

# **Solihull Local Plan Review**

## **Draft Submission Plan**

### **Regulation 22 (1) (c) Statement**

#### **Appendix A**

**Summary of Main Issues Raised by Regulation 18 Consultation (Draft Local Plan – 2016) and the Council's Responses.**

**May 2021**

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## 1. Introduction

1. This document has been prepared to fulfil the requirement of Regulation 22 (1) (c) (iii) & (iv) of the Town & Country Planning Local Plan Regulations. It sets out the main issues raised in the 2016 Regulation 18 consultation on the Draft Local Plan and how those representations were taken into account.
2. The document uses the summary of representations published in July 2017 with the addition of a paragraph under each section setting out the Council's response to the representations. This additional text is shown blue to help differentiate it.

### Background

3. In July 2015 the Council decided that instead of pursuing a Local Area Plan (LAP) for potential development around the HS2 Interchange, it should be pursued through a review of the Solihull Local Plan (SLP) which was adopted December 2013. Two further factors also pointed to an early review of the plan; namely to deal with the legal challenge to the housing requirement in the SLP and to address the housing shortfall that is occurring in the wider housing market area.

### Scope, Issues and Options Consultation (Nov 2015)

4. The first stage of the LPR consultation took place from 30<sup>th</sup> November 2015 to 22<sup>nd</sup> January 2016. At this stage views were invited on the scope of the review, the issues that ought to be taken into account and the broad options for growth that ought to be considered.
5. The consultation document (available [here](#)) set out the key issues/questions and broad options for accommodating the anticipated growth. A summary of the representations and the Council's responses to them can be found [here](#).

### Draft Local Plan (Nov 2016)

6. Consultation on the Draft Plan commenced on 5th December 2016 and finished on the 17th February 2017. The consultation was originally scheduled to run until 30th January 2017, but was extended in recognition that there had been updates to the evidence base studies that were published after the consultation commenced.
7. A copy of the Draft Local Plan can be found [here](#), and the evidence base to support the local plan review can be found [here](#).

### Next Steps

8. The next stage in the plan making progress is for the Council to publish the submission version of the plan – this is the version the Council intends to submit to independent examination. The consultation responses to the Draft Local Plan will help shape the next version of the plan.
9. Prior to being submitted for examination the plan will be subject to consultation and the representations made at that stage will be the focus of the examination. It is anticipated that the submission version of the plan will be published towards the end of the year.

## 2. Publicity for the Consultation

### Letters, Emails and Publicity

10. Over 1,300 emails/letters were sent to all stakeholders on the Local Plan Consultation Database, including all those who had made submissions in the 'Call for Sites' exercise and those on the Council's Self-Build and Custom Build Register. This informed them of the Draft Local Plan (DLP) consultation, detailed where to get further information (including dates of drop-in sessions) and explained how to respond.
11. Nearly 1,200 Letters were sent to those with property/land located either within or adjacent to one of the proposed site allocations. This outlined the Local Plan Review process and explained how to respond.
12. Stakeholders were given the option of responding to the consultation through an online consultation response portal, electronically by email or by post.
13. The DLP and associated documents were available for inspection at Council (Connect) offices and all libraries within the Borough.
14. DLP summary leaflets were prepared and distributed to libraries, Council (Connect) offices and Parish Councils. Councillors and Council Officers also made these leaflets available at all consultation events.

### Web-based communication and Social Media

15. A link to the DLP consultation was available on the homepage of the Council's website.
16. The DLP and all evidence base documents were available to view on the Planning pages of the Council's website, including a link to the on-line consultation response portal, details of where to get further information and alternative ways to respond.
17. The DLP and the consultation were promoted through Solihull 'Stay Connected' – a free email alert service that provides Council updates to registered users and were also publicised on the Council's 'Get Involved' Website.
18. The DLP and the consultation were promoted through the Council's Twitter and Facebook accounts:
  - 43 tweets were sent out during the 11 week consultation period reaching a potential audience of many thousands.
  - The Facebook post on 6 December 2016 had 11 'shares' and reached 4,734 people. The Facebook post on 10 February 2017 had 34 'shares' and reached 21,097 people.

### Press Coverage

19. Press releases were issued by the Council.
20. Articles providing information on the DLP consultation and potential site allocations were published in the Solihull Observer and Solihull News over the course of the consultation period.

## Engagement with Stakeholders

21. Council Officers participated in a wide range of publicity and engagement events during the consultation on the DLP. This provided an opportunity for residents and stakeholders to raise queries regarding the proposals set out in the DLP prior to making a formal response. This included weekday/weekend drop in sessions/exhibitions in the following locations:
- Balsall Common library
  - Bluebell Centre, Chelmsley Wood
  - Dickens Heath library
  - Hockley Heath parish forum
  - Knowle library
  - Lighthall School, Shirley
  - Shirley town centre
  - Solihull town centre
22. All parish councils and neighbourhood forums were invited to briefings that took place in the Bluebell Centre and Solihull (The Core).

### 3. Respondents & Representations

23. There have been a total of 1,750 respondents to the consultation. These raised 6,320 representations in total. Each individual or organisation making a response is known as a 'respondent' and makes a single 'submission'. Each submission is reviewed to see how many of the consultation questions have been addressed and each one that has been is recognised as an individual 'representation'. So a single respondent can make multiple representations depending on the number of questions addressed.
24. Of the representations made, 1,153 were in support of the policy/allocation and 5,165 raised objections.

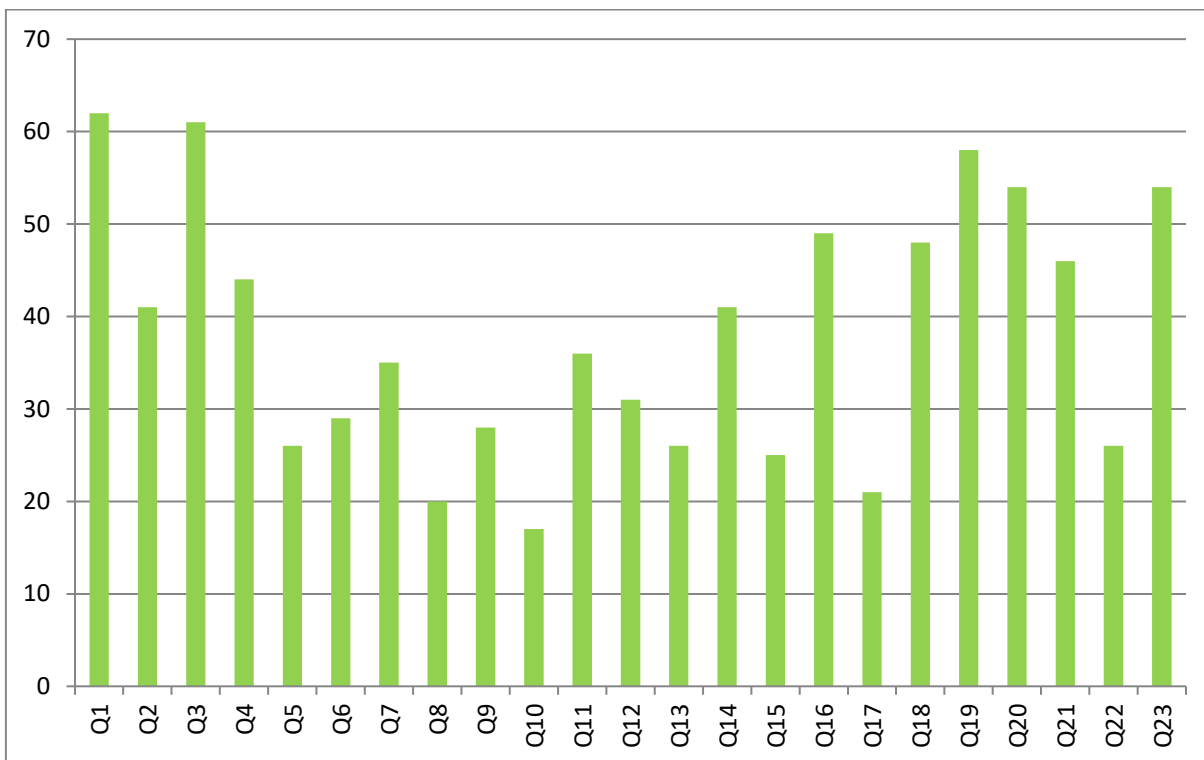
#### Summary table - Questions

<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q1 – Challenges	62	78	0
Q2 – Vision	41	95	0
Q3 – Spatial Strategy	61	187	0
Q4 – Policy P1 UK Central Hub Area	44	29	0
Q5 – Key Objectives of Policy P1	26	19	0
Q6 – Policy P1A Blythe Valley Park	29	13	0
Q7 – Policy P2 Maintain Strong Competitive Town Centres	35	45	1
Q8 – Scale and Location of Development (Town Centres)	20	15	0
Q9 – Policy P3 Provision of Land for General Business and Premises	28	26	0
Q10 – Scale and Location of Development (General Business)	17	20	0
Q11 - Policy P4 Meeting Housing Needs	36	93	0
Q12 - Level of Affordable Housing	31	66	0
Q13 - Self and Custom Housebuilding	26	21	0
Q14 – Number of New Homes	41	142	0
Q15 - Location of New Homes	25	333	1
Q16 - Infrastructure Requirements	49	800	0

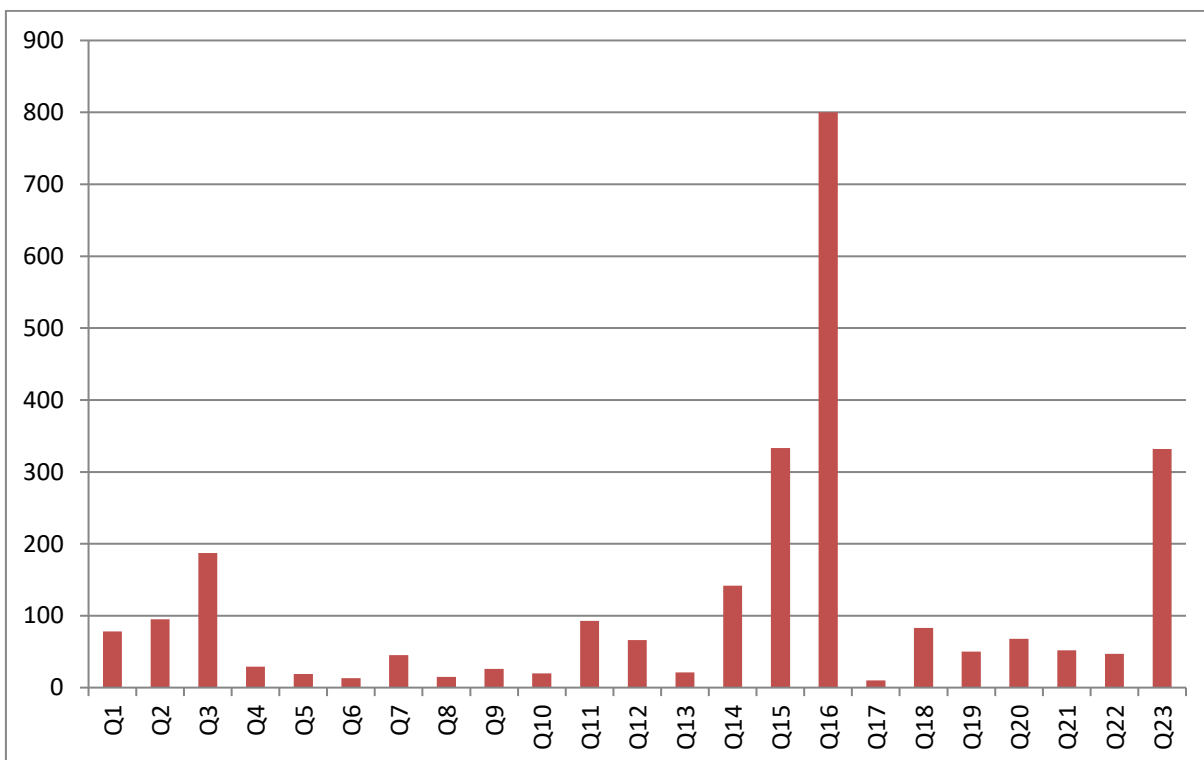


<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q17 – Policy P6 Provision of Sites for Gypsies and Travellers	21	10	0
Q18 – Improving Accessibility and Encouraging Sustainable Travel	48	83	0
Q19 – Protecting the Environment	58	50	0
Q20 – Quality of Place	54	68	0
Q21 – Health and Supporting Local Communities	46	52	0
Q22 – Policy P21 Developer Contributions and Infrastructure Provision	26	47	0
Q23 – General Comments	54	332	0

25. The following chart indicates the level of support for each of the subject areas set out in the questions. The questions are generally phrased ‘do you agree with the approach as set out in the plan, if not why not?’



26. The following chart indicates the level of objection for each of the subject areas set out in the questions.



**Key to Question Numbers:**

Q1 – Challenges

Q2 – Vision

Q3 – Spatial Strategy

Q4 – Policy P1 UK Central Hub Area

Q5 – Key Objectives of Policy P1

Q6 – Policy P1A Blythe Valley Park

Q7 – Policy P2 Maintain Strong Competitive Town Centres

Q8 – Scale and Location of Development (Town Centres)

Q9 – Policy P3 Provision of Land for General Business and Premises

Q10 – Scale and Location of Development (General Business)

Q11 - Policy P4 Meeting Housing Needs

Q12 - Level of Affordable Housing

Q13 - Self and Custom Housebuilding

Q14 – Number of New Homes

Q15 - Location of New Homes

Q16 - Infrastructure Requirements

Q17 – Policy P6 Provision of Sites for Gypsies and Travellers

Q18 – Improving Accessibility and Encouraging Sustainable Travel

Q19 – Protecting the Environment

Q20 – Quality of Place

Q21 – Health and Supporting Local Communities

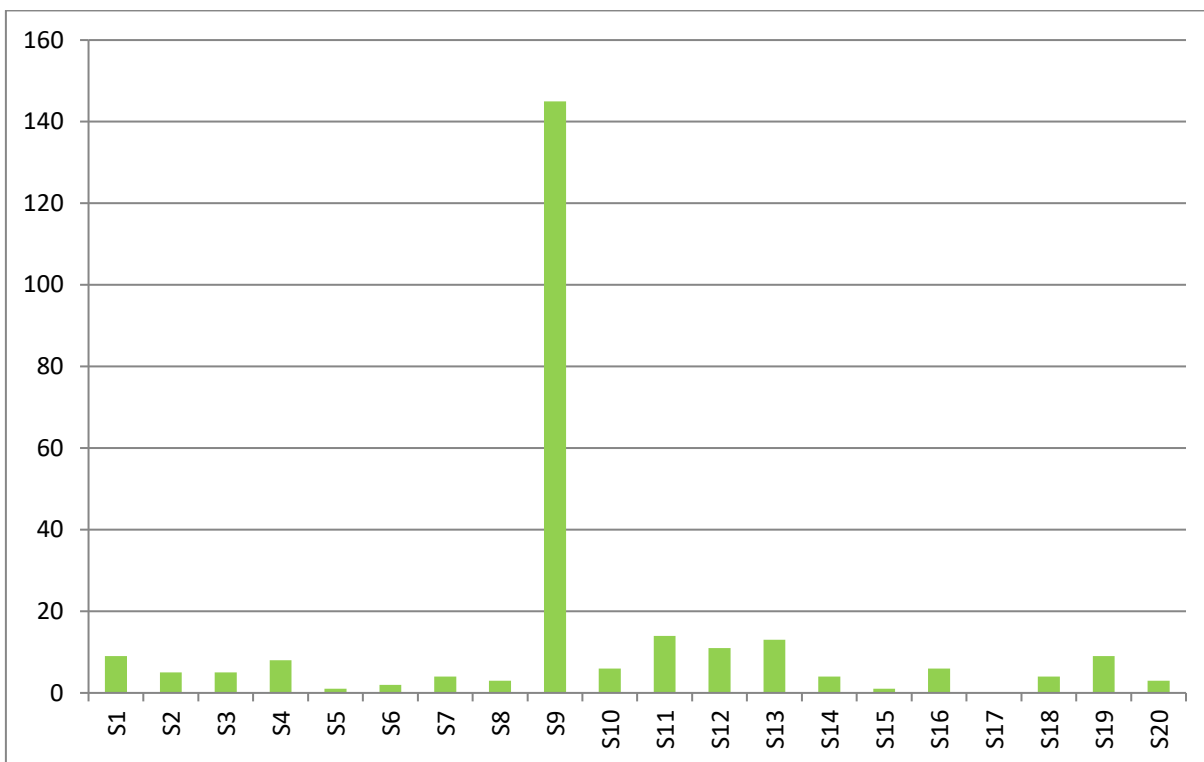
Q22 – Policy P21 Developer Contributions and Infrastructure Provision

Q23 – General Comments

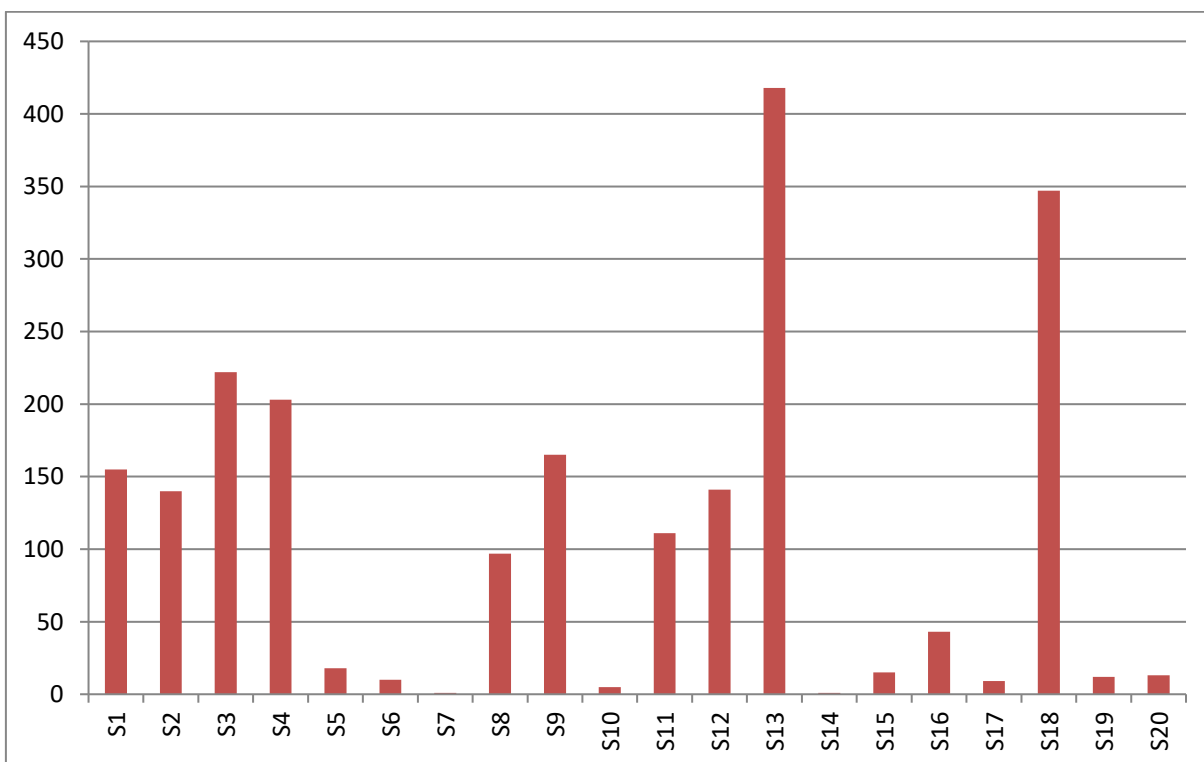
**Summary table – Allocated Sites**

<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Site 1 – Barratt’s Farm, Balsall Common	9	155	0
Site 2 – Frog Lane, Balsall Common	5	140	0
Site 3 – Windmill Lane, Balsall Common	5	222	0
Site 4 – Land West of Dickens Heath	8	203	0
Site 5 – Chester Road/Moorend Avenue, Fordbridge	1	18	0
Site 6 – Meriden Road, Hampton in Arden	2	10	0
Site 7 – Kingshurst Village Centre	4	1	0
Site 8 – Hampton Road, Knowle	3	97	0
Site 9 – Land South of Knowle	145	165	0
Site 10 – West of Meriden	6	5	0
Site 11 – TRW/The Green	14	111	0
Site 12 – Land South of Dog Kennel Lane	11	141	0
Site 13 – Land South of Shirley	13	418	0
Site 14 – Arran Way, Smith’s Wood	4	1	0
Site 15 – Jenson House, Auckland Drive, Smith’s Wood	1	15	0
Site 16 – East of Solihull	6	43	0
Site 17 – Moat Lane/Vulcan Road	0	9	0
Site 18 – Sharmans Cross Road	4	347	0
Site 19 – Land at HS2 Interchange	9	12	0
Site 20 – Land at Damson Parkway	3	13	0
Alternative Sites (Where a Call for Sites Submission Already Made)	9	242	0
Alternative Sites (New Suggestions)	13	173	0

27. The following chart indicates the level of support for each of the allocated sites in the plan:



28. The following chart indicates the level of objection for each of the allocated sites in the plan:



## Petitions

29. A total of 4 petitions were submitted in relation to the draft plan. The basis for the petition, and the number of signatures to it, is set out under the relevant chapters that follow, but it should be noted that the tables/charts in this chapter do not include the number the signatures.
30. The petitions were submitted in relation to the following sites:
- One in relation to 'south Shirley estates' with 108 signatures
  - One in relation to site 13 (land South of Shirley) with 361 signatures
  - Two in relation to site 15 (Jenson House, Smith's Wood) with a total of 664 signatures

## 4. Challenges

### Q1 – Challenges facing the Borough

*Do you agree that we've identified the right challenges facing the Borough? If not, why not? Are there any additional challenges that should be addressed?*

#### Representations received:

Number objecting: 78

Number supporting: 62

#### Key Issues raised by Representations:

##### General

- Concern that challenges will not be addressed by policies as currently drafted/unclear how will be addressed.
- Need more joined up approach looking at impact of growth on communities.
- Too many, should limit to managing change without compromising community.
- Should prioritise needs of elderly people.
- Prioritising challenges is challenge in itself.
- Need commitment to continually review Local Plan.

#### Council Response (Draft Submission Version)

- Challenges have been identified that reflect the range of issues within the Borough, which the Plan should address.
- The Plan works with a wide range of strategies and plans of the Council and partner organisations to address challenges.
- Needs of all the population are considered. A new Policy P4E on Housing for Older and Disabled People has been introduced.
- Plan is being reviewed according to national policy and guidance.
- The Authority Monitoring Report takes a 'plan, monitor, manage' approach.

#### Challenge A – Reducing Inequalities

- Need more explanation/lack of actions on how challenges will be addressed.
- Over reliance on a few key businesses risks worsening inequality.
- Add impact of increased population on social and green infrastructure.
- Need more variety in housing stock to address access to housing outside NSRA.

#### Council Response (Draft Submission Version)

- Changed to Challenge F.

- Explanations on how the objectives will be addressed is contained within the policies and justification sections.
- Policy P3 addresses general business and employment needs, including small and medium enterprises.
- The draft Infrastructure Delivery Plan (2020) addresses social and green infrastructure as well as physical infrastructure.
- The 2020 HEDNA addresses housing need by type, size and tenure across the Borough.

### **Challenge B – Meeting Housing Needs**

- Most significant challenge needs to address imbalance across Borough, assist with HMA shortfall and provide housing in most beneficial locations.
- Vitally important to address unmet housing needs.
- Not fully addressed and needs more land to be released.
- Should recognise historic undersupply of housing.
- Should not impose artificial limit on housing provision which will encourage price rises and migration contrary to Government policy.
- Plan does not have appropriate strategy to address objective re HMA shortfall.
- Do not agree increased housing requirement from Issues & Options document or need to provide for Birmingham overspill.
- Birmingham City Council should do more to meet its own needs.
- Need to support rest of conurbation by assisting delivery of development where required rather than encouraging greenfield/Green Belt development.
- Add point to ensure that Duty to Co-operate is satisfied in making appropriate provision for HMA land.
- Land availability and supply of affordable housing is major risk.
- Include maintaining affordability of existing housing by restricting extensions.
- Should widen housing mix and range of affordable housing.
- Refer to planning for demographic changes, such as increase in elderly population.
- Should encourage growth on large sites enabling delivery of infrastructure and avoiding piecemeal development.
- Include objective to encourage early development of brownfield sites in sustainable locations by reducing affordable housing requirement.
- Should spread housing burden evenly across whole of Borough.
- Should not restrict growth to larger settlements, as some smaller areas can accommodate additional housing.
- Too much growth in certain areas e.g. Shirley.
- If new housing delivered in Balsall Common will conflict with Objectives A, C, E, J and K.



- Inadequate details of provision of infrastructure/inadequate provision to support housing proposals.
- Include impact of growth on congestion, e.g. in Dickens Heath.
- Agree, particularly the first three points.

#### Council Response (Draft Submission Version)

- Council is seeking to meet the Borough's housing need in full, in accordance with the standard methodology for local housing need, as well as making a contribution to the wider HMA shortfall.
- Historic housing supply is addressed under the new standard methodology.
- Brownfield development is often exempt from affordable housing provision due to permitted development approvals process and/or consideration of vacant building credit.
- Growth has been distributed according to the spatial strategy and site selection methodology, prioritising those areas most able to accommodate new development.
- Smaller scale growth has been proposed in smaller settlements.
- The 2020 HEDNA addresses housing need by type, size and tenure across the Borough.
- Needs of all the population are considered. Policy 4D (Self and Custom Housebuilding) and Policy 4E (Housing for Older and Disabled People) broaden the mix of housing to be delivered in the Plan period.
- Infrastructure needs are addressed in new Challenge O, Policy 21 and the Settlement Chapters, and transport issues in Challenge H.
- A draft Infrastructure Delivery Plan (2020) has been published to support the proposals in the draft Submission Plan.
- Birmingham City Council have increased their housing provision over and above their Local Plan requirement, which has contributed significantly to the reduction in the wider HMA shortfall (see HMA Position Statement, September 2020).

#### **Challenge C – Sustaining Attractiveness of the Borough**

- Should manage growth to maintain quality of the environment.
- Need to retain character/attractiveness of rural/semi-rural locations, including Balsall Common.
- Growth proposed for some locations e.g. Knowle, Shirley conflicts with Objective.
- Include improvement of attractiveness of walking/cycling.
- Add objective to promote architectural excellence.

#### Council Response (Draft Submission Version)

- Respecting and enhancing local character are addressed in Policies P15 and P16.

- Reference to cycle ways and wildlife to provide sustainable connectivity is included in the objectives.
- Policy P15 promotes high quality design and place-making for all new development. The concept masterplans identify locations where development of particularly high architectural value will be expected, e.g. in the zone of influence of heritage assets.
- New development will be expected to contribute positively to local character, distinctiveness and streetscape quality throughout the Borough.

#### **Challenge D – Sustainable Economic Growth**

- Objective should seek to address need for employment land as fundamental component of economic growth.
- Should seek to actively improve economic role not just maintain (JLR).
- Objectives should include maximising employment growth for office, industry and logistics development in UK Central Hub area.
- Should seek to meet needs of small/medium enterprises as well as key larger businesses.
- Need direct investment in improvements as well as growth.
- Add new point to maximise opportunity for reducing congestion on motorways, strategic rail network and rail through delivery of infrastructure/appropriate level of housing.
- Include impact of congestion on motorways, strategic highway network and rail from additional housing development.
- Should cover retail needs to be informed by updated study of quantitative and qualitative needs.
- Challenges should include recognition of impacts of on-line shopping.
- Refer to need for MSA.
- Include needs for improvements to Balsall Common centre as part of holistic plan for settlement.
- Recognise loss of key services in some communities such as Meriden.
- Will be addressed through UK Central Hub Area Growth and Infrastructure Plan.

#### **Council Response (Draft Submission Version)**

- Challenge 'M' relates to 'maximising the economic and social benefits of the High Speed Rail 2 link and the UKC Hub Area'.
- 'Support smaller businesses and employers' has been added to the objectives.
- Congestion and transport issues are mentioned under Town Centres in this challenge, as well as addressed in Challenge H.
- Improvements to Balsall Common centre are included within the Balsall Common Settlement Chapter.

- The need to address infrastructure requirements are addressed in Challenge O, Policy 21 and the settlement chapters.
- Impact of Covid on towns and local centres, including their role as retail and leisure destinations, is included in revised Challenges and objectives.
- MSA is addressed in justification to Policy P8.

### **Challenge E – Protecting Key Gaps**

- Challenge needs more emphasis as most difficult one given level of growth required and critical to preserving Borough's character.
- Challenge does not reflect para. 81 of the NPPF.
- Green Belt still requires protection.
- Challenge not adequately addressed for Meriden Gap and needs new policy.
- Add threat of sprawl.
- Release of Green Belt for new development should be focussed on sites that perform least well against Green Belt functions/in Green Belt Assessment.
- Should seek to release poorly performing Green Belt too small/unsuited to housing allocation for more specialist needs.
- Housing allocations, e.g. Balsall Common/Shirley conflict with objective to safeguard key gaps.
- Refer to need for MSA.

### **Council Response (Draft Submission Version)**

- The Council attaches great importance to the Green Belt and its purposes.
- The Council has taken full account of the 2016 Green Belt assessment and national planning policy and guidance.
- The Site Selection Topic Paper outlines the site selection methodology; lower performing Green Belt parcels are prioritised over higher performing parcels in the hierarchy. Site selection also takes into account the sustainability of locations, having regard to the Sustainability Appraisal, the overall spatial strategy and wider supporting evidence base.
- Policy P17 relates to Green Belt and the Countryside.

### **Challenge F – Climate Change**

- Means proposed to address challenge inadequate.
- Need energy plan to achieve carbon reduction.
- Should include objective for new development to incorporate renewable energy sources.
- Support recognition of role of decentralised energy/heating networks (JLR).
- Add objective relating to provision of sustainable drainage systems.

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**Council Response (Draft Submission Version)**

- Challenge changed to Challenge A in Draft Submission Version.
- Revised challenges and objectives have been strengthened and expanded to reflect the Council's Climate Change declaration, Statement of Intent to Protect the Environment and West Midlands Combined Authority #WM2041 Green Paper.
- Revised Policy P9 includes requirement to incorporate renewable/low carbon sources on residential development.
- Sustainable drainage systems are addressed in Policy P10.

**Challenge G – Gypsy & Traveller Sites**

- Object to time, effort, money expended on very small section of community.
- Should not accommodate free movement of gypsies and travellers.

**Council Response (Draft Submission Version)**

- The Council is committed to meeting needs for all communities in the Borough.
- National policy and guidance requires the housing needs of travellers to be assessed and reflected in planning policies.

**Challenge H**

- Need greater emphasis on reduction of congestion.
- Should refer to congestion on motorways and capacity issues on rail services.
- Need greater emphasis on transport barriers to specific developments such as Airport/public transport to Airport/HS2.
- Add requirement for congestion management through infrastructure provision (JLR).
- Need for permissive policies to encourage growth of key employers (JLR).
- Should identify key bottlenecks in town centre around Monkspath Hall carpark, Solihull School and roundabout by station.
- Recognise poor/declining rural transport, accessibility issues at rural stations and maintenance of rural road network to encourage cycling.
- Recognise need to improve access to countryside.
- Include need for more cycle routes.
- Add traffic congestion and parking issues and need for improvements in Balsall Common/Knowle.
- Refer to need for MSA.
- Should address issues of autonomous transport.

**Council Response (Draft Submission Version)**

- Challenge H in the draft Submission Plan identifies a range of issues, including congestion and parking; poorer public transport in rural areas; transport demand and access to Solihull Town Centre; walking and cycling connectivity; multi-modal access to employment centres etc.
- Settlement chapters include reference to local transport issues and how these will be addressed.
- A draft Infrastructure Delivery Plan (2020) has been published to support the proposals in the draft Submission Plan, including strategic and more localised transport schemes.
- Policy P1A refers to transport issues and opportunities around the UKC Hub Area, and Policy P2 in town centres.
- MSA is referred to in justification of Policy P8.
- Solihull Council's Low Carbon Future Mobility project is looking at how zero-carbon, autonomous vehicles could be integrated into the Borough's transport network in the future.

### **Challenge J – Health & Wellbeing**

- Include impact of growth on recreational facilities, playing fields and allotments and objective to plan appropriately for sports activities/facilities.
- Add importance of traffic calming and safe cycle routes throughout Borough.
- Not addressed in proposal to develop Solihull MIND site.
- Contribution of challenges to physical activity and healthy lifestyles acknowledged.

#### Council Response (Draft Submission Version)

- The need to provide safe cycling routes and appropriate levels of open space is included in the revised objectives.
- The retention of Solihull MIND garden in Knowle is addressed in new site Policy KN2.

### **Challenge K – Natural Assets**

- Include degrading of Arden landscape in challenges.
- Include objective to avoid loss of natural assets for new housing.
- Include objective to mitigate impacts on natural assets to reverse decline in biodiversity.
- Need to support growth in rest of conurbation by protecting Borough's natural assets.
- Should give equal weighting to natural environment bordering Shirley as for Arden landscape, other than River Blythe.

#### Council Response (Draft Submission Version)

- Degrading of Arden landscape is included in the challenges.

- The proposed objectives address the need to halt and reverse the decline and loss of natural environment assets, as well include a revised objective on integrating green infrastructure and biodiversity net gain within development.
- Policy P10 expects full account to be taken of the nature conservation or geological value of site to be considered, including those without formal designations.
- SSSIs such as the River Blythe will be subject to special scrutiny according to their 'special scientific interest' as nationally important sites for nature conservation.

### **Challenge L – Water Quality & Flood Risk**

- Objectives should seek to ensure no building on flood plains.
- Strengthen second objective to minimise risk of flooding.
- Include objective to mitigate impacts on assets to reverse decline in biodiversity.
- Include requirement for porous driveways in objectives.

#### Council Response (Draft Submission Version)

- Revised objective explicitly refers to flood risk sequential test.
- Policy P10 states that new development will not normally be permitted within areas at risk of flooding; this is further highlighted in the location of the development parcels within the concept masterplans.
- Biodiversity impacts are addressed in Challenge K, and Policy P10.
- Policy P11 requires sustainable drainage systems for new developments, however, does not prescribe porous driveways as a solution.

### **Challenge M – Maximise Benefits HS2**

- 'Garden village' concept inappropriate as would not enable the full potential benefits of HS2 to be realised.
- Amend second objective to better reflect vision for Arden Cross of mixed-use urban quarter that maximises benefits of connectivity and opportunities associated with HS2.
- Too much emphasis on HS2 as benefits limited.
- Needs to refer to need for MSA.
- Challenge M critical for Balsall Common.
- Will be addressed through UK Central Hub Area Growth and Infrastructure Plan.

#### Council Response (Draft Submission Version)

- Challenge and objectives recognise the potential economic and social benefits of growth enabled by the HS2 rail link and interchange station for the wider region and national economy.
- Balsall Common settlement chapter refers to HS2.

- MSA is referred to in justification of Policy P8.

### **Challenge N – Mitigate Impacts of HS2**

- Should recognise impacts of HS2 and construction works on local communities, farms and rural businesses and highways network.
- Impact of housing and HS2 developments including severance at same time on Balsall Common.
- Will be addressed through UK Central Hub Area Growth and Infrastructure Plan.
- Challenge N critical for Balsall Common.
- Should recognise isolation of Meriden between HS2 and proposed garden city development.

### **Council Response (Draft Submission Version)**

- Revised objectives refer to development of strategy to mitigate the traffic impacts of the HS2 station to include provision of public transport, junction schemes and environmental measures.
- Needs of local settlements are addressed in the settlement chapters.

### **Additional Challenges**

- Need focus on rural area issues such as transport, infrastructure and broadband.
- Ensuring adequate/improved infrastructure for housing and HS2 is additional challenge.
- Air quality is massive challenge which should be addressed separately.
- Challenges do not address community cohesion.

### **Council Response (Draft Submission Version)**

- Settlement chapters address local issues in more detail.
- New Challenge 'O', and Policy 21, relate to providing infrastructure.
- Air Quality is a cross-cutting theme and included in Challenges A and J, as well as the Vision, Improving Accessibility & Encouraging Sustainable Transport Chapters and Policies P9, P14 and P18.
- Since the publication of the 2016 Draft Local Plan the Council have published a Clean Air Strategy, which includes Planning as one of the five main themes.

## 5. Vision

### Q2 – Vision for the Borough

*Do you agree with the Borough Vision we have set out? If not, why not, and what alternative would you suggest?*

#### Representations received:

Number objecting: 95

Number supporting: 41

#### Key Issues raised by Representations:

##### Overview

- Difficult to reconcile statements in overview with impacts of level of housing growth.
- Overview could be made more robust for HS2 by reference to East and West Midlands rather than wider area.
- Reference to managed growth gives misleading impression about ambitions for major growth in UK Central Hub Area and should be rephrased.
- Too much emphasis on HS2, as benefits unclear and disruption inevitable, and should recognise growth independent of HS2 Interchange.
- Vision of fairer more equal Borough not reflected in distribution of growth focussed on less affluent areas.
- Safety and prosperity outside Plan's control, so should focus on local cultural opportunities to provide greater fulfilment.
- Unclear how happiness would be quantified so best excluded.
- Climate change needs to be added to overview with clear emphasis on Borough's role.
- Omits specific reference to importance of sporting activities/facilities for health and wellbeing.

#### Council Response (Draft Submission Version)

- Vision has been updated to reflect the Council Plan (2020-2025).
- The Plan has been developed in the wider context of the Council's strategic frameworks such as the Health and Wellbeing strategy, the building blocks of inclusive growth and recovery from Covid-19.
- Since the publication of the 2016 Draft Local Plan, HS2 bill has been granted Royal Assent and work is underway in the Borough.
- Climate change objectives have been included in the updated Borough Vision – Overview.
- The Borough Vision reflects the Council Plan (2020-2025) Vision: 'Where everyone has an equal chance to be healthier, happier, safer and more prosperous through growth that creates opportunities for all.' Happiness is a measure of overall wellbeing.



- Health and wellbeing, including physical activity, are addressed in more detail in the 'Health and Supporting Communities' chapter.
- The 'Borough Vision – in detail' refers to quality of housing, public realm and green space. The local area perspectives of the Borough wide vision are explained in the settlement chapters.

### **Borough Vision**

- Should reference WMCA Strategic Economic Plan and meeting aspirations of key businesses.
- Welcome reference to JLR in paras. 72-87 but should reference relationship with Fen End site (JLR).
- Reference to NEC in para. 82 should reflect opportunity for place-making through residential and other business uses to make consistent with Policy P1.
- Should recognise growth of all businesses not just key economic assets and promote local jobs for local people to reduce traffic congestion.
- Should recognise infrastructure needs to support businesses including supply chains, operations and markets, and needs of large scale housing developments.
- Relies on increasing transport dependency, but better approach would focus on local employment, improved broadband infrastructure and tele-working, with transport growth limited to goods and materials.
- Whilst vision establishes positive economic context and ambition, concern that not matched by policies including scale of housing to be provided.
- Ambiguous and contrary to NPPF as should be explicit on aim to meet housing need in full together with adequate proportion of wider housing need from HMA.
- Should recognise that there will be selected releases/amendments to Green Belt boundary to provide sustainable housing growth.
- Growth should be focussed on HS2 and existing transport infrastructure rather than close to existing urban areas/settlements.
- Vision skewed towards developer interests rather than local communities.
- Revise to reflect commuting patterns, protect Green Belt and rural features and avoid large scale developments.
- Vision for growth should be to create completely new town in Borough.
- Inadequate consideration of reasonable alternative patterns of growth.
- Needs to be more focus on intensifying developments by increasing densities and a wider mix of affordability and tenure.
- Support emphasis on affordable housing, which must include greater emphasis on social rented housing and address provision for people with disabilities.
- Inadequate treatment of Meriden Gap contrary to description as vital and strategic in Green Belt Assessment.
- Statements re. Green Belt protection, sustainable development and maintaining environment assets contradicted by Plan proposals.

- Growth conflicts with national guidance on functions of Green Belt and importance to vision.
- Protection of key gaps between settlements should be given great weight and a high planning priority, including the narrowest part of Meriden Gap between Balsall Common and Coventry and the distinctive character of Dickens Heath which will be eroded by housing proposals.
- Should include opportunities for small scale developments in poorly performing Green Belt locations which would reduce reliance on windfalls
- Should acknowledge the agricultural aspects of land use within the Borough, including the need to be able to grow more food locally.
- Loss of recreational areas will not result in healthier lifestyles.
- Timescales contradict Council Plan which indicates UK Central to be delivered by 2020.
- Support approach to Green Belt in para. 74.
- Support level of ambition but may be derailed by economic uncertainties, which must be considered.

#### Council Response (Draft Submission Version)

- The local area Vision perspectives have been added to the settlement chapters in the Draft Submission Version.
- Council recognises the need to balance sustainable economic growth ambitions with maintaining and enhancing the quality of environment and protecting the integrity of the Green Belt.
- A number of issues raised are more detailed matters that are addressed in the policy and settlement chapters.

#### **North Solihull Regeneration Area**

- Should be greater reference to job creation.
- Most housing allocations do not add to regeneration programme.
- Welcome reference to Chelmsley Wood as a focus for regeneration and growth and policy protection afforded which will support investment strategy for shopping centre.

#### Council Response (Draft Submission Version)

- The need to improve the skills base and access to employment is included in the 'North of the Borough' settlement chapter. North Solihull forms one of the four zones identified by through the UK Central programme which seeks to redistribute the benefits of the wider scheme.
- Proposed Site NS1, Kingshurst village centre redevelopment, proposes wider benefits to the local community.
- 2016 Draft Local Plan site 14 has since been granted planning approval and been built; site 15 has not been progressed further as a housing site.

**Mature Suburbs**

- Should give greater emphasis to Shirley in hierarchy of mature suburbs.
- Urban intensification will not enhance suburban character.
- Transport strategy should focus on safe and reliable public transport rather than cycling as unrealistic for ageing population.

