

DRAFT SUBMISSION PLAN – FAQs

This document brings together a set of FAQs that are intended to help with the publication of the Draft Submission Plan

1.	Time Frame	1
2.	Arrangements for Making Representations	1
3.	Housing Numbers	3
4.	Brownfield Land	3
5.	Green Belt	4
6.	Affordable Homes	4
7.	Gypsy & Traveller Accommodation	5
8.	Climate Change	5
9.	Biodiversity	6
10.	Health	6
11.	HS2	6
12.	Infrastructure (in general)	6
13.	Transport Issues	7
14.	Flooding	8
15.	Household Waste & Recycling Centre (HWRC)	9
16.	Government Consultations on Planning Reforms	9
17.	Additional Questions	9

1. Time Frame

1. **What is the time frame for the plan?** The plan will run from 2020 to 2036.
2. **When will the plan be next updated?** Whilst the plan is expected to have a 15 year post adoption time horizon, all local plans must be reviewed every 5 years to ensure they are up to date. If the review identifies significant changes in circumstances (so that the plan is no longer up to date), then a new plan will be required.

2. Arrangements for Making Representations

3. **What is the purpose of the publication?** Previous consultations have shaped the plans contents, what we are looking for now are representations on the soundness and legal compliance, rather than general comments on the plan or preference of one site over another for example.
4. **What happened to previous consultations?** Previous consultations have shaped the nature and content of this plan, and comprehensive summaries of all previous consultations will be submitted as part of the plan’s examination. They are also available on the Councils website having previously been presented to Cabinet meetings and Scrutiny Board where necessary.
5. **What does soundness cover?** This relates to whether the plan has been positively prepared (meeting needs), is justified (being an appropriate strategy based on proportionate evidence), is effective (deliverable over the plan period), and is consistent with national policy.

6. **How can I make representations?** The Planning Inspectorate advises using a model form for making representations and we have based ours on the one that they have issued. Furthermore by using our on-line portal this will help capture the right information that will help the independent examiner when he or she comes to examine the plan (see question 13)
7. **Can I object to a site being included?** Yes. Please use the policy reference number to highlight which site you are objecting to and in your representations you should seek to set out why you believe including the site would not be 'sound'. For instance you may believe its inclusion is not justified, it may not be deliverable or you believe it is not consistent with national policy.
- For sites that are currently located in the Green Belt, rather than objecting simply on the basis that they are currently located in the Green Belt it is likely an examiner would wish to understand your views on whether there are exceptional circumstances for releasing the site from the Green Belt.
8. **Can I object to a site being excluded?** Yes Please use the 'call for sites' reference number used in the site assessments to highlight which site you are referring to. Like the above question, your representations should seek to set out why you believe excluding the site is not sound.
9. **What is meant by legal compliance?** This includes ensuring that all legal procedures have been properly followed and includes the duty to cooperate, whilst this is not a duty to agree, we must be able to demonstrate effective and on-going cooperation with others, most notably our neighbours in the Housing Market Area.
10. **Why is only six weeks being given to comment on the plan?** This is the (minimum) requirement set out in legislation and is considered appropriate given the stage we are at. There have already been three consultations about the plans contents in 2015, 2016 and 2019, the last two of which were specific about which sites may be included. These consultations generated more than 3,000 responses, which have all been taken into account when producing this version of the Plan¹. At this stage there are no new sites being included, although some boundaries and masterplan principles have been amended in response to the consultation responses previously received. We have already given stakeholders the 'head up' about the publication of the plan and the document produced for Cabinet & Council is already being reviewed by interested parties. Given the uncertainties around potential changes to the planning system, which may have different transitional arrangements to those set out in the consultation, it is prudent to continue as soon as possible.
11. **What arrangements are being made to make sure communities are aware of the publication?** We use a database of interested persons and groups, including those who have commented previously, and write to them or email them. We also write to the occupiers of houses adjacent to allocated sites. In addition to which we use the Council's stay connected alert service and social media.
12. **What arrangements are being made to engage with communities?** We will need to monitor Covid restrictions to see what is possible, but we will have planning officers available to help with telephone queries and we are looking to conduct live Q&As via social media.

