plan found unsound. However, the four Councils do request that the Solihull Plan be subject to an early review if it can be evidenced that the housing delivery rate does not deliver against the agreed reprofile.”*

79. South Staffordshire DC confirmed they don’t have an objection to the approach, particularly if the HMA authorities generating the unmet need are content with this approach.
80. Therefore the 2,000 dwelling contribution to the shortfall occurring in the HMA would be provided over the whole plan period.
81. It is considered that the position of the other authorities allows the Council to pursue a pragmatic approach to the HMA shortfall contribution that allows delivery to start sooner than would otherwise be the case.

### Other LPA plans

82. Whilst not directly relevant to the examination of the Solihull Local Plan, it is considered that it is useful context to set out the position with regard to some other Local Plans coming forward in the HMA as follows:
  - **Black Country Authorities** – The examination was advised of the publication of the Draft Black Country Plan (BCP) (July 2021) (doc ref SMBC007). This R18 plan provided for limited Green Belt releases but the areas needs were still not accommodated in full. In autumn 2022 the 4 BCAs took a decision not to progress with a joint plan, but instead to pursue individual local plans.
  - **Dudley MBC** – The Draft Dudley Local Plan was published in October 2023. This R18 plan excludes the Green Belt releases previously included in the BCP and now makes no Green Belt releases and indicates that its own needs cannot be accommodated.
  - **Wolverhampton CC** – The Issues & Preferred Options Consultation on the Wolverhampton Local Plan was published in February 2024. This R18 plan excludes the Green Belt releases previously included in the BCP and now makes no Green Belt releases and indicates that its own needs cannot be accommodated.
  - **Walsall MBC** – Although WMBC has not published a R18 plan since work on the BCP was decided not to be progressed, the leader of the Council has committed to a plan coming forward that will not include any Green Belt land release. It’s not yet clear whether the areas needs will be able to be accommodated in full.

- **Birmingham City Council** – The Birmingham Local Plan Preferred Options was published in July 2024. This R18 makes no Green Belt releases and indicates that the city's needs cannot be met in full.

83. Of course, these plans will in time be subject to their own examinations, but their approach to Green Belt land releases and how their own need (and that of others) is to be accommodated is useful context for this examination.

## 8. Potential for a Review Trigger

84. The Inspectors' letter dated 5<sup>th</sup> September 2022 (INS007) makes the following comments (paragraph 20):

*“This Local Plan should address this issue if it is to comply with the fundamental principles that underpin it and which informed the Council’s duty to co-operate engagement and statements of common ground with other authorities. The alternative of not addressing the issue in this Local Plan and leaving it to a future review is not an appropriate option, given the particular circumstances that apply, notably the commitment to contribute approximately 2,000 dwellings to unmet need in Birmingham up to 2030/31. Such a review would be likely to take considerable time to come to fruition and go through necessary stages of preparation, submission and examination. The Council would need a clear trigger point for a review and to initiate the preparation of a new local plan. The key concern for us is delivery and given that construction starting on site is anticipated to start in September 2025 and first completions expected in October 2027 (see document SMBC016), these would seem to be the most obvious trigger points for a review. Leaving a decision to undertake the preparation of a new local plan to such a time would mean that it is unlikely to be adopted much before 2030/31 and the contribution that could be made to Birmingham’s unmet needs by that date would be limited.”*

85. It seems that a key concern about using a review mechanism in light of the Inspectors' identified shortfall at the NEC was the timing of it and the commitment to providing the HMA shortfall by 2030/31. In particular the lack of time that this would provide between the review date and the time taken to prepare an updated plan.
86. Given the agreement with Birmingham CC (the authority creating the shortfall this plan was intending to address) that the 2,000 contribution could be pre-profiled so that it is spread throughout the plan period rather than it needing to be provided by 2030/31, this gives, in the Council's view, a greater flexibility such that a review mechanism now becomes a reasonable, justified and pragmatic approach to any shortfall that may occur towards the end of the plan period.
87. Should a review mechanism be necessary a policy setting it out could be included as main modification and potential trigger points and back stop date could include the following:
- A review will be undertaken on the need for an update to the plan within 3 years of this plan being adopted.
  - An earlier review will be undertaken will be undertaken in the event that:
    - There are significant changes to the NPPF and/or regulations that require an earlier review.
    - There are significant changes to Local Housing Need as a result of any amendments in how the standard method for calculating LHN is amended.
    - There are significant and persistent shortfalls in housing delivery measured through the Housing Delivery Test.
88. Such an approach would be in accordance with [PPG](#)<sup>17</sup> advice which states:

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<sup>17</sup> PPG: Plan Making (Paragraph: 050 Reference ID: 61-050-20190315)

*“The Inspector will need to work proactively with the local planning authority. Underpinning this is the expectation that:*

*consideration should be given to the option of the local planning authority making a commitment to review the plan or particular policies in the plan within an agreed period, where this would enable the Inspector to conclude that the plan is sound and meets the other legal requirements.”*

89. Similar advice is in the Planning Inspectorates [Procedure Guide for Local Plan Examinations](#), which states<sup>18</sup>:

*“In some circumstances, the Inspector may determine that the plan is unsound as submitted, but that it can be made sound provided that the LPA commit to bringing forward a review/update to it within a defined timescale (See the PPG chapter on Plan-making - paragraph 050). An example might be where further work is needed to identify additional sites for housing in the later part of the plan period, and the further work would involve a lengthy delay to the examination, whereas dealing with the issue through a future plan review/update would enable the plan to be adopted. In such cases a MM to the plan should set out the commitment to a review/update, the matters that will be dealt with, and the date by which it will be submitted for examination. Consultation on that MM, together with any other necessary MMs to the plan, should take place in the usual way.”*

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<sup>18</sup> At paragraph 6.13

## 9. Comparison to Other Local Plan Examinations

90. Consideration has been given as to whether a similar position exists with other plans currently being examined and the approach that Inspector is taking.