## Council Response (Draft Submission Version)

- Shirley Town Centre is included as one of the three main Town Centres of the Borough in Policy P2.
- Windfall development as urban densification will be assessed against Policy P5 and Policy P15, which seeks high quality development and contribution to local character and distinctiveness.
- Transport improvements in the Borough will require a range of sustainable travel modes, as highlighted in the draft Infrastructure Delivery Plan.

**UK Central Hub Area**

- Welcome opportunity to maximise benefits of HS2 with Interchange integrated with green infrastructure and key economic assets (UGC).
- Support vision subject to allowing time for existing businesses to relocate where necessary.
- Support vision but needs to be sufficient employment land to meet needs and market demands.
- Support vision for NEC, but should reflect opportunities for place making through residential and other business uses.

## Council Response (Draft Submission Version)

- The NEC Masterplan (December 2018) is referenced in the UKC Hub Area settlement chapter.
- The 2020 HEDNA assesses employment land availability and provision, and the findings are reflected in the Sustainable Economic Growth chapter and policies.

**Rural Area**

- Vision for rural area will be destroyed by growth proposed.
- Reference to local facilities and services being accessible by walking/cycling does not reflect reduction in bus services or lack of safe cycle routes.
- Protection of Green Belt and environment not based on factual evidence.
- Amend para. 83 to reference evidence in Green Belt Assessment/Sustainability Appraisal and agreement under Duty to Co-operate.

- Welcome support for farm-based rural economy but should be strengthened in line with paras. 20-21 of the NPPF.
- Support protection for smaller/historical settlements with restriction of growth levels.
- Should recognise need for MSA to support motorway network.

#### Council Response (Draft Submission Version)

- The 'Rural Area' Vision section is now spread across the rural settlement chapters.
- The Council have prepared concept masterplans to support the Local Plan Review to ensure that proposed site allocations respect local landscape and streetscape character, and promote cohesion with existing communities.
- The Local Plan Review is supported by a wide range of evidence including the Green Belt Assessment, Sustainability Appraisal, Landscape Character Assessment, Habitat Regulations Assessment, Heritage Impact Assessment and infrastructure studies.
- Since the 2016 Local Plan Review consultation the Council has begun work its Local Walking and Cycling Implementation Plan, which includes improves accessibility and connectivity in less urban areas.
- MSA is referred to in justification of Policy P8.

#### **Knowle, Dorridge, Bentley Heath, Hockley Heath**

- Character of Knowle will be destroyed by inappropriate housing developments.
- Should recognise importance of Solihull MIND facility in Knowle.
- Hockley Heath should not be identified for affordable housing for Borough but included within sentence with Knowle/Dorridge in para. 84.
- Para. 84 should be amended to refer to evidence base.

#### Council Response (Draft Submission Version)

- Hockley Heath has been accorded its own settlement chapter in the Draft Submission version.
- Policy KN2 refers to the retention of the MIND garden within the site development principles.
- The Green Belt Assessment and Sustainability Appraisal findings and other evidence are included within the Site Selection Document, which inform the site allocations.
- There is a Borough-wide need for affordable housing.
- The Draft Submission Plan refers to the Knowle, Dorridge and Bentley Heath Neighbourhood Plan, which was made in April 2019.
- See also comments above on 'Rural Area'.

#### **Catherine-de-Barnes, Hampton in Arden, Meriden**

- Welcome commitment to reclamation of former ammunition depot in Hampton.

- Lack of reference to Catherine-de-Barnes.
- Support provision of market/affordable housing for Catherine-de-Barnes, Hampton and Meriden.

#### Council Response (Draft Submission Version)

- A distinct settlement chapter has been assigned to Hampton in Arden and Meriden areas respectively. Catherine-de-Barnes has been included in the Hampton in Arden chapter.
- Welcome support for policy provisions in this area.

#### **Balsall Common, Berkswell, Barston, Temple Balsall, Chadwick End**

- Vision for Balsall Common with significant development on edge is inappropriate as not a sustainable location, scale of development not required to secure thriving centre and inadequate infrastructure.
- Housing proposals for Balsall Common contrary to vision.
- Strategy for growth in Balsall Common inappropriate as will not relieve additional traffic in village.
- No consideration given to impacts of JLR development at Fen End.
- Should include upgrading/expansion of Balsall Common centre for existing residents and housing growth proposals.
- Should reference evidence in Green Belt Assessment informing selection of appropriate housing sites in Balsall Common.
- Include provision for centrally located open green spaces in expanded Balsall Common.
- Object to bypass which is not justified and would have significant adverse impacts.
- Bypass should be shown on plan as pivotal to how settlement develops.

#### Council Response (Draft Submission Version)

- The Green Belt Assessment and Sustainability Appraisal findings and other evidence are included within the Site Selection Document, which inform the site allocations.
- Balsall Common chapter includes reference to future village centre masterplan that will address environmental and transport concerns.
- Green infrastructure provision is included in the site policies for Balsall Common.
- Extensive studies have been carried out on the bypass line options, including possible alternatives, and these have been published as part of the evidence base for the draft Submission Local Plan.
- The indicative bypass line has been shown on the proposed Policies Map.
- See also comments above on 'Rural Area'.

#### **Dickens Heath, Tidbury Green, Cheswick Green, Blythe Valley Park**

- Growth in Dickens Heath is resulting in infrastructure that cannot cope and car based journeys when walking envisaged.
- Protection of natural environment, Green Belt and countryside not supported by housing proposals in Dickens Heath/South Shirley.
- Agree significant new development should be directed towards Dickens Heath as has services, good public transport links and capable of accommodating level of growth.

#### Council Response (Draft Submission Version)

- The Blythe settlement chapter and site policies include reference to infrastructure improvements for the area, as well as taking into account natural environment assets and Green Belt compensation.
- See also comments above on 'Rural Area'.

## 6. Spatial Strategy

### Q3 – Spatial Strategy

*Do you agree with the spatial strategy we have set out? If not, why not, and what alternative would you suggest?*

#### Representations received:

Number objecting: 187

Number supporting: 61

#### Key Issues raised by Representations:

##### Level of Growth

- Strategy does not address objective to provide scale of growth to meet appropriate proportion of HMA shortfall (Birmingham CC).
- Fails to support ambitions or align economic and housing policies as scale of housing does not address overall housing need shortfall in HMA.
- Falls short of level required to meet housing need for Greater Birmingham HMA.
- Will assist in delivering wide range of homes but need to release some lower performing Green Belt areas to meet Borough needs and wider HMA shortfall.
- Fails to give proper consideration to strategic role and function of West Midlands Green Belt as premature in absence of satisfactory resolution of apportionment of wider HMA housing need.
- Insufficient land allocated and lack of safeguarded land does not meet requirements of NPPF so Green Belt boundaries will not be permanent.
- Sufficient smaller deliverable sites required to provide 5 year housing land supply.
- Any allocation to meet Birmingham's needs should not be developed until such time as Birmingham has developed all of its brownfield land sites.
- Disagree that spatial strategy needs revising as HS2 yet to be agreed.
- Support approach to level of growth in rural areas although some sites questionable.

#### Council Response (Draft Submission Version)

- Council is seeking to meet the Borough's housing need in full, in accordance with the standard methodology for local housing need, as well as making a contribution to the wider HMA shortfall.
- Since the publication of the 2016 Draft Local Plan the wider HMA shortfall has been considerably reduced, as evidenced in the latest HMA Position Statement.
- The Green Belt Assessment and Sustainability Appraisal findings and other evidence are included within the Site Selection Document, which inform the site allocations.
- The Council is expected to plan for and meet its identified housing needs. Whilst brownfield sites are prioritised, there is a lack of available land in the Borough to meet this need. It is therefore considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations.

- The Council attach great importance to the Green Belt. The Draft Submission Plan does not propose the removal of additional land from the Green Belt for safeguarding purposes, as the long established and continuing strategy is to protect the Green Belt. However, the UKC Hub Area will provide housing beyond the plan period (e.g. up to 2,500 homes on Site UK1 in accordance with the Arden Cross Masterplan), and potentially also Site BC1 in Balsall Common.
- The Draft Submission Plan provides for a range of housing developments, from smaller sites on windfall, SHELAA and Brownfield Land Register sites and 5 allocations under 100 dwellings, as well as larger scale developments.

### **Strategic Objectives/Sequential Approach**

- Sequential approach does not accord with NPPF as sustainable options should be identified regardless of existing policy constraints.
- Sequential approach contradicts much of Plan's vision and spatial strategy relating to scale of growth to be delivered at the UK Central Hub Area and need for Green Belt release.
- Delete reference to brownfield first approach as contrary to NPPF which supports review of Green Belt to promote sustainable patterns of development, and Policy P7 re accessible locations.
- Sequential approach should include transport requirements and avoiding overload on connections to primary routes.
- Should start with development of brownfield sites, especially with good public transport.
- Need to demonstrate that all brownfield land used up in both Borough and Birmingham.
- Should make greater use of infill opportunities especially around UK Central Hub Area, M42 and proposed site for MSA.
- After brownfield development should be spread equally across other options not sequentially as proposed.
- Approach to previously developed land supported but not followed for Balsall Common.
- Non-Green Belt should be allocated first, but sufficient land that can be made available without needing Green Belt land/Green Belt should be absolutely sacrosanct.
- Sequential approach b(ii) should be amended by deleting reference to land lost as a result of committed development, as unclear that strategic matter or why uncommitted sites in accessible locations not preferred to other Green Belt/greenfield sites.
- Protection of open countryside in Green Belt not given sufficient weight in balance for Dickens Heath/South Shirley.
- Sequential approach not flexible enough as greenfield sites in urban areas can be more valuable than Green Belt, e.g. playing field in Site 15.
- Approach to testing of Green Belt options for release is misplaced, as should involve sustainability assessment of impact on openness, accessibility to facilities and reference to travel to work patterns.
- Lack of comparative analysis. Does not define how Council proposes to assess alternative locations for development.



### Council Response (Draft Submission Version)

- The site selection process was further refined and explained in the Draft Local Plan Supplementary consultation document and introduction to the Site Assessments Document for the Call for Sites.
- Since the publication of the Draft Local Plan (2016) the site selection methodology has been further refined and is considered to be in accordance with para. 138 of the revised NPPF.
- The Council has carried out a wide-ranging Call for Sites exercise as well as a more focused Call for Sites for brownfield sites. The vast majority of land that has been put forward is on Green Belt land.
- More explanation on the background to the spatial strategy and site selection methodology are included within the updated Overall Approach and Site Selection Topic Papers, which were published to support the consultation on the Draft Submission Local Plan.

### **Strategic Objectives/Balanced Approach**

- Concentrating development is justified as has advantages of accessibility, range of services in existing settlements.
- Over reliance on large scale sites which should be supplemented with small and medium sites delivered by smaller builders.
- Support recognition of role of smaller sites in early delivery of housing land.
- Land releases required early in Plan period, which should include sustainably located brownfield sites.
- Balance between concentration and dispersal not reflected in Knowle where 2 large sites proposed contrary to para. 102 which discourages disproportionate additions in settlements with limited facilities and is inconsistent with Draft policies and other Council strategies.
- Support approach in Knowle which delivers maximum housing growth without blighting large areas with suburban sprawl.

### Council Response (Draft Submission Version)

- The Council have refined the spatial strategy, and have continued with the approach of 'balanced dispersal'. More significant expansion of rural villages/settlements is considered appropriate at Dickens Heath, Knowle and Balsall Common. Limited expansion is considered more appropriate at smaller rural villages and settlements such as Hampton in Arden and Meriden.
- See also Council's response to other spatial strategy comments above.

### **Strategic Objectives/Additional Criteria**

- Should explain how alternative locations will be assessed in para. 101.

- Need greater clarity on what is meant by 'less accessible' settlements.
- Should be greater emphasis on higher densities/brownfield land/conversions in accessible locations.
- Support additional criteria for green field/Green Belt locations in para. 101.
- Support intention to promote use of sustainable transport modes and reduce reliance on car.
- Should build more houses on public sector land.
- Should allow some development in isolated settlements whilst protecting nature of location.

#### Council Response (Draft Submission Version)

- All Call for Sites that have been put forward for development have had a high level assessment in the SHELAA, and more detailed assessment in the Site Selection Document. The latter was first published in 2019 to support the Supplementary Consultation on the Local Plan Review, and updated for the 2020 consultation.
- Further detail on the site selection methodology is contained within the Site Selection Topic Paper, updated as part of the evidence base for the draft Submission Plan.
- Proposed Policy P5 includes more detail on recommended densities according to location and housing mix; e.g. higher densities will be sought in town centre locations.
- Public sector land has been submitted in the Call for Sites and taken into consideration.
- Isolated locations perform poorly in the site selection hierarchy for allocations, and are generally also sited within the Green Belt. Policy P17 sets out those settlements of washed over Green Belt where limited infilling may take place; Policy P4B sets out criteria where Rural Exception sites may be considered for affordable housing.
- See also Council's response to other spatial strategy comments above.

#### Guiding Principles

- Recognition of major growth opportunity around UK Central Hub Area not followed through in site allocations.
- Guiding principles ignore release of Green Belt to support businesses other than around HS2 and should include growth ambitions of JLR, consistent with Policy P1.
- Failure to link housing distribution to economic and transport policies.
- Should focus on local businesses to provide jobs for residents rather than encouraging housing to meet needs of people in London.
- Greater balance between needs of large and small businesses required.
- Should include significant new housing to be located in areas of high accessibility to employment areas by public transport.
- Should recognise role of smaller scale developments in contributing to 5 year housing land supply.

- Should acknowledge role of existing sites with good transport links in meeting development needs.
- Need overarching assessment of whether development sustainable in accordance with NPPF.
- Additional principle required to consider alternative locations against criteria and evidence.
- Additional principle required to provide safeguarded land in event of non-delivery of allocations.
- Additional principle required to locate housing near to areas of economic activity and employment to minimise impacts on transport infrastructure.
- Additional principle required to release Green Belt to support junction improvements to M42.
- Principles should be weighted to prevent flawed decision making, recognising priority for preservation of Green Belt.
- Fails to explain how Green Belt purposes weighted in site selection process.
- Contrary to vision for protection of environment in para. 74.
- Fails to reflect objective of contributing to sustainable development as guiding principles in support do not include positive improvements to quality of built, natural and historic environment or conservation of heritage assets (Historic England).
- Should identify all natural environment strategies, objectives and opportunities as part of strategy and ensure growth avoids areas of value/directed to land with least environmental/amenity value (Natural England).
- Spatial strategy should be mindful that development does not form barrier to movement of wildlife along nationally important habitat network following M42 corridor, especially around UK Central Hub Area.
- Guiding Principles generally in support/not in support not reflected in proposals for Knowle or Balsall Common.
- Appropriateness of strategy for waste management uncertain as proposals lack detail and justification and data sources dated.
- Support guiding principles/spatial strategy principles.

#### Council Response (Draft Submission Version)

- Site Selection Methodology and spatial strategy have been updated since the 2016 consultation, taking into account the consultation responses, the revised NPPF and Sustainability Appraisal Framework.
- Major growth opportunity at UKC Hub Area is recognised in Policy P1, the UKC Hub Area settlement chapter and site policies UK1 and UK2. Plan proposes significant residential development (2,740 dwellings) in the area, as well as employment growth opportunities.
- Site UK2 has been put forward to support further growth needs for JLR.
- Accessibility to good transport links and key services is a principle factor in the site selection methodology and spatial strategy.

- Scope of proposed allocations and alternative sites to contribute to the purposes of sustainable development have been assessed through the Sustainability Appraisal.
- The Site Selection Document takes into account a wide range of constraining factors; concept masterplans for the proposed allocations consider impacts on and opportunities for the ecological network, wider nature conservation objectives and heritage assets. Policies P10, P15 and P16 address these issues in more detail.
- Since the publication of the 2016 Draft Local Plan Review the Council have commissioned a Waste Needs Assessment (2018) to support the Plan.
- See also Council's response to other spatial strategy comments above.

### **Broad Options for Growth**

- Combination of all options from previous consultation and mixed concentration/dispersal strategy lacks focus which should be on previously developed land.
- Not true options as all needed to meet housing requirement, do not reflect Green Belt/landscape (Area F) evidence and unclear how meaningful gaps between settlements will be retained close to Bromsgrove/Worcestershire boundary (Bromsgrove DC).
- Focus for Borough and wider HMA growth should be around sustainable transport nodes, supporting Solihull Connected, particularly on Solihull rail line, in co-operation with neighbouring authorities rather than locating large numbers of new houses in rural locations away from employment.
- Growth should be focussed on options A-E aligning with rapid transit proposals, rather than existing/new rural settlements where sustainable transport often limited (TfWM).
- Support option A as improved public transport justifies provision of affordable housing with good access to employment without a car.
- Support options B, D and E which are suitable for greater levels of development.
- Option E should be pursued rather than option G to reduce need to travel.
- Support option F and strategy to minimise releases from Green Belt.
- Support growth option G as large scale urban extensions in sustainable locations and supported by infrastructure can deliver significantly to HMA need.
- Support option G as easiest to deliver in short term and should be ranked highly.
- Support broad locations for growth.
- Wider dispersal strategy would be fairer, meet local needs and provide more housing in short term.

### **Council Response (Draft Submission Version)**

- The Council recognise that Growth Options A to D are within accessible locations in the main urban area, and appropriate development opportunities within these options are preferred in the site selection hierarchy. Proposed growth in these areas has been maximised in the housing and employment land supply, however, there are extremely

limited availability of land in these areas. As such, the Council have had to look at options E, F and G, which require land to be released from the Green Belt.

- The spatial strategy seeks to strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a ‘balanced dispersal’ approach.
- The Council have further consulted with Transport for West Midlands since the 2016 Draft Local Plan Review to identify potential transport improvements to increase the accessibility and sustainability of sites located further from the main urban area.
- Further detail on the Council’s approach is provided in the Overall Approach Topic paper published to support the Draft Submission Plan.

### **Locations for Growth: Option E UK Central Hub Area & HS2**

- Support option E which can reflect/deliver the UK Central Masterplan, HS2 Growth Strategy, Hub Growth and Infrastructure Plan and emerging Hub Framework, promote maximised economic and social benefits and provide opportunities for a range of sites.
- Growth option E should be extended to include National Motorcycle Museum, where major investment proposed with substantial synergy with UK Central Hub proposals.
- Agree spatial strategy as growth option E will allow sustainable locations and further enhance HS2 offering.
- Significant concerns about local traffic/highway impacts of UK Central Hub Area development which will require addressing (NWBC).
- Disagree with option E as HS2 yet to be agreed and will require significant Green Belt releases.
- Option E has logic but not accessible from some of proposed housing areas, such as Shirley.

### **Council Response (Draft Submission Version)**

- Welcome support for Option E.
- Since the Draft Local Plan Review consultation there has been a wealth of evidence to further support growth in this location, including masterplans for the Airport, NEC and Arden Cross as well as the UGC Framework Plan.
- The draft Infrastructure Delivery Plan (2020) includes proposed multi-modal transport schemes to improve accessibility and reduce congestion and associated issues in the UKC Hub Area.
- The Council have not considered it appropriate to release further Green Belt at the National Motorcycle Museum site.

### **Locations for Growth: Option F Limited Expansion of Rural Settlements**

- Disagree that Hampton in Arden has limited range of services.
- Support broad options and inclusion of Meriden as appropriate location for growth.

- Opportunities for growth in Catherine-de-Barnes, Dorridge and Hockley Heath should be included in option F.
- Option F fails to acknowledge growth opportunity on east side of Tidbury Green or at Cheswick Green.

#### Council Response (Draft Submission Version)

- Limited growth in smaller rural settlements considered sustainable in terms of level of growth in relation to existing settlement.
- Hampton in Arden is considered more limited in services as it lacks a secondary school and is not close to the main urban edge.
- The Site Selection Document has assessed all of the Call for Sites in more detail.
- Additional proposed sites were put forward in Catherine-de-Barnes and Hockley Heath in the Draft Local Plan Supplementary Consultation (2019) document, and views on 'amber sites' close to Dorridge and Cheswick and north of Tidbury Green were sought at that stage. In the Draft Submission Plan only the sites in Catherine-de-Barnes and Hockley Heath were included as site allocations.

#### **Locations for Growth: Option G Urban Extensions**

- Option G should focus on new sites in east and south of Borough where land available, not on extensions to settlements which fundamentally alter their character.
- Should include growth between fringe of mature suburbs south of town centre and M42 concentrated around railway line under option G.
- Growth option G east of Solihull should include land between the Grand Union canal and Hampton Lane.
- Inclusion of Site 16 under option G is inappropriate as wholly Green Belt and part of narrow gap to Catherine-de-Barnes, not urban extension.
- Support inclusion of land north-east of Damson Parkway under option G.
- Extension of commercial activities north-east of JLR not supported as will impact on many local residents.

#### Council Response (Draft Submission Version)

- Growth has been proposed at locations distributed across the Borough. There are very limited opportunities for new settlements in the Borough, and little interest was shown by site promoters. However a small number of options were identified through the Call for Sites exercise, which were isolated from the urban area and would involve a significant incursion into the Green Belt, without the connection to services and strong public transport links; nor were they of a size that would create sufficient self-containment to make them sustainable.
- Further land has been identified at SO1 (previously named Site 16) between Grand Union Canal and Lugtrout Lane.

- Proposed site allocations in the Draft Submission Plan have been assessed having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection methodology, whilst taking into account the reasonable alternatives.

### **Locations for Growth: Option G Significant Expansion of Rural Settlements**

- Need further allocations in Green Belt around rural settlements where supports public transport provision.
- Disagree with option G as HS2 yet to be agreed and will require significant Green Belt releases.
- Agree spatial strategy as growth option G will allow sustainable locations and further enhance HS2 offering.
- Inadequate consideration of alternatives to Site 4 under growth option G.
- Option G fails to acknowledge growth opportunity on east side of Tidbury Green or at Cheswick Green.
- Support inclusion of Site 9 under option G.
- Disproportionate amount of housing in Dickens Heath/south of Shirley, Knowle and Balsall Common requires further assessment to limit concentration and impacts.
- New settlements should not be permitted in Knowle/Dorridge/Bentley Heath area as contrary to purposes of Green Belt.
- Rationale for choice of sites in Knowle unclear and methodology based on Call for Sites submissions unsound and contrary to national Green Belt policy.
- Any growth in Balsall Common should be focussed on north side closest to UK Central Hub job opportunities/to south-west away from HS2 and impacts.
- No account taken of factors affecting Balsall Common e.g. traffic impacts of HS2, HS2 construction sites providing brownfield opportunities, influences from and growth in Coventry.
- Lack of housing at Hockley Heath means fails to provide proportionate development to sustain settlement.

### **Council Response (Draft Submission Version)**

- More significant growth has been proposed as extensions of larger settlements in the Borough, with a greater range of services.
- Proposed site allocations in the Draft Submission Plan have been assessed having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection methodology, whilst taking into account the reasonable alternatives.

### **Locations for Growth: Other Options**

- Should include growth between fringe of mature suburbs south of town centre and M42 concentrated around railway line under option A.
- Selection of options E-G in preference to land at Stratford Road (SHLAA 62) in option D not justified by evidence.

- Option G new settlements not followed through by consideration of potential for new settlements close to A45 or between Balsall Common and Hampton.

#### Council Response (Draft Submission Version)

- Proposed site allocations in the Draft Submission Plan have been assessed having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection methodology, whilst taking into account the reasonable alternatives.

#### **Other comments**

- Spatial strategy does not address infrastructure requirements for settlements where large scale housing proposed.
- Should adopt more strategic approach to releasing land for rapid transit system/transport links and hubs to avoid growth hindering its future development.
- Spatial strategy does not address risk of not sustaining rural based economy, especially livestock farming.
- Should include specific reference to provision for sports activities/facilities to provide strategic basis for policies and reassurance where policies could result in loss of facilities.
- Spatial Strategy Key Diagram could be amended at next stage to reflect Hub Growth and Infrastructure Plan and emerging Hub Framework.

#### Council Response (Draft Submission Version)

- Since the consultation on the Local Plan Review, the Council has prepared a draft Infrastructure Delivery Plan to address the infrastructure needs of the proposed developments.
- In total the proposed allocations result in the release of ca. 5% of the Borough's Green Belt for development purposes, therefore the majority of farming land will be continue to be available for those purposes.
- Further work has been carried out on the Playing Pitch Strategy and Playing Pitch Mitigation Strategy to support sporting facilities, the replacement of playing pitches and sports ground where necessary and Policy P20.
- UKC Hub Area has been included on the Policies Map as part of the Draft Submission Plan.
- Policy P8A identifies proposed rapid transit links.



## 7. Sustainable Economic Growth

### Q4 – Policy P1 UK Central Hub Area

*Do you agree with Policy P1? If not, why not, and what alternative would you suggest?*

#### Representations received:

Number objecting: 29

Number supporting: 44

#### Key Issues raised by Representations:

##### UK Central Hub Area

- Policy P1 should be Borough wide recognising employees will come from miles around, with UK Central section in sub policy.
- UK Central jobs growth will be additional to baseline forecasts in Employment Land Review and hence not included in land requirements.
- Contradiction in evidence needs resolving as Employment Land Review indicates 5,400 new jobs to be delivered in Plan period whereas Strategic Housing Market Assessment does not include job growth which is not reflected in objectively assessed housing need.
- Agree policy which reflects ambitions in NPPF to secure sustainable economic growth and create jobs and prosperity.
- Agree aim of Policy P1 is realistic and will address spatial implications of change over Plan period.
- Support but could be strengthened to reflect role as key economic driver (Airport).
- Development should focus on high productivity, high talent enterprises.
- Support proposal and recognition of importance of key economic assets (Birmingham CC).
- Scale of growth can be achieved by significantly increasing allocations beyond Site 20 to provide an economic growth zone for JLR/Airport expansion, complementary development and supply chains, and highway improvements.
- Agree but concern about policy bias towards large employers and that policy aims may not be achieved as dependent on fortunes of small number of enterprises over which SMBC has no control, and success of HS2 which is not guaranteed.
- Should encourage wider employment growth and opportunities for support chain businesses as well as key economic assets.
- Policy should discourage distribution or warehousing in Hub Area due to negative impact on road network and need to promote jobs of high economic value.
- Plan should clarify whether 1000 dwellings are part of or additional to Solihull's housing need.
- Support policy principles and opportunity to realise economic growth potential in Hub Growth and Infrastructure Plan, which demonstrates larger capacity including 1,500 dwellings, and seek amendment to para. 116 to clarify that HGIP produced to support level of growth.

- Should increase housing numbers to 2,000 to enable sustainable and vibrant urban quarter.
- Any new housing/settlements should be focussed on HS2/JLR area to support businesses and reduce need for car travel.
- Review of Green Belt presents opportunity to meet longer-term needs of Borough in manner that supports aims of policy.
- Evidence provided in form of landscape and visual appraisal and Green Belt review.
- Over-reliant on housing delivery in Hub Area, as no certainty on timing of HS2/associated development or deliverability of housing within Plan period.
- Support as aligned with WMCA Strategic Economic Plan, but vital that SMBC works with TfWM to secure necessary connectivity and infrastructure (TfWM).
- Policy should promote improved opportunities for walking and cycling as well as public transport to encourage active and healthier lifestyles.
- Policy should recognise need for comprehensive upgrade of Junction 6 to support ambitions, and need for MSA to support.
- Policy could create sprawl and huge growth in car dependency as area not well served by public transport, so must include proposals to reduce car dependency.
- No consideration of potential impacts of reduction in imports of JLR vehicles on growth of Hub Area following Brexit and changes to US import policies.
- Growth will impact on housing proposals close to Airport/JLR which should be reconsidered as inappropriate.
- Support policy (JLR+).
- Support flexibility of approach to ensure future development opportunities not lost.
- Support opportunity which could include provision of arts facility to help sustain attractiveness of Borough.
- Agree challenges and objectives addressed by policy.
- Broadly agree (Natural England).

#### Council Response (Draft Submission Version)

- Welcome support for policy approach in the UKC Hub Area.
- The Local Plan will continue to provide a framework to support development opportunities at the UK Central Hub; supported by UGC Hub Growth and Infrastructure Framework and Plan, the Arden Cross Masterplan, NEC Masterplan and Birmingham Airport Masterplan. The draft Submission Plan includes Policies UK1 and UK2 to set out the principles for development at the two allocated sites.
- Since the publication of the Draft Local Plan, the Development Consent Order for Junction 5A has been granted and is underway.
- Public transport improvements and increasing connectivity are key factors in the UKC Hub Area proposals. The Council will work with key stakeholders to prepare an SPD to guide development and the delivery of infrastructure across the UK Central Hub Area.

- Proposed housing in the UKC Hub Area will contribute to Solihull's housing requirement, the revised policies set out expected delivery during the plan period.
- The growth in the UKC Hub Area has been taken into account in the 2020 HEDNA, which provides the evidence to support the identified employment and housing requirements set out in the Draft Submission plan.

### **Arden Cross**

- Support flexibility and justification but wording can be refined to better reflect Arden Cross vision, potential for early delivery of development to coincide with HS2, and strengthen exceptional circumstances justifying removal from Green Belt.
- Support with emphasis on early development opportunities in line with Government/WMCA aims.
- Support work of Urban Growth Company in assisting delivery (Birmingham CC).
- Support in principle as wider economic benefits justify reduction in Green Belt gap (Coventry CC).
- Support release of Green Belt land for Arden Cross development.
- Growth around HS2 Interchange should be properly planned to define scale of retail development and ensure town centre first approach not undermined, with defined threshold for impact assessment based on updated Retail and Leisure study and delivery linked to development's own need.
- Insufficient detail on connectivity between Borough/existing rail networks and HS2 Interchange to ensure compatible with Policy P8.
- Should recognise potential for combined HS2 Interchange and Airport terminal passenger facilities (Birmingham CC/Airport).
- Plan should carry forward commitment in Local Area Plan to protect and enhance heritage assets as scale and location of development would affect setting of a number of important assets (Historic England).
- If HS2 becomes reality, provision of Meriden Garden City would be step towards vision and take pressure off Balsall Common.
- Garden City approach should not be compromised with retail/other development of an appropriate not large scale.
- Important to maximise potential of HS2 but all the more important to protect the remaining Green Belt.
- Deletion of Green Belt should be for specific use(s) to avoid speculative developments, with development along rail line restricted for environmental reasons.
- Object as no proposals to mitigate increased traffic congestion, carbon emissions, air pollution and noise.
- Should not be developed until aggregate resources have been extracted.
- HS2 Bill still under discussion.

- The development of Policies P1-3 and the Sustainability Appraisal findings are included in the 'Sustainable Economic Growth Topic Paper' published to support the consultation on the Draft Submission Plan (2020).
- Since the consultation on the 2016 Draft Local Plan, the Arden Cross consortium have published a Masterplan (2020) which sets out the scale and broad type of development in the Arden Cross site (called UK1 in the Draft Submission Plan).
- It is anticipated that 500 dwellings will come forward within the plan period (up to 2036) and up to an additional 2,500 dwellings post plan period.
- The Council will undertake work on an SPD to deliver development and coordinate infrastructure across the UK Central Hub area.
- To facilitate development at the UK Central Hub it is necessary to remove the Arden Cross land from the Green Belt. The Council consider there are exceptional circumstances to justify the release of this land in order to maximise the economic benefits of the substantial national infrastructure investment at this location through the HS2 rail link and interchange station. This investment will act as a stimulus with the potential to bring local economic and socio economic benefits, to accommodate growth for the wider Greater Birmingham and Solihull LEP and West Midlands area and to bring investment of national significance to the area. It is therefore important that these benefits are realised through the delivery of the Hub proposals. The exceptional circumstances are set out in more detail in para. 94 of the Draft Submission Plan.
- The HS2 Act received Royal Assent in February 2017, with the Notice to Proceed issued in April 2020 and construction works are now underway; with the line expected to be open between 2029-2033.

## NEC

- Welcome approach in Plan for NEC (Birmingham CC).
- Support policy which offers opportunity for further retail and leisure activities at Resorts World to support NEC ambitions.
- Support policy to diversify visitor offer at NEC and should be reflected by reference to residential and other commercial uses.
- Support growth including housing on underused land at NEC, which should not result in conflict of uses or impact on amenity.
- Any additional development should be within NEC boundary, with protection for Bickenhill Plantations as buffer to nearby housing.
- Any reduction in car parking should not be detrimental to local area.

## Council Response (Draft Submission Version)

- Since the consultation on the Draft Local Plan, the NEC have published a Masterplan (2018) which sets out the scale and broad type of development across the NEC.
- No development is proposed on Bickenhill plantations.
- It is anticipated that 2,240 dwellings will come forward within the plan period.

**Airport**

- Support policy which recognises importance of successful regional airport and provides reasoned approach for supporting infrastructure.
- Should support growth outside current boundary through wider Green Belt release of land south of the Airport. This is required to facilitate growth at the airport and is based upon the expectation that passenger numbers are forecast to increase from 11.6 million passengers per annum (mppa) in 2016 to between 15.73mppa and 22.25mppa within the lifetime of the plan. This increase in passengers will need additional aircraft stands, further car parking (new provision and to replace that being lost through extending the aircraft stands) and an increase in ancillary/support uses (e.g. cargo support, catering facilities for airlines, engineering facilities to support maintenance operations, hanger space, engine ground running pen and staff accommodation) (Airport).
- Welcome support for expansion of Airport to maximise use of runway (Birmingham CC).
- Concern about effects of Airport's future growth plans and land requirements.
- Airport development should be within existing boundary and maintain/enhance living environment around site.

**Council Response (Draft Submission Version)**

- Since the consultation on the Draft Local Plan, Birmingham Airport have published an updated Masterplan (2019) for the period up to 2033 and Surface Access Strategy (up to 2023).
- Policy P1 states that proposed Site UK2 could potentially accommodate ancillary Airport needs as well as local employment and JLR growth.
- It is confirmed that projected passenger growth until 2033 can be met by the single runway.

**JLR**

- Recognise importance of JLR to regional economy.
- Paras. 134-137 justify release of Green Belt to support policy aims, but should include mixed-use including hotel/residential to ensure sustainable development.
- Support policy and exceptional circumstances justifying Green Belt release at Damson Parkway (JLR).
- Green Belt release insufficient to realise scale of economic development envisaged by WMCA Strategic Economic Plan.
- Expansion should not be considered in isolation from Airport aspirations.
- Should consider wider context of which Lode Lane plant a part to avoid limiting economic consideration as housing need, traffic flows and potential employment opportunities arise from multiple sites.
- Object to excessive amount of land proposed for release from Green Belt.

- Site 20 will have negative impact on several thousand homes north and east of Lugtrout Lane, create unbroken commercial developments on doorstep from Lode Lane to NEC and probably reduce numbers employed in Midlands in JLR supply chain.

#### Council Response (Draft Submission Version)

- Proposed site UK2 has been carried forward in the Draft Submission Plan to support a range of employment needs, including the expansion of JLR. Two parcels have already been granted planning permission; the Despatch centre was completed and has been operating since c2016, the Logistics centre is currently under development.
- The allocation will be delivered as part of the wider UK Central Hub area to ensure a coordinated approach to infrastructure and development.
- Work has been undertaken to assess transport infrastructure capacity in the Damson Park area and junction improvements are planned to the A45 as well as new cycleway improvements. These are referenced in the draft Infrastructure Delivery Plan (2020).

#### **Birmingham Business Park**

- Development at BBP should minimise environmental impact on surrounding residents.
- Development at BBP should be properly planned to define scale of retail development and ensure town centre first approach not undermined, with defined threshold for impact assessment based on updated Retail and Leisure study and delivery linked to development's own need.

#### Council Response (Draft Submission Version)

- Development at Birmingham Business Park should accord with wider policies in the Plan, including P14 'Amenity'.
- Land remaining to be built out at Birmingham Business Park is included in the Policy P3. Of the 2.4 ha that is available, 2.4ha is considered readily available for B1, B2 or B8 development (as per the previous Use Class Order). The Council will continue to review the employment land supply to ensure sufficient land is available to meet the evidenced need.

## Q5 – Key Objectives of Policy P1

*Do you agree with the key objectives that development is expected to meet, as identified in Policy P1, are appropriate? If not, why not? Are there any others you think should be included?*

### Representations received:

Number objecting: 19

Number supporting: 26

### Key Issues raised by Representations:

- Policy should relate to Borough as whole with objectives for Solihull, with sub-policy relating to UK Central Hub Area.
- Key objectives should be disaggregated so clear how each economic asset will contribute with site specific objectives in accordance with para. 58 of NPPF.
- Will help secure sustainable economic growth and improved connectivity.
- Support overall principles to realise full potential of UK Central and Hub Area which is greater than outlined in policy as made clear in Hub Growth and Infrastructure Plan (Urban Growth Company).
- Should ensure that HS2 brings employment and commercial opportunities to the area rather than Solihull becoming commuter village for London.
- Economic development ambitions should be balanced by housing growth/uplift as currently fails to consider wider infrastructure implications of full potential of investment.
- Insufficiently clear and/or onerous e.g. need to clarify terms such as growth and place making as will obviously support economic growth whereas unclear how employment led growth will support strong, vibrant communities (JLR).
- Should be revised to limit development, make clear not required to meet local employment needs, address area east of M42, impact on M42 and likelihood that will be road served and generate car traffic.
- Additional objective required to demonstrate how proposals will contribute to persistently high unemployment across parts of the Borough/sub-region.
- Focussing on attractive locations in motorway corridor will result in sprawl and overheating economy, whereas Solihull should work with other authorities to spread economic activity to areas where required.
- Dependency on JLR is worrying.
- Lack of certainty on timing of HS2 means delivery of housing within Plan period uncertain.
- Principles are fine but detail is in question e.g. impact of JLR growth on Green Belt.
- Development will need to be assessed against other policies e.g. P8, P9 to ensure growth supports wider aims.
- Should prioritise reduction in pollution, congestion and development of energy plan to ensure carbon emission targets can be met.

- Agree principles of policy.
- Broadly agree as relate to protecting and enhancing natural assets and takes climate change into consideration (Natural England).
- Agree objective to contribute toward strategic green infrastructure network.
- Support objective incorporating low carbon and renewable energy principles.

#### Council Response (Draft Submission Version)

- Policy P1 continues to reference the key assets: Arden Cross, National Exhibition Centre, Birmingham Airport, Jaguar Land Rover and Birmingham Business Park.
- The policy has been strengthened with regards to ‘inclusive growth’; a tenet of the Council Plan and West Midlands Combined Authority strategies; sustainable transport and connectivity, green infrastructure networks and minimising the use of natural resources and incorporating low/zero carbon and renewable energy principles.
- The policy makes direct reference to supporting employment and supply chain opportunities.
- The policy includes a focus on high quality design and innovation, to create distinct and unique places and high quality public realm.
- The Council is committed to ensuring coordinated approach to delivery of infrastructure and development across the UK Central Hub area.



## Q6 – Policy P1A Blythe Valley Park

*Do you agree with Policy P1A? If not, why not, and what alternative would you suggest?*

### **Representations received:**

Number objecting: 13

Number supporting: 29

### **Key Issues raised by Representations:**

- In separating policy for BVP from rest of Borough should not overlook its importance/role in Borough and wider region.
- Does not reflect conclusion in Employment Land Review that BVP is site for expansion with potential to capture demand beyond travel to work area.
- SHELAA does not include additional land submitted for BVP and considers site in terms of housing only, so needs re-assessment.
- Policy should discourage distribution or warehousing in Hub Area due to negative impact on road network and need to promote jobs of high economic value.
- Not supported as introducing uses into unsustainable location for which lack of take up of employment land is insufficient justification.
- Concern that inadequate housing being provided around BVP to meet economic need.
- Capacity too high, will take up Green Belt and contribute to sprawl.
- Support aspirations for growth, but additional traffic using Junction 4 will significantly and detrimentally impact on access to/from BVP.
- Very poor transport connectivity which will require addressing with transport providers to ensure not isolated and inaccessible.
- Question capacity of A3400/M42 to cope with additional traffic.
- Further clarity required about wider connectivity, which should include potential benefits offered by canal towpath for sustainable traffic free route.
- Road infrastructure supports development of new settlement.
- Object to lack of guidance to define scale of retail development and ensure town centre first approach not undermined, with defined threshold for impact assessment based on updated Retail and Leisure study and delivery linked to development's own need.
- Support intention to integrate residential and employment uses/to utilise underused employment areas for broader range of development including housing.
- Will support growth in wider UK Central Hub Area.
- Will provide for sustainable mixed-use development to meet needs of Borough.
- Support final paragraph and would have expected policy to have been implemented, but principle of demonstrating integration with surrounding areas and facilities has been ignored.
- Adjacent to SSSI and flood plain so any development must pay careful attention to both issues.

- Welcome intention to protect and enhance natural environment, so should add Objective K to list of challenges and objectives addressed by policy.
- Support objectives of policy, reference to mixed-use community and primary economic asset, and recognise that planning restrictions have already been relaxed and being implemented.
- Include provision of arts facility to help sustain attractiveness of Borough.
- Plan should address anomalies between UDP and Local Plan boundaries.

#### Council Response (Draft Submission Version)

- Policy P1A Blythe Valley Park has been retained, as distinct in scope and location from the UKC Hub Area, but still within the UK Central.
- Since the consultation on the Draft Local Plan, hybrid planning permission has been granted for a mixed-use development across the site and the first residential phases are under construction.
- At the time of writing the policy, Blythe Valley Business Park had ca. 7ha remaining of employment land to be built out, and this is also now included within Policy P3.

## Q7 – Policy P2 Maintain Strong Competitive Town Centres

*Do you agree with Policy P2? If not, why not, and what alternative would you suggest?*

### Representations received:

Number objecting: 45

Number supporting: 35

### Key Issues raised by Representations:

#### Town Centres

- Object as policy not based on up to date retail and leisure needs.
- Policy must define primary shopping areas.
- Should consider when and where need likely to arise and identify local thresholds above which impact assessments will be required for town centre uses, as NPPF threshold too high.
- Should be greater ambition for larger number and variety of housing in town centres to provide for all age groups and create enhanced churn.
- More emphasis required on connecting residential areas to local town centres (TfWM).
- Broadly support policy with inclusion of green infrastructure as key consideration (Natural England).
- Support policy.