¹ 2015 Issues and Options generated approx. 170 responses. 2016 draft plan generated approx. 1,750 and the 2019 consultation exercise generated approx. 1,100 responses, In total approx. 3,020.

13. **What will the Council do with my representation?** All representations will be reviewed by Council officers, the Leader and Cabinet Member (as outlined in the recommendations to Full Council). They will then be sent to the Planning Inspectorate alongside the Plan and the evidence base for independent examination. All representations made to the Plan will be reviewed by the nominated Inspector and there will be an opportunity for those who have made representations to participate within the public hearings, whether that be verbally and/or through further written hearing statements.
14. **What would prevent the Plan being submitted to a Planning Inspector?** The council will have full regard to all representation made at this stage of the process. If representations raise significant points regarding legal compliance or a need to make significant changes which would affect the context or deliverability of the Local Plan, and which, as a result require the Plan to be amended then the Plan may need to be brought back to Full Council for review and further consultation.

3. Housing Numbers

15. **Why do we have to contribute to the housing shortfall from other authorities when we are an area constrained by Green Belt?** There is a legal duty to cooperate and studies done across the whole area have shown that urban areas cannot accommodate the need and other areas will also have to release Green Belt.
16. **How many new houses will be built?** Over the plan period, the policy is seeking to accommodate around 15,000 new dwellings, which amounts to 938 new homes each year.
17. **What is being done to meet the needs of the Borough's aging population?** The draft submission plan introduces a new policy 'Housing for Older and Disabled People' (policy 4e). This will require that,
- i. On major developments (10 or more homes or a site of 0.5 hectares or more) all homes must be built to higher accessibility standards (as defined in Building Regulations)
 - ii. All major developments must provide at least 5% of homes that are suitable for wheelchair users (as defined in Building Regulations)
 - iii. All developments of 300 dwellings or more must provide specialist housing or care bedspaces
18. **How are we providing a more appropriate range of housing types and sizes to meet future needs?** We have commissioned a Housing and Economic Development Needs Assessment, which breaks down the different kinds of housing that is needed to meet the needs of the future population. This takes into account existing housing stock and different types of households, as well as what will be expected in the future.

4. Brownfield Land

19. **How many homes are being constructed on brownfield land?** At least 44% of the known total land supply will come forward from brownfield sites (also known as previously developed land – PDL). Although at this stage we don't know what windfall sites there will be, these are typically PDL sites and so once their contribution is taken into account the total supply from PDL sites will be around 50%.
20. **Have we ensured all brownfield land has been exhausted?** We have to produce a brownfield land register and have sought to maximise its use. This included carrying out

additional steps above and beyond the legal minimum requirements – an additional focussed call for sites and publishing it for consultation. All potential sites have been considered and included where appropriate.

5. Green Belt

21. **Why does so much Green Belt have to be released?** We have prioritised non Green Belt land first in the site selection process, but there isn't enough to meet our needs. The acute housing need provides the exceptional circumstances needed to change Green belt boundaries.
22. **How much Green Belt land is being released?** In total all of the proposed allocations relating to Green Belt sites amount to approximately 574ha² out of a Borough total of approximately 11,945ha. This represents 4.8% of the total. This does not mean that all of this land will be developed, as areas of open space and other green/blue infrastructure will be provided in these allocations. Furthermore some areas of land being removed from the Green Belt are already occupied by buildings, for instance the existing Arden Academy campus.
23. **What Green Belt compensation is being proposed?** This will be environmental and access improvements. Where possible this will be close to where the development takes place.
24. **How are we protecting the Meriden Gap?** Whilst some development will take place in the area between Solihull and Coventry, we have focussed on the land that makes least contribution to the purposes of including land in the Green Belt so the integrity of the land that remains is protected.