### Wirral Council

91. Wirral Council's local plan is currently being examined following its submission in autumn 2022. The Secretary of State appointed Inspectors, Mike Worden BA (Hons) Dip TP MRTPI and Tom Bristow BA MSc MRTPI, to hold an independent examination of the plan.
92. The area covered by the local plan is a mix of an urban area, individual settlements and an area of Green Belt that separates the urban area from the settlement and separates the individual settlements.
93. The plan was prepared on the basis of focussing on the regeneration of Birkenhead and the left bank of the Mersey, and that sufficient brownfield land and opportunities exist within the urban areas of the Borough to ensure that needs can be met over the plan period. The Council therefore concluded that exceptional circumstances to justify alterations to the Green Belt boundaries do not exist in Wirral. An extract from the local plan is provided below to indicate the settlement pattern and extent of Green Belt.

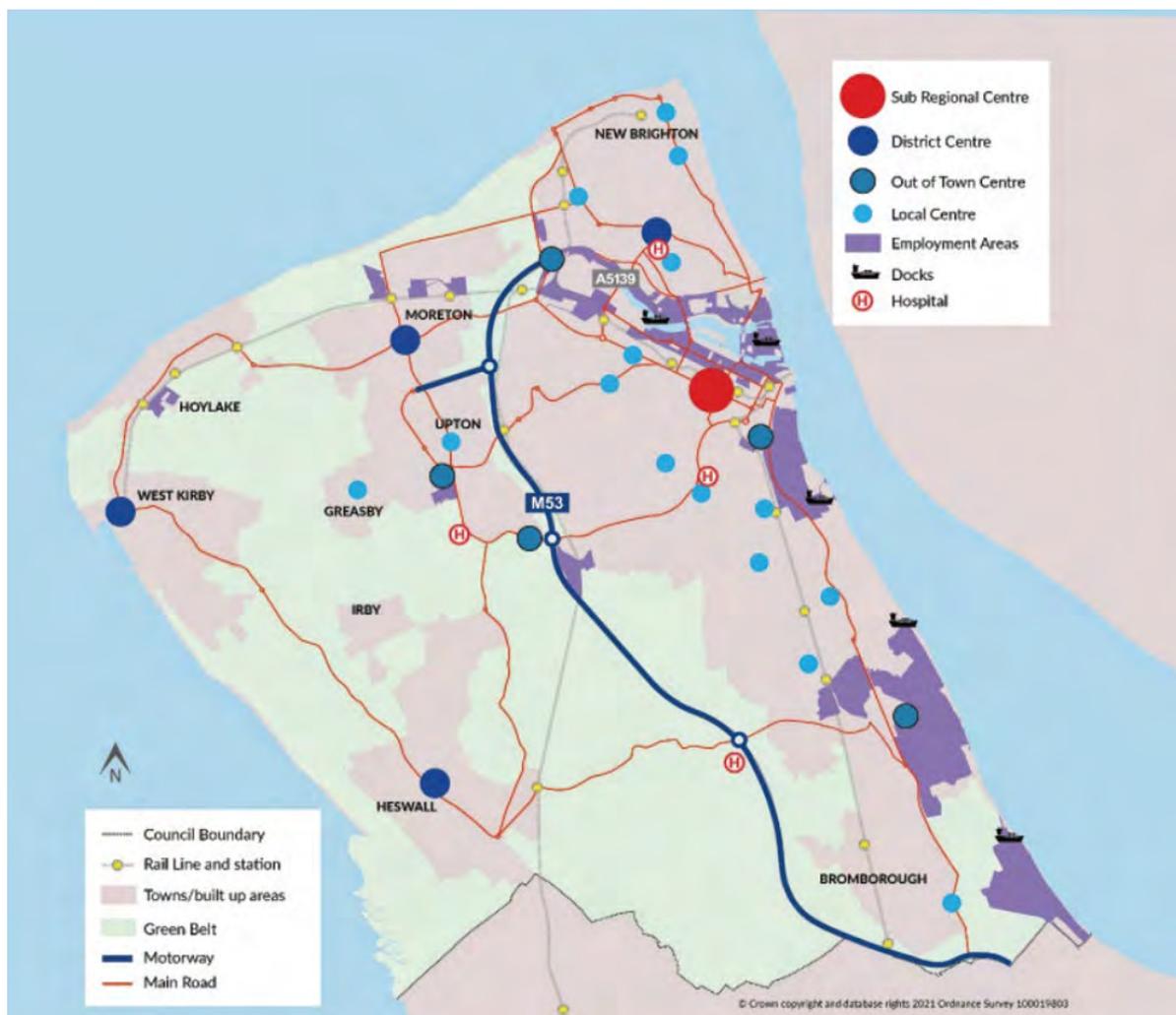


Figure 2.2 form the Wirral Local Plan 2021 – 2037 [Draft Submission Plan](#), May 2022