#### Council Response (Draft Submission Version)

- The policies have been supported by evidence in the Solihull Town Centre Masterplan, the emerging Shirley Economic Plan and preliminary work that was undertaken for a potential Chelmsley Wood Masterplan.
- Policy P2 seeks to diversify and range of uses within town centres and to support their sustainability post-Covid.
- Primary shopping areas for Solihull Town Centre are included in the supporting text. For Shirley, retail activity will be focused within the town centre boundary.
- Policy P2 expects proposals for main town centre uses to be located in the three main town centres; such developments that are proposed elsewhere will be considered in the light of the NPPF requirements and will have full regard to sequential and impact assessments, as appropriate.
- See also comments below on each of the three main town centres.

#### Solihull Town Centre

- Need to ensure continued success of Solihull town centre is not detrimentally affected by inappropriate development outside centres.
- Fails to acknowledge principal role as focus for retail or framework to attract new retail floor space.

- Difficult to deliver mixed-use and high density residential development as entire development requires completion before occupancy/residential development long standing ambition but has not moved forward and doubtful will be realised.
- Should be greater emphasis on residential development as offers opportunity for higher density housing in location with good transport connections and conversion of unoccupied shops/offices, and less on commercial development.
- Should take account of expected decline in High Street shopping over Plan period.
- Support policy approach to strengthen and diversify centre and allowing flexibility, which will encourage investment which should include more hotels and employment sites as well as residential in accordance with NPPF.
- Support recognition that Solihull town centre should continue to be primary focus for retail and leisure, the opportunity sites and addition of complementary town centre uses, principle of relocation station and improvements to north/south access to High Street.
- Loss of car parking should be addressed by park and ride scheme utilising sites in the Green Belt around the periphery of Solihull town centre e.g. Ravenshaw, Widney Manor, Damson Parkway and South Shirley.
- Concerned at lack of proposals for improving roads especially the hazardous traffic island west of Solihull town centre.
- Traffic management schemes have not enhanced Solihull town centre.
- Need to take account of impact of proposals on surrounding roads, including A41/Hampton Lane/Yew Tree Lane junction.
- Improvements to gateways and urban design should not be at expense of rent increases forcing out small businesses.
- Welcome changes to wording of fifth and sixth points under Solihull town centre.
- Lack of cultural content is disappointing as cultural and community facilities play a key role in vibrant centres, support day to day needs and help promote wellbeing and improve quality of life.
- The term sustainable economic growth is confusing and needs defining.
- Include Solihull School on existing use plan as significant large single use.

#### Council Response (Draft Submission Version)

- Since the consultation on the Draft Local Plan, the Solihull Town Centre Masterplan has been under revision. The Policy refers to the imminent update of the TC Masterplan, which recognises the need for greater flexibility in use, and the decision to redevelop Solihull rail station at its current location.
- Revised policy references the Integrated Transport Hub and strengthened connectivity routes for pedestrians and cyclists.
- Transport studies have been undertaken to inform Policy P2, including possible highway improvements in town centres and is referenced in the Infrastructure Delivery Plan.

- Policy recognises the strategic importance of Solihull Town Centre within the West Midlands.
- Policy P2 supports and encourages as range of different uses in Solihull Town Centre beyond traditional retail. This includes the presence of a varied 'evening economy' that will encourage broad age spectrum of individuals to visit the centre, as well as encourage arts and cultural activities.
- The term 'sustainable economic growth' is included in the NPPF. It is economic growth which supports the principles of sustainable development.
- The policy is not supporting Park and Ride in the Green Belt to serve the Town Centre, rather encouraging more sustainable transport options for work and leisure to the town centre.

### **Relocation of Solihull Station**

- Unclear how far vision is deliverable as relocation of station dependent on others.
- Object to relocation of station as huge cost with little benefit, doubtful proposed site will be sufficient for same level of parking and bus interchange, and would result in loss of part of Tudor Grange Park.
- Rather than relocating station should use site for badly needed housing/commercial use and invest in public transport to attract people from rural and other areas, with improved interchange, car parking/park and ride/cycling/pedestrian routes.
- Relocation of station should take account of rail users, as proposed site uphill and less accessible, and nearby businesses and new interchange could improve connectivity (TfWM+).
- Agree relocation of station would benefit town centre.
- Reducing car dependency/ensuring traffic reduction in new developments and highway design/innovation would enhance connectivity and avoid unnecessary relocation of station (TfWM+).
- Object to loss of Monkspath Hall Road carpark/new multi-storey car parking.

### **Council Response (Draft Submission Version)**

- Since the consultation on the Draft Local Plan, the Council are pursuing the option for an Integrated Transport Hub in and around Solihull station to accord with Solihull Connected objectives and the West Midlands Strategic Plan.

### **Masterplan/Opportunity Sites**

- Inconsistencies between policy and Town Centre Masterplan need to be resolved.
- Overdeveloping and reducing car parking will not encourage people to use town centre.
- Town Centre Masterplan should be incorporated in Plan to give it development plan status and greater clarity and detail on delivery of objectives required.
- Support development of town centre as outlined in Masterplan.

- Timing of growth should influence phasing for plan led retail need and preferred strategy.
- Concern about impacts of development on Paragon headquarters, which should not be included as potential redevelopment site.
- Preferred uses for Mell Square/Mell Square East should allow greater flexibility by inclusion of retail, leisure, residential, including private rented sector, and commercial uses.

#### Council Response (Draft Submission Version)

- Solihull Town Centre Masterplan has been under revision and subject to a number of studies, including economic appraisal and market analysis.
- Masterplan/Opportunity sites are no longer included within the revised policy. Details of specific opportunity sites expected to come forward in Solihull Town Centre will be provided in the updated 2020 masterplan.

#### **Shirley Town Centre**

- Will do nothing to address gridlock during peak hours/development of High Street being hindered by traffic on A34.
- Support approach but more detail required and Shirley Economic Plan should be referenced.
- Support restriction on retail floorspace for former Powergen site, and could review residential capacity as opportunities elsewhere limited.
- Welcome reference to Shirley town centre.

#### Council Response (Draft Submission Version)

- An Economic Plan for Shirley is being refreshed to address the impacts of Covid and changes in retailing culture.
- Council is progressing an A34 Stratford Road project to address improvements to connectivity, accessibility and congestion as part of the UK Central development programme.

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

- Welcome inclusion of policy, but weak on detail such as need for investment and modernisation, creation of sense of place, lack of night time economy and scarcity of facilities.
- Town centre should be developed to bring in business.

#### Council Response (Draft Submission Version)

- North Solihull is one of the UK Central Areas, and further work is being carried out by the Council to support development and investment within Chelmsley Wood Town Centre.

**Main Town Centre Uses Elsewhere**

- Balsall Common centre should be included as strategic priority as requires masterplan to define scope, nature and timing of improvements to car parking, local importance, physical appearance and attractiveness.
- Policy needs to reflect strategic need for redevelopment of Balsall Common centre, with possible locations around station or north of village.
- Balsall Common centre has suffered from inappropriate development, oversupply of some uses and loss of other business premises, relocation of health centre, inadequate parking, lack of bus station, traffic congestion and speeding, and now proposals to divert through traffic, which should be addressed by comprehensive plan.
- Knowle should be included in policy as growth will make Knowle/Dorridge larger than Shirley.
- Need policy guidance for expansion of businesses in out of centre locations which are facing increasing competition.

**Council Response (Draft Submission Version)**

- Revised policy includes direct reference to applications having full regard to sequential assessments and impact assessments as appropriate.
- Balsall Common village centre is addressed in the Balsall Common settlement chapter.
- Knowle village centre is addressed in the Knowle, Dorridge & Bentley Heath settlement chapter.

## Q8 – Scale and Location of Development (Town Centres)

*Do you believe the right scale and location of development has been identified? If not, why not?*

### Representations received:

Number objecting: 15

Number supporting: 20

### Key Issues raised by Representations:

- Difficult to deliver mixed-use and high density residential development as entire development requires completion before occupancy.
- Growth should reflect masterplan and include reference to zone of influence around Sapphire Court.
- Only one of six opportunity sites identifies opportunities for retail which is insufficient and inflexible, and should be added to Homer Road Civic Buildings site.
- Should progress relocation of station with housing on current site, but recognise technical issues of topography.
- Oppose expansion of town centre for new station which includes parts of Tudor Grange Park.
- Plans for Solihull town centre offer opportunity for higher density residential development/housing on periphery appropriate.
- Some development of Shirley town centre needed as Parkgate development has led to decline of shops and businesses.
- Solihull town centre already too large and additional development better located to Chelmsley Wood.
- Chelmsley Wood town centre needs investment and modernisation.
- Should apply principles to Balsall Common as opportunity to focus retail and services around a much improved centre.

### Council Response (Draft Submission Version)

- See responses outlined above under Q7.



## Q9 – Policy P3 Provision of Land for General Business and Premises

*Do you agree with Policy P3? If not, why not, and what alternative would you suggest*

### Representations received:

Number objecting: 26

Number supporting: 28

### Key Issues raised by Representations:

- Need clearer justification for scale of employment land proposed, explaining how far will address needs, with sufficient flexibility for land to come forward on non-allocated sites where proven need to accord with NPPF.
- Should align with UK Industrial strategy.
- Insufficient land for employment purposes if GBSLEP Strategic Economic Plan/WM Land Commission predictions/conclusions correct, and Employment Land Review has not considered level of growth identified in SEP.
- Recommendations of Employment Land Review should be translated into policy to provide greater certainty on level and type of growth and recognise potential of Arden Cross.
- Plan lacks discussion of expansion at the Airport, JLR, new industrial opportunities and MSA.
- Concern at precautionary approach adopted to identifying land for employment purposes and suggest plan, monitor and manage approach to avoid over-allocation.
- Should ensure that opportunities for strategic employment sites in sustainable locations are not restricted, to address evidence in WM Land Commission report.
- Should include number of small scale sites including those supporting Airport/JLR etc.
- Older sites more difficult to regenerate so should be recycled with replacement identified/existing commercial land is most appropriate to develop.
- Should enable release of unviable or vacant land to stimulate growth, release equity for investment and provide Starter Homes.
- Conflict between protection of business and employment premises and allocation of land containing businesses for housing should be resolved.
- Methodology used to translate employment forecasts to floor space is not robust or appropriate as suppresses some requirements, notably B8.
- Significant demand for B8 uses which is not adequately addressed.
- Policy should refer to B1, B2 and B8 for preferred uses.
- Employment Land Review uses 2014 BRES data which has been updated with 6% increase in job numbers for Solihull so underestimates future jobs growth.
- Para. 174 should emphasise powers to encourage utilisation of existing premises as existing vacant sites are barrier to creation of vibrant communities.
- Should include encouragement for appropriately scaled expansion as well as retention of small and medium sized enterprises, and for development that supports rural businesses, particularly provision for leisure and recreational use of countryside.

- Seek specific reference to farms and rural businesses to support growth and development and avoid disadvantages to thriving agricultural businesses.
- Impact on local road infrastructure underestimated from changes to motorway access, lorry movements in residential and rural areas and public transport improvements required.
- Travel between north and south of Borough still difficult without car so need for local employment/transport networks to provide access to jobs in North of Borough.
- Impact of lack of digital connectivity and high capacity communication networks in rural areas.
- All sites identified close to motorway network and will be traffic generating encouraging sprawl.
- Need greater focus on local economies/employment opportunities at Chelmsley Wood town centre, Smith's Wood and Kingshurst village centres and industrial estates in Castle Bromwich and Marston Green to strengthen communities and reduce travel/encourage more sustainable modes.
- Welcome policy and criteria which are broadly appropriate, but should add reference of need to demonstrate that loss of employment sites would not adversely affect nationally/regionally significant employers (JLR).
- Broadly support but should add wording seeking enhancement of local environment where possible.

#### Council Response (Draft Submission Version)

- The revised employment policies in the Draft Submission Plan, take into account the findings of the HEDNA prepared in 2020 which provides the evidence underpinning the employment land requirement set out in policy P5.
- Proposals at UK1 and UK2 are addressed in more detailed new specific site policies, as well as Policy P1.
- Matters of design and local environment are covered in more detail in Policies P9, P10, P11, P14 and P15.
- Point 4 and para. 151 of P3 encourage the creation of small and medium enterprises, including in rural areas, in accordance with other policies in the plan. Farm diversification proposals would be considered in this context.

## Q10 – Scale and Location of Development (General Business)

*Do you believe the right scale and location of development has been identified? If not, why not?*

### Representations received:

Number objecting: 20

Number supporting: 17

### Key Issues raised by Representations:

- Need clearer justification for scale of employment land proposed, explaining how far will address needs, with sufficient flexibility for land to come forward on non-allocated sites where proven need to accord with NPPF.
- Fails to identify total employment land requirement across the Borough, with insufficient land for employment purposes if GBSLEP SEP/WM Land Commission predictions/conclusions correct, compounded by removal of large area of employment land at Blythe Valley Park for housing.
- Risk that job growth underestimated and insufficient land identified so additional sites required such as SHELAA Site 80 land at Wyckhams Close.
- Need greater focus on local economies/employment opportunities at Chelmsley Wood town centre, Smith's Wood and Kingshurst village centres and industrial estates in Castle Bromwich and Marston Green.
- Should identify brownfield sites and locate employment land closer to where people live to reduce car based travel and avoid sprawl.
- Should establish specific employment requirements for UK Central Hub Area and make overall requirements for Borough clearer (Urban Growth Company).
- LPR19 HS2 Interchange is another infringement of Green Belt and Meriden Gap.
- SHELAA has not assessed LPR19 as employment site.
- Green Belt allocations at LPR19/20 HS2 Interchange and Damson Parkway not justified or necessary for employment needs of Borough's residents and should be deleted.
- Releasing Green Belt for LPR19/20 requires joined up approach incorporating proposed Junction 6 access.
- Support growth at LPR19 HS2 Interchange.
- Support allocation of LPR20 Damson Parkway as in appropriate location to support existing JLR plant, but must allow flexibility for businesses that may not be able to continue to seek alternative premises (JLR+).
- SLP31 Birmingham Business Park should not be relied on for supply later in Plan period as will be developed early.
- Opportunity for extension of SLP10 Blythe Valley Park overlooked.
- Employment Land Review/SHELAA assessment incorrect for Fore as does not include extant planning permission, and does not reflect information submitted to Call for Sites.
- SLP27 Fore allocation should be increased to include additional areas for car parking as existing site too constrained, and preferred use should include B2 and B8.

- Density of development at SLP25 TRW/The Green too high and no open space identified.
- Support allocation of SLP25 TRW/The Green of which 3 ha will be developed for employment with the remainder housing.
- Plan should address needs of other land uses, such as car sales as unsuitable for town centres or business parks, and Stratford Road corridor with existing uses is a suitable location.
- Should use SSSI Impact Risk Zones to aid consideration of locations for development and avoid designated sites, priority habitats, protected landscapes best and most versatile agricultural land, areas at risk of flooding and brownfield sites of high environmental value (Natural England).
- Support exclusion of SHELAA Site 165 as would have significant impact on Green Belt.

#### Council Response (Draft Submission Version)

- Revised policy has taken findings from 2020 HEDNA into account. The Council will continue to review the employment land supply to ensure sufficient land of the right type is made available to meet the evidenced need.
- The SHELAA has been updated and published to support the Draft Submission Plan consultation.
- Site at The Green has since been granted planning permission (in 2019) for a mix of housing and development associated with car dealerships.
- Employment land on existing sites, such as Cranmore Estate, will continue to be supported, but is not considered to require a separate allocation (para. 146).
- Policy P3 sets out the particular circumstances where alternative development may be accepted.
- Para. 151 includes how small and medium sized businesses will be supported subject to policy considerations.
- Proposed site allocations have each been subject to an Ecological Assessment by the local Habitat Biodiversity Audit.
- Chelmsley Wood Town Centre is addressed in Policy P2 and Kingshurst Village Centre in Policy NS1. Further detail is provided in the settlement chapter 'North of the Borough', which recognises the opportunities to improve the skills base and access to employment north of the Borough, as well as protecting the amenities of local residents.
- There are not considered to be exceptional circumstances to further expand the Fore (SLP 27) into the Green Belt.

## 8. Providing Homes for All (General Policy Approach)

### Q11 - Policy P4 Meeting Housing Needs

*Do you agree with Policy P4? If not, why not, and what alternative would you suggest?*

#### **Representations received:**

Number objecting: 93

Number supporting: 36

#### **Key Issues raised by Representations:**

- General support for P4, but a number of detailed comments on its practical implementation.
- Need for more detail in P4 (e.g. affordable tenure and size mix; the meaning behind factors i) to vi) that the policy will take into account) rather than reserve this for a Supplementary Planning Document (SPD).
- SPD needs to be revised and brought up to date in the light of current data.
- Support for the revised threshold which brings it in-line with national guidance.
- Concern over viability of 50% affordable housing and its potentially negative impact on housing delivery.
- P4 should encourage the development of suitable brownfield sites by having a lower affordable housing requirement in such cases.
- Need for policy to be tested/supported by a viability study.
- Flexibility is needed to take account of specific circumstances and viability considerations; housing mix also needs to take into account masterplanning and viability.
- The Council should work proactively with the landowners/developers in producing development briefs and not produce them in isolation.
- The affordable housing that is developed must be in keeping with surrounding properties.
- Starter Homes no longer mandatory.
- Justification of the proportions of rent and shared ownership in light of SHMA.
- Importance of affordable housing being affordable for local people and in perpetuity.
- Policy should be extended to explicitly cover provision for people with disabilities.
- Shortage of bungalows and single storey accommodation for the elderly people and those with disabilities.
- Policy needs to promote opportunities for first time buyers.
- Housing for rural workers needs to be considered.
- Plan is unsound due to lack of provision for rural exception sites and in absence of monitoring of sites in adopted plan. Land at Barston and Chadwick End should be allocated as rural exception sites.

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**Council Response (Draft Submission Version)**

- The development of Policies P4A-E and the Sustainability Appraisal findings are included in the 'Housing Topic Paper' published to support the consultation on the Draft Submission Plan (2020).
- At the 2019 Supplementary Consultation stage the Council acknowledged that the 2018 revised NPPF confirmed that the statutory requirement for 20% Starter Homes (as required by the Housing and Planning Act 2016) would no longer be enacted. It also stated that the Council will respond should this change through any secondary legislation.
- Revised policy has taken findings from 2020 HEDNA into account.
- The thresholds for types and tenures are included within the Policy.
- Policy and/or supporting text reflects revised NPPF with reference to vacant building credit, threshold trigger for affordable housing and Build to Rent.
- The Meeting Housing Needs SPD will be updated following adoption of the Local Plan.
- Policy P4B includes the criteria for assessing rural exception sites, which will be addressed at planning application stage.
- Policy P4A supports affordable routes to home ownership.
- Government policy is providing a range of options for first time buyers, including consulting on First Homes.
- New Policy P4E 'Housing for Older and Disabled People' has been introduced.
- The Meeting Housing Needs SPD will set out design and layout requirements to ensure tenure blind affordable housing is integrated into developments at the earliest design opportunity.

## Q12 - Level of Affordable Housing

*Do you agree with the level of affordable housing being sought in Policy P4? If not, why not, and what alternative would you suggest?*

### **Representations received:**

Number objecting: 66

Number supporting: 31

### **Key Issues raised by Representations:**

- Support for the revised threshold.
- Support for a flexible approach in implementation of this policy.
- Concern and disagreement with the proposed 50% requirement:
  - Not supported by viability assessment
  - May deter private development
  - Risk to prejudicing other planning objectives
  - Justification given an annual affordable requirement of 210 and the percentage that this represents of OAN

- The level of affordable housing should only be set at 40% for the houses completed over the period up to 2020. Beyond that the level should be set to 20%.
- The percentage is too high for Solihull. Providing a mix of housing that addresses the needs of a wider profile of household types, e.g. elderly, single persons etc, would encourage better rotation of starter homes and houses suitable for families.
- 2012 viability study is out of date and a new assessment is needed.
- An up-to-date viability assessment should be published for comment.
- Viability Statement should be required rather than financial contribution where on-site provision not viable.
- The actual level of the different types of affordable housing to be sought, including those emerging as a result of the recent White Paper, need to be tested in a robust way. This testing should cover (a) dimensioning need and (b) assessing viability for different classes of site. The testing results need to be spelt out in the reasoned justification and backed up by an appropriate evidence base.
- The 20% Starter Homes requirement should be removed following the Government's response to the technical consultation on 7 February 2017.
- Starter Homes should be included within affordable housing not additional.
- Policy must be effectively enforced by the Council and adhered to by developers.
- The Policy is right but SMBC are poor at implementing it. No planning permissions should be granted for developments under the Plan unless the Developer can show that they have strong partners in place.
- The quality of the affordable provision is important. Care should be taken that the units are not out of keeping with the market housing in the area.
- A need to provide more affordable housing for the elderly and first time buyers.
- There is a need to ensure that affordable housing remains in perpetuity, or at least beyond the first occupation.
- Objections to affordable housing provision at DLP sites 16 and 18.

#### Council Response (Draft Submission Version)

- On consideration of the consultation responses and approach from Government, the Council have considered to retain the 40% contributions to affordable housing.
- Revised policy has taken findings from 2020 HEDNA into account.
- A Viability Assessment has been published to support the Draft Submission Plan consultation.
- There is a Borough-wide need for affordable housing.
- The policy does not cover matters relating to how affordable dwellings will be allocated for occupation. Eligibility and priority is governed by the Council's Housing Allocation Scheme.

### Q13 - Self and Custom Housebuilding

*Which option for delivering self and custom housebuilding do you favour and why? If neither, do you have any other suggestions?*

#### Representations received:

Number objecting: 21

Number supporting: 26

#### Key Issues raised by Representations:

- Support and objection for both option 1 and option 2.
- Would allow for custom development to be delivered in the most appropriate location.
- A number of self-builders identified Option 1 to be the most feasible and deliverable. The size and nature of plots that self-builders are likely to require will be more suited to smaller sites and not those typically built by volume house builders.
- Self/Custom Build sites should not be on one site alone.
- A number of independent sites should be allocated for up to 20-30 dwellings each.
- Policy should encourage Self/Custom build of individual dwellings on infill or small Green Belt sites within or adjacent to rural settlements where this accords with the Parish or Neighbourhood Plan.
- Option 2.
- Only 91 people on register therefore only need for developers of allocated sites to make a 5% contribution to self and custom build on larger residential sites of 500+ units or via voluntary agreement between developer and SMBC on sites falling below this threshold. 5% of larger units would yield 109 plots, i.e. a 20% buffer.
- More practical to deliver serviced plots on larger sites, where impractical could supply commuted sum.
- Should prepare viability evidence for policy, sites currently being promoted have been negotiated on existing planning policies and values.
- Plots should be marketed for 12 months, but returned to developer if unused.
- Option 2 would not enable a comprehensive and holistic masterplan/development in terms of delivery and design.
- Option 2 would also provide numerous health and safety issues trying to work with numerous individuals and their associated contractors which would ultimately slow down delivery.
- Site promoters argued that they would expect that individuals requirements may be quite unique and therefore may not fit within allocated sites especially those identified for a large number of houses and that a number of smaller sites that would allow for this type of build in pockets across the Borough.
- Option 2 would mean more sites available for self and custom housebuilding and would break up new estates with more interesting and individual new homes.



- Isolated plots on larger sites would be difficult to manage and may incur higher costs, may affect viability or provision of affordable housing and the desirability and viability of sites with only 45% market housing.

**Other comments.**

- Both options should be considered as part of the Council's provision of plots for self-build homes.
- Those individuals interested in self-build may be seeking first choice on individual plots across the Borough.
- Policy should give priority planning requests for those building self-build homes, in order to encourage more building.
- Self and custom house building will impact the look of the area and will not be in keeping with the established Borough of Solihull.
- Self and custom house building is welcome if in the right location under the right planning conditions.
- Self/Custom build can add to the variety and design quality of the Borough.
- Policy should allow use of Green Belt exceptions for one off self builds.
- Both options have merit and it is suggested that a combination of both approaches would allow for the most flexibility in delivering housing for this part of the market to ensure deliverability.
- Suggestion to allocate public sector land.
- 'The government states that housing contracts should go to smaller companies using innovative methods, and promote self-build and housing associations, which would help to deliver smaller more affordable homes. Is this in the plan?'

**Council Response (Draft Submission Version)**

- The Council is justified in making provision for self and custom build housing in order to comply with the Self and Custom Housebuilding Act, the Housing and Planning Act, National Planning Policy Guidance and the needs on the self-build register.
- The Council have progressed Option 2 from the 2016 consultation in the Draft Submission Plan. Providing a small percentage (5%) of self-build plots across sites of 100 dwellings or more allows for plots to be delivered across the plan period, as well as providing choice over location and timing over the plan period. Additional plots also come forward each year via windfall redevelopment, as evidenced by CIL self-build exemptions.
- Further detail and guidance for delivery of Policy P4D will be set out in the Meeting Housing Needs Supplementary Planning Document.
- Policy P4D has been subject to viability testing in the Viability Assessment (2020).

## Q14 – Number of New Homes

*Do you agree that we are planning to build the right number of new homes? If not, why not, and how many do you think that we should be planning to build?*

### Representations received:

Number objecting: 142

Number supporting: 41

### Key Issues raised by Representations:

#### View from developers that:

- Assumptions in SHMA are conservative, in particular regarding household suppression in younger households, affordability market signals and balancing households with economic growth.
- Solihull should take a greater share of the HMA shortfall, e.g. based on commuting and/or migration patterns.
- Birmingham overspill is 37,900, not 37,500.
- Formal agreement should be reached on how unmet needs from Birmingham will be dealt with.
- Alternative housing need assessments have been submitted by Pegasus, Barton Willmore, GVA, Lichfields, Persimmon Homes Central.
- The housing target from these assessments range from 890 to 1,317 dwellings per annum for Solihull's housing provision target, as a minimum.
- Barton Willmore critique: Target should be increased to a minimum of 890-987 homes p.a., for OAN, 12.5% higher than currently provided for. Housing numbers exceeding 1,000 homes p.a. would be required to support UKC Hub scenario.
- Should look to address long-term need post-2033, including allocating safeguarded sites to ensure the permanence of Green Belt boundaries.
- Any backlog in housing supply since 2011 should be front-loaded.
- Consider the LPEG recommendation to allocate an additional 20% of the dwelling requirement.
- SHMA is not an OAHN for Greater Birmingham HMA.
- Strategic Housing Needs Study 2015 is out of date.
- Phasing of supply is discouraged.
- Windfall supply included in overall housing supply is unjustified.
- Should be a greater contingency for the housing supply figures, at least 5%, preferably 10%.
- No evidence provided on 36dph densities.
- Need to take into account implications from the Housing White Paper, e.g. standard methodology for assessing housing need.

**View from local communities that:**

- Solihull should only meet its own needs.
- Phasing of supply is encouraged.
- Acceptance that there is a housing shortage and affordability issues for first time buyers and young families.
- Housing needs may decline after Brexit, this needs to be kept under review.
- Housing figures should be constrained by Green Belt.
- Solihull's overall plan for housebuilding in the review period appears excessive. Let us not forget the Borough is aspirational versus its neighbours and at this rate of growth it would appear supply far outstrips demand and thus feeds inward migration rather than supporting resident population growth in a sustainable manner.
- Unless there are clear plans to increase employment and wealth generation in proportion to the number of new houses being built the result will be a decrease in the overall standard of living and quality of the Borough. The revised plan includes disproportionately more incremental houses than employment opportunities.
- Perception that the Council has been directed by central government to have a five year housing plan.
- Can understand how target of 6,150 has been derived. Believe it is too many homes to preserve the attractiveness of the region, and many of the other objectives set out in the DLP.

**View from HMA local authorities:**

- Birmingham City:
  - The provision of 2,000 dwellings is an important contribution to meeting the HMA shortfall. However, question the justification and evidence base for this figure.
  - Concern that at present the Draft SLP does not adequately address the housing shortfall arising from the Birmingham Development Plan and progress on this issue prior to the submission of the Plan will be important in demonstrating that the Duty to Co-operate has been met.
  - The SA should consider other reasonable alternatives e.g. 2,000-4,000 dwellings and higher contributions.
  - Unclear what the Objectively Assessed Need is given PBA recommendations and SLP housing land provision target.
- Bromsgrove District:
  - Contributions from LPAs to the HMA shortfall needs full support of all GBHMA authorities.
  - Should be based on a robust and thorough apportionment methodology, i.e. Strategic Growth Study.
  - 2000 figure received some but not full support.
  - Strategic Growth Study underway; essential that all of GBHMA receive same level of scrutiny.

- Need for strategic Green Belt Review in WM Land Commission report.
- Align contribution with Solihull's economic aspirations.
- PBA Stage 3 Report recommended locating shortfall within easy reach of Birmingham and lesser extent Solihull.
- OAN figure not defined in DLP.
- Unclear how 2,000 dwellings has been included within the 15,029 figure.
- Cannock Chase District:
  - Support provision to meet Solihull's own housing needs.
  - Object to presenting 2,000 to meet HMA shortfall as a maximum.
  - HMA have not yet decided distribution of shortfall and Duty to Co-operate is on-going. No apparent mechanism for future flexibility, this is essential.
- North Warwickshire Borough:
  - Note the DLP indicates a modest contribution to Birmingham's shortfall.
  - Wish to raise major concerns that 2000 dwellings does not significantly or sufficiently address neither the scale of the shortfall, nor the clear and significant links and relationships between Solihull and the Greater Birmingham area.
  - No clear rationale on how 2000 figure arrived at.
  - Particularly relevant given:
    - North Warwickshire's proposal of testing 3790 dwellings in their Local Plan to address shortfall;
    - Comparative infrastructure and services available in both authorities;
    - Significantly higher levels of commuting traffic, and travel to work relationships between Solihull and Birmingham, both local and strategic.
- South Staffordshire District:
  - Welcome Solihull's commitment to meet its own housing need.
  - NPPF clear that HMA need should be met in full.
  - 2,000 contribution is only 5% of shortfall.
  - Evidence on household formation and movement to work patterns; suggest Solihull should make a much higher contribution.
  - GBHMA currently working on evidence to investigate potential spatial options across HMA to meet shortfall.
  - This should be referenced and findings identified in Local Plan Review.
- Stratford-on-Avon District:
  - The contribution of 2,000 homes towards the Greater Birmingham HMA shortfall is welcomed. However, further technical work looking at how the shortfall should be accommodated across the HMA is being undertaken. Whilst the results of this work are not yet known, given the strong relationship of Solihull to Birmingham and the fact that Solihull Borough is fully within the Greater Birmingham HMA, it is highly likely that Solihull

Borough will be required to make further and significant provision towards contributing to the HMA shortfall. The Draft Local Plan should therefore make further provision to meeting these needs.

- Tamworth Borough:
  - The needs arising from the HMA require a co-ordinated and comprehensive approach to ensure that all available options are considered and tested. The full and active involvement of all authorities is essential to arrive at an agreed position that is both valid and justified. The rationale and reasoning for the proposed number of additional dwellings to contribute to the wider HMA shortfall is not provided. It is important to reinforce the approach that sustainable locations, where appropriate infrastructure exists or can be provided, should be prioritised to avoid undue additional pressure being placed on releasing less sustainable sites for development.

#### **View from Other LPAs**

- Coventry:
  - Given the pressures across the GBHMA and the Coventry and Warwickshire HMA, Solihull should continue to ensure that the needs of the GBHMA are met within its own area. The Council should ensure that every reasonable step has been taken to explore and positively plan for unmet need from Birmingham and other GBHMA authorities at a level that is justified and supported by evidence.

#### **UGC view:**

- The Hub Growth and Infrastructure Plan demonstrates a larger capacity for growth than is currently outlined in the Draft Local Plan. This would contribute towards the objectively assessed need of the Borough and the unmet need of the wider HMA.
- The overall number of dwellings (1000) should be greater and the HGIP sets out a figure of at least 1500 homes over the plan period, rising to 3-4000 beyond 2032.

#### **Comments on text in Local Plan**

- The housing split (figures in the DLP) do not sum and clarification is considered necessary, particularly on how the published split of the housing target fits into the wider overall housing target for the Plan period.
- Considered that the housing requirement in Policy P5 should be expressed as a minimum.
- Unclear how figures 12,094 and 14,278 are reconciled.
- Unclear how 2,000 of neighbouring unmet need is provided given only 700 dwellings is added.
- Policy should include tables from Housing Background paper.

#### **Council Response (Draft Submission Version)**

- The development of Policy P5 and the Sustainability Appraisal findings are included in the 'Housing Topic Paper' published to support the consultation on the Draft Submission Plan (2020).

- Since the 2016 consultation on the Draft Local Plan, the Government has introduced the standard methodology to assess Local Housing Need. The 2019 Supplementary Consultation document took the emerging standard methodology into account as the basis for assessing local housing need. The standard methodology was formally introduced in the revised 2019 NPPF and Planning Practice Guidance. For the Regulation 19 consultation in 2020, the proposed housing requirement figures were further supported by more recent evidence in the 2020 HEDNA. This document assessed the affordability and employment factors, as well as the Local Housing Need, and whether these would result in a need for any further uplift to the Borough's housing requirement.
- The Council is seeking to meet their own objectively assessed housing need in full; a substantial increase from housing that has been delivered on average in the previous 20 years and one of the highest LHNs within GBBCHMA housing market area.
- In meeting their full objectively assessed needs, the Council is not adding further pressure to the wider HMA shortfall. In addition, the circa 2,000 dwellings will make a sizeable contribution to the wider HMA shortfall, and more specifically, Birmingham's housing needs, without compromising their local infrastructure or environmental capacity.
- Since the consultation on the 2016 Draft Local Plan, the GBBCHMA has continued to engage in the Duty to Cooperate and seek levels of contribution from participating authorities. The latest update to their Position Statement states there is a shortfall of ca. 2,600 dwellings up to 2031. It is considered premature to specify contributions post-2031 as further capacity work needs to be carried out by the different local authorities, in particular, Birmingham and the Black Country.
- Further information is provided in the updated Housing Topic Paper, prepared to support the consultation on the Draft Submission Plan.

## 9. Providing Homes for All (Site or Settlement Specific)

### Q15 - Location of New Homes

*Do you believe we are planning to build new homes in the right locations? If not, why not, and which locations do you believe shouldn't be included? Are there any other locations that you think should be included?*

#### Representations received:

Number objecting: 333

Number supporting: 25

#### Key Issues raised by Representations:

- View from developers that concentrating development in a smaller number of sustainable urban extensions will slow delivery.
- Consider Council is relying too much on volume housebuilders performing and delivering such sites to meet annual targets.
- Recent research indicates more small and medium sites should be allocated to deliver housing by smaller building companies.
- Should be preference for small/medium sized allocations.
- Housing White Paper suggest 10% of allocation are 0.5ha or less.
- Should be more medium and smaller Green Belt releases, spread across the Borough.
- View that larger sites will enable infrastructure delivery.
- View from local communities that large amount of proposed housing in their area only and that distribution is disproportionate, particularly Shirley, Dickens Heath, Knowle and Balsall Common.
- Significant volume of concern regarding loss of Green Belt including Meriden Gap; risk of coalescence or Green Belt corridors that are too narrow.
- Need exceptional circumstances to change Green Belt boundaries, housing not sufficient.
- High scoring Green Belt parcels should not be released for development.
- No sustainable sequential test of sites been carried out.
- Recurrent view that brownfield sites have not been exhausted before proposing to release Green Belt land for housing.
- Concern that settlements and communities will lose individual identities.
- View that site selection for the allocations does not comply with the DLP's spatial strategy or planning policies, in particular P10, P14, P17.
- Concern for loss of landscape character and 'Urbs in Rure'.
- Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit.
- Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the

countryside does not result in conflict between new residents and existing farm businesses.

- Support new housing in locations with access to railway stations.
- In areas where large new housing allocations are provided we support the provision of bus links, cycle paths and pedestrian access from houses to stations. Recommend use of developer funding to improve amenities to Chiltern railway stations. Happy to help with specifications.
- Where residential development is planned next to the railway, we would caution that there will inevitably be noise and vibration from passing trains. Although Chiltern Railways cease operation during the night, it is likely that freight trains and maintenance vehicles will continue to run. Needs to be mitigated.
- The plan allocations should set out criteria for selecting sites with the least environmental value e.g. avoid designated sites/landscapes, BMV land, areas at risk of flooding.
- The policy does not identify land where development would be inappropriate, this should be addressed and clear criteria should be set out for development allocations.
- The Local Authority should utilise the SSSI Impact Risk Zones which has been designed to be used during the planning application validation process to help decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.
- Although CW Town Council supports the local plan, it's concerned about the amount of housing being built in North Solihull as all green spaces are being lost and the existing education infrastructure is being stretched. It is also concerned about the inclusion in the SHELAA Volume B of sites 53 and 221 and strongly opposes any house building on either of these sites. Bluebell recreation ground (53) includes allotments and community garden. The allotment site is held on a long term lease by Chelmsley Wood Town Council as is site 221, the Chelmsley Wood Town Council Offices.
- A number of new allocated housing sites have been proposed including 5,250 new dwellings in the Green Belt. Locations such as Balsall Common, Dickens Heath, Hampton in Arden and Knowle currently have limited public transport and there is a concern that housing development, at these locations, will only add to the current high levels of congestion.
- Also, with the wider impacts of HS2 and the regions natural growth, this could further exasperate congestion.
- Green Belt release for housing is justified.
- No evidence put forward to justify the dwelling numbers on larger proposed allocations.
- On average it takes 6.5 years once an outline application has been submitted for dwellings to be delivered on larger strategic sites.
- Therefore need more smaller sites to ensure continued delivery throughout Plan period, in particular around Balsall Common and Knowle.
- 1,150 dwellings proposed for Balsall Common is supported as a minimum.
- Misconception that Solihull has sufficient brownfield land to recycle.
- Housing land assessment is flawed.



- Housing should be located close to main conurbation, not increase journey times and congestion through Green Belt.
- Areas around Dickens Heath, Tidbury Green, Cheswick Green and Blythe Valley Park are optimal locations.
- Large proportion of capacity is located where the housing market is weakest and viability is most challenged; not deliverable.
- Failure to adequately consider the capacity of the housing market in Solihull to absorb higher levels of new housebuilding over the plan period.
- Limited available land resource in Solihull Town Centre. Brownfield development dependent on masterplanning.
- Concern the scale of housing will jeopardise the ability of the centre to adapt to changing and expanding needs of new and existing businesses, retail and community facilities.
- Calls into question the viability, achievability and deliverability.
- Policy P5: Contend that windfall supply will not continue at past rates. Insufficient grounds for continuing with such a high windfall allowance. Furthermore, such sites are unlikely to contribute to affordable housing due to lower site size.
- Absence of evidence to support record of delivery on Rural Exceptions Sites, therefore more should be allocated.
- None allocated in the Local Plan Review, should be revisited.
- Brownfield sites insufficient.
- Need to ensure that:
  - Housing sites offered are capable of being delivered within the plan period;
  - A range of sites to meet all sectors of the market, including higher value dwellings is provided for. Important to attract new businesses and an appropriate workforce.
  - Reliance on major urban extensions is treated with caution due to need for extensive infrastructure to bring them forward.
  - Green Belt release is not left until the later periods of the plan. Should be released early on to ensure delivery of sites over whole plan period.
  - Review of Green Belt goes up to 2050.
- Council should provide further evidence that the proposed 8% contingency provides sufficient flexibility for the District.
- Should consider mechanisms for bringing forward, if necessary, reserve sites and/or safeguarded land during as well beyond the plan period.
- A higher housing requirement will necessitate a commensurate increase in the overall HLS.
- Any phasing set out in Policy P5 should not be a brake on bring forward sustainable development.
- To maximise housing supply, widest possible range of sites, by size and market location should be allocated.

- Key to increased housing supply is number of sales outlets and wide range of products and locations.
- The criteria used to identify locations for new development need to be toughened up so that easy solutions are not prioritised.
- The housing shortage is going to give developers massive windfall profits and the Council should insist that development priority should be given to more difficult and perhaps more costly brown field sites.
- Smaller numbers of allocations in villages, e.g. capped at 10% expansion, could provide local homes that are needed and revitalise villages. However, proposals are excessive expansions for Shirley, Dickens Heath, Knowle and Balsall Common.
- Solihull should not be taking Birmingham's overspill.
- Proper place-making is required.
- Adverse impact on character that makes Solihull desirable.
- Land owners and developers sitting on thousands of planning permissions.
- Suburban sprawl will waste land and perpetuate.
- Densities proposed too high.
- Vacant office space and shops vacant for over a year in Solihull should be converted into dwellings.
- Should build higher density developments in line with Government advice in fewer areas focussing on needs of single person households to accord with policy of 36dph. Consider parking under houses, terraced developments or low rise flats, environmentally efficient developments and greater provision of Green Belt/green space.
- Settlements that perform well against accessibility criteria should be afforded significant weight when seeking to allocated development.
- Proposed allocations in the urban area will lead to loss of employment, retail, community and sports uses.
- Housing estimates appear over optimistic in some cases and viability is questionable, particularly for Solihull Town Centre.
- Notable that there are no sites in Dorridge.
- Proposals to add on to existing villages and rural sites is taking an inappropriate short term view. New housing needs primarily to be sited with ready access, preferably by public transport, to areas of high employment proposals.
- Consider that capacity of Sites 5, 9, 11, 18 and 19 have been overestimated, resulting in a shortfall of 1,107-1.607.
- Local objections to proposed Site 19 in existing Local Plan.

#### Council Response (Draft Submission Version)

- The development of the site selection methodology is included in the 'Site Selection Topic Paper' published to support the consultation on the Draft Submission Plan (2020).

- Between the 2016 Draft Local Plan and the 2019 Supplementary Consultation, the site selection methodology was further refined. In line with the NPPF, the site selection hierarchy prioritises non-Green Belt, brownfield first before greenfield and then to consider Green Belt options. Lower performing Green Belt in accessible locations is prioritised, with higher performing greenfield Green Belt in less accessible locations being of the lowest priority.
- The SHELAA shows that the Borough lacks a sufficient supply of non-Green Belt land to meet the objectively assessed housing need, and therefore it is necessary to consider sites within the Green Belt.
- Each of the sites submitted during the Call for Sites exercises have been considered in the Site Selection Document, taking into account the Sustainability Appraisal, Green Belt Assessment, SHELAA, Landscape Character Assessment, Accessibility Study as well as a range of hard and soft constraints.
- A substantial proportion of new development will be provided on non-Green Belt land, such as Town Centres, the NEC, Kingshurst Village Centre and re-development on windfall sites.
- Capacities on sites have been optimised to ensure the efficient use of land and minimum release of Green Belt, whilst meeting the objectives of sustainable development and policy-compliant schemes.
- To test the deliverability of each of the proposed sites, a concept masterplan was prepared for the residential sites, which were first consulted upon in the 2019 Supplementary Document. In the DSP, each of the sites were further supported by a specific site policy to provide a framework for assessment at planning application stage.

