Emerging Core Strategy Consultation

Council's Response to the Emerging Core Strategy Consultation and Recommendations for the Core Strategy

Solihull Local Development Framework

March 2011

Contents

Introduction

A draft summary of the consultation responses is contained in two documents, both documents follow the chapter order of the Emerging Core Strategy and identify:

i)   the individual representations received on that chapter (by respondent number)
ii)   the key issues raised by respondents
iii)   the Council's response to both the key issues and other issues raised
iv)   Officer recommendations/ implications for policy.

This document provides a summary of all representations received also individually coded for ease of reference alongside the summary of representations received. The prefix 'EX' relates to responses received by letter or email and the prefix 'CI' relates to leaflet responses received in paper format or on-line. A small number of responses were inappropriate and required moderating and as such we were unable to include them.

Background

The Core Strategy is the key Development Plan Document of the Council's Local Development Framework. It sets out the long-term vision for Solihull and will guide decision-making on future planning applications as well as help to deliver the Council's Sustainable Community Strategy.

An Issues and Options paper, 'Challenges and Choices' was formally consulted on during December 2008 and January 2009. The responses informed the Policy directions formulated in the Emerging Core Strategy.

Emerging Core Strategy consultation

The Emerging Core Strategy was published at the end of September 2010 for public consultation until the 10th December 2010. A request for an extension to the time period for Parish Councils was also agreed until the 4 January 2011. In order to widen the response to the Emerging Core Strategy as much as possible, an explanatory leaflet with questionnaire was devised focussing on the Vision and the 6 main issues affecting the Borough. An online version of the leaflet was also available on SurveyMonkey. The consultation was widely publicised through a variety of methods and media. This included several drop-in sessions at local libraries and staffed by Council officers. In addition, Officers attended Sustainable Community Strategy Partnership meetings and other stakeholder meetings. Workshops were also carried out with primary and secondary schools.

Response details

Number of representations by method
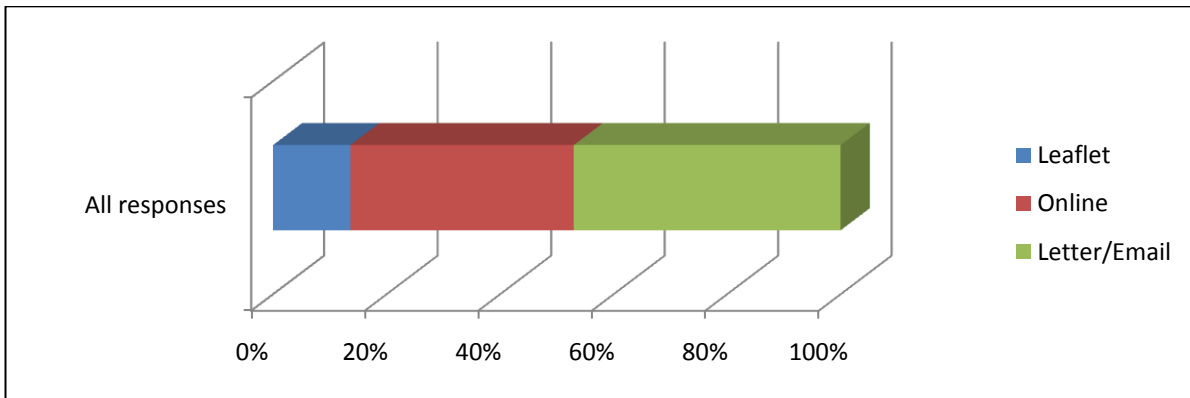
485 responses to the consultation were received.
66 used the leaflet questionnaire, and 191 used the online questionnaire.
228 submitted a free-form response (letter/email or combined elements of questionnaire with letter).

Four responses were made by both online questionnaire and letter, in which case the comments made were identical.