94. The latest from the Inspectors examining that plan was the issuing of a ‘post hearings note’<sup>19</sup> (dated 4<sup>th</sup> March 2024) that explains:
- “Following the final scheduled hearing session on 2 November 2023, this note sets out our view on certain matters and what should now be done. It reflects, and should be read throughout as, our initial thinking. It is without prejudice to any findings we may ultimately come to.”*
95. At paragraph 5 the housing requirement is set out to be 14,400 dwellings. Paragraphs 10 and 11 indicated:
- The Council’s current position in respect of anticipated supply over the plan period is set out in [WBC046]. We have reviewed the extensive evidence before us and hearing discussions in respect of allowances, site allocations and other deliverable areas (‘ODAs’). In broad terms we are satisfied that some sites and ODAs will likely deliver as the Council anticipate, although others may not.*
- Following on from the above, presently evidence indicates that the Plan is likely to demonstrably enable delivery of around 12,000 dwellings over an 18 year period ...”*
96. Document reference [WBC046](#) is the Council’s Housing trajectory Update (September 2023) which set out (at paragraph 98) an anticipated supply of 17,220 dwellings. Thus, it appears that the Inspectors conclusion on land supply was to reduce it from 17,220 dwellings to 12,000 dwellings, and when compared to the housing requirement, this would result in a shortfall of 2,400 dwellings.
97. At paragraph 14 the Inspectors address the potential for an early review policy as part of main modifications:
- We note that NPPF paragraph 68.b) requires the identification of broad locations for years 11-15 of the plan period ‘where possible’. There is also a statutory requirement for a local plan to be reviewed every five years. The Council have in hand work establishing and refining monitoring indicators. Notwithstanding that context, to ensure that the plan is positively prepared, it should include a policy related to early review. Whilst our report will address soundness in respect of overall housing supply and a stepped trajectory, the Council should work up a relevant early review policy in that respect, by way of suggested MM.*
98. The next steps section of the note (paragraphs 20 & 21) indicates the Inspectors expectations that progress is now made to the main modifications stage.
99. Bringing these threads together it would appear that:
- There is a shortfall in land supply.
  - The Inspectors are not suggesting that sites in the Green Belt need to be identified to bridge the shortfall.
  - The plan should be subject to a policy setting the circumstances when an early review should be undertaken.

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<sup>19</sup> Document reference [INSP015](#), a copy of which is provided as an appendix to this submission.

- The plan is to progress to the main modifications stage, thus implying that the Inspectors do not believe that the shortfall is a fundamental issue that would lead to the plan being found unsound.

100. It is considered that these are similar circumstances to the examination of the Solihull Local Plan.

## 10. Conclusion

### Revised Land Supply and Housing Requirement

101. The previous sections in this submission have indicated that the land supply position that was set out in the April 2022 updates (SMBC011 and SMBC013) has improved such that the shortfall identified by the Inspectors (as a result of their conclusions on the scale and rate of delivery at the NEC) is now in the order of 300 dwellings rather than the 1,740 dwellings that had been identified.
102. However, due to the pause in the examination, it will be necessary to extend the plan period by a further two years. Whilst some additional supply has been identified for the period 2037-39, there will remain a shortfall in the order of 1,150 dwellings. This shortfall is expected to occur towards the end of the plan period.
103. Discussions with HMA authorities who had raised concerns with SMBC’s approach to the DtC at the examination have identified the potential to re-profile the 2,000 dwelling contribution that the plan makes towards meeting unmet needs in the HMA. So, whilst the 2,000 is still incorporated in the housing requirement, there is additional flexibility as to when it would need to be provided by, and it can be spread throughout the plan period.

### Reviewing the Plan

104. Legislation already requires that this plan would need to be reviewed within 5 years of being adopted. It is common practice that early review triggers can be incorporated into a policy in the plan in line with PPG and other advice.
105. Although this statement has not been prepared to address the draft NPPF published at the end of July, it is worth noting that if the NPPF were to be amended in line with the draft then the transitional arrangements<sup>20</sup> indicated would allow the examination to be concluded and the expectation that the Council to *“commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.”*

### Precedent

106. This submission has identified a current local plan examination precedent which is similar to Solihull in that the Inspectors have reduced the land supply the Council believed was available; the supply is now below the requirement; no Green Belt releases have been suggested as necessary to make up the shortfall; and that the shortfall (which occurs towards the end of the plan period) can be addressed through an early review of the plan. The examination of that plan is now moving to the main modifications stage.

### Concluding Remarks

107. The Council remains of the view that the emerging local plan will assist in boosting land supply now, this includes through significant Green Belt releases. Whilst it is seeking to take a positive approach to emerging plan allocations (as set out in the July 2023 Cabinet report), the delivery of the sites will be assisted by having the plan adopted as soon as possible.

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<sup>20</sup> At paragraph 226.

108. It is the Council's view that the plan will be an appropriate strategy, even if it's not the most appropriate strategy, and it would be a pragmatic and reasonable approach for it to move towards adoption through the main modifications stage.
109. The matters raised in his statement could be incorporated into main modifications to the plan which would then be subject to full consultation and all stakeholders would have the opportunity to comment on them; and for the Inspectors to receive and then review those submissions in order to come to a view on whether the plan is sound.