## Balsall Common – Representations Regarding the Settlement as a Whole

### Key Issues raised by Representations:

- The settlement is not an accessible location.
- Disproportionate amount of development planned for the settlement.
- Fears that the village is being turned into a small town.
- Objection to loss of Green Belt, countryside and open spaces for recreation/leisure.
- Proposed development alongside other committed development such as HS2 and Jaguar Land Rover will put intolerable strain on the settlement.
- If the allocations are to proceed they should be phased towards to the end of the plan period to ensure they do not coincide with other committed development.

### Key Infrastructure Issues raised by Representations:

- Support for a Balsall Common bypass:
  - Will add relief to the already strained Kenilworth Road.
  - Supermarket could be built off bypass.
- Objections to a Balsall Common bypass:
  - Would harm the vitality of the village centre, the openness of the Green Belt.
  - Bypass should not be seen as a justification for unacceptable and inappropriate large scale housing development.
  - Real reason for bypass it to fulfil future road links for HS2 expansion.
- Only 6% of residents take public transport to work.
- Public transport is poor. Two train services an hour to Birmingham/Coventry and these are packed at peak times. Bus links are poor and infrequent. Need for more regular buses to e.g. Solihull/Knowle/Warwick University. Average 1.6 cars per household with 2.5% of households having 4+ cars/vans.
- Cycle lanes inadequate.
- The settlement suffers significant congestion, particularly the Kenilworth Road.
- Will increase congestion on roads further east into Coventry.
- Development will generate 1500+ additional cars.
- Lack of physical and social infrastructure to support the increase in population:
  - Primary school overcrowded. Need 4-form entry, either at one school or two schools with facilities such as before & after school care/sports/swimming/social multi-purpose hall.
  - Re-siting schools would make them inaccessible and add to congestion.
  - Concerns about expanding class sizes in Meriden schools.
  - Require extended and improved campus at secondary school. 30% of pupils are out of catchment. Key infrastructure improvements include new sports hall, gym renovation, all weather pitch provision, performing arts facilities,

specialist classroom for food technology, product design and technology, new purpose built sixth form block and extensions to dining and kitchen facilities.

- GP at capacity.
- Improve walking and cycling access, and links with surrounding settlements.
- Need more public sport and leisure facilities.
- Car parking capacity at the station should be increased.
- Parking in the village centre is inadequate.
- Large scale housing should be conditional on providing adequate infrastructure.
- No mention in infrastructure requirements on shopping or banking, banks are withdrawing from the area. New retail outlets should not be isolated.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- Balsall Common is a rural settlement with a full range of facilities, including both a primary and secondary school, health services and a range of retail and associated facilities.
- Balsall Common was identified as an area for one of four new or expanded settlements around the Greater Birmingham housing market area in the 2018 Strategic Growth Strategy from GL Hearn.
- Following the 2016 consultation, three further sites on brownfield or part-brownfield land in the settlement were proposed and taken forward to the 2019 Supplementary consultation.
- Following the 2016 consultation, a series of studies were carried out to test the potential for a bypass to alleviate congestion through the village, as well as providing a service road to the largest proposed site at BC1, Barratt's Farm. A Parking Study was also carried out for the settlements at Balsall Common, Knowle and Dickens Heath.
- The Council acknowledged the need for appropriate school provision, and on consultation with the Council's School Place Planning team, a new two-form primary school was proposed (on Site 1) at the Supplementary Consultation document stage.
- The Council acknowledged concern about pressure on healthcare services, and commenced engagement with the Clinical Commissioning Group and University Hospitals Birmingham.
- Between the 2016 and 2019 Draft Local Plan consultations, Berkswell Parish Council and Balsall Parish Council began preparation and consultation on respective Neighbourhood Plans.
- The Balsall Common settlement chapter in the Supplementary Document set out high level future infrastructure needs for the settlement.

## Site 1 – Barratt's Farm, Balsall Common

### Representations received:

Number objecting: 155

Number supporting: 9

### Key Issues raised by Representations:

#### *Objections*

- The site is Green Belt, located in the narrowest part of the Meriden Gap with no clear defensible boundary.
- No reason to develop this Green Belt site when there are other brownfield sites available in Balsall Common which have been ignored.
- Development will close the gap between Solihull and Coventry.
- The allocation is not supported by the evidence base. The site extends into an area of highly performing Green Belt and the Landscape Character Assessment suggests that the site would only be able to accommodate small areas of new development.
- Whilst there are no formally designated sites, there are numerous ponds, hedgerows, trees and areas of grassland which have wildlife and biodiversity value.
- Impact on landscape character and value. The historic field pattern is irreplaceable and part of the character of the area.
- Will result in urbanisation of the countryside and impact adversely on the character and appearance of the area.
- Impact on the historic environment given the presence of listed buildings on the site.
- The existing site has important social and environmental benefits which will be lost.
- The development would harm attractive open countryside and remove opportunities for quiet recreation.
- Impact on the network of public footpaths which cross the site.
- Concern where access points to the site will be and impact on road safety and neighbouring residential amenity.
- Loss of privacy and view for neighbouring residents and depreciation of local property values.
- Increased noise, air and light pollution, impacting on residents' quality of life.
- Accessibility to the site is poor and public transport is insufficient.
- The bypass will just provide access to the development and will not relieve congestion in the village. The bypass line will set a precedent for future growth.
- The development will impact on the physical, social and green infrastructure in the village.
- The allocation is disproportionate to the size of Balsall Common and too large to be absorbed by the village or integrate with it.
- Flooding and drainage issues.

- The development will change the character of Balsall Common; it will do nothing to benefit the village and will ruin its community feel.
- The site is inappropriately located given its proximity to HS2. The effects of HS2 on the proposed development have not been considered, including impact on site delivery and effect on future residents.
- The construction of the proposed houses will coincide with that of HS2 resulting in additional disruption in the village and stress to existing residents.
- Allocation of the site would be in conflict with policies and aims of the Draft Local Plan.
- Loss of agricultural land. The site is used for growing wheat and grazing cattle.
- Any future plans must reflect the importance of the site in terms of retaining trees and hedgerows, preserving corridors for wildlife, green buffers/tree belts and open space.
- Some objections from landowners to their land being included within the allocation.

#### *Support*

- The site has potential for good accessibility.
- The site is close to the railway station and the site boundary could be extended northwards towards the station.
- The allocation could accommodate all the houses required in Balsall Common thereby limiting the amount of Green Belt being taken elsewhere around the village.
- It could create mixed living opportunities with homes for younger people and the elderly.
- The site could deliver the bypass and provide a range of recreational, leisure, community and other facilities such as a new school that would better link with the village centre and railway station.
- The site can deliver a viable and sustainable development to assist the Council in meeting its wider housing objectives.

#### **Key Infrastructure Issues raised by Representations:**

- The proposed highway access is unsuitable and will put traffic onto residential roads. The surrounding road network will not cope with the additional traffic generated.
- The A452 only becomes congested when there are problems on the motorway network, and there is no identified need for improved capacity.
- The development will encourage car use and will add to congestion and commuter traffic as there is little employment in the village.
- Balsall Street East, to west of village, cannot cope with further traffic.
- Will increase traffic and congestion. Local roads unsuitable for expansion. Routes to exit the village to the east are restricted by low bridge at Station Road and narrow bridge on Lavender Hall Lane.
- Concerns about access to site and traffic and road safety implications. Unreasonable to get a road link via Barratt's Lane or Meeting House Lane due to narrow sections.
- Possible access at or near 111 MHL is unreasonable. Need adequate pedestrian pathways.

- A defined route and bypass is required.
- No 'bypass' is proposed, but with the lack of funding the proposals are likely to create a rat-run that will cause further environmental harm for residents.
- Current proposal is not a bypass but an access road for Site 1.
- We believe that the infrastructure required has been identified. It is considered that the Balsall Common bypass (ref. Solihull UDP 2006), which would be of significant local (and regional) benefit, and a first phase of which, could also be delivered as part of the Concept Masterplan for land south of Station Road (see also Section 6: Transport and Access).
- Bypass needs to connect from Evesons Fuels to Berkswell Station.
- Development will exacerbate existing parking problems in the village.
- Hallmeadow Road used for parking for Berkswell Station and medical centre.
- Development could not commence until HS2 works were completed. Otherwise impact of heavy HGVs in the area.
- Room for multimodal transport developments and terminus is required.
- There is no strategy to deliver bus service provision.
- We have a Doctor's surgery but probably need more Doctor's for the growing size of population.
- A further affordable care home and day care facilities in the Barratt's farm area is probably needed.
- Loss of green space for recreation.
- Loss of park and sports pitches at Meetinghouse Lane.
- Green space with play equipment will be required.
- Already have disruption of flight path and HS2.
- There is no strategy to deliver school provision.
- Support for building a new school.
- Lack of trust in volunteers to deliver infrastructure commitments.
- Generally support. New housing in Balsall Common must be built in a location where new facilities such as a school, shops, parking and recreation space can be accommodated. Site 1 could do this.
- Will increase traffic and congestion. Local roads unsuitable for expansion. Routes to exit the village to the east are restricted by low bridge at Station Road and narrow bridge on Lavender Hall Lane.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.



- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated taking into account the reasonable alternatives.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage. The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- In the 2019 consultation document, the allocation was extended to include land extending from the current edge of the settlement up to the line of HS2, and the proposed number of dwellings increased from 800 to 900 dwellings. The HS2 line is considered to provide a strong defensible Green Belt boundary.
- The western part of the site is lower performing Green Belt. Although the eastern part of the site falls within higher performing Green Belt, the HS2 line will cut off the higher performing land from the main part of the Broad Area to the north and east, and thereby reduce its contribution to Green Belt purposes.
- The site is located close to Berkswell rail station, has the potential to accommodate a new primary school and a new bypass, which will act both as a service road to the development, and also relieve congestion along the A452 Kenilworth Road.
- See comments above under 'Balsall Common' section.

## Site 2 – Frog Lane, Balsall Common

### Representations received:

Number objecting: 140

Number supporting: 5

### Key Issues raised by Representations:

#### *Objections*

- The site is in the Green Belt and the allocation is not compliant with the National Planning Policy Framework or Government guidance.
- There are no exceptional circumstances to justify release of the site from the Green Belt.
- There are several brownfield sites in Balsall Common that have not been adequately considered.
- Balsall Street East is already a defensible Green Belt Boundary. Breaching this would generate additional pressure for further development.
- Will result in loss of well used playing fields, public green space and allotments. This will impact on health and wellbeing and is contrary to local and national policies and strategies.
- The site provides valuable public amenity space in an area of Balsall Common where this is lacking.
- The site is in a prominent location and will adversely impact landscape character and harm attractive open countryside.
- Impact on hedgerows, biodiversity and wildlife. The site includes/is adjacent to listed buildings. Concern that great weight has not been given to the conservation of affected designated heritage assets and their setting.
- Question whether it is feasible to widen Frog Lane. Widening Frog Lane would also destroy its character as a historic rural lane.
- Evidence in the Green Belt Assessment, Landscape Character Assessment and does not suggest this site is in a suitable location. Other local sites score better and are more suitable for development.
- The site has poor accessibility, it does not meet the Council's own criteria and public transport is inadequate.
- The site is some distance from the village centre, local facilities and the train station, which will encourage car use.
- Noise pollution for existing and future residents due to location under the flight path.
- Will impact on those who use the land for business purposes.
- Impact on neighbouring properties in terms of market value and residential amenity of occupants.
- Security to existing properties will be compromised.
- Local disruption during construction.
- Lack of consultation.

- This number of houses could be accommodated in Dorridge or Knowle.
- The proposed allocation would conflict with many aims and policies of the Draft Local Plan.

*Support:*

- The allocation accords with or can be made to accord with the spatial strategy.

**Key Infrastructure Issues raised by Representations:**

- Additional traffic will add to existing congestion and pollution in the busiest part of the village. New Jaguar Land Rover site will exacerbate this and could result in highway safety issues.
- Impact of HS2 construction traffic will add to disruption and put further pressure and strain on the village, contrary to the Council's aim to manage the growth.
- Houses on Frog Lane would add to peak hour congestion on Balsall Street East and Alder Lane.
- Highway infrastructure in Holly Lane and Gipsy Lane and surrounding roads cannot handle extra traffic.
- Existing parking issues in the vicinity will be exacerbated.
- Access will be difficult and will create a dangerous junction.
- Flooding and drainage issues.
- Local infrastructure is inadequate and will be put under further strain with additional development and population.

**Council Response (Draft Local Plan Supplementary Consultation 2019)**

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The 2019 concept masterplan proposed to retain the allotments and playing fields, and the indicative capacity for the site was reduced from 150 to 110 dwellings.
- The site has an overall accessibility score of medium, and is in close proximity to the local primary school.
- See comments above under 'Balsall Common' section.

### Site 3 – Windmill Lane, Balsall Common

**Representations received:**

Number objecting: 222

Number supporting: 5

**Key Issues raised by Representations:***Objections:*

- Concern that Windmill Lane will become more of a rat-run and increase the risk of accidents.
- The site is a significant distance away from services and facilities in the village and walking routes are unattractive and potentially hazardous.
- The site scores poorly in relation to all accessibility criteria apart from access to primary schools.
- The site is in the Green Belt and very special circumstances to justify development have not been demonstrated.
- Altering the Green Belt boundaries would contravene national policy as the boundaries should be regarded as permanent.
- There are 14 previously developed sites in and around Balsall Common that have not been properly considered.
- Site 240 (in the Strategic Housing and Employment Land Availability Assessment) should be allocated as an alternative.
- Will impact on the rural character and appearance of this part of Balsall Common.
- Adverse impact on the character of the landscape,
- The site is adjacent to a listed building. Concern that the Council has failed to demonstrate that great weight has been given to the conservation of affected designated heritage assets and their setting.
- Impact of the development on airflow to the Windmill may reduce current capacity to turn the sails.
- Will impact on wildlife (including protected species), biodiversity and ecology.
- The Council's assessments of the site are incorrect. Alternative assessment scores are proposed.
- Other sites perform better in terms of the assessment and are therefore more suitable for development.
- The development will not be large enough to solve the housing shortage.
- Adverse impact on property values and residential amenity of neighbouring occupants.
- Objections to land being included in the allocation when landowners' permission has not been given.
- Extending the village southwards should be deferred until the bypass is completed.
- Development of the site is contrary to local plan policies and aims.

*Support:*

- Natural extension to Balsall Common which reflects the limited landscape impact that would result and the site's proximity to a good range of services and facilities.
- Adjacent land should also be included in the allocation to create a defensible Green Belt boundary using Kenilworth Road and Windmill Lane.
- The site is infilling the triangle that is already being developed.
- Part of the site provides an opportunity for a small house builder and can be built out quickly.

**Key Infrastructure Issues raised by Representations:**

- Development of the site will add to the existing congestion hotspots to the south of Balsall Common and will exacerbate existing traffic delays.
- Lack of employment opportunities and inadequate public transport will generate additional car trips, increasing existing parking problems in the village and around the station.
- Flooding and drainage issues.
- Local infrastructure in the settlement is inadequate and will be put under further strain with additional development and population (see above).
- The site lacks the critical mass to contribute significantly to the village.
- Impact of HS2 construction traffic will add to disruption and put further pressure and strain on the village, contrary to the Council's aim to manage the growth.
- Object to loss of open space.

**Council Response (Draft Local Plan Supplementary Consultation 2019)**

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- In the 2019 consultation document the site's capacity was slightly increased from 200 to 220 dwellings to take into account the proposed extension of land to include the Windmill Lane/Kenilworth Road corner parcel.
- See comments above under 'Balsall Common' section.

## Site 4 – Land West of Dickens Heath

### Representations received:

Number objecting: 203

Number supporting: 8

### Key Issues raised by Representations:

- Coalescence of Dickens Heath with surrounding Solihull and Bromsgrove settlements.
- Loss of village character and identity.
- Pressures on infrastructure.
- Disproportionate housing allocation in Blythe Ward and Dickens Heath Parish; noted there are no allocations in Dorridge and Hockley Heath ward.
- Impact on the function of the Green Belt. Risk of coalescence between Dickens Heath, Whitlocks End, Majors Green and Shirley.
- Impact on landscape character; within an area of high sensitivity.
- Impact on wildlife in general, and Local Wildlife Sites Tythebarn Meadows and Little Tyburn Coppice in particular.
- Significant negative impacts on the local biodiversity due to loss of hedgerows, mature native trees and ponds, and also potential for loss of habitats that support legally protected species including great crested newts, badger setts and bat roosts.
- Potential LWS in north-west corner should be reassessed against LWS criteria.
- Ancient woodland is likely to require a suitable semi-natural buffer. Should be included in list of requirements.
- 90% of respondents to Dickens Heath Parish Council survey objected to both Sites 4 and 13 being removed from Green Belt.
- Greater than 800m walking distance from village centre.
- Loss of Akamba Heritage Centre.
- Harm to rural village character and uniqueness.
- Would contravene para. 32 of NPPF.
- Will result in the loss of playing fields and sports amenities close to south Shirley and Dickens Heath.
- View that Dickens Heath has already taken its 'fair share' during the last Local Plan allocations.
- Desire for Affordable housing for local needs in Dickens Heath.
- Richborough Estates Limited support the proposed allocation at West of Dickens Heath (Site 4) with any proposals being determined via a masterplanning approach. The allocation accords, or can be made to accord with the spatial strategy and sequential approach adopted in the Local plan review, the locational and accessibility criteria of Policy P7, and the criteria in Policy P8 for managing travel demand, reducing congestion and providing parking.
- Increased anti-social behaviour and crime.

- Impact on health and wellbeing from loss of community space.
- Devalue property.
- Village was never meant to be the size it is and already has a negative impact on travel.
- Considerable development already threatening gaps between Dickens Heath, Wythall and Earlswood.
- Loss of trees will reduce air quality.

**Key Infrastructure Issues raised by Representations:**

- Parking provision at both Whitlocks End and Shirley stations is already inadequate to satisfy the current demand.
- A significant investment in the local road network would have to be made to make this site sustainable.
- Local residents would also like to know what plans for further housing Bromsgrove have in the area.
- Increased traffic and parking unacceptable.
- Conflicts with policies in existing SLP and proposed DLP.
- Whilst I understand the benefits of developing land near to the Whitlocks End Train Station, as it has the potential for reducing dependence on cars for transport, this is still likely to impact traffic flows down the Haslucks Green Road.
- Surrounding roads are at breaking point.
- No real bus services and local train stations are overcrowded. The proposed increase number of residents will not be able to use the trains and will therefore increase car use.
- Tythe Barn Lane is already receiving too much traffic. It is too narrow and although the part where the proposed development is to be built can be widened, the Dickens Heath end cannot as the houses are too close to the road.
- As a resident of Haslucks Green Road we have seen a large increase in traffic with the development of Dickens Heath and Whitlocks End Station.
- 30 traffic accidents on a 300 metre stretch of Haslucks Green Road/Tilehouse Lane in Majors Green during the past 18 months, including one pedestrian badly injured on pavement.
- The other roads in Dickens Heath are generally too narrow and cannot currently cope with the amount of traffic.
- The shopping area in Dickens Heath is currently too small and parking is totally inadequate.
- Pressure in existing infrastructure which is at capacity including schools, dentist, GP
- Tythe Barn Lane currently houses several sports clubs. The Borough should not lose these facilities.
- The future inhabitants will clearly use Dickens Heath as for their facilities and I can find no indication of any plans to increase the latter, e.g. car parking, shops, pubs, restaurants, etc.

- Dickens Heath is already over-populated for its size and facilities (as is the railway station at Whitlock's End) and the roads are too narrow for yet more cars.
- Flood risk issues.
- Schools and doctors are at capacity.
- Need integration between neighbouring authorities.
- Site 4 may impact pupil intake to Woodrush High School in Worcestershire. Dickens Heath Primary school is a named feeder school.
- Worcestershire County Council wish to be included in consultations at appropriate time that may impact education provision within authority area.
- Can the sewage system cope?
- Loss of sports pitches; no reference to relocation or compensation.
- Concerns about traffic and infrastructure, roads and pathways near Majors Green. Already taken a significant amount of additional traffic and parking from Whitlocks End railway station.
- No details of pedestrian routes, need to review new road structure/lights for station carpark extension in context of growth proposals and liaise with Bromsgrove over Tilehouse Lane/Haslucks Green Road junction improvements.
- Concerned about the increased levels of traffic from existing developments at DH and Wythall will only be exacerbated by the new developments.
- Consideration should be given to carrying out road traffic flow measurements and analyses of all roads affected and come up with a solution that will link the proposed development sites with the A435 and A3400 roads, therefore preventing excessive traffic congestion in the Dickens Heath, Tidbury Green and Wythall Parish areas.
- Development has already led to increased levels of traffic, congestions, speeding and litter.
- Dickens Heath road itself is in a terrible condition. The pot holes are getting worse. This road needs urgent resurfacing.
- The station carpark is already full on weekdays.
- Encourage Centro to extend the Whitlocks End Railway Station carpark ASAP.
- Haslucks Green Road is already a notorious accident spot. All the roads in the area are not wide enough to take the traffic, especially roads like Drawbridge Road where cars frequently mount the pavement.
- The roads aren't much more than lanes in some parts, with narrow footpaths. Pedestrians have to step into the road to pass each other. The roads are heavily used at peak times and there have been several bad accidents in the area.
- Support constructing cycle/walking lanes in and around proposed sites, in particular, those leading to Whitlocks End Railway Station.
- Developers should be required to fund necessary improvement to existing highways, new roads and pavement lighting.
- Consider constructing a Park and Ride facility in a strategic location in order to limit the traffic flow through urban areas.



- Where will football clubs re-locate?
- Ensure Richborough proposed plan for the Sports Hub has adequate parking spaces for those who will use the facilities.
- School bus blocks the clock roundabout every morning.
- Impact of increased traffic on Blackford Road, which is already inadequate, has suffered from closures for repairs and has a weight restriction which is not enforced.
- The traffic congestion in the Shirley and Dickens Heath area has increased rapidly over recent years and the roads, pavements and traffic calming measures make it unsafe for pedestrians and cyclists. Bills Lane junction with Haslucks Green Road, Tythebarn Lane junction with Tilehouse Lane and the stretch of Haslucks Green Road between these two junctions is very busy and have narrow and poor street lighting. The country Lanes of Birchy Leasowes and Cleobury Lane are also becoming very busy. Maintaining a healthy lifestyle for walkers and cyclists has not been considered. Congestion on the A34.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- Further ecological surveys were carried out on the 2016 site, and land to the north of the playing pitches north of Tythe Barn Lane, adjacent to the canal, was identified as qualifying as a Local Wildlife Site and was subsequently designated.
- The site promoters proposed a Sports Hub on the parcel of land north of Tythe Barn Lane to replace and enhance the playing pitches across the site, however, even if all the land were available for re-development, it would not be sufficient land to accommodate all of the pitches. Therefore this proposal was not taken forward at the Supplementary Consultation stage.
- Given the above, and the need to retain and enhance green infrastructure and ecological connectivity within and through the site, the capacity was reduced from 700 to 350 dwellings in the 2019 consultation document. This comprised the parcel of land to the north of Tythe Barn lane and east of Akamba to accommodate ca. 100 dwellings, and the parcel south of Tythe Barn land and east of Tilehouse lane to accommodate ca. 250 dwellings.
- It was proposed to retain the playing pitches in situ north of Tythe Barn lane and seek appropriate re-provision of sport pitches and facilities that are located on the land south of Tythe Barn lane.

- In between the 2016 and 2019 consultations further work was carried out on the Playing Pitch Strategy and work commenced on the Playing Pitch Mitigation Strategy, to address concerns about the potential loss of sporting grounds and facilities and recognised need to provide suitable alternatives.
- For additional responses on infrastructure, see comments under 'Shirley/Blythe' section below.

## Site 5 – Chester Road/Moorend Avenue, Fordbridge

### Representations received:

Number objecting: 18

Number supporting: 1

### Key Issues raised by Representations:

- Contrary to evidence in SHELAA which states that site considered to be unsuitable and unachievable, with poor marketability and/or viability.
- Loss of Green Belt.
- Would result in loss of open/green space, visual and recreational amenity in river Cole corridor and part of Meriden Park.
- Landscape character has high sensitivity.
- Object to inclusion of allocation as majority of site is designated as and would have impact on a Local Wildlife Site – Cole Bank Park.
- Support replacement of roundabout, although given isolation from residential areas a commercial or retail use is suggested.

### Key Infrastructure Issues raised by Representations:

- Requires further clarification of remodelling of junction, boundaries and explanation as to how possible to accommodate 100 dwellings, especially as has been earmarked for potential community facilities.
- Includes key intersection of local road network bringing its deliverability into question.
- Concerned that with increased traffic associated with Site 19 HS2 Interchange will result in traffic congestion.
- Already been increased traffic delays from the recent single lane running downgrading of the adjoining A452 past the Chelmunds Cross development. Any junction modelling must take account of future road expansion and not further constrict it exacerbating traffic issues. Once developed it will be difficult to re-develop as required by increased traffic flow.
- Impact on flood plain as site in Flood Zone 2.
- Object as will cause congestion, noise, vibration and air pollution.
- Loss of open space for recreation and leisure. Would reduce size of Meriden Park.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- This site was initially identified as a gateway site by the North Solihull Partnership to be developed alongside other connected sites. Development would be dependent on the reconfiguration of the traffic junction as part of a wider traffic improvement scheme, which on currently available evidence is unlikely to be feasible. As there is uncertainty over the ability for the site to be delivered, it was not progressed to the 2019 Supplementary Consultation stage.

## Site 6 – Meriden Road, Hampton in Arden

### Representations received:

Number objecting: 10

Number supporting: 1

### Key Issues raised by Representations:

- Illogical site as physically separated from eastern edge of Hampton and narrow site frontage would make positive contribution to street scene difficult.
- Object, as together with SLP2013 Site 24 would increase housing stock of village by 25% which is unsustainable with current facilities and takes no account of housing developments agreed/completed, although would not object to sympathetic development incorporating significant open space and enhancing footpath access to village.
- Does not meet Plan's accessibility criteria.
- Viability may be affected by contamination relating to former use.
- Support, but delivery timescale should include 1-5 years.

### Key Infrastructure Issues raised by Representations:

- Fails to provide compensating open space to replace that proposed in SLP2013.
- No clear mention of primary school provision.
- Doctor's surgery is very small and has a 1.5 full time doctor equivalent. Our practice area covers much of the proposed sites. We have 3000 patients between the 1.5 doctors, which is already above the national average. Any significant increase on this would seriously undermine our ability to provide safe and timely healthcare to the new residents unless we could procure funding to increase the staff (both medical and administrative) at the surgery to cope with the huge increase in demand for appointments and care.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The concept masterplan proposes a comprehensive approach across the existing Solihull Local Plan site allocation (Site 24), which is adjacent to the site, and the provision of public open space to serve both sites.
- Hampton in Arden is village with a range of local facilities and good accessibility, and considered appropriate for limited growth under the spatial strategy.
- In 2017, the Hampton in Arden Neighbourhood Plan was made. The NDP acknowledges that although the development of both the existing and proposed allocation would

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result in a significant increase in housing within the village, the Parish has an ageing population and need to provide for local families, which the new development could provide (p.13).

- The Council's School Places Team have provided comments on the Local Plan Review at different stages, and confirm that the local primary schools could accommodate the proposed housing developments.
- The Council acknowledged concern about pressure on healthcare services, and commenced engagement with the Clinical Commissioning Group and University Hospitals Birmingham.

## Site 7 – Kingshurst Village Centre

### Representations received:

Number objecting: 1

Number supporting: 4

### Key Issues raised by Representations:

- Concern that including active refurbishment proposals/recently built homes will generate opposition, and request that specific boundaries be defined around areas for redevelopment or area be designated as mixed-use.
- Request clarification that existing homes in Church Close, Colling Walk and Over Green Drive included in error.
- Needs to be undertaken sensitively to enhance village avoiding the mistakes made in some recent developments.
- Options for redevelopment will vary significantly in viability and care required in getting the right balance.
- Support principle but capacity likely to be difficult to deliver.

### Key Infrastructure Issues raised by Representations:

- N/A

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- An emerging masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The site was put forward for 100 dwellings in the Supplementary Consultation document in 2019.
- The Council has been leading on comprehensive re-development of the site in collaboration with local stakeholders.
- The site now has the benefit of a planning permission.

## Knowle/Dorridge/Bentley Heath – Representations Regarding the Settlement as a Whole

### Key Issues raised by Representations:

- Scale of development will create urban sprawl.
- Increased traffic and parking will have detrimental impact on Knowle and Dorridge Conservation Areas respectively.

### Key Infrastructure Issues raised by Representations:

- Residents and business' concerns are very clear that there is too much pressure on local infrastructure now and the scale of development proposed must be reduced. These concerns over infrastructure impacts have not been addressed. It is unreasonable to expect residents to accept any substantial further development in KDBH without any indication as to how the wider infrastructure impacts would be overcome.
- The resulting additional traffic will lead to huge congestion problems on Warwick Road, Knowle High Street and Station Road which could not be relieved without significantly harming the historic centre of Knowle.
- Sites will be largely car dependent because far from the centres of Knowle and Dorridge, which means a potential increase in car numbers in Knowle of 1,700 cars which has significant implications for air quality, land take, traffic volumes, car parking and living conditions.
- There is little detail as to how the 'highway capacity' is to be improved to accommodate the inevitable extra traffic associated with new housing in Knowle, without losing the character of the neighbourhood, or how widening will be possible in residential roads e.g. Station Rd where traffic is already heavy at peak times.
- Will require traffic calming measures.
- A bypass for Knowle would divide the village and damage local businesses.
- There is no provision for increased car parking in Knowle. 1050 new homes will surely lead to at least 1000 extra cars driving on local roads and needing to park near to local shops. Current parking arrangements are inadequate for today's needs, with inappropriate parking on pavements and grass verges, and this can only get worse.
- Any development in Knowle/Dorridge will increase pressure on station parking at Dorridge Station and this needs to be taken into account. Parking restrictions put in place have only moved vehicles further away; not solved chronic shortage of parking facilities.
- Rail capacity needs increases and additional car parking is needed near the station.
- While bus services and cycle lanes are a good thing the reality is that the majority of journeys will be by car for the convenience, speed and ability to convey heavy shopping loads.
- The proposal for a 30 minute bus service is pathetic. This is what we are supposed to have now and it does not cope with peak times at all. Any service MUST respond to the variation in demand.
- Infrastructure provision needs to be provided at the beginning of development, not afterwards.

- An additional 3500 residents is a 30% increase in size, which will wreck existing services of ALL sorts, not just transport.
- New primary school(s) would be required.
- Sewage and water supplies may be inadequate without very large additional works.
- Provision of new health centres, new green spaces and new community centres would all be required to prevent the developments being just soul-less housing estates.
- Also need detail re increase in healthcare facilities to match the extra needs - no discussion has taken place with existing providers.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- Knowle, Dorridge & Bentley Heath is a rural settlement with a full range of facilities, including both a primary and secondary school, health services and a range of retail and associated facilities. The scale of development is considered proportionate to the settlement and the services and facilities that are available.
- The Council acknowledged local concern for traffic congestion and parking issues. A Traffic Assessment for the proposed sites was commissioned, as well as a Parking Study that includes Knowle.
- Reference was made to the possibility of decked parking at Dorridge railway station in order to increase capacity and alleviate the impact of commuter parking on surrounding roads.
- The Council acknowledged the need for appropriate school provision, and on consultation with the Council's School Place Planning team, a new two-form primary school was proposed (on Site 9) at the Supplementary Consultation document stage.
- The Council acknowledged concern about pressure on healthcare services, and commenced engagement with the Clinical Commissioning Group and University Hospitals Birmingham.
- The KDBH settlement chapter in the Supplementary Document set out high level future infrastructure needs for the settlement.
- Between the 2016 and 2019 Draft Local Plan consultations, the local Neighbourhood Forum began preparation and consultation on the KDBH Neighbourhood Plan.



## Site 8 – Hampton Road, Knowle

### Representations received:

Number objecting: 97

Number supporting: 3

### Key Issues raised by Representations:

#### *Objections*

- Site is encroaching into Green Belt and outside the village boundary.
- Site is adjacent to Local Wildlife Site which will be impacted on by the development.
- Site is least accessible from the village centre and farthest from the train station.
- Purnell's Brook Meadows should be protected.
- Case for the proposed redevelopment of the football club has not been fully made.
- Football ground/pitches does not have community benefits unless you are involved in football, but development will lead to loss of Green Belt.
- Will impact negatively on the Conservation Area.
- Floodlights from new development will lead to light pollution and impact on wildlife.
- Impact on the listed building will be negative.

#### *Support*

- Allocation should be amended to include an extended area of land on the south side of Hampton Road.

### Key Infrastructure Issues raised by Representations:

- There will be increase in traffic and associated congestion as a result of new housing, but also from the higher number of people coming to use the new facilities.
- Need increase in primary school facilities for new housing proposals in Knowle.
- The closest station to the Hampton Road site is Hampton in Arden. It is not possible to walk to this station safely as there are no pavements or lighting. The parking facilities are at capacity, likewise at Dorridge and Widney Manor stations.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.

- The 2019 concept masterplan recognised the importance of the setting of the Grade I listed Grimshaw Hall and proposed that development should be set back from its immediate locality. A Heritage Impact Assessment was commissioned to specifically consider the impact of development on Grimshaw Hall.
- It was stated that the design and layout of the sports pitches, together with the buildings and parking provision would need to respect the landscape setting and ecological value of the site. Trees and hedgerows along Hampton Road were to be retained to ensure that the character of the approach into Knowle is maintained as far as possible. Furthermore, pedestrian and cycling connectivity towards Knowle and the canal, and tow path improvements were encouraged to promote health and wellbeing.
- The site was proposed for 300 dwellings across the two sites, and identified the potential for a further 50 dwellings if the cricket club was developable, in the Supplementary Consultation document.
- For additional responses on infrastructure, see comments under 'KDBH' section above.

## Site 9 – Land South of Knowle

### Representations received:

Number objecting: 165

Number supporting<sup>1</sup>: 145

### Key Issues raised by Representations:

#### *Object*

- Does not reflect the vision and aspirations of local communities.
- Too many basic questions being left unanswered for the NF to reach a view on what a reasonable reduced housing number might be.
- Site is poor in accessibility terms and represents an unacceptable location for new housing development.
- Proposal of poor quality, lacks rigour, fails to address many of the key issues associated with development such as infrastructure provision, and will create an unsustainable situation.
- Know the Government has said we need to build new houses in Knowle.
- Disagree with new housing on school.
- Disregard for Government's stated intention that brownfield sites should be developed first.
- Knowle is a small village, close to Solihull and Birmingham that have fantastic facilities.
- The school does not need to be rebuilt as already fit for purpose and able to maintain current high standards, green field land/green spaces and Solihull MIND site should be protected.
- Site is out of proportion with Knowle and will degrade the character of the village.
- Development will be on land currently designated as Green Belt.
- Site should be scaled down and the remaining numbers redistributed to a larger number of smaller sites in the settlement.
- The growth proposed will impact on the character and appearance of the Knowle Conservation Area.
- Loss of Green Belt and valuable Arden Landscape.
- Knowle is a village; this scale of development will turn it into a town.
- Facilities are already in Solihull.
- Will ruin village character.
- Loss of wildlife.
- No flats/apartments, well-spaced with at least one garage and 2 parking spaces to reduce risk of parking on road, with reasonable sized pavement (submission incomplete).

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<sup>1</sup> Whilst indicating support for residential development of this site a number of responses have indicated that less than 500 dwellings should be provided (rather than the 750 indicated in the draft plan).

- Should be less than 500 houses and school should restrict catchment area.
- Will destroy village feel of Knowle/Dorridge, and school is centre of community and should act responsibly in this process.
- Arden school should not be part of the solution for the national housing shortage, Knowle/Dorridge cannot accommodate such expansion and there are already public sports facilities available in the Borough.
- Concerned about level of provision for social housing and how development would affect planned footpath diversion.
- Land is and should be retained as Green Belt, Knowle would lose its village character, and the relationship with a property developer appears open to corruption.
- Would like Knowle to remain as it is with green areas and treed walkways, and catchment to school should be limited to Knowle and Dorridge to avoid unnecessary traffic, but if unavoidable should be less than 300 houses with design of school in keeping with Knowle, entrance to Grove Road to avoid conflict with emergency vehicles using Station Road, and additional parking required.
- Area has unique charm that is being ruined by continued development, there are already numerous schemes including affordable housing which will reduce desirability of area, and provision of further facilities at Arden school should not be at expense of further housing estates.
- Knowle has suffered from estates being built since 1970s, and is already far too busy with parking a nightmare.
- Should be restricted to less than 500 houses, and have serious reservations about the new school being located adjacent the Solihull Mental Health Trust's facilities.
- The principle of building new houses to support a new school required because of additional housing is farcical and involvement of developer suggests a deal has been done.
- Current school already has lots of facilities.
- Investment already made would be wasted.
- Size of current school is large enough.
- Disagree with taking children in from outside the area.
- There is adequate space on existing site to develop school, inadequate infrastructure in Knowle to support proposed housing and more needs to be done to address access and congestion or numbers reduced, no justification provided for loss of Green Belt and alternative options should be considered to protect Green Belt, no adequate environmental protection in place, and impact on wider community will not be compensated by any additional facilities on relatively small site.
- Concern that new Arden School Complex is already taken as a statement of fact. Much work still needs to be completed for inclusion in a planning application, and may not be built at all.

### *Support*

- Lower performing than other parcels in Green Belt.
- Well defined landscape boundaries, with no listed buildings on site.

- Support the proposals for a new school as it will lead improvements.
- Support Arden Triangle site. Lower impact of a small number of large developments than a large number of small developments. Provision of local infrastructure in the locality of the development.
- SHELAA states that site performs well against suitability, availability and achievability criteria. Consider more evidence is required for latter two tests.  
Availability: Not all landowners have been notified of proposal or confirmed their support.  
Achievability: Access has been identified as an issue by promoters we need more housing, especially affordable, to include some social housing.
- Will help to address housing crisis and existing school is inadequate to meet future needs of students in terms of space and facilities.
- Providing there are detached/semi-detached and large enough for a family, as many as will fit on the land should be built. Originally I was against the idea, thinking it was unnecessary, a waste of money. However, with more information provided it sounds like a very ambitious and exciting plan. I think there should be a mixture of 2, 3 and 4 bedroom houses, maybe some maisonettes as well.
- This is a once in a lifetime opportunity for the Knowle, Dorridge and Bentley Heath community to build excellent community facilities that will serve the local population for future generations.
- Should be a variation of housing including 1-bed to 5 bed houses. Not too many apartments.
- Smaller, cost effective and affordable for younger/first time buyers.
- The developers need to be required to consider sustainability, active travel and provision of green spaces and play areas. The houses built should include bike storage, utilise solar energy where possible and the whole area needs to be designated a 20mph zone.
- Subject to diverse types including affordable family homes and social housing, and good non-car based transport links, with cycle ways and walking routes enabling safe access to school and providing leisure routes.
- Too many houses proposed which will result in additional traffic when current position is already bad especially at peak times, and will result in loss of recently developed buildings at Arden school. School should focus on parking facilities, escalator provision, IT equipment and larger canteen.
- improvements to local infrastructure based on transport study and incorporating bypass with high quality, safe footways, cycle paths and crossings, funded by developers.
- Should be in keeping with surrounding area and not exclusive gated developments.
- Densities in line with Four Ashes development.
- Reasonable garden space in keeping with character of local area.
- Consideration of access as all traffic will go through village.
- Support development of Site 9 to enable new secondary school to be built subject to less than 500 houses unless roads are widened, extra parking provided in Knowle centre and additional health care facilities provided.

- May need additional parking for new school as further to walk for many children.
- Any more than 500 would have a detrimental effect on the local area. Significant development would require major investment in the area's infrastructure including, but not limited to school places, school premises and health care provision.
- Money needed by selling land for homes should go towards a new school but am concerned that the land identified for the new school appears smaller than the current site and is locked by other developments.
- Agree with site 9 being developed for housing that would enable a new secondary school to be built. Under 500 houses should be built on this site. Too many houses could cause over-population.
- Agree with site 9 being developed for housing that would enable a new secondary school to be built. Over 500 houses should be built on this site. Provide as many houses for the community as possible.

**Key Infrastructure Issues raised by Representations:**

- Scale of development underestimates the amount of new roads and access from Warwick Road that will be required.
- The Arden Academy proposals do not include an independent assessment of the need for new secondary school premises, including existing building condition surveys, which should be commissioned. An independent assessment of statutory educational need across Solihull Borough should be commissioned to substantiate the proposals for a new 10 form entry secondary school.
- A view is emerging that a new school could be of benefit to the community but the price to pay for those benefits in terms of the consequential impacts on infrastructure, landscape, and access to countryside that would result from 750 houses is unnecessarily high.
- Highlights need for increase in primary school facilities for new housing proposals in Knowle and Dickens Heath, in particular impact on St George and St Teresa school which has been unable to expand and is forced to exclude children in parish and with siblings at school, and whose catchment includes new developments at Balsall Common, Hockley Heath and Blythe Valley as well as Knowle/Dorridge, which should be addressed as a matter of priority.
- Continue to improve facilities at the existing Arden school.
- Fail to understand how local authority is allowed to spend millions on Arden over 6 years and think it is ok to pull down a perfectly adequate school to make a few pounds and try and disguise it as a benefit to our community.
- Present infrastructure unable to cope.
- Station Road is currently is quite dangerous when Arden School comes out.
- The new school needs to be future proof. Is the site big enough for the proposed capacity until 2030? Will the school have flexible spaces for multiple uses?
- Appropriate off-road parking, allowing at least 2 cars per house should be provided and it should not adversely affect traffic in Knowle village.