Number of representations by organisation
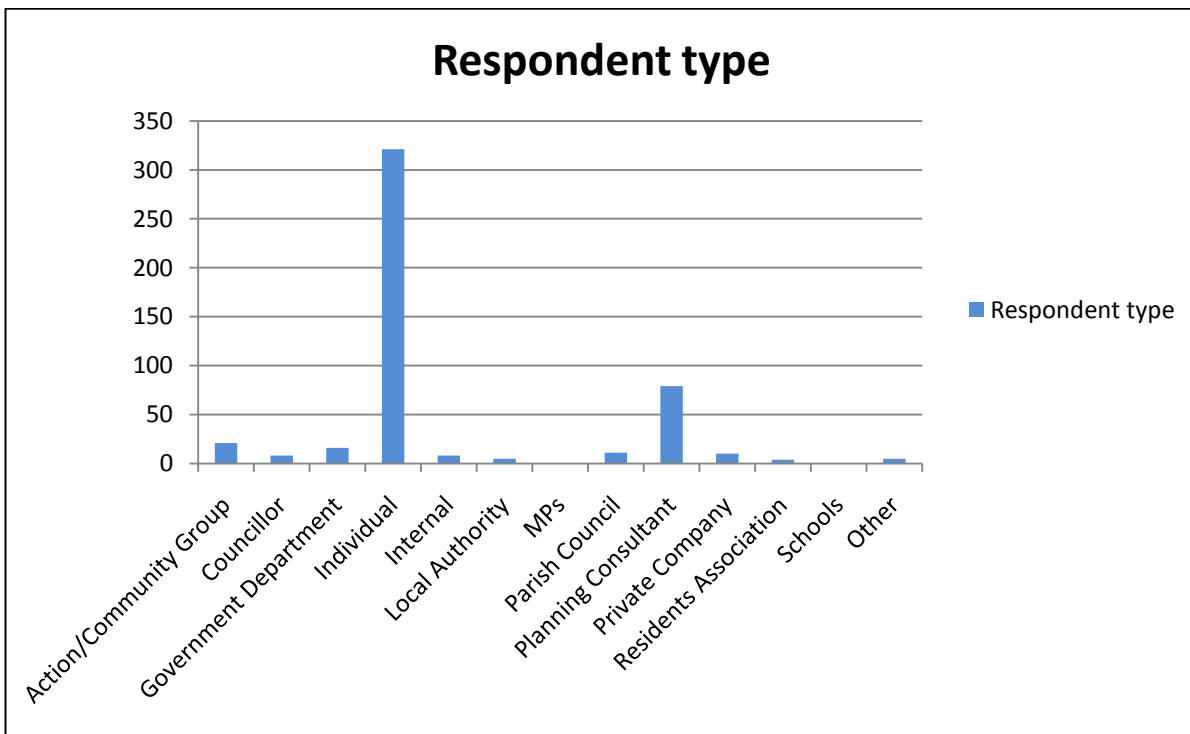
Data organisation

Responses were received in a variety of formats. For analysis purposes, however, all of the representations received had to be related to the different chapters of the Emerging Core Strategy. There are also sections addressing comments made on the evidence base and the consultation process itself. Furthermore, views were invited on the alternative housing site options contained within the September 2010 SHLAA document, which was available online and in a number of public offices, such as local libraries.

Each respondent was assigned an identifier number and their responses broken down into the relevant corresponding part of the Emerging Core Strategy. For the sake of succinctness, Appendix A lists the respondent numbers only, followed by an overview of the key issues raised, the Council responses to all of the representations received, concluded with recommendations. All representations are summarised in Appendix B, in order of the chapters of the Core Strategy.

Responses received in free-form format, e.g. by letter, were assigned a prefix 'EX' and then a number. Responses received by leaflet or via SurveyMonkey were assigned a prefix 'CI' and then a number. In a few instances identical responses were submitted both in letter form and on-line. For these cases the EX number has been included in full only.

Appendix C is an analysis of the simple 'yes'/'no' responses to the questionnaire.

Every effort has been made to ensure that all responses received have been incorporated in this document and addressed with a Council response.

Chapter 2 - Solihull Today

Representations received:

EX: 58, 93, 94, 98, 137, 141, 144, 174, 187, 207, 208, 209.

CI: 220, 305.

Key issues raised by the above representations:

- Concern that current crime and anti-social behaviour issues not fully reflected.
- Concern that health issues should be more prominent to reflect target of healthier lifestyles.
- Concern that reference to the historic environment does not reflect guidance.

Council's response to all representations listed above:

- Higher levels of crime and fear of crime in North Solihull included under the Regeneration Zone, but could include overall picture in Overview.
- Health issues included in Challenges and Strategy, but could consider whether further references should be made to better reflect their importance.
- Need to ensure Overview reflects Borough's historic environment context and relevant guidance.
- Could add reference in North Solihull Regeneration Zone to poor quality left over open space around housing. Reference to the quality of the landscape is linked to the river Cole and woodlands.
- Need to clarify that Blythe Valley Park is outside the Urban West to address inconsistency with spatial strategy diagram.
- Reference to the Arden landscape and ancient woodland is included in Policy 12.
- Multi-functional benefits of canals is too detailed information for inclusion in the Solihull Today chapter, but could be picked up under Policy 11. Canals could be included on the map of the Borough.
- Identification of airports on the regional policy context map is not intended to distinguish between relative importance or functions.
- Could amend reference to Proposed Metro on the regional policy context map to Proposed Rapid Transit link.
- Borough map shows safeguarded land correctly as Green Belt.