**Appendices**

## A. Site Allocation Capacity Updates

Key to shading:

	Planning application approved or resolution to grant subject to S106
	Planning application submitted
	Pre-application submission made
	No planning application or pre-application advice sought.

Ref.	Site Name	Original Capacity (Oct 2020)	Revised Capacity (Apr 2022)	Revised Capacity (Jul 2024)	Notes
BC1	Barratt's Farm	875	963	1,158	Two planning applications submitted covering majority of allocation. Proposals include: 960 dwellings 120 extra care apartments 122 care home bedspaces <sup>21</sup>
BC2	Frog Lane	110	110	110	One planning application for whole allocation submitted.
BC3	Windmill Lane / Kenilworth Road	120	132	120*	Pre-application submission submitted for whole site for up to 150 dwellings.
BC4	Pheasant Oak Farm	200	220	268	Two planning applications submitted for all of allocation.

<sup>21</sup> 122 bed spaces indicated which at a 1.8 ratio gives 68 dwelling equivalent.

Ref.	Site Name	Original Capacity (Oct 2020)	Revised Capacity (Apr 2022)	Revised Capacity (Jul 2024)	Notes
BC5	Trevallion Stud	230	253	310*	Pre-application submission for residential development of 226 dwellings on 7.47 ha of the 12ha allocation. Includes an illustrative masterplan for whole of BC5 site with this application being 'Phase 1' and the remainder of the site marked for 'phase 2'. Phase 2 estimated to yield around 70 dwellings.
BC6	Lavender Hall Farm	80	80	90*	Pre-application submission submitted for whole site for up to 100 dwellings.
BL1	West of Dickens Heath	350	385	540	Two planning applications covering all of allocation submitted (450 and 90 dwellings).
BL2	South of Dog Kennel Lane	1,000	1,100	1,250*	One planning application covering east part of allocation (550 dwellings) and one pre-application submission covering remainder of allocation (732 dwellings)
BL3	Whitlocks End Farm	300	330	450	Pre-application submission submitted for whole site for c450 dwellings.
HA1	Meriden Road, Hampton in Arden	100	100	100	Planning application submitted for small part of site (26 dwellings) south of SLP allocation and pre-application submission submitted for majority site for 126 dwellings.
HA2	Oak Farm, Catherine-de-Barnes	95	105	95	Two planning applications submitted for whole of allocation (duplicate submissions).
HH1	School Road	90	99	100*	One pre-application submission for whole of site. Three options indicated with capacities of 89, 99 and 102 dwellings.

Ref.	Site Name	Original Capacity (Oct 2020)	Revised Capacity (Apr 2022)	Revised Capacity (Jul 2024)	Notes
KN1	Hampton Road	180	198	193*	Pre-application submission for residential development (140-150 dwellings on main site and 50-60 dwellings on relocated football club). Mid-point of estimates taken for this exercise.
KN2	South of Knowle	600	660	855	Two planning applications submitted for large parts of the site. Proposals include: 450 dwellings 170 extra care units Pre-application submissions also made for the other two parcels of land expected to provide residential development, these are for 200 units and 35 units.
ME1	West of Meriden	100	95	85	Planning application for 75 dwellings covering majority of allocation submitted. Resolution to grant subject to S106 at Planning Committee in May 2024. National Case Work unit indicated application not to be called in. Remainder of site estimated to yield a further 10 dwellings.
NS1	Kingshurst Village Centre	50	45	0	Full planning permission granted Apr 2022 and work commenced on site. Proposals included 79 units which was a net increase of 45 units. Revised capacity here noted as zero as the additional 45 units is now in the land supply under planning permissions.

Ref.	Site Name	Original Capacity (Oct 2020)	Revised Capacity (Apr 2022)	Revised Capacity (Jul 2024)	Notes
SO1	East of Solihull	700	770	770	Planning application covering minority of allocation submitted. Insufficient detail submitted for enough of site to justify revising capacity from that included in SMBC011.
SO2	Moat Lane Depot	90	99	99	No submissions so capacity remains as per SMBC011.
		<b>5,270</b>	<b>5,744</b>	<b>6,593</b>	

111. It should be noted that the above table records the planning application or pre-application submissions that have been made. In some circumstances the site promoters/applicants subsequent response for information on an updated trajectory has seen a slight amendment in relation to some site capacities. These are indicated with an asterisk \* in the column 'revised capacity (Jul 2024)' in the table above. The table in section 5 of this submission uses the most up-to-date figures.