- With increase in traffic, poor parking facilities that mean workers are parking on the roads, Knowle is becoming already over-loaded with traffic entering and leaving through the village. Increase in houses = more traffic = dangerous roads for our children.
- Concern about access on the Warwick Road as this is the main road that leads to the M42 and will cause traffic issues. Not safe for pedestrian access.
- School's current position is due to piecemeal development on the site. Most sustainable solution is to redevelop on site in a modular programme.
- School is perfectly adequate as it stands, and a great deal of funds have been invested already.
- Not necessary for community facilities to be built at school as all are available close by in Solihull and Warwick.
- Better to improve the existing than build new.
- Knowle already a busy, bustling village. Concerned about added traffic and demand on services and space.
- The following has been suggested as additional community facilities at new school:
  - Adult learning zone
  - Public library
  - Hi-tech multi-media centre
  - Outdoor sports facilities, including tennis courts and cricket pitches, sports track.
  - Floodlighting for sports pitches
  - Indoor sports facilities, including squash/badminton courts, gym.
  - Swimming pool, e.g. Olympic sized to attract funding
  - Sauna/Steam Room
  - Theatre/performing arts centre
  - Cinema
  - Conference facilities
  - Evening classes.
  - Youth club
  - Village hall
  - Additional parking for residents, including cycle parking
  - NHS services
  - Eateries
  - Community café
  - Day nursery
  - Mum and baby buildings
  - Nature Reserve

- Car boot facilities
- Large open space for events
- Skate park
- Good transport drop offs for parents/buses/coaches
- For all facilities consider access for disabled/elderly/young children/families
- Need to resolve safeguarding issues with school being open to public.
- Arden Academy is already very successful, and received significant investment in recent years. State of the art facilities do not equal results.
- The school and its needs both current and future need to be paramount. The site is small so only build things for which there is likely to be a need. E.g. there are at least 2 day nurseries already in Knowle and Dorridge and 1 on Blythe Valley Park.
- Suggested Arden School improvements: outdoor sports pitches, larger dining hall, dedicated sixth form facilities and lockers for new school; student councillor, new computer suite, first aid centre and toilet upgrades, business school, technology suite, music rooms/recording rooms/studios, performing arts studio for dance and theatre, bigger library.
- Rather than a new secondary school at Arden, a new school should be built in Hockley Heath to rival Knowle allowing both to operate with smaller class sizes and raise standards through competition.
- The current Arden site is described as constrained, however the new site will distance the activities further from the centre of Knowle and potentially damage trade on Knowle High Street which requires support - i.e. staff and pupils will have poor access to the shops and cafe facilities because they are further away and unable to walk there easily. A better alternative would be to continue to use the very new buildings at either side of the site and rebuild the central block.
- If a new primary school is to be incorporated I feel strongly that this should be a non-faith school that is open to all.
- Enlarged sports complex is inappropriate development in the Green Belt.
- A singular access to site 9 from the Warwick Road would be unacceptable, even with a roundabout.
- Concern regarding access and drop off points. Access from A4141 only would be inadequate.
- Children cannot cycle safely anymore.
- Consideration of other infrastructure needs such as medical services, parking and shopping facilities.
- The new school should become a community hub that could link with the large number of developments for older people within the area to support community cohesion and help combat social isolation and loneliness (particularly the elderly).
- As I understand it the Council owns the Arden Academy site, so should make provision for new 3 storey 200 carpark (basement/ground/first floor) in the corner nearest to the village centre, with access from Milverton Road and Station Road, and consider a free-



flowing one-way system to alleviate congestion, plus lights control of the 3 pedestrian crossings in the High Street, which cause much of the problem.

- Is the capacity of the sewage treatment facility in Norton Green Lane capable of servicing another possible 1000 homes? The additional houses on the Middlefield site will be connected soon, and there is already impact in the vicinity from emissions, which can be quite offensive if there's a south easterly, have existing pollution levels been measured, how will this be addressed in the future?
- Concerned that sufficient places are made available at Arden School for all the new houses. Better to overprovide because any excess spaces will be snapped up by pupils from very nearby Warwickshire villages like Lapworth, who have long journeys to secondary schools at present. Under provision on the other hand would be disastrous for all. Less critical for Junior Schools as Lapworth has an excellent J+I School, which could at present take more pupils from Solihull if necessary.
- Would be more appropriate to leave Arden Academy where it is and meet demand for secondary school places on another site? The competition between the two would drive up standards. A super-school will not benefit children's education. Site 9 South of Knowle will require consideration of another GP surgery due to the numbers of extra patients, and as a local GP myself aware that the GP services are already straining under the load, particularly given the ageing population. School should include gym, pool, theatre and skate park facilities for use by wider community.
- Would like safe cycle routes to the new Arden school incorporated into the development of Site 9.
- Would object to through route on Milverton Road to school.
- Keep MIND garden, possibly with social prescribing option.
- Allotments would be good.

Taylor Wimpey:

- Understood that 'likely infrastructure requirements' for Site 9 in Appendix C are for the entire site. Our component is only 1.04ha, capable of delivering 36-40 dwellings.
- Recent planning permission at 'Middlefield Spring' {Site 14 in SLP} included open space provision which is to the north of Taylor Wimpey's site, north of Grove Road.
- Therefore not considered appropriate to provide further open play space within this small element of the overall allocation.
- Financial contribution towards the installation and enhancement of the play space would be considered more logical.

Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.

- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- Having regard to desk top analysis and other evidence, sites visits, constraints and opportunities, the site capacity was reduced from 750 to 600 dwellings between the 2016 and 2019 consultations.
- The 2019 consultation document proposed two alternative options for the site's development, one with Arden School remaining in situ, and one with the Arden School re-located and the current site redeveloped for housing. The Council sought views on the different options, although it was recognised that further justification would be required to ensure that the relocation of the school would be appropriate without impacting on the character and appearance of the site, nor compromising the delivery of the necessary supporting infrastructure.
- The layout for both options sought to retain important landscape features and recognised the importance the setting of built heritage assets near to the site. The MIND garden was also retained. Biodiversity off-setting was required due to the loss of semi-improved grassland and no development was proposed on the Local Wildlife site. The concept masterplan also identified the need for public open space to provide a green link to the neighbouring Middlefield development.
- For additional responses on infrastructure, see comments under 'KDBH' section above.

## Site 10 – West of Meriden

### Representations received:

Number objecting: 5

Number supporting: 6

### Key Issues raised by Representations:

- Site contains a potential Local Wildlife Site and should be protected and enhanced as part of the development and this should be added to the likely infrastructure requirements.
- Allocation contains previous developed land including the former garage and caravan storage site.
- A small housing development would be near to the centre of the village, local shops and transport and other facilities would make it an ideal location for more older persons' accommodation in the village.
- Need for rented houses in Meriden.
- New developments are leading to an increase in the crime levels.
- Supporting some small scale developments to meet local needs, such as older persons' accommodation.
- Acknowledged that whilst site 10 is in the Green Belt, evidence indicated this was not a strongly performing area.
- More needs to be done to find brownfield land in the urban area before building on Greenfield.
- Will meet national policy requirements to delivery sustainable development on available, suitable, viable and achievable land. Promoter advises site can be brought forward in first five years of plan period.
- Represents a logical sustainable westwards expansion of Meriden with clear, defensible Green Belt boundaries.
- Expressed concern about additional traffic and parking problems and engineering solutions to resolve them, effect on character of village.
- Further strain on schools, nursery places and medical practices.

### Council Response (Draft Submission Version)

- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The site's capacity was increased from 50 to 100 dwellings at Supplementary consultation stage, as a higher density scheme was considered deliverable on site.

- The Meriden settlement chapter in the Supplementary Document set out high level future infrastructure needs for the settlement.
- Between the 2016 and 2019 Draft Local Plan consultations, Meriden Parish Council began preparation and consultation on their Neighbourhood Plan.

## Shirley – Representations Regarding the Area as a Whole

### Representations Made:

- A petition with 108 signatures on it was collected by residents who attended a consultation event at Lighthall School. It raises objections to 'south Shirley estates'.

### Key Issues raised by Representations:

- Not aware that infrastructure requirements have been examined.
- New distributor road may be necessary.
- Additional retail provision may be required.
- Parking already inadequate.
- Possible sites will create substantial car traffic.
- Rail service at Whitlocks End station does not go to Solihull Town Centre.
- Only a slow and indirect bus service across the Borough to UK Central.
- Cycle and pedestrian access to Dickens Heath village could require improvement.
- Doctors, Schools and road systems are already heavily overloaded or over-subscribed and there can be a great deal of doubt over whether the local road systems would cope.
- It can already take 30 minutes to drive from the Bills Lane area to the M42 junction because of the existing levels of traffic - and the Shirley/Cheswick Green roads would become impossible - and unsafe - if these developments were to go ahead.
- I agree with principle of concentrated development so that infrastructure can be built in BUT to have MORE concentrated development in the Shirley/Dickens Heath would put too much pressure on existing infrastructure. Due to Dickens Heath, local secondary schools are already at capacity (all schools have porta-cabins already), roads are full to capacity & parking space is at a premium. There are other suburbs of Solihull on the edge of the urban area that have not had this amount of development imposed.
- Concerns about impact of housing increase in Blythe and Shirley wards due to SLP allocations, Tidbury Green appeals and proposals in Draft Local Plan on traffic on roads connecting to Majors Green, in particular Haslucks Green Road.
- Seek confirmation of traffic flow analysis of existing and future proposals.
- Houndsfield Lane used a short cut from Shirley to Dickens Heath; Ford floods during heavy rain. Potential for bridge.
- Consultation required with Worcestershire County Council Highways Authority.
- Roads in Worcestershire unable to cope; traffic flows to motorways.
- Trains and station carpark oversubscribed.
- Seek confirmation that infrastructure needs of Majors Green considered.
- Residents are upset at losing Green Belt buffer between, Shirley, Dickens Heath and Cheswick Green (Sites 4, 11, 12 and 13) but solution could be provision of T-shaped community park with amenity land, sports fields and wild areas to form permanent buffer zone between existing community and proposed development, with central facilities hub by the canal and house building around the edge.
- Congestion in Shirley an existing problem, and worsening.

- Affects Stratford Road from the M42 junction, Dog Kennel Lane, Tanworth Lane, Shakespeare Drive, Blackford Lane, Haslucks Green Road and Bills Lane.
- No. of fatalities on Bills Lane.
- Nearby roads used as rat runs. Cause pollution, highway and pedestrian safety issues.
- Sites 4, 11, 12 and 13 would cause major traffic issues in this area.
- Local railway services already oversubscribed.
- Overspill parking on side roads will worsen.
- Local infrastructure, e.g. GPs and Schools, is insufficient.
- Solihull hospital has been downgraded. Heartlands hospital is distant from Shirley; parking is limited and expensive.
- In relation to Site 4, 11, 12, 13 Objection.
- Recognise urgent need for housing.
- DLP not consider impacts on local infrastructure and ability to develop roads, hospitals etc for increased local population.
- Parking insufficient at railway stations. Roads at capacity at peak times.
- 3000+ cars will increase air and noise pollution.
- Loss of trees to absorb pollution.
- Reducing recreational and public amenity space.
- Loss of 9 sports pitches.
- Loss of wildlife.
- Journey to HS2 terminal area already a nightmare.
- Junctions 4 to 6 of M42 already at capacity.
- Recent development in Cheswick Green and Dickens Heath already added to congestion.
- Blackford Road, Tanworth Lane and Dog Kennel Lane very busy at peak times.
- Stratford Road almost at a standstill in morning from Cranmore Road to Monkspath Hall Road.
- Proposed development of 2550 houses will increase strain on road infrastructure, including air and noise pollution.
- Loss of green space for community benefit and health.
- Heavy congestion on Stratford Road, M42 and surrounding roads will get worse. E.g. always congestion around junctions where Burman Road and Shakespeare Drive meet Bills Lane. Ask traffic surveys carried out at peak times.
- Poor public transport links. Unreliable bus service.
- Insufficient parking at railway stations.
- Danger to pedestrian safety. Narrow roads. One footpath only in places.

- Local schools, nurseries, doctor surgeries and hospital already unable to cope. Will need new school and surgery. Heartlands hospital already overstretched.
- Loss of vital green space for recreation.
- Huge increase in traffic. Need clear proposals on road infrastructure and transport. Blackford Road has history of structural problems, been repaired 4 times in 6 years. Roundabout at the end of Dickens Heath Road would disperse traffic across several routes.
- Sites 12 and 13 are not well served by public transport and too far from railway stations.
- Preferable to use Monkspath Hall route to take additional traffic than B4102. If train station is moved, can create a transport hub.
- Put dedicated cycle route into Solihull from development sites, e.g. off the Stratford Rd into Hillfield Park.
- Not considered impact of traffic from these sites going south through our parish and Stratford District Council.
- Traffic increased dramatically in recent years due to developments in South Solihull and no recompense been made from Solihull Council for wear and tear of our roads.
- View that new housing is required in the Borough and for local people; concerns on scale and consequent impacts.
- Significant number of representors consider the proposed scale of development of 2,550 on sites 4, 11, 12 and 13 represents an over-concentration of growth in a small area and is excessive.
- Objection to concentration of housing around Shirley/Dickens Heath/Cheswick Green/BVP in current and emerging Local Plan, instead of sharing across Borough.
- Significant concern that scale of development at Sites 4, 11, 12 and 13 will cause the coalescence of settlements; Shirley, Dickens Heath, Wythall, Majors Green.
- View that individual communities will lose their distinctiveness.
- Significant objection to loss of countryside and Green Belt.
- HS2 already destroying other parts of local countryside.
- Council object to new developments in the Green Belt, why treat one house different from over 2000?
- Contrary to Government manifesto 2015 on protecting Green Belt and countryside.
- Loss of green areas will reduce Shirley's image from the lovely 'town in the country' it always was.
- Adverse impact on landscape quality.
- Increased housing would not sustain the attractiveness of the area or existing properties.
- Scale of development will have an adverse impact on existing communities, particularly in terms of:
  - Adverse impact on privacy.

- Pressure on local infrastructure and services, which are currently considered insufficient.
- Wrong to blindly pursue the delivery of numbers and ignore the quality of life of existing and new residents.
- Increase in crime rate in Dickens Heath since new development been finished.
- Employment opportunities in Shirley would not be sufficient to meet increased population.
- Impact on infrastructure and quality of life of residents in Earlswood & Forshaw Heath not been taken into account.
- Developments by SMBC in last 20 years had dramatic impact on rural parish and none for the better.
- Strong concern for loss of wildlife and green infrastructure.
- View that new housing in Shirley area will not benefit growth at UKC Hub, in particular HS2, as it is too far, and will worsen congestion on local roads and M42.
- No evidence of cross-boundary consultation or discussion as prescribed by the Localism Act.
- View from SDC Parish Council that Stratford District Council should be compensated for impacts of these developments, e.g. traffic on roads.

#### **Key Infrastructure Issues raised by Representations:**

- Overriding concern that infrastructure and local services are already under pressure or oversubscribed; that new development will only exacerbate these issues and the Local Plan Review has not outlined how these effects will be mitigated.
- Primary and Secondary schools are oversubscribed; there are inadequate school places or opportunities for expansion.
- Loss of recreational green space for dog walkers, children's play.
- Increased flooding.
- Health:
  - Local GPs oversubscribed, difficult to get an appointment.
  - Solihull hospital been downgraded.
  - Loss of green spaces will have an adverse impact on local communities' opportunity for recreation, exercise, enjoyment of the countryside with a consequent adverse impact on health and wellbeing.
- Transport:
  - Proposed developments will make existing traffic congestion and noise much worse.
  - Dog Kennel Lane is either a standstill or a race track, exceeding speed limit of 40mph. Particularly congested at rush hour including surrounding roads. Traffic makes crossing roads difficult for pedestrians, especially Tanworth Lane towards Cheswick Green. Traffic on Tanworth Lane already increased since Mount Dairy Farm development.



- Developments at Parkgate, Powergen, the relocation of Shirley library, Sainsbury and KFC have already made it a less pleasant place to live, and further development will exacerbate traffic on already crowded roads in the area, although traffic surveys are mostly done outside peak periods when the problems are worst.
- Dickens Heath development increased traffic on Bills Lane, Shakespeare Drive and Haslucks Green Road.
- Already congestion affecting whole of Stratford Rd from M42 junction and all arterial routes.
- Previous correspondence with Council's Highways team about highway safety concerns.
- Increased traffic would not assist tackling climate change.
- Increased traffic would reduce accessibility.
- Local railway stations not fit for purpose. Parking is at capacity at local railway stations. More parking will impact on the water table.
- Cycling is hazardous and allocations are not on established public transport routes.
- More convenient locations with better road links are required.
- Increased traffic will result in increased noise and pollution levels.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- South of Shirley/Blythe area is considered a suitable location for urban extension due to its location on the edge of the urban area where need arises. In particular for the proximity to high frequency public transport corridors and key local services and employment opportunities such as Blythe Valley Park and Shirley.
- The Council acknowledged local concern for traffic congestion and parking issues. A Traffic Assessment for the sites in Blythe/South of Shirley was commissioned, as well as a Parking Study that includes Dickens Heath. Preliminary discussions have been held with Transport for West Midlands on the potential to increase parking capacity at Whitlocks End Station, as well as improving accessibility to the station and promoting more walking and cycling to the station.
- The Council acknowledged the need for appropriate school provision, and on consultation with the Council's School Place Planning team, a new two-form primary school was proposed (on Site 12) at the Supplementary Consultation document stage.
- The Council acknowledged concern about pressure on healthcare services, and commenced engagement with the Clinical Commissioning Group and University Hospitals Birmingham.
- Further consultation meetings were held with the local Parish Councils between 2017 and 2019 to take local views and knowledge into account.
- The Blythe settlement chapter in the 2019 Supplementary Consultation Document set out high level future infrastructure needs for the settlement.

## Site 11 – TRW/The Green

### Representations received:

Number objecting: 111

Number supporting: 14

### Key Issues raised by Representations:

#### *Support:*

- Least controversial of Sites 4, 11, 12 and 13.
- It is an existing brownfield site and has good transport connectivity.
- Would preserve Green Belt corridor south of Shirley.
- Potential for higher capacity with recycling of commercial uses.

#### *Objection:*

- General objection to number of homes in the vicinity and impacts on traffic and services.
- Agree to principle of development, but concerns about high density.
- Concerns about impact on employment uses on site:
  - Loss of one of the few remaining modern employment sites so close to Shirley. Retaining and/or redeveloping it as an employment site would offer continued opportunities for employment for those occupying the new houses proposed off Dog Kennel Lane and the South of Shirley site, rather than removing those employment opportunities altogether.
  - No evidence for accepting loss of employment on this site.
  - Active businesses should be excluded from red line site.
  - Unclear how Policy P3 and P5 work in relation to this site. Current allocation would conflict with Policy P3 as clarification required on use, type and amount on the site.
  - Draft allocation does not reflect uses in Call for Sites form.
  - SHELAA - ref. 124 is a Category 2 site. Report observes that housing would result in loss of existing employment land uses on site, which needs to be found acceptable in planning terms. We have found no up-to-date evidence to substantiate this.
- Concerns about proposed housing numbers/density on site, e.g. calculations demonstrate ca. 8.8ha of developable land, or 253 dwellings at 36dph and 80% NDA.
- Clarification required whether uplift is due to high density apartments/Extra Care.

### Key Infrastructure Issues raised by Representations:

- See overall objections to Shirley Sites.

Council Response (Draft Local Plan Supplementary Consultation 2019)

- A planning application for a mix of housing and development associated with car dealerships at Site 11, The Green, was submitted in 2018 and was under consideration at the time of the Supplementary Consultation.

## Site 12 – Land South of Dog Kennel Lane

### Representations received:

Number objecting: 141

Number supporting: 11

### Key Issues raised by Representations:

#### *Support:*

Site Promoter:

- Support principle of sustainable urban extension at Site 12.
- Capacity on land ownership for up to 1500 homes.
- Carried out a number of assessments. No physical constraints. Sustainable location.
- Vision Document submitted.
- The release of site 12 should extend over to link to the rather ad hoc and long established development at the head of Creynolds Lane and include a feeder road leading over to Dickens Heath.
- Develop jointly with Site 11 with perimeter road moved to south.
- We would not object to development of the land north of the Miller and Carter, as there would still be some Green Belt protecting the village on that side.
- I can agree reluctantly with the Lighthall Farm site, at least the site would have access to the Stratford Road, being adjacent to it.

#### *Objection:*

- Whilst in a sustainable location there will be impact on Green Belt and coalescence between Shirley and Dickens Heath.
- Light Hall Farm is a building of historic significance to the area. This area is still used regularly by walkers and is important to the residents of Cranmore.
- Historic England: Notes that the site includes and/or is adjacent to listed building(s). Concerned that SMBC has failed to demonstrate that the Plan will be consistent with the national objective of achieving sustainable development; that evidence has been gathered and applied to indicate a positive strategy for the historic environment will be employed or that great weight has been given to the conservation of affected designated heritage assets and their setting in accordance with national policy and legislative provisions.
- No defensible southern boundary, potentially leaving open land to south for future development.
- How will the Green Belt between this site and Cheswick Green be protected from further development?
- Grounds for objecting include unknown impact of existing developments and outline planning permissions granted for new developments, loss of Green Belt and local landscape, urban sprawl.
- In para. 83 the plan talks about 'The network of strong and vibrant communities across the Rural Area will have been sustained with a range of local facilities and services that

are readily accessible on foot and by bicycle and that are appropriate to the scale and hierarchy of the settlement', whereas the plan seeks to extend many communities and leave only a small strip of dividing land.

- There are many fine trees on this site, such as large mature oaks. These should be preserved for environmental and amenity reasons.
- The site also has some flooding, supports protected species (bats, badgers) and being Green Belt contributes to the feeling of space and proximity of countryside for the Borough
- The amount of social housing allocation is also a paramount reason for my objection.
- Devalue property.
- Realise there is a need for affordable housing but the horrors of the intense building already in Dickens Heath comes to mind. When building new developments there needs to be plenty of green space for children and adults to enjoy and of course we need to preserve as many of the existing trees as trees are essential to our wellbeing. A mature canopy tree releases enough oxygen to sustain two human beings. Please with thoughtful planning we could provide a healthy environment where people can live.
- Only benefit is extra employment and rates income, Council should make case to Government that enough development already and find more suitable areas.

**Key Infrastructure Issues raised by Representations:**

- See general infrastructure issues raised for Shirley sites.
- Transport:
  - The traffic along Dog Kennel Lane is already high especially during peak hours where it can take at least 15 minutes to travel down towards Tanworth Lane.
  - Impact on traffic Congestion and air quality on A34 and on surrounding local roads.
  - The impact of additional congestion on the local roads from the proposed new housing sites needs to be assessed. The internal roads within Dickens Heath are already experiencing congestion during peak hours in the morning and do not have the capacity to accommodate additional traffic from the proposed housing sites west of Dickens Heath and south of Shirley.
  - The roads aren't much more than lanes in some parts, with narrow footpaths. Pedestrians have to step into the road to pass each other. The roads are heavily used at peak times and there have been several bad accidents in the area.
  - Impact of increased traffic on Blackford Road, which is already inadequate, has suffered from closures for repairs and has a weight restriction which is not enforced.
  - Will increase volume, noise and danger of traffic on Haslucks Green Road in area subject to speeding, accidents, road rage incidents, additional people unlikely to walk to station due to poor quality pavements and increased parking, results in loss of countryside and rural walking areas, will increase

pressure on overburdened schools and medical services, and will adversely affect property values.

- Object to amount of development focussed on South Shirley as traffic congestion already extremely bad at peak times with traffic from Dickens Heath, will be compounded by extra housing on Site 12, Tanworth Lane junction and A34/M42 already suffering gridlock, will create extra pollution increasing health problems such as asthma.
- Increased number of residents travelling long distances to Waste & Recycling Centre
- Flooding:
  - Flooding to be an issue
  - Covering the area with housing would increase run-off to Cheswick Green. Very efficient drainage will be needed to protect existing and potential housing.
  - ca 20% within Flood Zone 3.
- Suitability constraints including contamination.
- Stratford Road near Audi Garage already very congested.
- Shirley area already very built up.
- Very concerned about impact of extra traffic on Shirley.

Taylor Wimpey specific comments include:

- Integrating new highway with proposed development at West of Dickens Heath on B4102 and Dog Kennel Lane. Further clarification is required from the Council on this requirement.
- Possible capacity enhancement to A34. TW support the need for possible 'mobility' capacity enhancements to A34, with priority given to pedestrians, cyclists and public transport in terms of the movement hierarchy.
- Requires multiple points of vehicular access. This should also include non-vehicular access.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The 2019 concept masterplan proposed to retain historic landscape features, such as hedgerows, standard trees and ponds. Development was not specified in the zone

around the Grade II listed building, but stated that any development that would be permitted would need to be sensitive to the historic setting. Cycling and walking links were proposed through the site to connect to Site 11 in the north, and west towards Shirley Town Centre. New development would avoid Flood Zones 2 and 3 and betterment would be sought where possible to alleviate flood risk downstream, as well as managing any residual flood risk on site in accordance with Policy P11. A new two-form primary school to serve local development was also proposed on the site.

- In addition to restricting development around the Grade II listed building, the site was extended further east by one field, but not extended further south, to retain a suitable separation gap between the site and Cheswick Green village, and prevent coalescence.
- The capacity for the site was increased from 850 to 1000 dwellings in the Supplementary Consultation due to the increase in the site size and range of densities achievable on site.
- For additional responses on infrastructure, see comments under 'Shirley/Blythe' section above.

## Site 13 – Land South of Shirley

### Representations received:

Number objecting: 418

Number supporting: 13

Petition objecting: 361 signatures

### Key Issues raised by Representations:

- Significant local objection to this allocation; predominantly due to loss of informal green space for recreation, leisure and children's play; loss of wildlife and green infrastructure; concerns for impacts on infrastructure and local services; loss of Green Belt and distinction between edge of Shirley and rural south.
- View that DLP has not addressed infrastructure issues.
- View that there is a lack of green space for Shirley South residents to enjoy.
- View that area has already taken a lot of development through the current Local Plan, with sites at Aqueduct Road and Powergen.
- Shirley residents feel 'dumped on'.
- Proposed Green Belt gap between Site 13 and Dickens Heath considered too narrow.
- Note that the site includes and/or is adjacent to listed building(s). Concerned that SMBC has failed to demonstrate that the Plan will be consistent with the national objective of achieving sustainable development; that evidence has been gathered and applied to indicate a positive strategy for the historic environment will be employed or that great weight has been given to the conservation of affected designated heritage assets and their setting in accordance with national policy and legislative provisions.

### Petition:

- Seek to retain and enhance existing open space and a green corridor to the Bridleway, Canal, Bills Lane and the wider Countryside for health and wellbeing benefit of existing and future residents.
- Should be no secondary vehicular access to Woodlands and Badgers Estate.
- Object to concentration of 2,550 homes to south of Shirley and there should be a fairer distribution across the Borough.
- A wider Green Belt gap should be retained between Shirley & Dickens Heath.

### General:

- More children on Baxters Green/Road riding through on their bikes and causing trouble, cutting through to the School and causing noise, litter and more hassle for residents.
- We need housing, but not at the cost of reduced quality of life.
- Loss of view onto fields.
- Not acceptable to use Solihull Green Belt areas to compensate Birmingham shortfall.
- Allocation of social housing inappropriate and will alter to detriment the nature of established housing genre.
- Existing properties will depreciate in value.



- The area is being over developed by property developers who will cram as many houses as they can into the area and Solihull Council who see green fields as pound signs.
- Concern that development will be high density like Dickens Heath, without sufficient open space and greenery.
- Loss of Urbs in Rure character.
- Shirley has become so commercialised with car showrooms, too many supermarkets and out of town shopping with inadequate parking for employees, which cause the area to be totally gridlocked during peak times and high pollution levels. Loss of greenspace and wildlife habitat at Shirley Park and Green Belt including an unnecessary MSA, whilst Powergen has remained undeveloped. Family housing should be freed up by building elderly persons retirement properties, which would avoid building on greenfield land.
- Loss of Christmas trees will increase air pollution.
- Shirley will be a less pleasant place to live.

**Key Infrastructure Issues raised by Representations:**

- Layca community fields:
  - Loss of well used green space that is seen as a community asset and appreciated for its contribution to health and wellbeing.
  - At least, retain the amenity area between Woodloes Road and Baxters Green as this is of great benefit to all local residents and for any potential new residents when any new housing is completed.
  - Retain 'Green Corridor' from Bills Lane to Sans Souci.
  - The site is one of the few areas remaining where countryside can be enjoyed within the Solihull district to the west of the M42.
  - Propose site as a community managed nature reserve. Would be fantastic for community relations and help bees and butterflies if convert fields to wildflower meadows.
  - Wish to retain public access/corridor to the canal.
  - Shirley park has already lost trees and some of the land to the Parkgate development.
  - Trees should be protected by TPOs.
  - Loss of hedgerows and important wildlife habitat.
  - Layca community association intended the land for public amenity use and not to be built on.
- Flooding:
  - Fields act as a floodplain. Development will result in flooding issues including surface water and impact on neighbouring properties.
  - Fields are boggy.
  - Sewer stream running through it - is land saturated?
- Transport:
  - Stretton Road onto Shotteswell Road is not able to cope with more traffic as it is too narrow for constant car travel.

- Lack of bus services in area.
- There will need to be substantial improvements to the road network to cope with, probably, 1,000 cars and related vehicles arising from the new dwellings. Tanworth Lane, Dog Kennel Lane and Blackford Road are already overcrowded in rush hours with constant queues.
- Schools are full and at the beginning and end of the day the traffic in the area is dangerous for the school pupils.
- Increase in noise, air pollution and carbon emissions as a result of more traffic.
- The roads aren't much more than lanes in some parts, with narrow footpaths. Pedestrians have to step into the road to pass each other. The roads are heavily used at peak times and there have been several bad accidents in the area.
- The road systems (Tanworth lane, Dog kennel lane, Dickens heath road & Stratford road) cannot cope with traffic as it stands already & is often grid locked in rush hour.
- Bills Lane is not a road, traffic problems all times of day.
- Shirley station cannot accommodate additional parking so people park on local roads.
- Need joined up thinking about road infrastructure with adjacent counties.
- Impact of increased traffic on Blackford Road, which is already inadequate, has suffered from closures for repairs and has a weight restriction which is not enforced.
- Blackford Road is already regularly closed due to sewer collapse - the already heavy traffic must be a factor.
- Complete disregard of speed bumps on Blackford Road; hazardous to children.
- Will increase volume, noise and danger of traffic on Haslucks Green Road in area subject to speeding, accidents, road rage incidents, additional people unlikely to walk to station due to poor quality pavements and increased parking.
- Poorly located for public transport for commuting, especially to London.
- Existing high levels of traffic in area. Safety concerns for children on foot on way to Lighthall School.
- Concern that access from Bills Lane, which already suffers from heavy traffic as a bypass for Haslucks Green Road, to get to the retail park, and during school start and finish times, will make existing residential area intolerable and undermine safety.
- Will exacerbate the traffic congestion on Haslucks Green Road, already causing gridlock in peak times following the Asda development and with the Powergen redevelopment to come, as occupiers will use Asda and/or route to Solihull/Birmingham so the road infrastructure is inadequate to support this level of development.

- Unless the previously planned 'Shirley Relief Road' is reinstated it is difficult to see it offering any improvement in the already busy traffic in the area. This allocation in particular would cause Shirley and Dickens Heath to merge into a mass of over-corded small local roads and housing.
- Will increase rat-running.
- Need to travel long distances to Waste and Recycling centre.
- Object to large amounts of construction traffic.
- Roads around Tidbury Green and Earlswood are in a bad state already.
- Local services:
  - The doctor's surgery in Tanworth Lane is already over capacity.
  - Difficult to get a hospital appointment.
  - Trip to Heartlands Hospital is a nightmare.
  - No longer a maternity ward in Borough.
  - Schools are full and oversubscribed.
  - Schools underfunded.
  - Need for additional nursery places.
- Impact on infrastructure and quality of life of residents in Earlswood & Forshaw Heath not been taken into account.
- Developers should be required to build cycle paths on roads and Stratford canal and new parkland as well as improving roads and drainage.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- Further work was carried out on the site between the 2016 and 2019 consultations. A smaller parcel of land to the west, on Whitlocks End Farm (proposed Site 26) was considered more suitable for development than progressing Site 13. The alternative site would provide a narrower front, and minimise the separation between the urban edge and Dickens Heath. Furthermore, it would avoid further development in the gap between the urban edge and Dickens Heath along Dickens Heath road, which is the principal route south from the urban edge to the village, and as such is where the perception of the gap should be at its greatest.
- Development on Site 26 would also allow the retention of more land as accessible open space south of Woodloes Road, and potential for habitat improvements and greater accessibility to the wider countryside.
- Development at Site 26 would also shift the focus of vehicular traffic movements away from the more congested Dickens Heath Road, and disperse towards Bills Lane/Haslucks Green Road.

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## Site 14 – Arran Way, Smith’s Wood

### Representations received:

Number objecting: 1

Number supporting: 4

### Key Issues raised by Representations:

- Includes areas with existing planning permission and new playground which should be removed from allocation or designated as mixed-use site.
- Support, if done sensitively as good example of where new homes should be provided.

### Key Infrastructure Issues raised by Representations:

- Support in principle but should exclude new playground/park in Mull Croft which may have been included in error or provide compensatory open space.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The concept masterplan for the site was not progressed to Supplementary Consultation stage as the site received planning permission for 51 dwellings in the interim, and has since been built out.

## Site 15 – Jenson House, Auckland Drive, Smith's Wood

### Representations received:

Number objecting: 15

Number supporting: 1

Petitions objecting: 97 & 567 signatures

### Key Issues raised by Representations:

- Object as more housing will put pressure on roads and facilities, Jenson House may need to be re-opened as school due to shortage of places elsewhere; Auckland House is critical community asset and loss of well used green space/sports pitch important for health and wellbeing and contrary to Council strategies (petition with 686 signatures).
- Auckland House is critical community asset that contributes to health and wellbeing and stronger communities elements of local plan and Council's strategic plan and should be removed from allocation.
- Housing should be restricted to built-up parts of site excluding Auckland Hall and Jenson House if required for education.
- Impact on wildlife.
- Object as more housing will put pressure on roads and facilities, Jenson House may need to be re-opened as school due to shortage of places elsewhere; Auckland House is critical community asset and loss of well used green space/sports pitch important for health and wellbeing and contrary to Council strategies (petition with 686 signatures).
- Shortage of school places and planned new housing means Jenson House may be required and should be reserved for new school.
- Loss of vitally important green space/sports field used by community and several clubs in area that has suffered significant losses already and detrimental to Big Local Project, a key flagship community programme.
- Object to loss of sporting facilities in absence of evidence to justify development which should be determined by Playing Pitch Strategy (Sport England).
- Concern at loss of Bosworth Field as used for organised activities for young people across North Solihull, by Chelmsley Wood Colts FC and Cars FC, identified as potential facility for investment as local asset by Solihull Moors FC and should be excluded from site.
- Loss of opportunities for sports and physical activity in area and suggest health impact assessment should be undertaken to assess impact.
- Since closure of Bosworth Wood Primary School, local children have to go out of area as Smith Wood Primary Academy is full. 100 additional families will exacerbate issue.
- Limited recreational facilities in the area. Field on Auckland Drive is one of largest in area and well used.
- Loss of open space for sports, children's play and recreation. No alternatives available nearby. Lanchester Park too far for young children. Local football teams would have to disband.
- Existing parking issues, as many houses don't have frontages.

## Council Response (Draft Local Plan Supplementary Consultation 2019)

- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The site's capacity was reduced from 100 to 50 dwellings, to allow retention of the junior playing pitch and Jensen House as an education facility. The Supplementary consultation referred to the work that was underway to determinate whether and to what extent the site may be available to accommodate residential development.

## Site 16 – East of Solihull

### Representations received:

Number objecting: 43

Number supporting: 6

### Key Issues raised by Representations:

#### Objection

- Recognition of the site's proximity to Solihull Town Centre, JLR and Airport/HS2 hub area, and therefore support for the site.
- Concerns about the impact of the development on local road infrastructure, in particular the impact on the key crossroad/junction of Hampton Lane.
- Concerns about the loss of Green Belt and in particular narrowing of the gap to Catherine-de-Barnes.
- Loss of sporting facilities, prime agricultural land and wildlife.
- Main concern relating to this site relates to coalescence between Solihull and Catherine-de-Barnes.
- A junior football club will be affected by this development.
- Contrary to SHLAA assessment (reference 247) undertaken in 2012 which concluded that site should not be considered for development unless there are no suitable alternatives, it adjoins a busy commuter road subject to significant delays, lacks local infrastructure in absence of shops, surgery or schools, would bring urban area to within one field or 400m of Catherine-de-Barnes, and would result in loss of agricultural land and playing fields.
- The 2012 SHLAA and SLP Inspector considered the site to be unsuitable.
- Site 16 conflicts with challenges C and E and objectives of Policy P7. Public transport is vital for the health and wellbeing of the elderly community in the rural settlements.
- Would impact on traffic congestion and road improvements would detract from the rural character of the area.
- The site includes listed buildings and there would be loss of sports pitches and impact on wildlife.
- Concerned that SMBC has failed to demonstrate that the Plan will be consistent with the national objective of achieving sustainable development; that evidence has been gathered and applied to indicate a positive strategy for the historic environment will be employed or that great weight has been given to the conservation of affected designated heritage assets and their setting in accordance with national policy and legislative provisions.
- Should consider density and increasing to higher density could mean fewer sites needed (especially in Shirley).
- 650 houses would seem to be a wholly inappropriate development and would have a very detrimental visual, noise and environmental effect on owners of the existing houses as the current field is overlooked and provides a lovely view.
- Concern that potentially hedgerows and trees will be removed.

- Objections to the level/scale of housing being proposed for the site and feel that it is better suited for a lower level of housing, without quantifying what that level should be.
- Accept there is a need to provide houses but the development will reduce the gap between Catherine-de-Barnes and Solihull.
- Will change the character of the rural area.
- Potential loss of agricultural land and listed buildings.
- Green Belt policies have applied to existing homeowners who want to build on their own land.
- The size of the development will fail to enhance the area, contrary to Policy P19.
- Woodland behind Pinfold Road should be retained as it provides a habitat for wildlife and provides privacy and security for residents of Pinfold Road.
- Whilst need to provide for new houses, object to housing Site 16 as unsuitable due to loss of Green Belt, loss of historic hedgerows and trees along Field Lane/Lugtrout Lane; widening lanes will make traffic problems worse.
- Loss of views from properties on Lugtrout Lane.
- Damson Parkway meant to set Green Belt boundary.
- Land Rover expansion has already resulted in loss of ancient trees.
- Loss of 'Urbs in Rure' character.
- Loss of wildlife.
- Site in several ownerships.
- Development of this scale would seriously damage the rural aspects of this area and the approach to Solihull from the motorway which is such an attractive feature.
- The loss of open green spaces and trees would increase pollution levels from road traffic and from the airport, lack of public transport alternatives.

#### *Support*

- Site is ideally located to town centre, JLR, HS2.
- Low densities comparable to Catherine-de-Barnes, rather than higher densities at Damson Parkway, would be a waste of land.
- Site was rejected as LWS in 2002.
- May be worthwhile exploring viability of immediately adjacent land also in process.
- Proposed Mitigation:
  - If approved, development should be restricted at the periphery. Provide significant buffer strips of undeveloped and landscaped to retain open aspect to minimise impact on existing dwellings.
  - Section 106s should ensure additional infrastructure e.g. cycle, pedestrian and vehicle routes, school, medical centre and encourage use of public transport. Field Lane is not a suitable access road for development, and widening would result in permanent loss of rural byway and ancient hedgerow. Could close road to traffic and access from Hampton Lane or Lugtrout Lane.



- Existing Green Belt constraint on existing properties should also be removed so can redevelop.
- Appreciate need to increase number of homes.
- Topography means it is obscured from viewpoints in surrounding area.
- Highly sustainable location; easy walking and cycling distance to Solihull Town Centre.
- Agree with findings in Green Belt Assessment, Accessibility Study, and Landscape Character Assessment.
- Broadly agree with SHELAA except for erroneous reference to a LWS on-site.
- Disagree with statements in SA referring to LWS and potential loss of heritage asset.
- Size of the site would enable protection and enhancement of the setting of the Grade II Listed building within the site, adjacent to Field Lane, and the Grade II Listed building outside the site boundary.
- Site has clear, defensible Green Belt boundaries.
- Ecology is a 'soft constraint' according to SHLAA 2012, evidence that 6 LWS were lost beneath the Dickens Heath settlement.
- UKLD fully engaged with landowners and will promote as one comprehensive development.
- Developable in early part of plan period.
- Will meet the objectives of Growth Option G.
- Will meet national policy requirements to deliver sustainable development on available, suitable, viable and achievable land.
- Represents a logical sustainable eastwards expansion of Solihull.
- Town Centre has benefitted from number of improvements in recent years; allocation will help to secure its continued success.
- No known legal or physical constraints.

**Key Infrastructure Issues raised by Representations:**

- Widening lanes will make existing traffic problems worse and detract from the rural character of the area.
- Traffic causes noise and pollution.
- The site between Lugtrout Lane and Hampton Lane, based on the car ownership figures given in the document mean there are additional 1200 cars owned by people living off Damson Parkway. How is this to be dealt with, as the road junctions at the end of Parkway already cause problems for existing residents? I am also concerned that not details of entrance and exist points is given, where would they be.
- The traffic on Damson Parkway, Hampton Lane and the A41 already causes locals no end of issues. We have to contend with the rush hour traffic and JLR traffic flow. How houses could be built in the fields and the transport links be improved has not been clarified.