6. Affordable Homes

25. **What do we mean by affordable housing?** National planning guidance defines this as 'housing for sale or rent, for those whose needs are not met by the market'. In Solihull this has meant social rented and shared ownership housing.
26. **What is social rented housing?** Rents are set in accordance with the Government's rent policy and are significantly below market values. Social rented homes are let to people on the Council's housing waiting list.
27. **What is shared ownership?** This is where a person part buys and part rents. An initial share of the property (minimum 25%) is purchased from the Council or a housing association, who hold the remaining equity. The Council/housing association charges rent on the proportion they own. Shared owners can buy further shares in their home when they can afford to do so, and ultimately own it completely - a process known as 'staircasing'.
28. **What are First Homes?** On 6 August Government announced that these will be introduced. First Homes will be sold at a discount of at least 30%. When the home is sold, the discount will always be passed onto the new owner with the discount applied to the new value. Revised national planning guidance will require that a minimum of 25% of all affordable housing secured through developer contributions should be First Homes.
29. **Are First Homes Part of the Plan?** First Homes are not a part of this Local Plan as under transitional arrangements government has said that local plans submitted for Examination within 6 months of the policy being enacted will not need to reflect First Homes policy requirements.

² This relates to site areas and in some locations the new GB boundary uses a defensible boundary beyond the site.

7. Gypsy & Traveller Accommodation

30. **Are new sites for gypsy & travellers being included?** Not as part of this plan, but the Council will be updating its G&T Development Plan Document and will take into account a refreshed G&T Accommodation Assessment (GTA) which will be published shortly. The GTAA has been delayed due to difficulties and engaging with the G&T community during the covid-19 crisis.

8. Climate Change

31. **How is the plan responding to Climate Change?** The plan seeks to both reduce carbon emissions and mitigate against the effects of climate change.

To reduce emissions:

- Developments will be located in accessible locations for sustainable transport, or improve the existing provision as well as being well-connected for cyclists and pedestrians.
- New homes and commercial buildings will be energy efficient, and a percentage of residual energy required for new homes will come from low carbon or renewable sources.
- Electric charging points will be required for new housing and commercial developments.

To mitigate effects:

- New development will contribute to biodiversity net gain and green infrastructure, which will provide new wildlife habitats and capture carbon.
- We will seek the highest standards for water efficiency, avoid flood risk zones and where possible, seek solutions that will provide betterment for existing communities.
- Waste from new development will be minimised.

32. **What is a zero carbon home?** The meaning of zero carbon in planning terms has changed several times over the last decade. We will be requiring homes that are the equivalent of 'Code Level 5', this means the energy required to run the home will be zero carbon.

33. **Why not lifetime zero carbon?** We want the plan to be at the forefront of technology in reducing the energy required to build and run homes and our commercial buildings to net zero carbon. However, there are still some ways to go, and there will be some energy required in low carbon-impact construction e.g. producing recycled materials. We will encourage applicants to consider the lifetime impact of not just the operation but also the construction of buildings.

34. **How has air quality been taken into account?** The policies that tackle climate change will also have a beneficial effect on air quality, such as electric charging vehicle points on new dwellings and reducing the overall need to travel by private car. A policy on air quality will be included in the plan, and supported by a Health SPD.

35. **How will the plan reduce air pollution?** The Plan will work to minimise the causes of air pollution such as transport emissions, and minimise exposure to air quality impacts. Some causes of air pollution, such as those related to agriculture and air travel, are not necessarily

within the scope of the Plan, but measures that mitigate air pollution will be given significant weight.

9. Biodiversity

36. **How does biodiversity net gain work?** The Council will continue to use the biodiversity metric, which measures the existing biodiversity on a site against the proposed development of a site. Developers will be required to implement measures that will increase the biodiversity value by at least 10%. This can be through e.g. new/improved habitats as well as contributions to larger scale green infrastructure that is beneficial to people and wildlife.

10. Health

37. **How will the Plan take Health and Wellbeing into account?** The Plan will update the existing policy on Health and Wellbeing and be supported by a Health SPD. Applications for significant developments will be required to submit a Health Impact Assessment. These will consider issues such as access to health facilities, availability of green spaces, promotion of active travel and the quality of building. They will cover aspects of both mental and physical health and wellbeing. The wider Plan has been subject to Sustainability Appraisal, which includes an assessment of health and wellbeing impacts.

11. HS2

38. **When is HS2 going to open?** HS2 Ltd has said the line will open between 2029 & 2033.