**B. Schedule of Planning Applications on Allocated Sites<sup>22</sup>**

Local Plan Review Site	Application Reference	Description	Date Validated	No. of dwellings
BC1 – Barretts Farm (Majority Site)	PL/2023/01520/PPOL	Outline planning application with all matters reserved except access for the erection of up to 970 residential dwellings including affordable housing (use Class C3), the construction of the length of the Balsall Common Relief Road between Station Road and Waste Lane, including new vehicular access points off Station Road and Waste Lane, extension to the station car park, a neighbourhood and local centre including a care home and care or retirement accommodation (use Class C2), a community building (use Classes E(a)(b)(c)(d)(e), F1(d)(e), F2(a)(b) and C3), a primary school and pre-school (use classes E(f) and F1(a)), public open space and associated infrastructure.	27/07/2023	Up to 970 dwellings, including 40% affordable and 60-bed care home & 30 extra care/assisted living apartments
BC1 – Land at Oxhayes Close (Part Site)	PL/2023/00963/PPFL	Full planning application for the construction of an integrated retirement community of up to 90 extra care units (use class c2) and a 62 bedroom care home (use class C2), with ancillary communal and care facilities, means of access, landscaping, open space and all other associated works and infrastructure.	21/07/2023	62 bed care home + up to 90 extra care units.
BC2 – Land at Frog Lane (Whole Site)	PL/2023/02248/PPOL	Outline application for the erection of up to 110 dwellings, including affordable housing, together with a vehicular access from Balsall Street East; pedestrian/cycle access from Frog Lane; blue and green infrastructure including sustainable drainage, children's play areas and ecological area; ancillary structures such as a foul water pumping station; associated infrastructure and the demolition of the existing dwellings (means of access only for consideration).	25/10/2023	Up to 110 x C3 dwellings with 40% affordable.
BC4 – Land at Catchems	PL/2023/02281/PPOL	Outline application for the erection of up to 18 dwellings, the formation of associated vehicular	01/11/2023	Up to 18 dwellings – C3 housing

<sup>22</sup> Those allocation which relate to sites to be released from the Green Belt.

Local Plan Review Site	Application Reference	Description	Date Validated	No. of dwellings
Corner (Part Site)		and pedestrian access onto Waste Lane, highway improvements, parking, landscaping, drainage features, open space, and associated infrastructure (All matters reserved except for access into the site from Waste Lane).		
BC4 – Pheasant Oak Farm (Majority Site)	PL/2023/02214/PPOL	Outline application for residential development (up to 250 homes, including 40% affordable) with vehicular access off Waste Lane; demolition of existing buildings/structures; associated landscaping and new public open spaces; community growing area/orchard; and enhancements to Millennium Way through the site	25/10/2023	Up to 250 x C3 houses with 40% affordable.
BL1 – Land North of Tythe Barn Lane	PL/2024/00728/PPFL	Residential development of up to 90 dwellings, associated development including site infrastructure, associated works, landscaping, public open space, sustainable drainage system and vehicular access off Tythe Barn Lane.	17/04/24	90 dwellings
BL1 - Land South of Tythe Barn Lane (Majority Site)	PL/2023/02656/PPOL	Outline application for erection of up to 450 dwellings (Class C3), including affordable housing and custom/self-build homes, together with a care or retirement home accommodation (Class C2); vehicular accesses from Tythe Barn Lane, Birchy Leasowes Lane and Tilehouse Lane; roundabouts at the junctions of Tilehouse Lane/Tythe Barn Lane and Tilehouse Lane and Birchy Leasowes Lane; vehicular/pedestrian/cycle accesses from Tythe Barn Lane, Tilehouse Lane and Birchy Leasowes Lane; a footway/cycleway on land to the north of Tythe Barn Lane; blue and green infrastructure including sustainable drainage, children's play areas, incidental greenspaces and ecological areas; ancillary structures such as a foul water pumping stations and sub-stations; associated infrastructure and the demolition of the existing sports club and stables structures (All matters reserved except for access).	20/12/2023	Up to 450 dwellings, including 40% affordable and element of care home/assisted living (TBD with LPA)

Local Plan Review Site	Application Reference	Description	Date Validated	No. of dwellings
BL2 – Land south of Dog Kennel Lane	PL/2024/00598/PPO	Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Stratford Road and Dog Kennel Lane for: up to 550 dwellings (comprising use Classes C3 and C2), public open spaces and children's play areas, ecological habitats, sustainable drainage features, walking and cycle routes, highway improvements, and ancillary works.	09/04/24	550 dwellings
HA1 – Meriden Road, Hampton in Arden	PL/2024/00975/PPFL	Erection of residential dwellings (Use Class C3) with associated public open space and infrastructure.	03/06/24	26 dwellings
HA2 – Oak Farm, Catherine-de-Barnes	PL/2023/01173/PPOL and PL/2024/00976/PPOL	Outline application for residential development for the construction of up to 95 dwellings with associated infrastructure and open space with all matters reserved except access.	26/05/2023 and 11/06/2024	95 dwellings
KN2 – Land South of Knowle (Majority Site)	PL/2023/02294/PPOL	Outline planning application for access with all other matters reserved for the construction of up to 450 houses, provision of land for primary School, infrastructure, engineering works, open space and associated works	01/11/2023	Up to 450 (C3) dwellings, inc. 40% affordable.
KN2 – Stripes Hill House (Part Site)	PL/2023/00222/MAJFDW	Hybrid planning application for the construction of an integrated retirement community of up to 170 extra care units (use class c2) with ancillary communal and care facilities and green space consisting of: (a) Full planning application for approximately 48 extra care units including the village centre (Use class c2), means of access, landscaping, open space and all other associated works and infrastructure; and (b) Outline planning application (all matters reserved except access) for up` to approximately 122 extra care units with ancillary community space, gardens, green space, landscaping and all other associated works including demolition of stripes hill house and infrastructure.	07/02/2024	Care village: Up to 170 Extra Care apartments including: 48 Extra Care apartments; Up to 122 Extra Care Units + ancillary care.
ME1 – Land at Maxstoke Lane (Majority Site)	PL/2022/02282/PPFL	Development of 75 affordable dwellings and associated works on land at Maxstoke Lane	26/10/2022	75 dwellings, all affordable.