- The area around Yew Tree Lane, Damson Parkway and the Solihull bypass is already heavily contested especially around Land Rover shift times. Building a further 600plus houses on the land by Lugtrout Lane will only increase the problem.
- Development on housing site 16 will require major infrastructure improvements, including major changes to Solihull bypass, Hampton Lane and Yew Tree Lane junction, improvements to Damson Parkway, widening and traffic control at Lugtrout Lane and Field Lane.
- Area already suffering from terrible traffic problems. Also this area is having to contend to extensions to the JLR plant and ever increasing noise from the airport. The motorway service station is also being considered which is not too far away.
- Staggered junctions at Yew Tree Lane, Hampton Lane, Marsh Land and Solihull bypass cause significant traffic congestion (plus noise and air pollution and traffic delays).
- Traffic congestion along Damson Parkway/Yew Tree Lane will probably be exacerbated by opening of JLR Logistics operation (Site 20).
- Field Lane is not a suitable access road for the development, and widening would involve the permanent loss of a valuable rural byway including ancient hedgerow. If development is approved Field Lane should be closed to vehicular through traffic.
- Access to site should be from Damson Parkway.
- Upgrading local roads will not resolve ongoing traffic issues or accommodate 650 homes. Contrary to Policy P8.
- Flow through Hampton Lane likely to increase with development of UK Central.
- Land is used as an 'overflow' carpark for the Spire hospital.
- Council's own policy to not support developments that will increase delay to vehicles.
- Only poor public transport available, so development will need new and regular services provided.
- The speed limit is not adhered to.
- Bus services do not comply with Policy P7.
- The requirement for local facilities has not been addressed.
- Proposal for new school will not address shortfall in faith schools with long waiting lists where siblings may not get a place due to increased demand.
- Local schools and medical services oversubscribed so will not cope with increased population.
- Impact on existing unreliable foul sewage treatment facility prone to flooding.
- Sport England is aware that work is currently underway on the completion of an up-to-date Playing Pitch Strategy (PPS).
- Site is subject to a deed/covenant (for sports use) from previous applications and questions whether the land therefore should be deleted from the plan.
- Loss of land used for children's sport and football pitches.

- Given the size of the proposed allocation, it should be feasible and viable for the existing football fields and associated community building in the north east corner of the proposed allocation to be retained for outdoor sport and recreation use.
- Loss of sports facilities not accord with Challenge J.
- Should not be permitted without additional infrastructure and social amenities, e.g. cycle, pedestrian and vehicle routes, schools, medical centre and a design that encourages and supports the provision and use of public transport.
- Sufficient size for opportunity to further improve accessibility by providing on-site community facilities.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council's response on the spatial strategy approach, and the exceptional circumstances to release Green Belt land to meet housing need are included within the relevant sections above.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The site is accessible and well related to the Town Centre which has a full range of services and facilities, with excellent public transport links.
- The Solihull Town Centre and Mature Suburbs settlement chapter in the Supplementary Consultation document set out high level future infrastructure needs for the area.
- On consideration of the 2016 consultation, the site was extended further north, to include land between Lugtrout Lane and the canal. . Utilising the canal as the new Green Belt boundary enabled this additional land to come forward for development in accordance with the spatial strategy. The capacity on the site was retained as 600 dwellings to accommodate retention of the playing pitches on site and provide a buffer around the Grade II listed building Field Farm and 237 Lugtrout Lane.
- The layout seeks to retain important landscape features, the rural character of Lugtrout Lane and Field Lane, and respond sensitively to areas of ecological importance.
- The Council acknowledged local concern for traffic congestion. The supplementary consultation document identified that studies were being undertaken to look at key junctions within and close to the Town Centre and stressed that encouraging more cycling and walking to the town centre would be essential. The concept masterplan included pedestrian links with the surrounding area.
- The Council acknowledged concern about pressure on healthcare services, and commenced engagement with the Clinical Commissioning Group and University Hospitals Birmingham.

## Site 17 – Moat Lane/Vulcan Road

### Representations received:

Number objecting: 9

Number supporting: 0

### Key Issues raised by Representations:

- Concern about loss of employment sites as no indication of where existing uses will be relocated or replaced.
- Potential conflict with Policy P3.
- Boulton Road/Vulcan Road industrial estate should not be developed for housing but retained for employment uses as meet market needs with housing numbers redistributed to small and medium sized sites elsewhere.
- Renewal Christian Church Family Centre and carpark should be deleted from proposed site allocation as full active and integral part of facilities and little likelihood that will become available for residential or other development.
- Requires careful design to avoid social and parking problems experienced at Wharf Lane site.

### Key Infrastructure Issues raised by Representations:

- Should not be allocated for housing as established businesses/area and infrastructure will have adverse effect on existing area.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- This brownfield site is situated in the main urban area, and located in an accessible location which is well served by public transport and close to key services and employment centres.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- For the 2019 Supplementary Consultation document, it was proposed that the site be developed in two phases to respond to lease restrictions and time scales of the landowners who occupied the industrial and commercial uses on the site. Given the location and surrounding character, a higher density development of 200 dwellings was proposed.
- The Christian Renewal Church Family Centre and carpark were removed from the allocation, and an area of POS was proposed between the industrial estate and depot redevelopment that would provide opportunities to link with the neighbouring Wharf Lane development.

- The 2019 concept masterplan recognised that the current land uses (industrial, commercial and SMBC Moat Lane Depot) are still in operation and have existing lease agreements in place.

## Site 18 – Sharmans Cross Road

### Representations received:

Number objecting: 347

Number supporting: 4

### Key Issues raised by Representations:

- Inaccuracies with promoters submission.
- Other sporting clubs could use the site, and there is a demand so such.
- Density of proposed development is out of character with surrounding housing and would be out of context locally.
- Social housing would be out of character.
- High density would result in over two storeys that would cause overlooking into existing neighbouring properties.
- Site is not in accordance with elements of Policy P7.
- Absurd that houses nearby are being enlarged then infill taking place with smaller houses.
- No reference in constraints to TPO No. 174. Seek assurances that TPOs will be retained and protected during construction.
- The present roads are unable to cope with the volume of traffic at certain times of the day, especially at school starting and finishing times. To add another 100 houses could potentially mean another 200 cars trying to access the road system which the present infrastructure would be unable to sustain.
- Existing traffic congestion will be exacerbated, increasing noise, pollution and impacting on highway safety.
- Risk to pedestrians, especially schoolchildren, accessing Sharmans Cross Junior School from traffic and fumes.
- Designated cycling route on Sharmans Cross Road, but not safe with congestion.
- Crossroads of Streetsbrook Road, Sharman's Cross Road, Stonor Park Road & Dorchester Road is gridlock between 8am to 9.15am. Dangerous to pull out into traffic for drivers and cyclists, particularly in winter and bad weather. Touchwood Phase 2 will make it worse.
- Sharmans Cross Road is main route from Shirley to Solihull.
- Increased volumes of traffic moving in/out of site, especially those turning right out of site towards town.
- Witnessed accidents at Sharman's Cross Road/Streetsbrook Road junction.
- Potential access road into or near Winterbourne Road will cause traffic congestion and noise.
- Alternative roads, Winterbourne and Beaminster, are not suitable for volume of traffic.
- Added pothole damage.
- Headlights from tennis club shine directly into our living room.

- Our drive used by other drivers to turn in to avoid queues.
- Likely to be insufficient parking, resulting in more on-street parking. Is there up to date traffic modelling and traffic impact study. What are the proposed access and egress routes? What are proposed mitigation measures? What are measures to consider side road parking and effect upon existing and future traffic flows?
- Flooding issues in nearby back gardens, water table is very high. New development would exacerbate surface water run-off.
- Development will lead to a loss of sporting facilities, which are valuable to the local community.
- Shortage of pitches currently in Solihull. Any loss of pitches should be replaced.
- Solihull falling in league tables. In lower 3rd quartile nationally for adult sports participation 3 times/week.
- According to Sport England, Solihull is in the third quartile nationally for adult participation in sport. Council has a legal duty to address the existing shortage of facilities.
- Arden Tennis Club very popular. Reduced parking due to loss of Arden Tennis Club.
- SMBC said that the land would be used for sport use only.
- Understand several groups have tried to use sports pitch, but not succeeded.
- Understand that current freeholders are proposing unreasonable rent rates.
- Misleading to state that playing fields are derelict.
- Pressure on existing schools and GPs which are already stretched.
- GPs and primary schools 1500m from site with no direct bus links.
- Not compliant with NPPF accessibility criteria.
- Under law local amenities should be within 800m. Site 18 would be 1700m from Solihull Town Centre and 1000m from train station.
- Long walk from train station.

#### Arden Tennis Club:

- No commitment to such development plans and fully reserve our rights regarding the land and premises which we own and occupy. However, we do have specific criteria that need to be complied with in order to ensure further cooperation:
- Tenure of the land occupied by the club comparable to existing arrangements i.e. Freehold.
- Beneficial improvements to the structure and buildings of the clubhouse and its associated playing and fitness facilities.
- Ease of access into and out of the site.
- Significant improvement regarding car parking arrangements.
- Significant improvement to the club's potential for future sustainability.

## Others:

- Pow Grove Local Wildlife Site forms the western and southern boundaries of this site allocation, part of which includes ancient woodland. Mitigation will need to be in place to make sure that there is no direct or indirect harm to these habitats. Ancient woodland will need a semi-natural buffer to protect it from harm from neighbouring development.
- Likely that the Green Infrastructure required will need to include a semi-natural buffer of the neighbouring ancient woodland so as to protect it from harm.

## Council Response (Draft Local Plan Supplementary Consultation 2019)

- The site is located within an existing, accessible residential area, close to Solihull Town Centre with its full range of services, facilities and public transport links.
- A concept masterplan was developed for the site, taking into consideration the site's constraints and opportunities and was progressed to the 2019 Supplementary Document stage.
- The concept masterplans take account of local landscape character and distinctiveness, heritage assets, green infrastructure connectivity and priority habitats, enhancing access to public rights of way and increasing accessibility by different modes, flood risk, new open space provision, and where appropriate, accommodating new infrastructure.
- The site was proposed for 100 dwellings in the Supplementary Consultation, but did not include the existing tennis club or facilities for re-development.
- Landscape features would be retained and development kept out of the buffer zone of Pow Grove Local Wildlife Site.
- The Council acknowledged that whilst the former sports ground had been disused for a number of years, compensation for the loss of playing pitches would be required.



## Site 19 – Land at HS2 Interchange

### Representations received:

Number objecting: 12

Number supporting: 9

### Key Issues raised by Representations:

- Further explanation/justification/detailed proposals required showing how residential capacity will be accommodated close to HS2 station.
- Delivery is a significant concern as development could only commence once HS2 completed in 2026, which may be delayed, land subject to safeguarding for HS2, and 1000 dwellings by 2033 is very unlikely timescale.
- Concern that initial garden village concept will be diluted with design considerations compromised by need to achieve housing numbers and request that MADE be consulted on Arden Cross Masterplan.
- Site compares poorly with others, such as Call for Sites 80 Wyckhams Close as far as HS2 safeguarded land, flood risk, biodiversity and heritage constraints are concerned.
- If site does not come forward within Plan period, other sites will be required, and Call for Sites 207 Brown's Lane/Smith's Lane/Widney Manor Road is suitable alternative.
- Inconsistencies between housing assessment of site in the SHELAA and Sustainability Appraisal, with former stating agricultural land classification grade 5 and latter more than 20ha of grades 1-3b.
- SHELAA fails to note potential constraints of listed building at Park Farm and the registered Park and Garden at Great Packington, or the proximity of site to River Blythe and Coleshill & Bannerly Pools SSSI.
- Site includes/adjacent to listed building(s) and plan fails to demonstrate that appropriate evidence has been gathered or weight given to conservation of heritage assets in accordance with national policy (Historic England).
- Support delivery of 600 dwellings within NEC site, although higher capacity but uncertain whether deliverable during Plan period.
- Support as can contribute to the majority of the Challenges but should be minimum as more land should be released for development, with provision set out separately for Arden Cross and NEC.
- Support mixed-use, including residential development of site.
- Arden Cross site should be included in Summary Table of Allocated Sites in para. 223, as Policy P1 promotes residential opportunities on site.

### Key Infrastructure Issues raised by Representations:

- Significant local concerns about impacts of UK Central Hub area proposals and development around HS2 Interchange on local rural highway network, traffic levels and flows which must be considered when maximising connectivity (NWBC).
- Areas of surface car parking at Airport/NEC should be converted to multi-storey and developed to support/complement HS2/Resort World and alleviate pressures on South Shirley and south-north traffic flows.

## Council Response (Draft Local Plan Supplementary Consultation 2019)

- The HS2 Act received Royal Assent in February 2017, with the HS2 Interchange station situated within the 140ha triangle site, Site 19.
- The Council consider there are exceptional circumstances to justify the release of this land from the Green Belt, in order to maximise the economic benefits of the substantial national infrastructure investment at this location through the HS2 rail link and interchange station. This investment will act as a stimulus with the potential to bring local economic and socio economic benefits, to accommodate growth for the wider Greater Birmingham and Solihull LEP and West Midlands area and to bring investment of national significance to the area. It is therefore important that these benefits are realised through the delivery of the Hub proposals.
- The UK Central Urban Growth Company (UGC) was established by the Council in 2016 to lead and coordinate the delivery of the projects in the UKC Hub Area. Through the UGC, the Council has been working closely with range of landowners responsible for Site 19, Arden Cross Ltd, which reflect both public and private interests. There is collective support for the overall vision and commitment to actively working towards delivery.
- The UGC Framework Plan and Hub Growth and Infrastructure Plan were updated in 2018. These documents set out the infrastructure requirements and housing and economic growth ambitions for the Hub area, as well as design principles for the site. As such, the Council have not prepared a separate concept masterplan for this site.

## Site 20 – Land at Damson Parkway

### Representations received:

Number objecting: 13

Number supporting: 3

### Key Issues raised by Representations:

- Object to inclusion of land east of Old Damson Lane, which would be more defensible Green Belt boundary, due to impact on landscape/woodland at gateway/approach to conurbation.
- Object as will cut off Elmdon Park from countryside/Green Belt to east reducing it to an urban park, reduce character of landscape and enclose public footpaths in area.
- Green Belt land should not be released for use by JLR.
- Object as allocation will probably reduce number of people employed in wider supply chain, will create ribbon of commercial development from Lode Lane to NEC, and the buildings proposed so far are out of proportion with area and represent the cheapest solution.
- Will adversely affect several thousand homes east/north-east of Lugtrout Lane/in Damsonwood area changing setting and character of area. Site previously identified as part of land for second runway for Airport and was recommended for safeguarding in 2003 White Paper, which is preferable to current suggestion east of A452, so should not be developed until long term plan adopted by Birmingham Airport.
- Site identified for JLR and suppliers but should be extended to include B1/B2/B8 uses as does not address wider needs for large scale logistics and industrial floor space/mixed-use employment land as evidenced by Call for Sites submissions.
- Provision for/cost of distribution for JLR not of wider concern and site would be better used for housing rather than South Shirley as close to A45 and infrastructure improvements around HS2/NEC.
- Part of site at Dunstan Farm should be allocated for housing.
- Support site as providing for expansion of existing plant and for storage of parts and components but will need to remain flexible (JLR).
- Support need for masterplan for whole site to ensure appropriate and effective development with necessary infrastructure, especially improvements to A45/Damson Parkway junction delivered.

### Key Infrastructure Issues raised by Representations:

- Site together with other development at Site 16 will have long term and cumulative impacts on traffic congestion in the area.
- Site will impact significantly on sports clubs which will find it difficult to relocate.

### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The 2019 concept masterplans focussed on residential sites and therefore a masterplan for Site 20 was not included within the documentation.

- Parts of the site have already benefitted from planning permission for works associated with the Jaguar Land Rover plant; the Despatch centre in 2014 (and built out by 2016) and Logistics Operations Centre in 2017 (under development).
- Council acknowledges the need to accommodate provision for the sporting clubs that may be affected.
- Between the 2016 and 2019 consultations, work had commenced to assess transport infrastructure capacity in the Damson Parkway and A45 area. Junction improvements are planned at the A45 junction and a new cycle link on Damson Parkway to improve connectivity. Capacity will continue to be assessed as part of ongoing work to deliver proposals for site UK2 and as part of the wider UK Central Hub proposals.

### Alternative Sites (Where a Call for Sites Submission Already Made)

#### Representations received:

Number objecting: 242

Number supporting: 9

Number commenting:

Measure of support for following sites within the SHELAA<sup>2</sup>; those with an asterisk are from the site promoters only:

Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
1	Landowner	Springhill	1.2	Berkswell	Meriden
5*	Cerda Planning	Land at Grove House	0.55		Knowle
6*	William Davis	Land at Old Station Road, Hampton in Arden		Hampton in Arden	Bickenhill
8	Landowner	103 Birchy Leasowes Lane	0.73	Tidbury Green	Blythe
9	Pool Structures	Land to rear Lavender Hall Farm		Berkswell	Meriden
13	John Shepherd Estate Agents	Land at rear of 2214 Stratford Rd, Hockley Heath	3.4	Hockley Heath	Dorridge & Hockley Heath
14	John Shepherd Estate Agents	2440 Stratford Road and land adj.	1.06	Hockley Heath	Dorridge & Hockley Heath
16*	Tyler-Parkes Partnership	Land South of Hampton Lane	5.02		Bickenhill
17*	Tyler-Parkes Partnership	Land west of Ravenshaw Lane/South of Hampton Lane	1.6		Bickenhill
19*	Tyler-Parkes Partnership	Land adj. to Bakehouse Lane/Wheeler Close	1.69	Chadwick End	Knowle
20*	Tyler-Parkes Partnership	Land adj. to Solihull bypass, south of Hampton Lane	3.646		Bickenhill
22*	Landowner	Land to the south of Houndsfield Lane (former Clementine Farm)	1.41	Tidbury Green	Blythe
23	Landowner	Land adj. to 'The Woodlands'	3.8	Hampton in Arden	Bickenhill

<sup>2</sup> Further details on these sites are within the 2016 SHELAA at [http://www.solihull.gov.uk/Portals/0/Planning/LPR/Strategic\\_Housing\\_and\\_Employment\\_Land\\_Availability\\_Assessment\\_Vol\\_B.pdf](http://www.solihull.gov.uk/Portals/0/Planning/LPR/Strategic_Housing_and_Employment_Land_Availability_Assessment_Vol_B.pdf)

Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
28*	Colliers International	Land lying to west of 227 Lugtrout Lane	0.87		Bickenhill
29	Tyler-Parkes Partnership	The Orchard, Earlswood Road	1.2		Dorridge & Hockley Heath
31	Solihull Blooms Garden Centre				
34	Johnson Fellows	Box tree Farm Craft Centre			Dorridge & Hockley Heath
41*	Barlow Associates Ltd	Land at Whitlocks End Farm	50	Dickens Heath	Blythe & Shirley South
43	Agent	Land adj. to Old Lodge Farm	1.33	Berkswell	Meriden
47	Land off Kelsey Court				
49	Phase 2 Planning & Development Ltd	Land adj. 84 School Road, Hockley Heath	0.65	Hockley Heath	Dorridge & Hockley Heath
54	Solihull MBC	Clopton Crescent Depot & British Legion Club		Fordbridge	Chelmsley Wood
57	Tanworth-in-Arden Education Foundation	Land adj. 2102 Stratford Road		Hockley Heath	Dorridge & Hockley Heath
59*	Delta Planning	Golden End Farms	9		Knowle
62*	Marrons Planning	Land adj. to Shirley Golf Course, Stratford Road	8.63	Cheswick Green	Blythe
64*	Tyler-Parkes Partnership	Land at Barston Lane/Oak Lane	1.7	Barston	Blythe
68*	Harris Lamb Limited	Land off Jacobean Lane	3		Knowle
69*	PRW Strategic Advice	Norton Lane, Earlswood	3.2	Tidbury Green	Blythe
79*	Hancock Town Planning	Land fronting Waste Lane, Balsall Common	0.72	Berkswell	Meriden
81*	Delta Planning	Land at Fillongley Road, Meriden	3.7	Meriden	Meriden
82	Richard Cobb	Land at Kenilworth Road	2	Balsall	Meriden
83	Richard Cobb	Land at Catherine-de-Barnes	1	Hampton in Arden	Bickenhill
84	Richard Cobb	Land at Houndsfield Lane	1.5	Tidbury Green	Blythe
85	Richard Cobb	Land adj. to 179 Hampton Lane, Catherine-de-Barnes	1.1		Bickenhill

Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
86*	Richard Cobb	Land at Old Station Road	0.93	Hampton in Arden	Bickenhill
87	Richard Cobb	Arden Brickworks	8.75	Hampton in Arden	Bickenhill
88	Richard Cobb	Land at Widney Manor Road	6		Dorridge & Hockley Heath
89	Richard Cobb	Village Farm, Berkswell	0.75	Berkswell	Meriden
90*	Richard Cobb	Land at Coventry Road, Berkswell	0.75	Berkswell	Meriden
92	Richard Cobb	New Mercote Farm	13	Berkswell	Meriden
93*	Richard Cobb	Land at Heronfield	0.5		Knowle
94*	Richard Cobb	Land at Diddington Lane, Hampton in Arden	1.59	Hampton in Arden	Bickenhill
96*	Richard Cobb	Land on north side of Lugtrout Lane	1.2		Bickenhill
101*	Spitfire Properties Ltd	Land at Old Waste Lane/Waste Lane, Balsall Common	1	Berkswell	Meriden
103	Davis Planning Partnership	Box Tree Farm			Dorridge & Hockley Heath
104	Bilfinger GVA	Land off Blue Lake Road, Dorridge (Oak Green)	4		Knowle
106*	Cerda Planning Ltd	Land at Oakfields Way, Catherine-de-Barnes	1.4		Bickenhill
107*	Cerda Planning Ltd	Land at Gentleshaw Lane	5		Knowle
110*	Sworders	Land to rear of 114 Kenilworth Road	15.32		Knowle
111*	Bilfinger GVA	Land to Widney Manor Road	3.9		St Alphege
112	Fernhill Court				
121	Barton Willmore LLP	Land west of Stratford Road, Hockley Heath	3.2	Hockley Heath	Dorridge & Hockley Heath
127	Landowner	Woodford	0.62		Dorridge & Hockley Heath
128*	Brooke Smith Planning	Area G, Meriden		Meriden	Meriden
132	Turley	HS2 Interchange		Bickenhill & Marston Green	Bickenhill
133	Brooke Smith Planning	Creynolds Lane, Shirley	0.7	Cheswick Green	Blythe

Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
135	Barton Willmore LLP	Land at Dorridge Road, Dorridge			Dorridge & Hockley Heath
136	DS Planning	Oak Farm, Catherine-de-Barnes	3.44	Hampton in Arden	Bickenhill
139	Chave Planning	Land south of School Road, Hockley Heath	5.9	Hockley Heath	Dorridge & Hockley Heath
141*	Bilfinger GVA	Land around Earlswood Station	37	Tidbury Green	Blythe & Stratford
142	Bilfinger GVA	Grange Farm, Balsall Common	35	Balsall	Meriden
143*	DS Planning	Lugtrout Lane	0.46		Bickenhill & Elmdon
144*	Catesby Estates Ltd	Land at Fillongley Road, Meriden	3.36	Meriden	Meriden
146	Turley	Blythe Valley Park	25	Cheswick Green	Blythe
165	Nurton Developments Ltd	Boxtrees Site 2	90	Hockley Heath	Dorridge & Hockley Heath
166*	Savills (UK) Limited	Land north and south of Hampton Road, Knowle	3.39		Knowle
168*	GL Hearn Ltd	Land at Illshaw Heath		Cheswick Green	Blythe
170	Green Light Developments	Pheasant Oak Farm	2.5	Berkswell	Meriden
173*	Savills (UK) Limited	Winterton Farm/land to the north of Blythe Valley Park	28.4	Cheswick Green	Blythe
175	Savills (UK) Limited	Land to the south of School Road, Hockley Heath	2.5	Hockley Heath	Dorridge & Hockley Heath
176	Star Planning & Development	Land to the west of Dickens Heath	15	Dickens Heath	Blythe
178*	Framptons	The National Motorcycle Museum	6.9	Hampton in Arden	Bickenhill
184	Cheswick Green Parish Council	Rear of Cheswick Green Primary School		Cheswick Green	Blythe
187*	Bruton Knowles	Land to the east of Leys Lane	1	Meriden	Meriden
192*	Nigel Gough Associates	Jordan Farm	15.35	Tidbury Green	Blythe
195	Pegasus Group	Land at Damson Parkway	27	Hampton in Arden	Bickenhill



Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
196	Pegasus Group	Land at Bickenhill Road, Marston Green	14.42	Bickenhill & Marston Green	Bickenhill
197*	Pegasus Group	Land south of Meriden, Solihull	9.1	Meriden	Meriden
198	Pegasus Group	Land north-west of Balsall Common, Solihull	8.05	Balsall	Meriden
199	Pegasus Group	Land at Four Ashes Road, Dorridge - Box Trees	3		Dorridge & Hockley Heath
205*	DS Planning	Land adj. to Widney Manor Road			St Alphege
206	DS Planning	Land at Norton Lane, Tidbury Green		Tidbury Green	Blythe
207	Savills (UK) Limited	Land bounded by Brown's Lane, Smiths Lane & Widney Manor Rd	7.1		Dorridge & Hockley Heath
209*	Tyler-Parkes Partnership	Tidbury Green Golf Club	18.6	Tidbury Green	Blythe
210	Tyler-Parkes Partnership	Land between 39 and 79 Earlswood Road	1.5		Dorridge & Hockley Heath
211*	Stansgate Planning	Land between Main Road and Fillongley Road, Meriden	23	Meriden	Meriden
212	Berkswell Quarry				
216	Warwickshire International Lincoln Farm Truckstop	Land at Lincoln Farm Truckstop		Berkswell	Meriden
220	Solihull MBC	Chapelhouse Depot, including Conservative Club and former Boys Club		Fordbridge	Kingshurst & Fordbridge
225	Solihull MBC	Chelmsley Wood Town Centre (ongoing regeneration masterplan including redevelopment of old library site)		Chelmsley Wood	Chelmsley Wood

Site Ref	Promoter/Agent	Site Name	Area (ha)	Parish	Ward
226	Solihull MBC	Land at Damson Parkway and Coventry Road			Elmdon
238	Landowner	33 Wootton Green lane		Balsall	Meriden
241	Landowner	Arden Lodge Field, Arden Drive	1.5		Dorridge & Hockley Heath
244	Golf Club	Land at Tilehouse Green - Copt Heath Golf Club	2.3		Knowle
1004*		Land To Rear 575A to 587 Tanworth Lane			Blythe
1006*		Land West Of Stratford Road, Hockley Heath			Dorridge & Hockley Heath
1013*		Land at and to the rear of 146-152 Tilehouse Lane		Dickens Heath	Blythe
1015		Land North West Of Balsall Common		Balsall	Meriden
1017		Land At Wootton Green Lane		Balsall	Meriden

Significant support for following sites within the SHELAA:

Site Ref	Promoter/Agent	Site Name	Area ha*	Parish	Ward
76	Peter Brett Associates	Berkswell Quarry - potential extension land	68	Berkswell	Meriden
204	Barlow Associates	Land at Oaklands Farm	1	Balsall	Meriden
240 (part of 1017)	Tyler-Parkes Partnership	Land at Wootton Green Lane and Kenilworth Road		Balsall	Meriden

Measure of objection to following sites within the SHELAA:

Site Ref	Promoter/Agent	Site Name	Area ha*	Parish	Ward
104	Bilfinger GVA	Land off Blue Lake Road, Dorridge (Oak Green)	4		Knowle
135	Barton Willmore LLP	Land at Dorridge Road, Dorridge			Dorridge & Hockley Heath

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Council Response (Draft Local Plan Supplementary Consultation 2019)

- In preparation of the 2019 Supplementary Local Plan Review consultation, the Council produced more detailed Site Assessments for each of the Call for Sites, bringing together the findings from a range of evidence sources.
- The sites were subsequently assessed according to the updated site selection methodology, and RAG rated as Green, Amber or Red sites. Green sites were proposed as potential allocations and/or 'SHELAA' sites to be considered in the land supply.

## Alternative Sites (New Suggestions)

### Representations received:

Number objecting: 173

Number supporting: 13

### Key Issues raised by Representations:

- Brownfield sites have not been exhausted before releasing land from Green Belt.
- No robust and detailed appraisal of alternative sites has been carried out in a sequential test.
- Brownfield sites in Birmingham should be prioritised before building on Solihull's Green Belt, e.g. Tyseley, cheap car parks in city centre.

### Proposed new areas for development:

- Outskirts of Solihull Town Centre:
  - This would help ease town centre traffic and encourage residents to use public transport instead of adding more cars to the over populated town centre roads.
- North of Solihull Town Centre:
  - Suggest that the 'Area of Influence' to the north of Solihull Town Centre, which includes the train station, Solihull Careers Centre, Solihull Fire Station and Sapphire Court, is an appropriate location for new residential dwellings and should be considered further within the Local Plan Review process.
  - This is particularly pertinent in order to release pressure on Green Belt release.
- Touchwood expansion:
  - Use for residential rather than retail.
- Re-use of old office buildings:
  - In prime locations with direct and easy access onto the road infrastructure.
- Urban golf courses:
  - Could relocate elsewhere in keeping with planning policy.
  - Could provide significant areas of non-Green Belt land for housing.
- Backland development:
  - Conversion of huge gardens to small estates like those on Blossomfield Road.
- Brueton Park:

- Land on Widney Manor Road behind Solihull Sixth Form with direct access to Solihull and the M42.
- Monkspath Hall car parks:
  - Could be made multi-storey and land could be released for affordable flats.
  - These could potentially serve workers in the service industries in the town centre and younger people. Less dependency on public transport but good access to train services.
- Dickens Heath/Tidbury Green:
  - Land to the south of proposed Site 4 (Refined Green Belt Parcel 73) would be more sustainable in terms of transportation, access to existing services, would not result in the closure of businesses and while it would bring Dickens Heath and Tidbury Green closer together, there would still be a strong enforceable boundary, and it would prevent Solihull/Bromsgrove/Birmingham merging along the Western boundary.
- South of Shirley expansion:
  - A more logical direction for development for Dickens Heath would be to take in the land on the other side of the Stratford on Avon Canal bound by Tanworth Lane, Braggs Farm Lane, Lady Lane and Dickens Heath Road, and then continue over the other side of Tanworth Lane to the land bound by Tanworth Lane, Blackford Road, Creynolds Lane and Stratford Road.
  - This would make access to the considerable better roads and the motorway network much easier and would give a much better traffic flow.
- Expand development at Blythe Valley Park.
- Expand Cheswick Green into garden village.
- Lilac cottage:
  - Land at corner of Box Trees Road and Earlswood Road.
- Stratford Road, Shirley:
  - Convert space above shops and retail outlets into residential flats.
- Retail park Marshall Lake Road recycled for residential with retail encouraged to relocate to Shirley town centre.
- Light Hall School:
  - Relocate Light Hall school to site 13 to include some playing fields and a formal park as well as some housing. Similar to the approach proposed for Arden Academy in Knowle. Use the existing school site for residential development.
  - School very run down and classes being held in porta cabins.
  - New School could be built opposite Miller and Carter, with better road connections. Would ease pressure off residences in existing school area.
- Noted there are no new developments in Dorridge and Hockley Heath ward. Dorridge would be more suitable location for growth due to rail connections (3x hour service to Birmingham) and new services in village centre.
- View that areas around Catherine-de-Barnes, Hampton in Arden, Knowle and Dorridge have not been proposed for new housing.

- Catherine-de-Barnes and Hampton in Arden are closer to HS2 Interchange.
- Infill sites within existing villages, e.g. Dorridge.
- Off Hampton Road towards Barston and Motorway/canal area.
- South of Catherine-de-Barnes:
  - Along and between Henwood Lane, Berry Hall Lane and Ravenshaw Lane.
  - Little mention of Catherine-de-Barnes in the DLP.
  - Village has existing amenities. Could be enlarged to a sustainable settlement with addition of a school and health centre.
  - Upgrading Ravenshaw Lane to provide direct access onto A41 Solihull bypass near Junction 5 of the M42 would alleviate some of congestion on Hampton Lane. Would also preserve green space as a buffer against urban sprawl.
- Undeveloped land between Catherine-de-Barnes and the current houses on Hampton Lane, or on the other side of Hampton Lane where there are no houses all the way back to the M42 and is a much larger plot should be considered as alternatives to Site 16.
- Spread growth around villages, e.g. Berkswell, Hockley Heath, Earlswood, Illshaw Heath, and Chadwick End.
- West of Balsall Common.
- Lavender Hall Farm, Balsall Common.
- New Mercote Farm, Balsall Common.
- Dengate Drive, Balsall Common.
- Westward expansion of Coventry.
- Close to Motorway Service Area – land is already blighted.
- M42 corridor and aligned to Dorridge/Bentley Heath:
  - Lower combined Green Belt score than sites 4 and 12.
  - More balanced distribution of growth.
  - Well placed for optimum usage of existing infrastructure; close to M42 and highways.
  - Proposed sites do not have existing established use, e.g. golf course.
- UK Central Zone 1:
  - Build the houses where the jobs are going to be created, e.g. HS2, Birmingham Business Park, Jaguar Land Rover, and Blythe Valley Business Park etc.
  - These are going to be the booming areas of the Borough and the people working there are going to need homes, so it would be logical to build them in those localities.
- Make more efficient use of NEC/Airport/International station car parks.
- Land at Airport Way – does not adjoin built-up areas.
- JLR Sports field:
  - Very few employees actually use the sports field.
- Land Pockets between:

- A452/A45/M42
- A452/Coleshill Heath Road/M42
- Bickenhill Lane/B4438/Westerly direction
- B4438/M42/A45
- Hampton Lane/A41/M42
- Land around Birmingham Business Park.
- A45 corridor:
  - Fill in the space between Solihull and Coventry along the A45 corridor, in and around the NEC and beyond.
- North Solihull sites:
  - Lower performing in Green Belt assessment.
  - Take advantage of investment into Metro links.
- New village close to M42:
  - Support a standalone new village with all the infrastructure, close to or with good roads to access motorway.
  - Could be built along the M42.
  - Would have less significant impact on existing roads and facilities.
  - Include sufficient space to extend new village if new housing required in the future.
  - Lots of Green Belt in the Borough.
  - Rather this than continual erosion of Green Belt that protects existing villages and their character.
- New small scale village built on garden city principles.
- Inter-Authority agreement on a site for a small town/very large village which could meet the combined housing targets.
- Land around Hatton Station, Warwick District:
  - Releasing land around Hatton Station in Warwick District offers greater potential.
  - Stratford DC worked with Redditch to meet their housing figure.
  - Need to wait for strategic HMA work to apportion LPA numbers and where other authorities can contribute on key transport corridors into Solihull and Birmingham.
- Consider Lapworth (Stratford upon Avon District) for housing.

**Proposed new sites for development:**

- Barston Sewage Works:
  - Severn Trent Water are currently in the process of upgrading Barston Sewage Treatment Works which will significantly reduce the overall land take of the works and will provide an opportunity to redevelop previously developed land for alternative uses.
  - The site represents a good strategic development opportunity given its location adjacent to the M42. Subject to the proposed Motorway services to the west of the M42 gaining planning consent, there could be a potential opportunity to provide

complimentary uses within STWL's land holding. The release of the site from the Green Belt and its allocation for development could secure significant benefits.

- Land r/o 32 Creynolds Lane
- New Holly Lane Farm, Holly Lane, Balsall Common.
  - 41.83ha.
  - Close to Balsall Common Village centre.
  - Close to JLR site at Honiley Airfield.
  - Part brownfield land.
  - Development could be phased.
  - Golf course planning application.
- Dunstan Farm:
  - Within Site 20.
  - To be used for residential, potential for ca. 700 dwellings.
- Land at Barston Lane:
  - Part of SHELAA Ref 64.
  - To be used as a rural exceptions site.
- Three Maypoles Farm Dickens Heath:
  - 13.3ha site.
  - Greenfield site in Green Belt.
  - Does not reflect character of area, functions as urban fringe.
  - With careful design could accommodate ca. 175 dwellings or 100 dwellings plus open space.
  - Lies immediately south of and partially within Site allocation 13.
  - Would provide a logical & more robust & defensible GB boundary to Site 13.
  - Would prevent coalescence with Dickens Heath.
  - Would ensure conformity with Vision for Solihull Rural area.
  - GBA score of 6 is equal or lower to allocations.
  - Accessibility score is comparable with allocations.
- Harper Fields, west of Kenilworth Road, Balsall Common:
  - Lies immediately opposite to proposed site allocation 3.
  - 2.3ha.
  - Greenfield land, moderate agricultural value in Green Belt.
  - Well contained, would create firm and defensible Green Belt boundary.
  - Would align with Spatial Strategy for Balsall Common.
  - Excellent access onto Kenilworth Road. Would complement site allocations 2 and 3.
  - Unclear why RP58 performs differently in GBA than RP57 and RP59.
  - Accessibility would be comparable to proposed allocations.
  - Believe it is suitable, achievable and available.
  - No constraints.
- Land at Fulford Hall Farm, Tidbury Green:
  - Submitted after 2015-2016 Call for Sites exercise.
  - Viable land values.

- Potential to cater for full range of housing needs, particularly higher wealth families that the conurbation needs to retain and attract for its economic growth.
- Sustainable and accessible location close to main housing need from Birmingham.
- Capacity for 1000 dwellings up to 2033.
- Market support.
- WSP Transport Study concludes development of this site would be in line with transport policy and has potential for highway and sustainable transport benefits.
- WSP Infrastructure Study has confirmed advice from Western Power and Severn Trent Water.
- Sustainable location.
- Oakes Farm, Balsall Common:
  - Includes SHELAA Ref. 204, but larger site.
- Land off Grange Road, Dorridge.
- Land adjacent to 161 Lugtrout Lane.
- Land adjacent to 157 Hampton Lane.

#### Council Response (Draft Local Plan Supplementary Consultation 2019)

- The Council has carried out a wide-ranging Call for Sites exercise, and additional sites were accepted for consideration between 2016 and 2019. These have been taken into account in various studies, including updates to the SHELAA, Accessibility Study and Sustainability Appraisal Framework.
- In preparation of the 2019 Supplementary Local Plan Review consultation, the Council produced more detailed Site Assessments for each of the Call for Sites, bringing together the findings from a range of evidence sources.
- The sites were subsequently assessed according to the updated site selection methodology, and RAG rated as Green, Amber or Red sites. Green sites were proposed as potential allocations and/or 'SHELAA' sites to be considered in the land supply.
- Further appraisal work and concept masterplan preparation led to changes in the capacity on certain sites, the decision to not progress some of the sites further in the Regulation 18 process (e.g. Site 5), and the inclusion of additional sites at the 2019 consultation stage (Sites 21-26).
- The Council also invited (through the Draft Local Plan Supplementary Consultation (2019)) comments on 7 'Amber Sites' that were considered 'less harmful' than those categorised as red (or omission sites) within the site selection assessments.



## Q16 - Infrastructure Requirements

*Do you believe we have identified the infrastructure required to support these developments? If not, why not? Are there any additional facilities you believe are required, if so what are they?*

### Representations received:

Number objecting: 800

Number supporting: 49

### Key Issues raised by Representations:

- Significant response regarding infrastructure concerns for each of the proposed housing sites and to some extent the mixed-use and employment sites. These are addressed more specifically under Q15.
- Strong view that infrastructure requirements need to be updated for the next version of the Plan.
- The infrastructure matters identified are commonplace for new housing developments and are not objected to in principle. Definitive infrastructure requirements will need to be established through the planning application process.
- View from some respondents that infrastructure issues have not been addressed or mentioned in the Plan.

### Highways

- Concern over the current lack of transport infrastructure and facilities and the likely impact upon them from developments in Hockley Heath, Blythe Valley park, and across the Warwickshire border.
- In addition to the proposed developments at the HS2 interchange, we note that the plan proposes around 1150 new homes over 3 allocations in Balsall Common. Whilst we support the overall provision of new homes in order to accommodate the Objectively Assessed Needs in the GBHMA, we are keen to ensure that sufficient infrastructure, in particular highway infrastructure, is in place to support the additional growth.
- In doing so, we would highlight the importance of considering transport infrastructure, in particular, cumulatively, having regard to planned developments, which are well advanced in both Coventry and Warwick District.
- DLP should take account of, and address, the highway infrastructure capacity wider than the Metropolitan area, and to include across the boundary into North Warwickshire.
- Note the need to address and minimise traffic levels and impacts on rural settlements and rural road network.
- Seek to separate local traffic and networks from strategic traffic, both generated by and servicing the growth in Solihull, Birmingham shortfall, construction of HS2 and eventual commuting traffic to Interchange station.
- Should be clearly addressed and stated in DLP.

- Concerns regarding the trip movements associated with Sites 4, 12 and 13 potentially amounting to over 2000 dwellings in close proximity to Bromsgrove district and impacts on wider transport network.
- Relevant sections of Solihull Connected Infrastructure Strategy would be interventions 28, 32 and 34.
- Insufficient attention to necessary infrastructure provision and enhancements within the Borough to facilitate the scale of development being planned for by the Council. This represents a deficiency in Plan and its evidence base.
- There are many related and complementary transport strategy documents and plans that are relevant to the LPR in terms of infrastructure projects.
- Given the scale of planned investment in major transport infrastructure improvements and other planned interventions, it is concerning that the Draft LPR and its evidence base gives limited attention to the subject of infrastructure investment or its benefits for releasing major growth within the Borough.
- Mixed support and objection for bypass around eastern side of Balsall Common.
- Sort the traffic in/out of Solihull School at peak times.
- Sort out the roundabout by the train station.
- There is no talk of future autonomous transport and more ideas needed on safer cycling.

### **Parking**

- Retail and parking needs to be addressed as additional infrastructure to what is identified in the DLP.
- Parking in village and local centres is widely considered to be inadequate.
- The large carpark on Monkspath Hall Road is used by traffic from the M42. A large scale carpark is required that avoids clogging the road past St. Alphege, e.g. expand Mell Square carpark across the Morrison's carpark.
- Council needs to incentivise people to leave cars at home/lift share.
- Introduce parking permits in congested areas, e.g. Dickens Heath, Solihull town centre.
- Concerned about parking at Dorridge station. Parking restrictions put in place have only moved vehicles further away; not solved chronic shortage of parking facilities. The impact of new development in Knowle/Dorridge will have to be taken into account.

### **Public Transport**

- Parking provision needs to be considered at suburban rail stations and the creation of Park and Ride schemes.
- Where proposals are likely to increase footfall at railway stations the Local Planning Authority should consider a developer contribution (either via CIL, S106 or unilateral undertaking) to provide funding for enhancements at stations as a result of increased numbers of customers.
- On page 144 there is a comment, 'Improvement to passenger waiting facilities at Berkswell Station'. The Council should clarify exactly what improvements to pedestrian waiting facilities they envisage or are seeking.