12. Infrastructure (in general)

General

39. **What plans are in place to improve local infrastructure (schools, health services etc.) for the proposed housing sites?** The Local Plan will be supported by a strategic Infrastructure Delivery Plan, which sets out the infrastructure needs related to growth and development, as well as more detail in the concept masterplans. New primary schools, with early years and SEN provision will be built to support the new communities as well as improvements/extensions to secondary schools where required. The Council have been working with the CCG (Clinical Commissioning Group) to understand the impacts of the proposed development and the additional services that will be required.
40. **Will the required infrastructure be in place before development takes place?** Infrastructure will be required to be in place in a timely manner to meet the needs of the development.
41. **How will we ensure that funding from the Community Infrastructure Levy will go to the communities that are taking their share of development?** Parish Councils will continue to receive directly 15% or 25% of the levy collected in their area, dependent upon whether they have a neighbourhood plan in place. Elsewhere, the levy raised in non parished wards will be spent through the Neighbourhood CIL process that invites groups to bid for the funds.

Schools

42. **Are there enough school places?** In locations where significant cumulative growth is proposed it has been identified that new primary schools will be required. The plan indicates that these schools will be required to serve Balsall Common, the Blyth area,

Knowle and the UK Central Hub area, and these are included in the concept masterplans. The new schools will be developed to include provision for Early Years and additionally resourced provision to provide for pupils with Special Educational Needs. The new schools will be developed on a timeline that matches the strategic site developments to ensure that there is no impact on other local neighbouring schools. **Elsewhere** the additional demand will be accommodated initially by the use of existing capacity through the natural contraction in the numbers of pupils being offered places from outside of a school's catchment area or where necessary additional facilities could be added at existing schools.

43. **Are there enough secondary school places?** On the whole there are sufficient numbers of secondary schools so no new ones are proposed and the additional demand will be accommodated by a combination of additional facilities at existing schools and/or using existing capacity through the natural contraction in the numbers of pupils being offered places from outside of a school's catchment area. (For the UK Central Hub area, any further expansion in dwelling numbers over the longer term may result in the need for new secondary school places, potentially through a new free school).
44. **Is the Arden Academy being relocated?** The planned approach to site KN2 (formerly known as site 9) include plans for the academy to be relocated within the wider site as part of a through school initiative (that includes new primary school accommodation). The opportunity will be taken to ensure facilities are available for wider community use and the new access will be off Warwick Road, thus alleviating the problems that currently exist on Station Road.

Doctors Surgeries etc

45. **How have the needs for health services been taken into account?** The Council has worked with the Clinical Commissioning Group to identify additional health requirements for the Borough based on the growth set out in the plan. This will need to be aligned with the CCG's 'Sustainability and Transformation Plan' and may require infrastructure improvements and contributions from developments.

Open Space

46. **What is being done to ensure that developments will have enough Green Space given the value of such areas during the pandemic?** Each concept masterplan includes public open space and play areas that will be required for each development. Connected green infrastructures will a key component of new developments. The Plan also provides opportunity for the creation of larger country Parks and access to the countryside.

13. Transport Issues

47. **How will additional road traffic be addressed, particularly as congestion is already a problem in the area?** Congestion is, and certainly will be by 2036, an issue in most areas across the Borough; insofar as possible, sites have therefore been located in close proximity to key public transport nodes, e.g. rail stations.

The Plan is supported by a strategic traffic assessment and more-localised traffic and parking assessments around Blythe, Knowle/Dorridge and Balsall Common. A balanced package of mitigation measures will be required in these areas, with the primary focus being on delivery of active travel and public transport improvements, with highways interventions being considered where absolutely necessary. It should also be noted that, legally, infrastructure brought forward in association with the Local Plan can only mitigate the impacts of that Plan; the Local Plan cannot be used to resolve existing issues.

The Council have been working with Transport for West Midlands to ensure that sustainable transport options are in place, such as improved bus services and better access to railway stations/increased Park and Ride capacity. New sites will also connect to key routes in the Local Walking and Cycling Infrastructure Plan and be supported by Travel Plans.