<b>Local Plan Review Site</b>	<b>Application Reference</b>	<b>Description</b>	<b>Date Validated</b>	<b>No. of dwellings</b>
SO1 – Land North of Lugtrout Lane (Part of Site)	PL/2024/00037/PPOL	Outline planning application for up to 50 dwellings involving the demolition of existing agricultural buildings, with all matters reserved except access	15/01/2024	Up to 50 x C3 dwellings

### C. Revised Housing Trajectory

113. The housing trajectory below replaces that provided in SMBC013 at page 6.

Row	Source	Capacity	Supply	Trajectory																			
				Y1-Y3			Y4-Y8					Y9-Y19											
				20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	36-37	37-38	38-39	
	COMPLETED SITES 2020-23		2,196	760	828	608																	
ROW 1	Sites with planning permission (started)	813					350	317	100	46													
ROW 2	Sites with planning permission (not started)	616						100	122	120	89	77	76	32									
ROW 3	Sites identified in land availability assessments	310								2	140	168											
ROW 4	Sites identified in Brownfield Land Register	23							15	8													
ROW 5	Town Centre Sites	1,430										125	125	125	125	175	175	125	125	125	125	80	
ROW 6	Solihull Local Plan Allocations	242									60	65	52	0	30	35	0	0	0	0	0		
ROW 7	Less a 10% discount (Rows 2-6)	-262	-262				0	-10	-14	-13	-29	-44	-25	-16	-16	-21	-18	-13	-13	-13	-13	-13	-8
	SUBTOTAL (Rows 1-7)						350	407	223	163	260	392	228	141	140	189	158	113	113	113	113	72	
ROW 8	Windfall	2800	2,800						200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
ROW 9	UKC HUB	900	1,600	UK1											100	120	120	120	120	120	100	100	
		700		NEC											83	83	83	83	83	85	100	100	
ROW 10	ALLOCATED SITES TO 2039			BC1	1158					90	120	85	85	85	85	90	90	90	90	90	90	68	
				BC2	110						30	40	40										
				BC3	120							30	40	40	10								
				BC4	268							38	35	50	50	50	45						
				BC5	310							15	48	48	48	48	48	7					
				BC6	90							20	50	20									
				BL1	540					30	90	60	60	60	60	60	60	60					
				BL2	1250							70	120	120	120	120	120	120	120	120	120	100	
				BL3	450	6,593					50	100	100	100									
				HA1	100								50	50									
				HA2	95						50	45											
				HH1	100					40	50	10											
				KN1	193							30	40	80	43								
				KN2	855				48	25	183	100	136	100	88	50	50	50	25				
				ME1	85						80	5											
				SO1	770					30	20			110	110	110	110	110	110	60			
				SO2	99											45	54						
	Annual Total			760	828	608	350	407	471	788	1,216	1,260	1,177	1,154	1,127	1,160	1,093	953	861	788	723	640	
	Cumulative Total			760	1,588	2,196	2,546	2,953	3,424	4,212	5,428	6,688	7,865	9,019	10,145	11,305	12,398	13,350	14,211	14,998	15,721	16,361	

**D. Housing Trajectory of Site Allocations from Site Promotors/Applicants**

114. The information provided in this appendix is taken from the site promotors/applicants submissions as part of the Council’s engagement exercise. It sent a request to each promotor/applicant seeking the following proforma to be completed. These were then compiled into a single spreadsheet which then follows.

Solihull Local Plan - Site Allocation Trajectory Data Collection

Allocation Site																																					
Outline application submitted																																					
Outline application determined																																					
Full/Hybrid/RMapplication submitted																																					
Full/Hybrid/RMapplication determined																																					
Actual or currently expected commencement on site																																					
Actual or currently expected first completion on site																																					
Housing Trajectory (completions expected in each of the years indicated)	<table border="1"> <tr><td style="background-color: #00a0e3; color: white;">2024/25</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2025/26</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2026/27</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2027/28</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2028/29</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2029/30</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2030/31</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2031/32</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2032/33</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2033/34</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2034/35</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2035/36</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2036/37</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2037/38</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2038/39</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2039/40</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2040/41</td><td></td></tr> <tr><td style="background-color: #00a0e3; color: white;">2041/42</td><td></td></tr> </table>	2024/25		2025/26		2026/27		2027/28		2028/29		2029/30		2030/31		2031/32		2032/33		2033/34		2034/35		2035/36		2036/37		2037/38		2038/39		2039/40		2040/41		2041/42	
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2036/37																																					
2037/38																																					
2038/39																																					
2039/40																																					
2040/41																																					
2041/42																																					
Site Capacity	0																																				