- Any enhancements at railway stations, including Berkswell Railway Station, would need to be fully funded by the third party developer from either S106 or CIL or unilateral undertaking. Any additional facilities at Berkswell Railway Station (over that which is extant) would need to be agreed with London Midland and agreement would need to be reached over who would have ownership of the asset with London Midland and Network Rail.
- Despite reference being made to the infrastructure requirements, to make that development an attractive and sustainable location, it is hard to understand how this will be the case for those more rural locations.
- Despite stating in Policy P7 'bus services will be provided for and offering at least a 30 minute daytime, evening and weekend frequency within 400m of the residential development over 100 dwellings', we feel services to these locations will not be profitable and will result in TfWM subsidising these services in long run. Therefore TfWM does not support significant development taking place at rural locations.
- Strong local view that parking at railway stations is inadequate, and results in parking on side roads that causes inconvenience and hazardous driving.
- A better bus network would be an improvement, but given sites are distant from the town centre it is unlikely bus services will be a viable proposition.

#### **Walking and Cycling:**

- The potential for improvements to the canal towpath, towpath access and canal bridge crossings (including those on the vicinity of sites) and other works that may be required should also be included within the infrastructure requirements for sites 4, 8, 9, 12, 13, 16 and 17.

#### **Strategic Road Network**

- No mention of potential Highways England M42 J6 options in DLP; needs to be included.
- Link road from M42 and/or branch line from East (sic) Coast Mainline would be beneficial to UKC Hub.
- We will require further detail to be provided in relation to the proposed allocations and the transport related policies put forward in the Local Plan Review. This is necessary to consider the implications of the levels of planned growth upon the SRN so as to ensure the potential transport implications of developments are considered and necessary infrastructure is planned accordingly.
- SMBC have expressed support of Junction 6 Option 1 in Cabinet Report (passed 12/01/17).
- Last IDP was published in 2012. Much has changed since then.
- No Transport Assessment been carried out to assess impacts of the additional housing growth and HS2 against planned highways improvements to Junction 6 of M42.
- Essential that preferred option for Junction 6 is stated.
- Essential to remove land from Green Belt to accommodate Junction 6 improvements in Local Plan Review.
- Impact of new junction in Bickenhill for M42 on land-take.

#### **HS2**

- Solihull plays an important role in realising the growth objectives of the WMCA with the planned infrastructure investment through HS2, in particular representing a fundamentally different context for attracting investment and business expansion.
- However, DLP fails to adequately consider the wider infrastructure implications of the full potential of investment being realised. Needs a more pro-active response to planning for growth.

### **Education**

- Little mention of additional education provision proportionate to proposed housing provision.
- Consider better footpaths to schools.
- Highlights need for increase in primary school facilities for new housing proposals in Knowle and Dickens Heath, in particular impact on St George and St Teresa school which has been unable to expand and is forced to exclude children in parish and with siblings at school, and whose catchment includes new developments at Balsall Common, Hockley Heath and Blythe Valley as well as Knowle/Dorridge, which should be addressed as a matter of priority.
- Concerned about the lack of policy references relating to the impact of the Local Plan on education provision across Solihull, and specifically in the Rural Area surrounding Hockley Heath (e.g. mitigating the impact of BVP).
- Ensuring there is an adequate supply school sites is essential and will ensure that Solihull MBC can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the Borough over the plan period.

### **Medical Facilities**

- Concerns have been raised by Solihull GPs about the potential increased pressures on GP practices from house building in GP catchment areas.
- Strong local view that GP practices are oversubscribed across the areas where new development is proposed, and there are long waiting times for appointments.
- View that dentists oversubscribed.
- Concern that Solihull hospital has been downgraded.
- Concern that Heartlands Hospital is nearest A&E for residents in south and west of the Borough.

### **Emergency services**

- Disappointed there is no mention of the need to consider the impact on emergency service infrastructure or of the need for increased Police infrastructure provision. The scale of development proposed will inevitably have implications for the maintenance of safety and security. There is likely to be a need for additional Police infrastructure.
- Wording similar to that included in the Solihull Local Plan 2013 should be included in the table of allocated sites. For each of the allocated sites the wording should be as follows: '...Consider impact on social infrastructure provision, e.g. Emergency services and community facilities'.

### **Community facilities**

- I have seen nothing about the need to invest in community facilities as additional households are created. Locally, for example, there are waiting lists for Scouts that mean that some young people are denied the opportunity to join - the constraint is often buildings and other facilities. The whole plan appears to be focused on profit and meeting targets - not on meeting the needs of existing and new communities.
- Access to social amenities within the community is a requirement, for example, we would suggest that additional facilities such as dementia friendly communities with the growing older population be considered as a priority.

### **Sport and recreation**

- Any sports pitches removed as a result of site allocations need to be replaced in other locations.
- The locations for Allocated Housing Sites identify the loss of too many existing Football Clubs/Pitches, contrary to Policy P18/P20, without identifying any compensatory arrangements for their replacement (i.e. Sites 4, 8, 13, 16, and 20).
- In Appendix C Schedule of Allocated Housing Sites Site Constraints, there is an inconsistency in terms of the text for existing Football Clubs/Pitches, whilst some are not even referenced.

### **Open Spaces**

- Any new development should have a percentage of open space that is accessible to all residents and the wider community.
- New site will need to be found for Solihull Moors football club.
- Strong local concern about loss of accessible open space and green infrastructure as a result of new development.
- Suggestion of a new dog park, like at Shirley Park.

### **Drainage and flooding**

- See site-specific issues.

### **Waste:**

- New sites will need to be found for the waste tip at Bickenhill and for the Moat Lane depot.

### **Infrastructure funding**

- Concern from local communities that Section 106/CIL monies are not spent in the areas most affected by development. Communities seek reassurance that adequate infrastructure will be provided to accommodate development. See Q22.
- Funding from CIL or S106 contributions will assist the council in providing the right infrastructure to meet the needs resulting from new development.
- Recommend use of developer funding to improve amenities to Chiltern railway stations. Happy to help with specifications.
- Need to ensure that education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion where demand indicates this might be necessary.

**Infrastructure Delivery**

- Need for a comprehensive Infrastructure Delivery Plan.
- Strategic Infrastructure planning for transport, energy resilience and digital communications need to be addressed.
- Industrial Strategy Green Paper (Jan 2017) identifies significant role the automotive sector plays in UK economic growth, and challenges posed by lack of infrastructure.
- Ensure that any local developments are sustainable and the impact on wider infrastructure is considered.
- The UGC considers that greater clarity should be provided on the amount and type of infrastructure required within the Borough in order to support the new homes, jobs and economic investment required to meet the aspirations of the Draft Plan. In turn, such clarity would also benefit the proposals for development within The Hub area and enable potential public and private funding support and investment to be agreed. The HGIP and current work evolving through the Hub Framework and infrastructure Investment Appraisal will provide a supporting evidence base for the local plan requirements for the Hub in this regard.
- Improving the infrastructure around the areas being developed, i.e. shops, schools, drainage, transport - must be done BEFORE the implementation of building projects, not after.

**Council Response (Draft Submission Version)**

- The Council acknowledge the importance of sufficient and appropriate infrastructure to support new development within the Borough.
- Work began on an Infrastructure Delivery Plan (IDP) in 2017 and a comprehensive draft IDP was published alongside the 2020 Draft Submission Plan.
- The draft IDP assesses the baseline infrastructure services and requirements within the Borough; takes into account planned provision and whether growth in the Local Plan will trigger the need for further improvements and/or enhancements.
- The document includes physical, social and green infrastructure, with an Infrastructure Schedule outlining particular infrastructure projects and schemes.
- The draft IDP also identifies infrastructure service providers and potential funding streams, which will include developer contributions.
- The Council have also commissioned more detailed transport studies to support the proposed growth and in alignment with the local transport strategy, Solihull Connected and strategic transport strategy, 'Movement for Growth'. The Council also consulted with TfWM on the preparation of concept masterplans to identify ways to improve accessibility and public transport opportunities on proposed sites. More detail is provided in the Transport Topic Paper.
- The Council have been in discussions with the Birmingham and Solihull Clinical Commissioning Group and University Hospitals Birmingham to identify the impacts of population growth in the Borough. This work is continuing, and further updates will be reported as the Plan progresses.

- The School Place Planning team has commented on progressive drafts of the Local Plan Review, and have taken the proposed levels of growth into account in their annual School Organisation Plan.
- At the time of writing the draft Submission Plan, the Council were undertaking a number of important Plans for the Borough's infrastructure needs:
  - Local Cycling and Walking Implementation Plan, which will identify key cycling and walking routes in the Borough as well as proposed new routes that will also benefit proposed sites within the Plan, e.g. Dickens Heath to Solihull Town Centre.
  - Net Zero Action Plan and Renewable Energy Feasibility Study. These will underpin the Council's Low Energy Carbon Framework and Climate Change Prospectus with regard to mitigating the impacts of Climate Change and enabling the Borough in its transition to net zero carbon.
  - Natural Capital Investment Plan, which will support the Council's tree planting targets of 25K trees/year until 2030, biodiversity net gain, green infrastructure and enhancing ecological connectivity.
- Following the publication of the Playing Pitch Strategy and Playing Pitch Mitigation Strategy, the Council are taking the next steps to identify the new Sports Hubs in the Borough to accommodate new playing and replacement sporting grounds and facilities.

## Q17 – Policy P6 Provision of Sites for Gypsies and Travellers

*Do you agree with Policy P6? If not, why not and what alternative would you suggest?*

### Representations received:

Number objecting: 10

Number supporting: 21

### Key Issues raised by Representations:

- Policy as written is contrary to guidance in Planning Policy for Travellers. Wording should be amended to ensure that planning applications are also considered against the criteria in the policy, not just allocations.
- Suggest removing or amending words to cross-refer to Green Belt policy and the need for very special circumstances. The reference to 'other locations' is also ambiguous and could raise equality issues if the policy imposes a requirement on Travellers which is not expressly imposed on others.
- Preclusion against Green Belt development is mistaken. There are previously developed sites on the fringes of the Green Belt that could be suitable.
- Criteria should include references to national designations such as Sites of Special Scientific Interest.
- Need to 'avoid' as well as mitigate any adverse impacts of sites. This word should be added to the criteria.
- Remove specific reference to 38 pitches in supporting text to allow opportunity for review of need as and when necessary. Suggest more general wording to clarify that the Council will assess need through robust local evidence and meet it through allocations.
- Existing sites should be expanded first.
- The existing number of sites is adequate.
- Allocating sites seem to be the opposite of a Traveller's way of life.
- Some views that providing for the accommodation needs of Gypsies and Travellers should not be given special consideration.
- Temporary stopping places/transit sites are required tackle the issue of unauthorised encampments from travellers in transit through the Borough. Travellers can therefore be directed to such sites.
- Agreement that development in the Green Belt should not be considered unless there are very special circumstances.
- Support for a policy that considers the accommodation needs of Gypsies and Travellers.

### Council Response (Draft Submission Version)

- The Council is required to identify and specifically plan for the accommodation needs of Gypsies and Travellers in their areas.
- Having regard to the requirement in the Planning Policy for Traveller Sites (PPTS) to use a robust evidence base to establish accommodation needs, together with a growing



recognition that the 2012 GTAA was coming to the end of its life, it was considered necessary to update the evidence base to support the preparation of Policy P6 in the Draft Submission Local Plan. The wording in the policy and supporting text has been amended to reflect this and reference to an updated GTAA is made.

- The Policy sets out how the Council will seek to meet the accommodation needs of Gypsies and Travellers who meet the PPTS planning definition of a Traveller. This includes utilising existing sites and allocations.
- The policy wording has been amended to reflect that the criteria listed will be used in the allocation of future sites as well as the consideration of planning applications.
- Policy P12 sets out how development affecting Sites of Special Scientific Interest will be considered.
- The wording of the criteria provides flexibility to ensure that any unacceptable impacts can be avoided through mitigation.
- Traveller sites are inappropriate development in the Green Belt and very special circumstances will need to be demonstrated. The policy seeks to ensure that other reasonable alternative locations have been discounted before sites in the Green Belt are considered.
- In accordance with the NPPF, and to ensure the Council meets its public sector equality duty, Policy P6 also seeks to ensure that there are culturally suitable choices to meet the identified accommodation needs of those Gypsies and Travellers who have ceased to travel permanently and do not meet the PPTS planning definition. Proposals for new sites or pitches, and applications for the intensification of existing sites will also be assessed against the criteria in the policy.

## 10. Improving Accessibility and Encouraging Sustainable Travel

### Q18 – Improving Accessibility and Encouraging Sustainable Travel

*Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not, why not, and what alternatives would you suggest?*

#### Representations received:

Number objecting: 83

Number supporting: 48

#### Key Issues raised by Representations:

##### General

- View that some of the proposed site allocations are in less accessible parts of the Borough. They are inconsistent with and contradict the aims and requirements of Policies P7 and P8.
- The developments proposed could place further strain on the local road and rail infrastructure, further hindering accessibility and the development of other transport options.
- Suggestions that some sites that have not been selected as proposed allocations would be in accordance with the policy requirements of Policies P7 and P8 and would be sustainable in transport terms.
- Affordable housing should be limited to locations with good public transport access to assist affordability.
- Transport policies need strengthening. Need to recognise that walking and cycling are separate modes that require separate considerations by developers.
- No real reference to cycle routes in the policies.
- Need to provide significantly improved cycling and pedestrian routes and better public transport between Solihull town centre to Birmingham airport and business parks.
- The policies will be impossible to deliver as they rely on outside and not always available funding outside of the Council's control.
- Policies will not deliver sustainable travel and do not address congestion and pressure on key roads/M42.
- Question whether the policies will reduce inequalities, particularly in rural areas.
- Need to recognise the barriers to public transport use such as lack of services and long intervals between services.
- Suggest a congestion charge in Birmingham together with increasing the cost of parking will encourage people to use the buses.
- Reference to developments such as Resorts World, the Arena and the NEC which have been allowed without being on a main bus route.
- Growth corridor along the M42 will exacerbate existing congestion.
- Lack of a policy to provide an approach for determining proposals for new transport infrastructure.

- Suggested wording amendments regarding freight movement on the canal network to clarify that support will be dependent upon the extent required and the maintenance implications for the waterway being addressed.
- Need reference to a Motorway Service Area.
- Comments that HS2 should not be supported. Para. 267 is incorrect as the HS2 Environmental Statement has been assessed on the basis that no road improvements would be needed south of the A45.
- Objections to a Balsall Common bypass as there is no justification for it and will impact on the character of the area. The proposals by Coventry and Warwickshire will take traffic away from the centre of the village.
- Some level of support for a Balsall Common bypass.
- Policies should make reference to traffic monitoring and supporting local communities who identify issues.
- Bus services should be improved and how this is implemented should be included the plan.
- Need to plan the road, rail and bus infrastructure first; then plan for additional development.
- Need to improve parking facilities at stations and alleviate on road commuter parking.
- Policies need stronger links to Solihull Connected.
- Detailed design issues should be included such as no pavement or verge parking and roads and pavements to be of adequate widths.

#### Council Response (Draft Submission Version)

- The spatial strategy, site selection, transport policies and transport evidence for the Plan have been developed taking the Council's transport strategy 'Solihull Connected' and the WMCA 'Movement for Growth' strategy into account. Solihull Connected sets out the scale of the transport challenge being faced in accommodating growth, and highlights the need for a multi-modal approach to accommodating travel demands, and the need to better integrate land use planning with transport planning.
- Informal consultation has been undertaken with Transport for West Midlands in considering the site options and advice on a 'cluster approach' in assessing and mitigating cumulative impacts, as well as incorporating measures to prioritise walking and cycling in concept masterplans, and making space for bus routes.
- An iterative approach was adopted in assessing and testing the transport implications of various sites, both in terms of location and potential capacity. In doing so, assessment was undertaken at both macro- and micro-levels, with both strategic multi-modal transport modelling and localised traffic/parking impact assessments carried out (as described above).
- 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. Growth in the Local Plan provides

opportunities to improve transport infrastructure for different modes, enable modal shift and increase connectivity across the Borough.

- Challenge H ‘Increasing Accessibility and encouraging sustainable travel’ has been updated to include reference to poor public transport links to key economic assets, managing transport demand and access to Solihull Town centre, the need to increase the sustainable transport mode share of journeys to school and college, and maintaining the long-term viability of public transport options.
- The chapter’s introduction now includes a section on the Local Cycling and Walking Implementation Plan. The site policies and concept masterplans refer to pedestrian and cycling opportunities as well as likely highway improvements.
- More localised policy directions can also be included in Neighbourhood Development Plans.
- The supporting text to the transport policies refer to the Motorway Service Area applications that were being assessed by the Council and Highways England at the time of the Draft Submission Plan consultation.
- A series of studies have been carried out on the feasibility and suitability of a bypass at Balsall Common, which are included within the transport evidence base. An indicative bypass line has been included on the Policies Map, and informed the layout of Site BC1 Barratt’s Farm.
- The Infrastructure Schedule in the draft IDP (2020) sets out a number of highway improvement schemes that will support growth in the Draft Submission Plan and wider area.

### **Policy P7 objections**

- Objectives are commendable but concern that the criteria are unviable and will frustrate development of several sites coming forward. Viability should be tested to ensure it does not prevent the delivery of housing land.
- The criteria are not achievable for large developments in rural locations.
- 30 minute bus frequency is unduly onerous and few dwellings are within 400m of a bus stop, so the policy is optimistic and unrealistic. It is futile to expect that all housing sites can be built in the most accessible locations.
- Policy only concerned with proximity and frequency to bus services. Commuters are interested in whether a service can get you to a destination in a timely manner.
- Too narrow a focus on accessibility to bus. Policy should be revised to refer to SPRINT and Metro and should consider ease of access against other modes of transport within walking distance.
- If distance to public transport is included, then it should also include proximity to train station and safe cycle and walking routes.
- Good connectivity does not always mean a bus stop within 400m of each and every property. Ease of access and quality of provision is most important. Other factors should be considered such as perceived safety, topography, expectations in locality.
- Access to bus routes should not be a restriction on housing developments as routes can be changed to suit.

- Lack of support for some changes in the policy compared to the previous version of the policy in the adopted local plan. The 'distance of 400m' should be a walking distance of 400m. The departure from existing policy regarding access to public transport is not acceptable.
- Policy is restrictive which prevents a more flexible interpretation of sustainable development. Should be an 'unless justified by local circumstances' clause like previous Policy P7.
- Amendments to policy suggested. The reference in the Policy to 'other established locations' should include established hubs of activity and not confined to those listed. Also, 5th bullet point – remove '/or'.
- The size thresholds for non-residential developments has not been included which may result in the onerous application of the policy on planning applications for smaller development or extensions etc. Suggest amending 3rd bullet point of the policy.
- Policy should be revised to reflect para. 17 of the National Planning Policy Framework (NPPF) and the NPPFs focus on whether developments 'can be made sustainable' is missing.
- The size of the developments that are covered by the policy should be reduced from 100 to 20.
- Policy does not refer to where employment development should be located.
- Excessive requirement for non-residential development to provide access to bus services at the frequency suggested by the draft local plan.
- Concern that rural business and rural tourism businesses rely on access by private car. It is therefore important that new rural businesses are allowed to develop in locations other than those that are accessible by public transport.
- Suggestion that the unique nature of sites within the UKC hub should be taken into account given the relative proximity and access to a range of existing and future transport facilities. It will be one of the best connected locations in the country. Proposals for development of individual sites should be considered in the context of wider hub aspirations in addition to the criteria in the policy.
- Policy conflicts with the Atkins Accessibility Study.

#### **Policy P7 support**

- Many comments agreeing with policy P7 in principle and supporting the policy.
- The policies will direct new developments to the most appropriate and accessible locations reduce reliance on the private car and encourage the uptake of more sustainable transport modes.
- Support that development should be in the most accessible locations.
- Homes should be built where public transport is available at frequencies greater than 30 minutes or 15 minutes.

#### **Council Response (Draft Submission Version)**

- The Council recognises the importance of directing development to the most accessible locations, as well as securing improved sustainable transport infrastructure. It therefore

provides the primary step in managing travel demands associated with development from the outset, by ensuring that realistic opportunities are available to travel by non-car modes.

- Policy P7 has been updated to make reference to both bus and rail connectivity, as sustainable transport choices.
- The policy refers to both accessibility in terms of access to services, as well as 'ease of access', and that development should demonstrate 'it is safe, attractive and suitable or all people by all modes.'
- In line with updated NPPF guidance, the policy is now explicit that prioritisation should be given first to pedestrian and cycle movements. The policy recognises that there are different ways to promote ease of access and enhance accessibility levels, and is not overly prescriptive in its approach.
- The Council has engaged informally with TfWM in preparation of the Draft Submission Plan; the concept masterplans take into account the need to provide appropriate infrastructure for enable the delivery of sustainable transport modes.
- The supporting text has been updated to reflect the latest position on HS2, i.e. that the HS2 Act received Royal Assent in 2017, with the Notice to Proceed issued in April 2020 and construction works are now underway.

#### **Policy P8 Objections**

- Need reference to freight traffic in the Policy.
- Disappointing that there are no plans to increase the cycle network.
- The simplest way to manage congestion and access is to build housing where the road capacity is.
- Further consideration should be given to park and ride opportunities, parking policy, cycling and walking, smart technology, key route network, bus services and bypass improvement lines.
- Need to revisit the need for a Shirley bypass to ease congestion on the A34 through the centre.

#### **Policy P8 support**

- Many comments agree with the policy in principle and the overall provisions are welcomed.
- Agree that policies can influence road safety through control or influence on the design of new development and manage the demand for travel.

#### **Council Response (Draft Submission Version)**

- The importance of cycling and walking links are highlighted in the chapter introduction and Policy P7.
- A freight policy has not been taken forward in the Draft Submission Plan.

- Managing congestion requires a multi-pronged approach; including reducing the need to travel from the outset, linking trips, modal shift as well as highway improvements.
- The policy continues to support local Park and Ride opportunities at appropriate railway stations, in accordance with other policies in the Plan. Further reference is included within the draft Infrastructure Delivery Plan 2020, such as potential at Whitlock's End Station and Berkswell.

### **Policy P8A objections**

- Metro could extend to Solihull Town Centre, or even Coventry, instead of SPRINT.
- Amendments requested to include Solihull Sprint in second bullet point.
- Knowle to UK Central Corridor should be included in rapid transit plans.
- Should consider light rail/transit system from central Solihull to new HS2 interchange via Lode Lane.
- No reference is made of the need to seek subsequent improvements on existing transport routes that would act as feeder lines to the new rapid transit modes. The plan should include such references (or signposts to relevant transport strategies) in order to express support for proposals that would assist the delivery of these improvements. E.g. between the airport and Stratford up Avon.
- Need a plan showing the proposed route of rapid transit would be helpful and should be part of the considerations when allocating sites for development.
- No justification for expensive projects like Metro and SPRINT.

### **Policy P8A support**

- P8 support extension of SPRINT services.

### **Council Response (Draft Submission Version)**

- TfWM have carried out extensive consultation on proposed SPRINT routes in the West Midlands conurbation, and continued work on the delivery of METRO.
- Rapid transit routes provide alternative sustainable transport options along key routes to main centres and employment locations.
- The updated policy includes an additional SPRINT route on the Warwick Road corridor, as well as the need for developments to design in access opportunities to ensure connectivity to Rapid Transit infrastructure where appropriate.

## 11. Protecting and Enhancing the Environment

### Q19 – Protecting the Environment

*Do you agree with the policies for protecting the environment? If not, why not, and what alternatives would you suggest?*

#### Representations received:

Number objecting: 50

Number supporting: 58

#### Key Issues raised by Representations:

##### Policy P9

Developer view:

- P9 - agree with national requirement to reduce carbon emissions on new developments.
- At site level would suggest fabric-first approach to improve energy efficiency, rather than provision of renewable energies that can be quickly out of date. Fabric first is in line with Building Regulations. Energy efficiency measures listed at strategic and site level should not be over and above national requirements as set out in Approved Document L of Building Regulations.
- Should also be considered how these policy measures will impact the viability of a scheme.
- Further consideration is necessary regarding the detailed drafting of Policy P9 to ensure does not go beyond Government requirements, subject to being cost effective and based on fabric first approach and not encourage district energy schemes as financially unsustainable.
- Welcome the references to CHP.
- Support the principles of Policy P9 and state that the Arden Cross proposals will make a significant contribution to this policy. However, concerns over the expectation that new development and specifically the UKC Hub area should develop and contribute to the development of heat networks within the Borough. This statement appears to have been generated in the absence of any Local Plan evidence to confirm the viability of such networks. The Heat Network delivery Unit Report is not specific to Solihull. Policy P9 should be amended to include a viability element.

Others:

- Could be more explicit about Council's expectations and role of spatial policy in reducing GHG emissions. Will the Council set up a renewable energy services company?
- Policy P9 is a very welcome part of this Plan, but it's difficult to determine what level of importance these will be given in relation to other, potentially competing, concerns. For example, the quality of buildings required to address climate change and reduce fuel poverty could be more explicit.
- Many farmers are considering opportunities for investing in renewable energy production. This could include; roof mounted solar panels, wind, anaerobic digestion or



growing Biomass (for local heating etc). These farms represent a significant opportunity for the Borough to produce renewable energy.

- The Canal & Rivers Trust would wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as the allocation Ref 4- West of Dickens Heath. The Policy or supporting text should be amended to include reference to the potential of the canal to contribute to low carbon technologies.
- Would welcome more reference to the canal infrastructure and to more alternative transport links such as cycle lanes to mitigate and adapt to climate change.

General:

- There should be a clear policy for requiring solar PV on all new buildings, and prohibiting green-field solar farms. In addition, policies should encourage use of solar PV in paved areas etc. There should be clear architectural/design standards for all solar PV installations.
- SMBC policy should ensure that all new housing built in the Borough have a minimum energy rating of A.
- In addition to renewable energy and energy efficiency there has to be local energy plan to ensure that domestic heating commercial heating and road transport can be decarbonised to ensure that carbon reduction targets can be met.
- In general I support the approach but suggest adding: All new commercial, retail and industrial development should contain solar generation capacity particularly roof top capacity but also on green areas maintained for water run off management.

#### Council Response (Draft Submission Version)

- The 2016 draft policy P9 was prepared in light of the Housing Standards Review outcome and Written Ministerial Statement (2015). Since that time, there have been significant changes at policy and legislative level, both locally and nationally.
- At a local level, in October 2019, the Council published a 'Statement of Intent to Protect the Environment'. The SIPE recognises the gravity of the climate change emergency and states that through the Council's Climate Change Prospectus, it will seek to minimise the environmental impacts of its own activities and will contribute to the improvement of the wider environment through local action.
- These actions include working with the Combined Authority in its plan for a West Midlands target of net zero emissions by 2041, and for the Council to become corporately net carbon zero by 2030.
- At a national level, the Government have amended the Climate Change Act (2008) to incorporate a more challenging target of net zero by 2050, rather than 80% reduction relative to 1990 levels. The Government are committed to replacing fossil fuel heating, decarbonising the grid and introducing the Future Homes Standard.
- Since the Draft Submission Plan consultation, the Government have responded to their initial Future Homes Standard consultation, agreeing to the introduction of a 31% uplift in energy efficiency relative to 2013 Building Regulations, which would accord with Policy P9 (2.i).
- The policy sets a more ambitious target net zero carbon target from 2025, which will allow a longer lead-in time for the development industry to the higher standards, and follows the Government's timeline to introduce the full Future Homes Standard.

- The policy P9 has been amended to explicitly state that significant weight is attached to the installation of district, low carbon and renewable energy schemes. Such schemes are instrumental in lowering the net carbon emissions of the Borough and meeting the 2041 target.
- The policy P9 states that 15% of energy for major housing development and non-residential developments of 1000+sqm should be derived from renewable and/or low carbon sources. This complies with powers set out in the 2008 Planning and Energy Act, and will complement the carbon reduction targets.
- Policy P9 has been amended since the 2016 version to include reference to conforming to BREEAM standards; Very Good for minor development and Excellent for major developments. The PPG does not restrict the setting of energy performance standards above the building regulations for non-housing developments.
- The policy has been strengthened with regard to electric charging points on residential and commercial development to reflect the Council's Air Quality Strategy (2019), Electric Vehicle Strategy (2020), and recommendations within the West Midlands Low Emissions Town and Cities Programme (2014). This will enable the greater uptake of electric vehicles and transition to low carbon transport.
- The revised policy provides clearer detail on the criteria for such renewable and low carbon energy, and carbon offsetting schemes, including in the Green Belt.
- More information on the Council's initiatives and wider evidence base is contained within the Climate Change Topic Paper.

### **Policy P10**

#### Developer view:

- Recognise importance of protecting the environment.
- Policy P10:  
'Full ecological survey' and 'net gain or enhancement' to each development is overly arduous and not in spirit of NPPF, which states 'provide net gains in biodiversity where possible.'
- Further consideration is necessary regarding the detailed drafting of Policy P10 to balance against other objectives and provide more flexible approach to local sites.
- The landscape part of the policy does not seem to meet criteria in NPPF.

#### Others:

- Object to Policy P10. Amendments are recommended so that the Mitigation Hierarchy heading comes ahead of the Site headings, to show that SSSIs have significantly increased levels of protection than LNRs and sites outside statutory designations.
- No evidence that an HRA report has been undertaken.  
Hockley Heath largely supports the plan's policies for protecting the environment but is disappointed there is so little mention of the village within the need to protect the natural environment. HHPC would welcome more reference to the historic place of 'Oakley Heath'.
- Recommend change to the paragraph on Biodiversity and Geodiversity (see full response).

Disagree with paragraph on LWS, LNR and Geological Sites. Should not be differentiated in terms of avoidance (see full response).

- Policy P10 is a very welcome part of this Plan, but it's difficult to determine what level of importance these will be given in relation to other, potentially competing, concerns. For example, the statement that areas of importance for biodiversity will be protected 'where it is reasonable, proportionate and feasible to do so' may make it easy to find reasons to avoid doing so (as was, perhaps, the case with Babb's Mill recently).
- Sites 4 and 13 do not comply with Policy P10 due to degradation of Arden landscape character and associated wildlife.
- Welcome importance being placed on maintaining a healthy, natural environment, which is consistent with Packington Estate's longer stewardship objectives.
- Suggest including contribution development (in rural areas and Green Belt) makes to the viability of maintaining landscape biodiversity. Conservation and enhancement cannot take place without income and capital.
- Arden Landscape section could be linked to Policy P3.
- Arden Landscape, Biodiversity/Geodiversity:
- Packington Estate, in particular the Deer Park contribute to the original Forest of Arden landscape. Any expansion east of A452 would negatively impact landscape character, River Blythe SSSI and result in 1000s of mature trees.
- Farmers and landowners must be fully engaged with discussions on the natural environment as they own and manage many of the areas key green and blue infrastructure assets.

Should acknowledge that for many farmers environmental management is a core business activity. Routine investment in e.g. hedging, tree planting, cutting and grazing. Farmers who do not participate in agri-environment schemes also make valid contributions. The work of the Campaign for the Farmed Environment has shown that these farms use a range of voluntary techniques to enhance the options and that this management is funded by farm businesses.

- Policies to protect the environment should be used to control any new residential development at the NEC and ensure the effects of existing adjacent uses can be mitigated against through careful consideration of layout, landscape buffering and/or appropriate acoustic insulation.
- It is important to create buffers to any new development so they connect with existing and created green infrastructure assets.
- Whilst we are pleased to see the references to ancient woodland in the 'Biodiversity and Geodiversity' paragraph of Policy P10, it still does not reflect national planning policy as we highlighted in our earlier Issues & Options consultation response in November 2015. We therefore raise two objections to this Local Plan Review document on (a) including ancient trees and (b) improving the wording of protection for ancient woodland.
- Our project (MIND) contributes positively to SMBC aims 274/279/280; in particular biodiversity and physical and mental health.

- We contribute to Policy P10 in sections Arden Landscape and Biodiversity and Geodiversity through our conservation activities including hedgerow management, the planting of trees, hedges and shrubs to break up the area, and species-rich grass land.
- This policy also states that 'Developers will be expected to incorporate measures to protect, enhance and restore the landscape.
- The development at Site 9 will prevent the positive contribution of the current use of the land.
- Concern that many of proposed Site Allocations are in conflict with Policy P10 on protecting the natural environment and landscape.
- All three sites selected in Balsall Common/Berkswell fly in the face of policy P10, particularly in protecting the Arden Landscape, green infrastructure assets and habitats, and should be withdrawn from the Local Plan for this reason.
- There is not much in this section which I disagree with. However, I do not understand how destroying large areas of Green Belt will protect the Arden landscape.
- I am not convinced that the Council is able to reconcile the Green policy agenda with the proposed housing development for Balsall Common.
- The scale of development in Balsall Common is surely counter to any purported protection of natural ecosystems, species diversity and the health providing qualities of the external environment for existing residents. Important wildlife species (Bats, mice, amphibians, migrating birds, domestic birds etc) all reside within the focused areas.
- I hope that there will be enough central funding to deliver all the proposals set out.
- The proposed housing sites at west of Dickens Heath and south of Shirley should be removed as these two sites do not support the policy of protecting and enhancing the environment given that: would result in the loss of ponds, hedgerows, woodlands and public rights of way; the site west of Dickens Heath would result in the loss of designated ancient woodlands and local wildlife sites; the loss of wildlife corridors between urban areas and rural village settlement of Dickens Heath that support legally protected species including badgers, bats and great crested newts.
- Agree with policy, but at Site 2, you are building on Green Belt land, including parts and allotments, and next to ancient meadow land which seems to me counter to your policies.

#### Council Response (Draft Submission Version)

- Welcome support for the policy and recognition of the importance of the natural environment in its own right, as well as the natural capital and ecosystem services that it provides to the people, places and economy of the Borough.
- Since the consultation on the 2016 Draft Local Plan Review there have been revisions to the NPPF and PPG with regards to the natural environment.
- The policy wording has been restructured to make it clearer that biodiversity assets of all development sites, not just those that are nationally or locally designated, will be assessed as part of the application process.
- The policy text has been amended so that it is clear that Local Nature Reserves, Local Wildlife Sites and Geological sites are all considered under 'local' sites.

- More detailed guidance is provided on information to be provided with a planning application.
- Policy text on the Arden Landscape has been strengthened to reflect the updated PPG and to inform proposals that could impact on the landscape, as well as contribute to its enhancement and restoration.
- A section has been added specifically on ancient woodland and aged/veteran trees to highlight their importance as irreplaceable habitats in accordance with the updated NPPF and representations from the Woodland Trust. The wider policy protection of trees has been retained in Policy P14.
- The text has been revised to place a stronger emphasis on securing measurable biodiversity net gain in response to the Environment Bill and the Government's commitment to halt and reverse the decline in biodiversity.
- The supporting text has been updated to include the Government's 25-year Environment Plan, the forthcoming Environment Act, recent local initiatives such as the ERDF Wildlife Ways project and the Council's forthcoming Natural Capital Investment Plan.
- Each of the concept masterplans has a key emphasis on retaining and enhancing green infrastructure and ecological connectivity on proposed allocations, as well as respecting local landscape character.

### **Policy P11**

- Wording is too prescriptive and should be limited to reference to national standards, to future proof against changes, omitting text relating to planning obligations which is ambiguous and does not comply with national regulations.
- Should address poor quality of river Blythe.
- Higher water efficiency standard not justified by Water Cycle Study and should be removed.
- Concern about future management of sustainable drainage systems.
- Wider impacts of water management/water run off areas should be investigated to inform policy.
- Need greater scrutiny of development in areas subject to risk of flooding such as near the river Cole and Blythe and policy should set out legal requirements, specific measures and monitoring.
- Policy should emphasise potential downstream effects of large urban developments and additional demands on drainage capacity which impact on farmers, food production and productivity of agricultural land.
- Local Flood Risk Management strategy 2015 does not factor in surface water thereby underestimating flood risk at development sites, constraints map does not include all areas of flood risk, and predictions are for wetter weather during parts of year.
- Concern that flood plains will be used for development.

- Concern about flood risk prevention, as many residents in South Shirley already experience flooding of gardens and adjoining land, and to ensure use of local knowledge and up to date.
- Poor drainage and flooding on roads in Hockley Heath, particularly Stratford Road and School Road.
- Welcome requirements for developments that reduce flood risk/reinstate natural flood plain where feasible.
- Agree in principle.

#### Council Response (Draft Submission Version)

- Policy updated to take account of evidence on water management and flood risk, advice from the Environment Agency and Lead Local Flood Authority (LLFA).
- Water Cycle Study provides evidence to support higher water efficiency standard.
- Level 2 SFRA undertaken for all proposed site allocations where potential flood risk identified in Level 1 SFRA or by Environment Agency.
- LLFA provided further input in respect of risks and opportunities associated with proposed development.
- Sustainable drainage techniques are promoted by the Environment Agency as a means of contributing to the Water Framework Directive and reduction of flood risk, as well as providing wider biodiversity and amenity benefits.
- Policy continues to promote naturalisation of the flood plain and de-culverting where possible.
- Site Specific flood risk assessments will be required for new developments at risk of flooding at the planning application stage to ensure that the development will be safe from flooding for its lifetime.
- The policy expects developers to engage early with the LLFA to ensure development do not have a detrimental impact on existing and planned flood risk management schemes.
- Developers will be expected to contribute towards the cost of planned flood risk management schemes, such as SUDS, as well as their ongoing maintenance.
- The Council continues to work on flood mitigation schemes for those parts of the Borough that are at risk of flooding.
- The concept masterplans take into account the latest flood risk data and seek to steer development away from areas of higher flood risk.

#### **Policy P12**

- Coverage of resource management lacks detail of waste management facilities required and when, area of search in Green Belt not justified and contrary to Government policy.
- Need for food waste collection service to reduce waste, raise awareness and support provision for anaerobic technology.
- Welcome policy to address waste capacity in Borough to minimise unauthorised disposal.

### Council Response (Draft Submission Version)

- A Waste Needs Assessment (2018) was undertaken to inform updated policy on waste management.
- Policy provides for provision of facilities without specifying technologies.
- Further detail is provided in the Waste Management Topic Paper, which was published to support the consultation on the draft Submission Plan.

### Policy P13

- Coverage of minerals lacks detail on existing sand and gravel quarries, expected lifespan and timing of new facilities which does not assist future planning.
- Does not address cumulative impact of various extraction operations or provide necessary mechanism and financial security to ensure restoration.
- Any subsequent extraction of coal bed methane resources would be very controversial and local communities will require earliest possible notice/consultation.
- Should include threshold for size of development that will be required to demonstrate that not sterilising mineral resources for development in defined settlements, as policy overly prescriptive.
- Should recognise Meriden Quarry as important resource for Borough and wider region.
- Proposals for extraction outside areas of search should not be prejudiced where proven workable reserve to accord with NPPF.
- Support recognition of need for aggregate minerals to meet needs of growth, identification of Mineral Safeguarding Areas and inclusion of associated infrastructure, and approach to ancillary uses.
- Welcome encouragement for prior extraction of minerals and recognise sustainability benefits of recycling aggregates.
- Welcome recognition of important contribution that reserves east of NEC can make to Borough's mineral requirement and encourage SMBC assistance with delivery of mineral extraction plan to ensure both reserves are worked and delivery of Site 19.
- Support identification of Marsh Farm as preferred area and area of search for sand and gravel extraction.
- Note identification of Mineral Safeguarding Area for coal.

### Council Response (Draft Submission Version)

- Policy provides criteria for assessing proposals including impacts and restoration.
- Policy recognises importance of Berkswell and Meriden Quarries.
- Mineral Safeguarding Area for Coal to be reconsidered in light of national policy on coal, climate change and approach of adjoining mineral authority. The area has not been designated on the proposed Policies Map.
- Two new Mineral Sites have been identified through the Call for Sites, and are identified on the proposed Policies Map.



- Further detail is provided in the Waste Management Topic Paper, which was published to support the consultation on the draft Submission Plan.

#### **Policy P14**

- Inadequate consideration given to air quality.
- P14 would be better included in Quality of Place chapter as it relates more to design than protection of the environment.
- Continuing lack of reliable broadband service in rural areas should be addressed.
- Woodland Access Statements should be referenced in policy as important tool complementing other access standards for green infrastructure.
- All mature trees on development sites should be retained, considered during design and protected during development.
- Should reference canal corridors rather than cuttings in para. 338 relating to quiet areas.
- Support protection of amenity for all including businesses (JLR).
- Support criteria for electronic communications networks and dark skies.
- Agree in principle.

#### **Council Response (Draft Submission Version)**

- Welcome support for policy's objectives.
- Additional wording on air quality has been included in the policy and supporting text to ensure that it is adequately considered. Improving air quality is a key objective of the Plan and cuts across many policy areas. It is considered to be sufficiently addressed in the Policy and the wider Plan.
- Policy P14 seeks to protect amenity. Disagree that it should be included in the Quality of Place chapter.
- Digital infrastructure and telecommunications are included in a new Policy P14A.
- The need to safeguard important trees is required by the Policy and elaborated further in the supporting text. Policy P15 also seeks to ensure that existing trees are integrated into development and that there should be no unacceptably loss of or damage to existing trees.
- Canal corridors, rather than cuttings are now referred to in the supporting text.

#### **General**

- General support for policies.
- Need greater clarity and strength in aligning/reconciling environment policies with other policies in Plan, notably housing proposals and preventing inappropriate development.
- Policies should be used to manage impacts of any new residential development at NEC.
- Hope that sufficient funding to deliver proposals.
- Consistent with NPPF and acceptable providing do not have adverse impact on viability.
- Support policies and principles in environment chapter and urge SMBC to ensure commitments and criteria are met, especially when dealing with major development.



Council Response (Draft Submission Version)

- Council acknowledge general support for environmental policies and agree that these need to thread through development proposals.

## 12. Promoting Quality of Place

### Q20 – Quality of Place

*Do you agree with the policies for quality of place? If not, why not, and what alternatives would you suggest?*

#### Representations received:

Number objecting: 68

Number supporting: 54

#### Key Issues raised by Representations:

##### General

- Support for the policies as they are consistent with the NPPF.
- Some site allocations conflict with policies to protect the Green Belt.
- Agreement with the policies but concern that commercial considerations and aspirations will outweigh the need for retaining historical features, nature and the Green Belt.
- Para. 343 conflicts with the Vision and Spatial Strategy.