48. **Balsall Common By-pass?** The plan makes provision for a by-pass to be provided to the east of the settlement. It will provide vehicular access to the Barratt's Farm development and the plan is seeking its early delivery. The bypass would enable Kenilworth Road, as it passes through the centre of the village, to be downgraded and enhanced through public realm, pedestrian and cycle infrastructure improvements.
49. **How has Transport evidence informed the site allocations and Plan as a whole?** The transport evidence base has been developed and published in an iterative manner, proportionate to the various stages of development of the Local Plan, in line with guidance. Accessibility analysis was undertaken to inform the broad locations in which development would be better placed, with the results of this analysis being published accordingly. This initial stage of work led towards the prioritisation of sites in close proximity to public transport nodes (in particularly railway stations).

Subsequent stages of assessment have focused on understanding in detail the localised implications of various specific sites, along with the cumulative impact of the plan as a whole. The primary purpose of doing so is to inform considerations regarding site viability, and therefore selection, to ensure that the Plan is sound. Given the nature of local plan development, in which transport impacts are not the only factor that can influence considerations regarding sites and their capacity, an iterative approach is taken to testing various sites and assessing localised and cumulative impacts. This stage of the process is particularly expensive, and has therefore been undertaken in a way that provides best value for the public purse; i.e. analysis undertaken, but not necessarily converted into public-friendly reports. This approach was adopted as repeatedly reporting on ever-changing assumptions regarding sites is both cost exhaustive and potentially misleading if published, as those reports would be made immediately redundant when further iterations are tested. It is this reporting process that is currently under way; like many other aspects of the Local Plan evidence base, the analysis has been completed with subsequent reporting nearing completion.

A comprehensive approach has been taken to developing the transport evidence base, with both macro- and micro-level impacts assessed. Strategic, multi-modal transport modelling has been undertaken to inform the Local Plan development, along with detailed analysis relating to the traffic and parking impact of specific sites, particularly in the Knowle / Dorridge, Dickens Heath and Balsall Common areas. Mitigation measures have been identified, where considered necessary, with the primary focus being towards the delivery of active travel interventions, and better accommodating access to public transport (in line with the conclusions of the previously-mentioned Accessibility Analysis).

14. Flooding

50. **How will new developments be protected from flooding?** A Strategic Flood Risk Assessment has been published showing the areas of the Borough that are at risk of flooding. Most of the proposed development sites are in areas with very low risk. A more detailed Level 2 assessment has been undertaken for a number of sites where there may be a risk, to ensure vulnerable areas are protected. These assessments have informed the concept masterplans.

15. Household Waste & Recycling Centre (HWRC)

51. **Is the HWRC being relocated?** The Council has not yet made a decision on whether the existing HWRC should be relocated, and if so where to. It recognises that there are limitations at the existing site and has started to look at options to overcome these. This may include relocating the centre to another site.
52. **Where is the HWRC being relocated to?** As part of the options assessment a site search has been undertaken and site UK2 at Damson Parkway has been identified as a potential location. To keep options open, and to be transparent, the plan identifies this as an option.
53. **Will the HWRC be definitely moving to Damson parkway?** No. Much more work needs to be done before this position may be reached, and this will include the need for a planning application to be submitted. It would be at the planning application stage that detailed technical studies, on for instance transport & highways impacts, would need to be prepared to support the proposals.

16. Government Consultations on Planning Reforms

54. **What impact will the Government reforms have?** The Changes to the current planning system would see Solihull's own needs being increased by around 20%, and therefore it is preferable to make use of the transitional arrangements and use the current standard methodology calculation.
55. **Why are we still progressing with the plan?** There is much detail still to be worked up before any changes could be brought into effect. In particular about how any further amendments to the standard methodology may be made, and how the methodology may make adjustments to take into account local constraints, eg the Green Belt, in setting a binding requirement on an area. These potential reforms will continue to be closely monitored, and at any point before the plan (which is the subject of this report) is adopted it becomes clear that pursuing a plan under the new regime is more beneficial to the Borough, then it remains an option to withdraw the current plan, but in the meantime it is prudent to continue. The direction from government is to continue with the Plan given the stage we are at.

17. Additional Questions

Any additional FAQs that may arise during the representations period will be added here in updates to this document.