### Housing Trajectory - Site Allocations - Promotor/Applicant Submissions

Site Ref	Site	Promotor	Outline Submitted	Outline Determined	Full/Hybrid/RM Submitted	Full/Hybrid/RM Determined	Commencement	First Completion	Total
BC1A	Barratt's Farm	Colchurch	Jul-23				Jul-05		970
BC1B	Barratt's Farm	Restful Homes			May-23		2025/26	2026/27	90
BC2	Frog Lane	Richborough	Oct-23				Spring 25	Summer 25	110
BC3	Windmill Lane / Kenilworth Road	Catesby Estates	Mar-25	Oct-25	Jun-26	Dec-26	Mar-27	Sep-27	120
BC4A	Pheasant Oak Farm	Barwood	Oct-23	Summer 24			Q3 2025	Q2 2026	250
BC4B	Pheasant Oak Farm	Rainier	Oct-23				2025/26	2026/27	18
BC5	Trevallion Stud	Tillia Homes	Late 2024		Late 2025				310
BC6	Lavender Hall Farm	JP Weaver	Q4 2024	Q2 2025	Q3 2025	Q1 2026	Q2 2026	Q4 2026	90
BL1A	West of Dickens Heath (south)	Richborough	Dec-23		Apr-24		Spring 25	Summer 25	450
BL1B	West of Dickens Heath (north)	Persimmon					2025	2025	90
BL2A	South of Dog Kennel Lane (east)	Richborough/ZF	Mar-24				2025/26	2026/27	550
BL2B	South of Dog Kennel Lane (west)	Taylor Wimpey	Sep-24	Sep-25	Nov-25	Sep-26	Jan-27	Jul-27	700
BL3	Whitlocks End Farm	Real Christmas Trees Ltd	Jul-24				Q3 2025	Q1 2026	750
HA1	Meriden Road, Hampton in Arden	c/o Stansgate					2029	2030	100
HA2	Oak Farm, Catherine-de-Barnes	Cala Homes	May-23				Autumn 25	Summer 26	95
HH1	School Road	Norton Developments	Jul/Aug 2024	Oct/Nov 2024	Jul/Aug 2025	Oct/Nov 2025	Jan/Feb 2026	Jun/Jul 2026	100
KN1A	Hampton Road (north)	Hampton Road D'ments	Winter 2024	Winter 2025	Spring 2026	Summer 2026	Winter 2026	Spring 2028	138
KN1B	Hampton Road (south)	Knowle FC							0
KN2A	South of Knowle	Inspired Villages			Feb-23		2025	2026	170
KN2B	South of Knowle	Taylor Wimpey							0
KN2C	South of Knowle	Kler	Nov-23				Q3 2025		450
KN2D	South of Knowle	PDR Developments							0
ME1A	West of Meriden	RCA Regeneration			Oct-22	Jun-24	Aug/Sep 24	Aug/Sep 26	75
ME1B	West of Meriden	R Singh							10
SO1A	East of Solihull (south Lugtroat Lane)	SMBC and Others		May-27		Nov-28	Jul-28	Jul-30	775
SO1B	East of Solihull (north Lugtroat Lane)								0
SO2	Moat Lane Depot	SMBC							99
UK1	Arden Cross	Muse					2028	2031/32	700
UK3	NEC	NEC							0
<b>Total</b>									<b>7210</b>

## Housing Trajectory - Site Allocations - Promotor/Applicant Submissions

Site Ref	Site	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42	Total
BC1A	Barratt's Farm		22	108	174	196	239	152	79											970
BC1B	Barratt's Farm			90																90
BC2	Frog Lane		30	40	40															110
BC3	Windmill Lane / Kenilworth Road				30	40	40	10												120
BC4A	Pheasant Oak Farm		20	35	50	50	50	45												250
BC4B	Pheasant Oak Farm			18																18
BC5	Trevallion Stud			15	48	48	48	48	48	48	7									310
BC6	Lavender Hall Farm			20	50	20														90
BL1A	West of Dickens Heath (south)		30	60	60	60	60	60	60	60										450
BL1B	West of Dickens Heath (north)		30	60																90
BL2A	South of Dog Kennel Lane (east)			20	53	53	53	53	53	53	53	53	53	53						550
BL2B	South of Dog Kennel Lane (west)				50	67	67	67	67	67	67	67	67	67	47					700
BL3	Whitlocks End Farm		50	100	100	100	100	100	100	100										750
HA1	Meriden Road, Hampton in Arden						50	50												100
HA2	Oak Farm, Catherine-de-Barnes			50	45															95
HH1	School Road			40	50	10														100
KN1A	Hampton Road (north)					30	40	40	28											138
KN1B	Hampton Road (south)																			0
KN2A	South of Knowle		48		48		36		38											170
KN2B	South of Knowle																			0
KN2C	South of Knowle		25	50	50	50	50	50	50	50	50	25								450
KN2D	South of Knowle																			0
ME1A	West of Meriden			75																75
ME1B	West of Meriden		5	5																10
SO1A	East of Solihull (south Lugtroat Lane)							110	110	110	110	110	110	115						775
SO1B	East of Solihull (north Lugtroat Lane)																			0
SO2	Moat Lane Depot									45	54									99
UK1	Arden Cross								60	60	60	65	65	65	65	65	65	65	65	700
UK3	NEC																			0
<b>Total</b>		<b>0</b>	<b>260</b>	<b>786</b>	<b>848</b>	<b>724</b>	<b>833</b>	<b>785</b>	<b>693</b>	<b>593</b>	<b>401</b>	<b>320</b>	<b>295</b>	<b>300</b>	<b>112</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>65</b>	<b>7210</b>