##### Policy P15 Objection

- Documents listed are out of date and not based on current national standards. Building for Life 10 is now Building for Life 12 and this should be referred in the Policy.
- Some aspects of the policy are unnecessary and should be omitted (e.g. 4th bullet point). All housing development has to meet approved document M of the building regulations as a mandatory requirement. A 'clear need' should be demonstrated for the introduction of optional technical standards. These should be tested as part of a viability assessment.
- Reference to Secured by Design should be omitted as this is now addressed through Building Regulations.
- Policy needs to encourage a masterplan approach to a site development and avoid dogmatic application of national design standards. The policy is overly prescriptive in that it places too many design requirements on future development proposals.
- Building in rural settlements should have regard to character and modern design of new build should be disallowed.
- The current design guides are inadequate for the needs of rural village settlements.
- More detailed design issues should be included in the policy.
- Concerns about how the policy will be interpreted and applied as it lacks clarity.
- Policy needs to detail the terms and levels of pre-application consultation.
- The definition of 'significant' development within Policy P15 should be set out.
- The policy should adopt and refer to Sport England/Public Health England Active Design principles as a means of creating an environment to get people active.

- Needs to be a reference in the policy to 'the creation of civic spaces that promote physical activity'.
- Developers should be required to demonstrate how developments meet the principles of being well planned, designed and sustainable.
- Air quality standards should be referenced in the policy.
- Policy needs to do more to enhance local green spaces.
- Need to tighten policies to prevent 'garden grabbing'.

#### **Policy P15 Support**

- Support the intent of the Policy.
- Welcome wording changes between adopted and proposed Policy P15.
- Specification of the Lifetime Homes standard is supported.

#### **Council Response (Draft Submission Version)**

- The documents listed in the policy have been reviewed to ensure they are up to date and relevant.
- The need to meet the requirements of approved document M of the building regulations has been removed from the Policy.
- The NPPF requires planning policies to ensure that developments are safe and where crime and fear of crime do not undermine quality of life or community cohesion and resilience. It is therefore considered appropriate to include a reference to Secured by Design principles in the Policy.
- The Draft Submission Plan includes concept masterplans for proposed site allocations.
- It would not be appropriate for the policy to preclude modern designs. The policy seeks to ensure that new development contributes positively to local character and is of a high quality design that has regard to local distinctiveness.
- Additional principles have been included in the policy to reflect the fundamental role that design has in the wider planning and development process, and its importance in delivering sustainable development.
- The Statement of Community Involvement sets out suggested minimum levels of pre-application consultation and engagement for applicants.
- The Local Plan provides opportunities to increase and enhance facilities and enable greater participation in physical activity. Policy P15 expects new developments to provide public and private open space where there is access to recreation and layouts which encourage walking and cycling. Policy P18 Health and Wellbeing also seeks to ensure that new development facilitates opportunities for formal and informal sport and recreation.
- Air Quality issues are addressed in Policy P14.
- The Council is preparing a Backland Development SPD to ensure that backland and related infill developments are designed to protect and make a positive contribution to existing residential areas.

**Policy P16 Objections**

- Some wording amendments suggested to reflect current good practice in heritage policy.
- Policy should be expanded to include requirements to identify unrecognised archaeological remains during any development.

**Policy P16 Support**

- Agree with the principles of the policy.
- Welcome the importance being placed on heritage assets and the Arden landscape in particular.

**Council Response (Draft Submission Version)**

- Welcome support for the policy.
- The policy justification has been updated to reflect the revised NPPF.
- The Council have commissioned an Archaeological Assessment (2018 and 2020) to provide evidence of the archaeological assets in the Borough, with general and site specific assessments and recommendations relating to the development proposals in the Draft Submission Plan.

**Policy P17 Objection**

- The Green Belt should be protected and is not suitable for further housing.
- Suggestions that some sites and land need to be removed from the Green Belt.
- Reference to preserving the visual amenity of the Green Belt is unduly restrictive and not consistent with the NPPF.
- Concern that the Council is not taking account of the important rural setting of settlements and the importance of maintaining the separation between them.
- It is misleading to suggest that the whole of the built up area of settlements inset in the Green Belt are not covered by Green Belt policy. Some areas of the settlement are within the Green Belt and Green Belt policy will apply.
- Some roads in Knowle are in the Green Belt. The village should be included in the list of settlements where infilling in the Green Belt could take place without harm.
- Requests for other inset villages to be specifically referenced in the Policy and in para. 369, not just those listed.
- Policy should enable consideration of changes of use to outdoor sport and recreation uses as not inappropriate development, or identify areas where such changes of use would be supported.
- Policy P17 does not qualify when changes of use to accommodate outdoor sport and recreation use could be regarded as 'very special circumstances', contrary to NPPF. If sporting facilities are unnecessarily lost to development, their replacement in the Green Belt cannot constitute very special circumstances.

- 'Appropriate facilities' for sporting facilities (such as changing rooms) should be included as very special circumstances, as stated in the NPPF.
- Need clarification on what a 'significant contribution to the local economy' is with reference to expansion of established businesses in the Green Belt. Suggest changing 'significant' to 'proportionate'.
- Para. 364 needs to confirm that Policy P17 does not exclude 'established businesses' other than Jaguar Land Rover and Whale Tankers; in accordance with the High Court Judgement.
- Para. 359 should include reference to delivery of supporting infrastructure for Junction 6 improvements. This land should be removed from the Green Belt and a Motorway Service Area site should be allocated at Catherine-de-Barnes.
- Wording on best and most versatile agricultural land does not accord with NPPF.
- Sustainability Appraisal (para. 5.19.2) states that some of the wording of the Policy creates uncertainty.
- The plan needs to identify 'safeguarded land' to meet longer term needs.
- Policy should give support to opportunities that enhance biodiversity of the Green Belt linked with alternative uses.
- Additional policy wording to state that development should not be located in an area of flood risk or flood risk management is suggested.
- Policy should refer to para. 89 of the NPPF to avoid any doubt that the local plan is in accordance with national policy.

#### **Policy P17 Support**

- Support protection of the Green Belt.
- Agree that inappropriate development should not be permitted.
- Support for limited expansion of existing businesses into the Green Belt.

#### **Council Response (Draft Submission Version)**

- The Council has conducted a lengthy Call for Sites exercise, invited Brownfield Call for Sites and maintained a Brownfield land register as well as assessed capacity on Town Centre Sites. Significant development is being proposed on previously developed land in the UKC Hub Area, as well as Solihull Town Centre. However, aside from these locations there are very limited opportunities for development within the main urban areas to meet the Borough's objectively assessed needs. The overwhelming majority of land put forward in the Call for sites lies within the Borough's Green Belt. Therefore, the Council consider there are exceptional circumstances to justify the release of land from the Green Belt to meet the Borough's housing and economic needs, in accordance with the NPPF.
- It is considered that the policy refers to the relevant paras. of NPPF.
- Challenge E, the spatial strategy and site policies recognise the importance of protecting key gaps between urban areas and settlements, and maintaining the integrity of the Green Belt.

- The Draft Submission Plan does not propose the removal of additional land from the Green Belt for safeguarding purposes, as the long established and continuing strategy is to protect the Green Belt. However, the UKC Hub Area will provide housing beyond the plan period (e.g. up to 2,500 homes on Site UK1 in accordance with the Arden Cross Masterplan), and potentially also Site BC1 in Balsall Common.
- It is not considered that there is justification for the deletion of land from the Green Belt for the Development Consent Order at M42 Junction 5A.
- The Motorway Service Area is subject to two proposals in different locations and these are being dealt with through the development management process.
- Flood risk is covered in Policy P11.
- A new Policy P17 'Green Belt compensation' has been introduced to support compliance with para. 138 of the revised NPPF. Compensatory measures can include environmental improvements such as biodiversity enhancements.
- The policy no longer refers explicitly to sporting facilities and natural burial grounds as these are referenced in para. 146(e) of the NPPF. The Council is currently reviewing land options for potential Sports Hubs within the Borough.
- Evidence of 'significant contribution to the local economy' would need to be provided at planning application stage.

## 13. Health and Supporting Local Communities

### Q21 – Health and Supporting Local Communities

*Do you agree with the policies for health and supporting local communities? If not, why not, and what alternatives would you suggest?*

#### Representations received:

Number objecting: 52

Number supporting: 46

#### Key Issues raised by Representations:

- General support for policies

#### Policy P18 – Health and Wellbeing:

- Question whether HIAs are required for each application for significant development. Unclear in text what defines 'significant development'.
- Do not consider that it is necessary to prepare an independent Health Impact Assessment where an ES is prepared as this will cover all of the key relevant issues.
- Concerns raised by residents in Hockley Heath regarding provision of healthcare facilities locally and ability to access local services due to poor transport network.
- Welcomes the changes proposed to the wording of Policy P18 with useful additions as follows:
- '...New development proposals will be expected to promote, support and enhance physical and mental health and wellbeing. Healthy lifestyles will be enabled by...Supporting safe and inclusive design that discourages crime and antisocial behaviour, and encourage social cohesion...'
- Policy P18 - Would like to see proliferation of fast food shops and takeaways, as well as lack of green spaces in North Solihull addressed in the Plan.
- Agree with the inclusion of nature conservation and green infrastructure within this policy.
- Removal of harmful food stuffs can be achieved to an extent but 'Free Will and Choice' cannot be taken away from the public. It should read 'support those with serious health risks that will benefit quality of life within the community'. Resisting hot food takeaways is pointing the finger at overweight individuals and/or risks to healthy individuals. The same, if not greater risks are those from newsagents and off-licences selling cigarettes and alcohol, which are taxable entities and obviously don't impact on communities as much as fast food.
- Policy wording:
  - i) By including 'that promote' sport and 'the differ needs of the diverse population that may use a development'
  - And rather than 'contribute' in ii and iii 'deliver'.
  - The reference needs to be to 'accessible' open spaces.

- The Public Health Directorate fully supports the proposal to include HIAs in order to maximise positive impacts of the proposed development and minimise potential adverse impacts.
- Solihull GPs have also been consulted on the proposals and have raised concerns that the Solihull MIND facility may need to be closed due to local development plans on the land.
- Concerns have also been raised about the potential increased pressures on GP practices from house building in GP catchment areas. The document submitted contains communication from local GPs on these 2 issues which are covered under Site 9 and Q16.
- Support the policies but I worry that by homing in on less accessible parts of the Borough for new housing allocations (which will then become mainly car dependent), the policies may not be realisable.
- Cycling and walking are popular and healthy activities but people will only do them more if they are safe and the car becomes a less convenient alternative. Walkers and cyclists need to be separated from motorised transport users and paths need to be well lit.
- There is no clear mention of primary care provision. Our surgery is very small and has a 1.5 full time doctor equivalent. Our practice area covers much of the proposed sites. We have 3000 patients between the 1.5 doctors, which is already above the national average. Any significant increase on this would seriously undermine our ability to provide safe and timely healthcare to the new residents unless we could procure funding to increase the staff (both medical and administrative) at the surgery to cope with the huge increase in demand for appointments and care.

#### Council Response (Draft Submission Version)

- Policy P18 has been strengthened in the Draft Submission Version to include clear parameters of when a HIA will be required and the level of assessment expected. Further guidance will also be given in the Council's Health Supplementary Planning Document that is referred to in the revised policy P18.
- The Council's Health Supplementary Planning Document will provide further information regarding how HIAs will be submitted. It is accepted that there is no national or local prescribed format of HIAs, provided that certain criteria are addressed. They can be submitted as stand-alone assessments or as part of an existing supporting document such as an Environmental Statement.
- Provision of health care facilities is addressed in detail in the Draft Infrastructure Delivery Plan (October 2020), and referred to in Policy P21. Each site policy in the Draft Submission Version addresses the need for contributions to/provision of primary health care services and appropriate UHB secondary care services in the wider CCG catchment, where appropriate.
- The Draft Submission Plan contains clear policies to discourage the proliferation of fast food shops and takeaways.
- The Council's Health and Wellbeing Topic Paper provides data and evidence of the links between healthy eating, obesity and health and wellbeing to support the policies regarding hot food takeaways in the Draft Submission Plan.



- Draft Submission Plan policy P18 contains policies to support access to green spaces and encourage cycling and walking. This is also stated elsewhere in the Plan, e.g. Policy P7 and P8, P10 and P20.
- Additional/alternative wording recommendations have been incorporated where appropriate.
- Sustainability Appraisal (SA) has been carried out at each iteration of the Plan and for each of the sites selected. SA includes health and wellbeing indicators which should ensure the most sustainable locations that promote health and wellbeing are taken forward.

#### **Policy P19 – Range and Quality of Local Services:**

- Lack of basic amenities in Arran Way centre, e.g. public toilets.
- The Theatres Trust is disappointing by the lack of cultural content in the plan. Cultural and community facilities play a key role in vibrant centres, support the day to day needs of local communities and help promote wellbeing and improve quality of life.
- Policy P19 (or P2) should cover community/social facilities with a definition for social infrastructure, resist loss of or change of use and support new community/social facilities or temporary uses to enhance wellbeing, vitality and viability and to properly reflect guidance in the NPPF, and major developments should incorporate opportunities for cultural activities.

#### **Council Response (Draft Submission Version)**

- Policy P19 of the Draft Submission Version of Plan contains policies to resist the loss of and support the delivery of 'community and social infrastructure'. This is intended to include cultural facilities.
- The social infrastructure needed to support major developments is set out in the Council's Draft Infrastructure Delivery Plan (October 2020). Major development will be expected to contribute toward this through direct provision of developer contributions, as referenced in Policy P21.

#### **Policy P20 – Provision for Open Space, Children's Play, Sport, Recreation and Leisure**

- General support for policies.
- Hockley Heath residents would welcome input into enhancement of canal network to improve towpaths and surrounding areas and also provision of cycle ways to access local areas.
- JLR: Policy P20 relates to the provision of open space, children's play, sport, recreation and leisure. It requires that all commercial developments of over 1ha or 1,000m<sup>2</sup> provide open space. However, such provision may not be appropriate or viable on all commercial schemes. As a result, it is required that appropriate caveats are applied to Policy P20 such that open space provision is only required where this is both viable and appropriate.

- Hampton in Arden Parish Council: Wish to see similar approach to that adopted for the Tame Valley for the enhancement of the River Blythe valley incorporating mitigation of the effects of HS2 and provision for a community and wildlife asset, which meets aspirations under policies P18 and P20.
- Lots of local concern about loss of sporting facilities through the Local Plan allocation process.
- There is a need to make explicit reference the playing pitches as part of the sports & recreation provision and the playing pitch strategy as evidence.
- The Inland Waterways Association (Warks branch) is pleased to see that the canal system within the Borough has been noted in Policy P20 as a possible transport route as well as an excellent tourist route and an extensive green space in a much built-up area. We would like to see better signage for passing canal users to access the town's facilities.
- Packington Estate: Policy P20 -Waterways:  
Propose change of wording to '...providing that the development safeguards the historic and natural environment, the needs of agriculture and...'  
The needs of agriculture, such as running of cattle across areas of grassland adjacent to rivers and waterways could potentially conflict with proposals for greater recreational and leisure use on the river and canal network.
- Policy P20 does not provide sufficient long-term protection for public open space. All such areas should be designated as Village Greens, and green spaces in new developments should be dedicated as Village Greens by the developers.
- Suggestions to use Policy P20 to allocate land for sporting purposes or open space.
- Some recreational areas do not have children's play facilities, for example Prospect Lane Recreational area. This would seem to conflict with the desires of government to get children to be more active. There is little SMBC can do to encourage recreational and leisure use of local rivers as most are now routed underground. The canal network could be put to better use although it is already actively used in some parts of the Borough.
- Strong support for retention of green spaces.
- Strong support for retention/replacement of sporting facilities
- Policies P18/P20 need to be stronger, clearer and cross-referenced against Policy P5, in terms of supporting the retention of existing outdoor sports facilities (and in particular existing Football Clubs/Pitches) and, where necessary, identify how any future loss of facilities will be compensated for or improved upon.
- Research shows that 'regular physical activity reduces the risk of developing cardiovascular disease, type 2 diabetes, dementia and some cancers by at least 30%'. The Government has a clear policy to encourage people to take regular exercise to reduce the impact of obesity with its attendant impact on not only the health of our nation but the cost to the NHS in treating obesity. Open spaces, sports and leisure facilities should not be lost whilst the health of our population is declining.

### Council Response (Draft Submission Version)

- Welcome general support for the policy and acknowledge importance of open spaces, play areas and sporting grounds & facilities to local communities.
- Since the consultation on the 2016 draft Local Plan the Council have commissioned a Playing Pitch and Athletics Assessments, a Playing Pitch Strategy and Playing Pitch Mitigation Strategy, as well as an up-to-date Open Space Assessment.
- The draft policy provides a framework to protect existing open spaces as well as making new provision in relation to developments.
- Draft Policy P20 makes provision for two Local Green Space sites that are designated on the Policies Map – it is not considered necessary to designate all public open spaces as Local Green Space specifically. There is also scope for Local Green Spaces that are of particular importance to local communities to be designated through Neighbourhood Plans.
- Site policies have been introduced for each of the site allocations and where applicable refer to the need to secure the re-provision of playing pitches prior to development, and that these should be of equivalent or enhanced condition and accessibility.
- The supporting text has been updated to state that in order to make the best use of community assets, new and enhanced sports provision in schools should be made available for wider community use where feasible.
- Sites are close to the canal network will provide opportunities for improved access and connectivity.
- Any impacts of land access for farmers and their livestock will be addressed at the planning application stage.
- The River Blythe SSSI is referenced in Policy P10, the Protecting our Environment chapter and in the Natural Environment Topic Paper.

## 14. Delivery and Monitoring

### Q22 – Policy P21 Developer Contributions and Infrastructure Provision

*Do you agree with the Policy P21? If not, why not, and what alternatives would you suggest?*

#### Representations received:

Number objecting: 47

Number supporting: 26

#### Key Issues raised by Representations:

- General support for policy. Concerns from developers about NPPF compliance and viability. Concerns from communities regarding adequate infrastructure provision as a result of new development.

#### Developer view:

- Policy should be clear that pooling of planning obligations would be undertaken in accordance with the CIL Regulations.
- Note obligations should be in line with national guidance and 3 statutory tests.
- Agree with review of CIL as part of viability work for Submission Version.
- Suggested addition to policy: Allow for negotiation on some developer contributions and the mechanisms for doing so, e.g. a standardised viability assessment undertaken by the District Valuer or individually appointed Chartered Surveyor. Would ensure robustness of policy to ensure development is not threatened by viability, and therefore would reinforce the principles of sustainable development.
- The requirements of Policy P21 should be explicitly recognised as factors that can affect the viability of a development and be taken into account in, for example, the establishment of the appropriate level of affordable housing which can be supported by a residential scheme.
- Policy P21 does not comprehensively set out how infrastructure provision and developer contributions will be sought.
- The Infrastructure Delivery Plan is a critical part of the necessary supporting evidence base for the LPR. It must therefore be robustly updated ahead of the Pre-Submission stage consultation. This could require an 'overhaul' of the Council's previous approach to producing their IDP given the scale of new infrastructure investment in the Borough that will be necessary to deliver the scale of planned growth.

#### Others

- Disappointed that reference to the West Midlands Police has been removed from the supporting text for Policy P21. The proposed supporting text in the Draft Local Plan Review does not include the Police within the list of those bodies the Council will be working in partnership with. Whilst it is accepted partnership working is 'not limited' to those listed, the Chief Constable formally requests that reference continues to be made to the West Midlands Police in the supporting text for Policy P21, similar to the wording in the adopted Local Plan.

- Need to work jointly to consider additional evidence of the transport implications of the proposed developments on the areas identified. This will enable us to agree the implications of proposed development traffic upon available existing and planned capacity of the SRN and inform the development of any future transport schemes required. In order to aid this understanding and ultimately assess the requirement of any schemes necessary to be included within the Infrastructure Delivery Plan, we need to agree with you an assessment of planned development traffic impacting the SRN.
- The first two bullet points should be caveated by the word 'appropriate'. Further, a third bullet point should be added 'contributions will reflect the viability of the development'.
- Developers should only contribute to changes to infrastructure required to facilitate their development.
- Should not used for upgrades that are required to facilitate natural growth, e.g. digital infrastructure.
- Emphasis and onus should remain on the local authority to provide/enable adequate services and infrastructure.
- This will not work unless developers are bound by law to contribute certain specific services to the development process.
- With regards to infrastructure it really depends on the size of development. But we agree that there must be greater emphasis on green, social, physical and digital infrastructure as part of a planned development, but again should be written into law that a development must have a minimum amount in accordance with its size.
- Cross-boundary usage of facilities and services needs to be considered and financial support provided.
- General approach to policy P21 supported. However, the policy allows for the diversion of funds away from areas with development to other areas of the Borough. All funds raised by development should be spent in the area where they are raised, except in very exceptional circumstances. Within this context such funds include all section 106 payments, all CIL monies, all new Homes Bonus and profit from the sale of Solihull Council land for development. Given the scale of proposed development and the infrastructure issues facing Balsall Common Berkswell Council considers this approach proportionate.
- Generally support the approach to P21. However the policy allows for funds to divert away from areas with development to other areas of the Borough. Support the principle that all funds raised by development should be spent in the area where they are raised 'except in very special circumstances'. This is a proportionate approach for Balsall Common given the scale of development proposed and the infrastructure issues.
- The wording is too vague and must be strengthened to be meaningful.
- The first sentence reads 'Developers will be expected to...', and this should be strengthened to read 'Developers must...'
- Furthermore, providing infrastructure and mitigation measures in a 'timely' manner, is too nebulous and open to interpretation and abuse. This must be strengthened.
- We question the effectiveness of this policy, and ask how it will be monitored and enforced?

- Under this section there is a recognition that to deliver the Local Plan there is a need to work in partnership with Voluntary sector organisations such as ourselves; we are hopeful that this can happen by understanding the positive impact of our Horticulture, Conservation and Sports project and works with us to maintain the service.
- View that local communities have not benefitted in the past from Section 106 or CIL monies, i.e. developer contributions should be spent in the areas that are affected.
- View from communities that wording is not strong enough and easily circumvented.
- S106 does not work, affordable housing that has been developed under s106 is often re-sold or rented at full market value.
- Policy should be amended to require developers to contribute to overall infrastructure requirement of the community in which they are developing - if the scale of development proposed drives a need for additional road/bypass infrastructure as well as additional school places, then full cost of all additional infrastructure should be levied across all of the proposed sites in the Local Plan for that locality. CIP should be assessed based on the future development value of the sites, not that at the date of planning application. SMBC should establish an entitlement to CIL based on actual site values achieved.
- Planning decisions have to take into account other factors rather in addition to policies in this plan, including but not limited to emerging issues, socio-economic factors, value for money considerations and prioritisation among different needs, impact of any decision on other areas and ensuring that all implications of proposed developments are fully understood and can be properly addressed.
- Policy should make direct reference to New Homes Bonus and how it will be spent.
- Consider that SMBC should provide additional justification and detail regarding developers being required to provide additional contributions towards 'digital infrastructure'.
- Unclear where the cost of improved infrastructure requirements will be funded from? What proportion would come from developers' levies, grants and other sources and how much from Solihull Ratepayers?

#### Council Response (Draft Submission Version)

- The draft Submission Plan has been subject to Viability assessment, which was published as part of the supporting evidence documents.
- Policy is clear that planning obligations will only be sought if/when they directly related to the development, and the nature and scale of any Section 106 contributions will be related to the form of development, its potential impact on the site and surrounding areas to make development acceptable in planning terms.
- Policy refers to compliance with national guidance and the CIL Regulations. The three tests for planning obligations are referred to in para. 493 of the Draft Submission Plan.
- The Council continues to operate CIL in Borough (introduced in 2016), and the Council has begun a CIL Review, taking into account the policy provision that would be expected under the Draft Submission Plan.

- Since the adoption of CIL, substantial funds have been transferred to Parish Councils and local community projects as part of the Neighbourhood CIL proportion.
- The supporting text highlights that there will be a need for public and private sector investment in capital infrastructure and revenue streams to support development. The Council is committed to carrying out its statutory duties and working with lead delivery partners to optimise the use of assets and bids for public sector funding.
- The draft Submission Plan has been supported by an Infrastructure Delivery Plan, which sets out the strategic level infrastructure needs and projects for the Borough. The concept masterplans include more localised infrastructure provision on-site, such as open space, transport connectivity and where relevant, new schools. A strategic Transport Assessment has also been carried out for the Borough, with more detailed traffic assessments for the three main settlements: Dickens Heath/South of Shirley; Knowle, Dorridge & Bentley Heath and Balsall Common.
- See the Council's response to Q16 for more information on infrastructure requirements.

#### Monitoring:

- Housing delivery should be monitored annually to ensure that output is in line with trajectory.
- Should be a commitment to achieve trajectory numbers as per the adopted plan.
- Measures should be put in place to allow for release of additional land for development if targets fail to be met for 3 years in a row.
- Would be prudent to include a large buffer and include reserve sites in the plan to avoid slow land release if plan is reviewed.
- Suggest as part of the monitoring considerations, indicators should monitor the effect of the plan on biodiversity, not biodiversity per se.
- Ideally indicators for other aspects of the natural environment should be used as well.
- It would be helpful if the indicators used for the SA/SEA could also be used to monitor the plan.

#### Council Response (Draft Submission Version)

- Housing delivery is monitored annually, both as overall housing and affordable housing components, e.g. the Housing Flow Reconciliation returns to MHCLG.
- The AMR was updated in 2020 and published on the Council's website.
- The monitoring indicators for the Draft Submission Plan have been updated to reflect the updated policy provisions.

## 15. General Comments

### Q23 – General Comments

*Are there any other comments you wish to make on the Draft Local Plan?*

#### **Representations received:**

Number objecting: 332

Number supporting: 54

#### **Key Issues raised by Representations:**

#### **Evidence Base:**

##### *Employment Land Review (ELR)*

- ELR post-dates the publication of the Draft Local Plan resulting in lack of detail on objectively assessed need for employment land.
- Evidence fails to fully acknowledge market signals and does not reflect the local and sub-regional economic vision and ambition for growth.
- No justification why the ELR does not consider the scenarios in the West Midlands Combined Authority's Strategic Economic Plan.
- Consideration needs to be given to historic rates of take-up and/or market drivers in validating future need.
- Conclusion that there is a 'notional oversupply' of employment land is over-stated and not adequately justified.
- Methodology of translating employment forecasts to floorspace and land is not considered to be robust or appropriate.
- Preferred baseline scenario is unlikely to take into account the potential growth in online retailing and e-commerce as a driver of logistics demand.
- Consider that forecasts underestimate the actual levels of demand across Solihull over plan period.
- Failure to recognise that small yards and storage/workshop sheds are needed by many businesses.

#### Council Response (Draft Submission Version)

- The Draft Submission Plan has been supported by an updated Housing and Economic Development Needs Assessment (2020).

##### *Strategic Housing Market Assessment (SHMA)*

- Job forecasts and growth in the SHMA appears to contrast significantly with the Draft Local Plan's scale of ambition for the area and infrastructure costs.
- Evidence in relation to economic growth underestimates the level of housing required to support the likely change in employment.
- Concern that evidence in the SHMA does not align with the wider strategies and policy based approach in the Draft Local Plan or other Council documents.



- Objectively Assessed Need for the wider Housing Market Area should be calculated.
- Birmingham overspill should be split proportionately between neighbouring authorities.
- Future projections and migration patterns should not be based on recession. Should apply 3% vacancy rate.
- Should frontload any 2011-2014 housing shortfall.
- Should deliver more housing South of A45 as locus of market pressure.
- Should not confuse market signal uplift with Housing Market Area shortfall.
- Data used in Experian model is out-of-date and outputs too pessimistic in projecting job numbers.
- Solihull will continue to have an overheated housing market if insufficient housing is allocated.
- Some disagreement with the findings and methodology of the SHMA.
- Concern that future growth levels have been underestimated.
- Welcome the SHMA and inclusion of private rented sector in affordable housing need.
- Some agreement with the findings and methodology of the SHMA.

#### Council Response (Draft Submission Version)

- The Draft Submission Plan has been supported by an updated Housing and Economic Development Needs Assessment (2020).

#### *Strategic Housing and Employment Land Availability Assessment (SHELAA)*

- Inaccuracies and anomalies in the sites assessments.
- Discrepancies between scores and comments in the SHELAA and those in the Sustainability Appraisal.
- Scoring system for housing is too generalised.
- Absolute constraints are inappropriate.
- Densities and build out rates are too optimistic.

#### Council Response (Draft Submission Version)

- The Draft Submission Plan has been supported by an updated draft SHELAA (2020), and errata to the 2016 SHELAA have also been published.
- The Sustainability Appraisal and SHELAA have assessed sites from a different perspective and at different scales.
- The Site Selection Assessments provide a more fine-grained analysis of the Call for Sites.

#### *Landscape Character Assessment*

- Inappropriate conclusions for some areas. In some cases a number of very different landscape types are considered as one parcel, when some individual parcels have a higher landscape value than the parcel as a whole.

- Assessment covers too broad an area.

#### Council Response (Draft Submission Version)

- The Landscape Character Assessment is a Borough-wide strategic level assessment. More detailed comments on sites have been included within the Site Assessments Document.

#### *Green Belt Assessment*

- The scoring system and parcel size and boundaries for the Green Belt Assessment are flawed and there are concerns and disagreements over the scoring and findings in relation to a number of sites.
- More qualitative assessment of Green Belt required.
- Generalised methodology means that all sites within a refined parcel are considered the same, when some areas within that parcel may perform better.

#### Council Response (Draft Submission Version)

- The Green Belt Assessment is a Borough-wide assessment. More detailed comments on sites have been included within the Site Assessments Document.

#### *Accessibility Assessment*

- Assessment is flawed. The conclusion that some settlements such as Balsall Common has medium to high accessibility is incorrect.
- Looks only at opportunities and constraints
- Score for some sites are considered incorrect.

#### Council Response (Draft Submission Version)

- The Accessibility Assessment has been updated in 2019 and 2020 to include more Call for Sites.
- The scope of the Assessment is to analyse existing accessibility criteria, and potential for further improvements have been considered as part of the highway capacity work and further transport studies where appropriate.

#### *Constraints Map*

- Mineral Safeguarding Area for Coal no longer relevant and should be removed.

#### Council Response (Draft Submission Version)

- Mineral Safeguarding Area for Coal has been removed from the updated Policies Map.
- See also comments under Policy P13.

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*Sustainability Appraisal (SA)*

- Not clear why some findings have changed between the Interim SA and the SA of the Draft Local Plan.
- Some site allocations do not appear to perform well against objectives.
- Some of the conclusions in the SA do not make sense.
- Unclear why some parcels have been assessed and not others. Several independent parcels have been assessed together which distorts the results.
- Gaps and out of date information in baseline data.
- Incorrect information used and errors identified.
- SA and Site Assessment Methodology need to be reviewed.

*Council Response (Draft Submission Version)*

- The Sustainability Appraisal has been updated for the preparation of the Draft Submission Plan.

*Topic Papers*

- Conclusions do not reflect findings of all evidence, are not fully justified and are flawed.

*Council Response (Draft Submission Version)*

- Topic Papers have been updated and further papers prepared to support the Draft Submission Plan.

*Other Evidence*

- Lack of Habitat Regulation Assessment in evidence base and some crucial evidence base documents are still outstanding.
- Necessary technical evidence is not available to comment meaningfully on what infrastructure is likely to be required as a result of site allocations.
- No Annual Monitoring Report published to consider effectiveness of existing policies.
- Ecology study recommends resurveying to Local Wildlife Site standard, however surveys have not been commissioned and therefore priority sites have not been identified.
- Proportionate evidence not provided in support of allocated sites or sites that have been rejected.
- The Flood Risk Management Strategy from April 2015 does not factor in surface water.
- Need to understand consequences that the West Midlands Land Commission February 2017 report to the West Midlands Combined Authority will have on the Draft Local Plan.
- Further details will be required to consider the implications of the levels of planned growth upon the Strategic Road Network.

- Cumulative assessment of proposals on M42 J4 will be required, including the need to take account of the potential for a Motorway Service Area.
- Council need to be clear about the weight of the Greater Birmingham Strategic Growth Study in progressing the Local Plan.
- Need to consider potential impact on J5 of the M42 including developments in Solihull Town Centre arising from the Masterplan.

#### Council Response (Draft Submission Version)

- A Habitat Regulations Appropriate Assessment (Stage 1 Screening Report) was commissioned following the 2016 Draft Local Plan Review consultation, and updated for the 2020 consultation. The Screening Report concluded that it was not considered necessary or the Draft Submission Plan to be taken forward to a Stage 2 Full Appropriate Assessment.
- The draft Submission Plan has been supported by an updated draft Infrastructure Delivery Plan.
- Level 1 and Level 2 Strategic Flood Risk Assessments have taken into account different sources of flooding.
- The Council is engaging with Highways England to assess further impacts on the Strategic Road Network.
- The GL Hearn Strategic Growth Study has been taken into consideration when developing the Draft Submission Plan.
- Further ecological work has been carried out on proposed site allocations, including as a result, the designation of a new Local Wildlife Site on part of former 'Site 4'.
- The M42 J5 DCO and Solihull Town Centre Masterplan transport assessments have been taken into account; more detail is in the draft Infrastructure Delivery Plan (2020).
- A Site Assessments Document has been prepared, considering each of the submitted Call for Sites in 2019, and updated in 2020.

#### Other points

- The proposed site allocations conflict with the policies in the Draft Local Plan.
- Many alternative sites are suggested which are considered to perform better against the policies and criteria.
- Comments from the previous consultation on Scope, Issues and Options have largely been ignored.
- Location of proposed housing allocations have no relationship to where employment and growth is focussed. Accommodation and jobs need to be planned together.
- Developers and the Council are seeking the easy option by building on Green Belt land without seriously considering other options and alternatives.
- Solihull's motto of Urbs in Rure is in jeopardy as a result of the developments proposed.

- Should consult on revised draft SPD on 'Meeting Housing Needs; alongside the Draft Local Plan and suggestions for other Development Plan Documents including 'Planning for Schools'.
- There are still challenges with regard to flood risk prevention in Solihull.
- The phasing of any future house building in Balsall Common needs to consider the impact of HS2 construction.
- A holistic study of Balsall Common needs to be undertaken.
- Should be a specific policy to protect the character and setting of Dickens Heath village, and limit further expansion.
- The Local Plan needs to address improving the management and monitoring of the planning application and development process.
- Proposed strategy will result in over-dependence on large housebuilders.
- Need more opportunities for small housebuilders should be provided on smaller allocations.
- Proposal for a new 'urban fringe' designation given that the present designation of Green Belt is too inflexible.
- Inadequate consideration given to providing accommodation for the elderly in the plan.
- The plan should include monitoring and reporting mechanisms.
- The Planning Inspectorate has issued a further report, dated 16th Dec, which looks at the pro and cons of housing development in the BDC area up to 2030. It refers to an additional 7000 properties for which they have land for 4700 only. The remainder may be built on Green Belt land. It does mention Wythall amongst other neighbouring areas (in Section 66 (Policy BDP5B)) citing 'largescale' settlements
- Concerns that some settlements are not represented accurately in the Borough portrait, e.g. Hockley Heath and Balsall Common.
- Concern over traffic level in Hockley Heath.
- Lack of meaningful engagement with the Knowle, Dorridge and Bentley Heath Neighbourhood Forum. Little recognition of the work done in canvassing residents' views.
- Thoughts and opinions of local people are not being considered or respected.
- Need to ensure cooperation with Bromsgrove District Council and Worcestershire County Council with regard to cross boundary impacts from proposed developments.
- Question whether there has been effective duty to cooperate with regard to meeting the housing shortfall in the Housing Market Area.
- Significant difficulties in using the online consultation portal. It is not user friendly.
- The plan is lengthy and the supporting documents are complex. It is difficult to provide appropriate responses.
- Lack of options to give local communities involvement and choice when considering potential housing sites.

- The consultation questions were too focussed and did not allow for meaningful responses.
- The draft local plan is full of jargon and fails the plain English test.
- Consultation events were held at the wrong time when most people are at work.
- Webpages relating to the consultation have proved difficult to navigate.
- Sites 4 and 13 conflict with the original masterplan and vision for Dickens Heath village – (Q15 Sites 4 and 13)
- Some feeling that the issues and opportunities are presented in a balanced, realistic and positive way.
- There is a level of support for the Draft Local Plan subject to minor changes.

#### Council Response (Draft Submission Version)

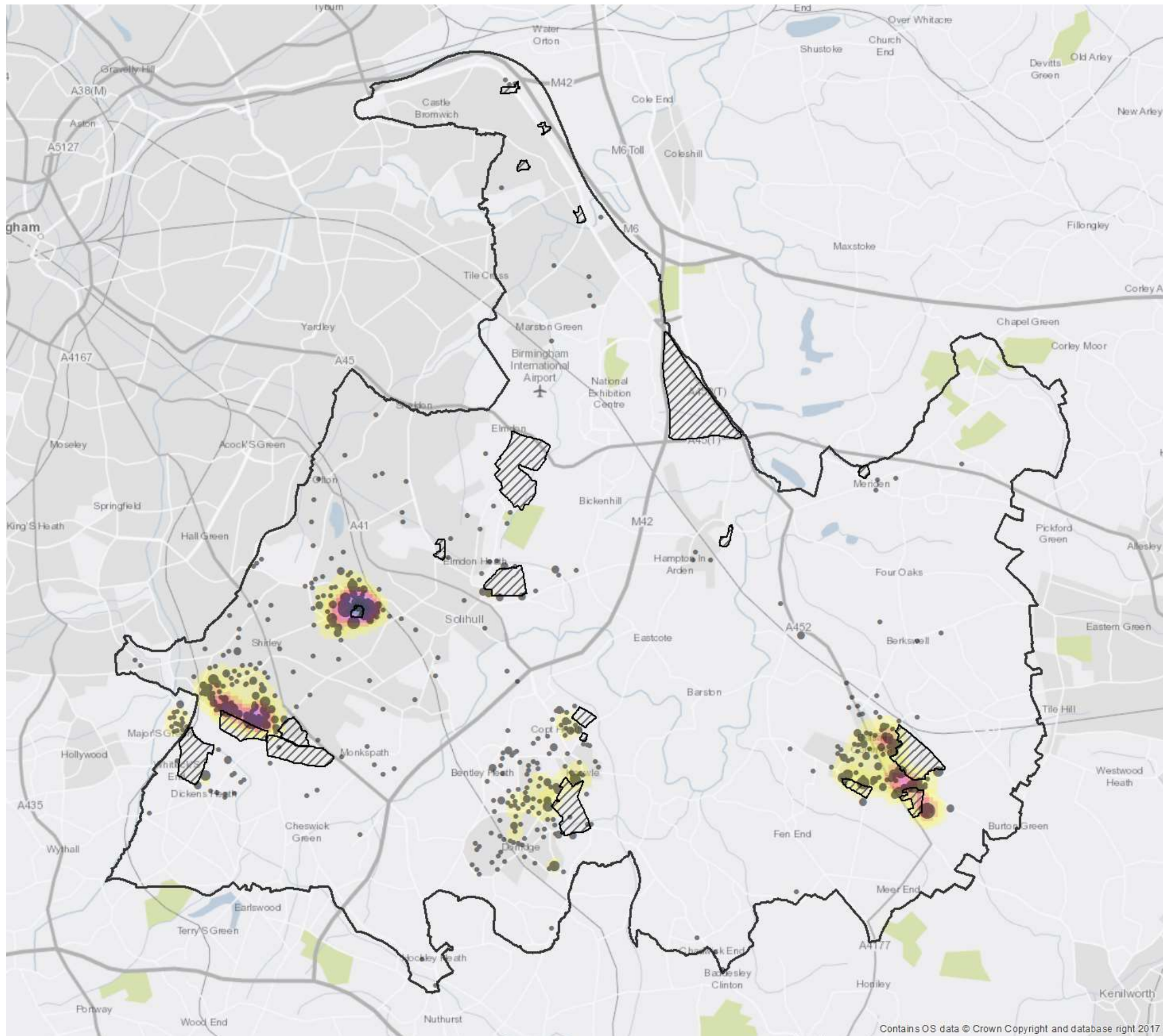
- The Site Selection Topic Paper sets out the approach the Council have taken in regarding land for development, which prioritises brownfield land in urban areas or villages. Over 96% of land put forward for development is in the existing Green Belt. Nevertheless, the draft Submission Plan is optimising the use of previously developed sites in key locations, such as the main Solihull Town Centre, NEC, existing planning applications. Furthermore, a significant proportion of windfall is redevelopment within urban areas. It is estimated that 44% of new dwellings delivered during the plan period will be on brownfield land.
- More fine-grained assessments of the Call for Sites has been carried out and included in the Site Assessment documents.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated taking into account the reasonable alternatives.
- The consultation questions were wide-ranging across the Plan, with scope for additional comments to be made.
- The Council have carried out further Regulation 18 consultation at the Supplementary Consultation stage and ongoing discussions with Parish Councils and Neighbourhood Forums.
- The Council have listened to feedback about the Local Plan webpages, and endeavoured to improve the accessibility of information and accessing the consultation portal online in subsequent consultations.
- The spatial strategy has adopted an approach of ‘balanced dispersal’, with significant housing allocations close to employment centres and/or direct public transport corridors.
- The Council has continued to engage with communities and support the development of Neighbourhood Plans.
- A new policy (P4E) has been introduced in the Draft Submission Plan addressing accommodation for older people and those with support needs.

- New Policy P4D will provide opportunities for self-build on housing sites of 100 dwellings and over. Smaller sites can also come forward on SHELAA, Brownfield and as yet unidentified windfall sites.
- Work has begun on revising SPDs and preparing new documents to support the proposed policies.
- See comments under Policy P11 concerning flood risk matters.
- The Balsall Common chapter addresses the impacts of HS2 construction and operation on the timing of delivery of sites.
- The Council have had further discussions with neighbouring authorities to address concerns raised, as appropriate and in accordance with the Duty to Cooperate.
- Draft Submission Plan includes monitoring indicators for the Plan.

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## A. Location of Respondents Relative to Allocated Sites



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**Policy & Spatial Planning  
Solihull MBC  
Council House  
Manor Square  
Solihull  
B91 3QB**

**Email: [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk)**

**Tel: (0121) 704 8000**

**Web site: [www.solihull.gov.uk/lpr](http://www.solihull.gov.uk/lpr)**