## E. Housing Trajectory of Site Allocations as Moderated by the Council

### Housing Trajectory - Site Allocations - Council's Revisions

Site Ref	Site	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	Total
BC1A	Barratt's Farm				85	85	85	85	85	90	90	90	90	90	90	68	1033
BC1B	Barratt's Farm			90	35												125
BC2	Frog Lane			30	40	40											110
BC3	Windmill Lane / Kenilworth Road				30	40	40	10									120
BC4A	Pheasant Oak Farm			20	35	50	50	50	45								250
BC4B	Pheasant Oak Farm			18													18
BC5	Trevallion Stud				15	48	48	48	48	48	48	7					310
BC6	Lavender Hall Farm				20	50	20										90
BL1A	West of Dickens Heath (south)			30	60	60	60	60	60	60	60						450
BL1B	West of Dickens Heath (north)		30	60													90
BL2A	South of Dog Kennel Lane (east)				20	53	53	53	53	53	53	53	53	53	53		550
BL2B	South of Dog Kennel Lane (west)				50	67	67	67	67	67	67	67	67	67	47		700
BL3	Whitlocks End Farm			50	100	100	100	100									450
HA1	Meriden Road, Hampton in Arden						50	50									100
HA2	Oak Farm, Catherine-de-Barnes			50	45												95
HH1	School Road			40	50	10											100
KN1A	Hampton Road (north)					30	40	40	28								138
KN1B	Hampton Road (south)							40	15								55
KN2A	South of Knowle		48		48		36		38								170
KN2B	South of Knowle				50	50	50	50									200
KN2C	South of Knowle			25	50	50	50	50	50	50	50	50	25				450
KN2D	South of Knowle				35												35
ME1A	West of Meriden			75													75
ME1B	West of Meriden			5	5												10
SO1A	East of Solihull (south Lugtroat Lane)							110	110	110	110	110	110	60			720
SO1B	East of Solihull (north Lugtroat Lane)			30	20												50
SO2	Moat Lane Depot									45	54						99
UK1	Arden Cross								100	120	120	120	120	120	100	100	900
UK3	NEC								83	83	83	83	83	85	100	100	700
<b>Total</b>		<b>0</b>	<b>78</b>	<b>523</b>	<b>793</b>	<b>733</b>	<b>749</b>	<b>813</b>	<b>782</b>	<b>726</b>	<b>735</b>	<b>580</b>	<b>548</b>	<b>475</b>	<b>390</b>	<b>268</b>	<b>8193</b>

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115. The yellow shading to the site reference/site description indicates that a planning application has been submitted.
  116. Not all site promoters responded to the request and therefore the Council has made assumptions about the delivery of the sites in question based on other submissions and the trajectory previously provided.
  117. Most of the Council's amendments from the promoters/applicants submissions were to push back the date completions are expected to first occur on a site.
  118. The site promotor submissions for the two applications at BC1 didn't include provision for the care homes included as part of the planning application submission. These have been included in the Council's moderated version.

**F. Implications for the Stepped Requirement**

119. The following table is provided as a replacement to the table at paragraph 9 of SMBC013. It indicates the stepped requirement proposed in April 2022, and compares this to the revised annual build totals and cumulative build total. The figures in green indicate delivery ahead of the requirement and figures in red indicate where delivery falls behind the requirement.

	Y1-Y3			Y4-Y8					Y9-Y19										
	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	36-37	37-38	38-39
Annual Build Total	760	828	608	350	407	471	788	1,216	1,260	1,177	1,154	1,127	1,160	1,093	953	861	788	723	640
Cumulative Build Total	760	1,588	2,196	2,546	2,953	3,424	4,212	5,428	6,688	7,865	9,019	10,145	11,305	12,398	13,350	14,211	14,998	15,721	16,361
Annual Housing Requirement	537	807	807	807	807	807	1,281	1,281	1,281	1,281	1,281	816	816	816	816	816	816	816	816
Cumulative Housing Requirement	537	1,344	2,151	2,958	3,765	4,572	5,853	7,134	8,415	9,696	10,977	11,793	12,609	13,425	14,241	15,057	15,873	16,689	17,505

120. To address the issue that delivery falls behind the requirement (due to the large component of the land supply being reliant on sites that are currently in the Green Belt) this submission indicates a revised stepped requirement. This revised stepped requirement is indicated in the table below which again compares the requirement to build totals.

	Y1-Y3			Y4-Y8					Y9-Y19										
	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	36-37	37-38	38-39
Annual Build Total	760	828	608	350	407	471	788	1,216	1,260	1,177	1,154	1,127	1,160	1,093	953	861	788	723	640
Cumulative Build Total	760	1,588	2,196	2,546	2,953	3,424	4,212	5,428	6,688	7,865	9,019	10,145	11,305	12,398	13,350	14,211	14,998	15,721	16,361
Annual Housing Requirement	600	600	600	600	600	600	600	1,000	1,000	1,000	1,000	1,000	1,000	1,200	1,200	1,200	1,200	1,200	1,305
Cumulative Housing Requirement	600	1,200	1,800	2,400	3,000	3,600	4,200	5,200	6,200	7,200	8,200	9,200	10,200	11,400	12,600	13,800	15,000	16,200	17,505

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## **G. Appendix - Report to Planning & Climate Change Cabinet July 2023**

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121. A copy of the Cabinet report has been supplied as a separate pdf to this statement. Alternatively, the report can be accessed [here](#).

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## **H. Appendix - Examination of the Wirral Local Plan – Inspectors’ Note**

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122. A copy of the Inspectors’ note has been supplied as a separate pdf to this statement. Alternatively, the report can be accessed [here](#).

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