Recommendations for the Core Strategy:

- Consider including a summary relating to crime and anti-social behaviour in Overview.
- Consider whether further references to health issues should be made to better reflect their importance.
- Consider rewording historic environment point in Overview to better reflect context and guidance.
- Consider adding reference in North Solihull Regeneration Zone to poor quality left over open space around housing.
- Amend reference to Blythe Valley Park in the Urban West to clarify that it is just outside the Urban West area.
- Amend reference to Proposed Metro on the regional policy context map to Proposed Rapid Transit link.
- Include canals on the map of the Borough.

Chapter 3 - Challenges and Objectives

Representations received:

EX: 67, 73, 81, 93, 94, 95, 98, 128-132, 138, 140, 141, 145, 147, 149, 151, 160-162, 168, 170, 171, 174, 179, 186, 187, 188, 194, 199, 203, 207-213.

CI: 72, 104, 196, 295.

Key issues raised by the above representations:

- Support for various challenges and objectives and no fundamental objections to any.
- Requests for additional challenges relating to the natural environment and crime and community safety.
- Concern that the challenges are not wholly addressed by the objectives.
- Concern that the implications of the challenges and objectives not always followed through in strategy and policies.

Council's response to all representations listed above:

General
- Challenges have been developed with input from the community through LDF Stakeholder Conference in April 2008 and consultation on 'Challenges & Choices' in January 2009.
- Natural environment and crime are covered in the challenges and elsewhere in the core strategy, but consider the need for new challenges, or incorporating additional material within existing challenges if appropriate.
- Including the objectives with the challenges rather than after the vision provides a clear link between them, but agree that objectives could be refined to better address the challenges.
- Infrastructure needs to be addressed in an implementation plan, but no known showstoppers.
- Core strategy identifies challenges that are particular to Solihull rather than those that apply in all areas, with Challenges A to E identified as priorities.
- Prioritising the key challenges and objectives in the strategy should help to maintain the Borough's success over the next 15 years and ensure the opportunity to benefit applies to all.

Challenge A
- Objective A seeks to close the inequality gap across the whole of the Borough, and recognises the issue of crime and fear of crime.
- Core strategy can contribute to reducing inequality, but acknowledge that other measures will be required.
- Concerns about wider inequalities, such as gender, disability and ethnic background to be addressed through a Fair Treatment Assessment.
- Recognise that Objective A does not fully address challenge in respect of improved links between north and south Solihull.

Challenge B
- Affordable housing is identified as a particular issue in the Borough, hence inclusion of a separate priority challenge to that of poor housing mix and shortage of gypsy and traveller sites, and is covered more fully in Policy 7.

- Adequacy of provision for affordable housing is a matter for Policies 4 and 7.

Challenge C
- Acknowledge that Objective C applies more widely across the Borough than the mature suburbs, but it is a priority challenge for the Urban West. Should make clear that the core strategy will address wider issues as well.
- Consider whether Objective C should be applied to large rural settlements as well as the Urban West.
- Issue of density of development in the Urban West is a matter for Policy 4.

Challenge D
- The impact of development pressures on the quality of the Borough's environment is recognised in Challenge D, but could include enhancement of the environment in the objective.
- Agree that reference to Shirley town centre should include poor quality of public realm.
- Challenge D reflects the importance of the key economic assets not only to Solihull, but to the sub-region and the West Midlands, whilst the role of small enterprises applies to all authorities.
- The Airport runway extension is not part of the core strategy and has been granted planning permission.
- Consider the case for inclusion of Whale Tankers in the list of key economic assets in Challenge D as a leading environmental engineering business and the Borough's second largest manufacturer.
- Consider the contribution of the agricultural sector to the Borough's economy and possible reference in Challenge D.

Challenge E
- The role of the canal network and the implications of encouraging greater use of canals is not considered to be a priority challenge for the Borough, but is addressed in Policy 11.
- Agree that could add enhancing the rural setting to Challenge E.
- Consider whether a stronger objective is required to address Challenge E, reinforcing the protection of the Meriden Gap and clarifying what an effective Green Belt is.

Challenge F
- Importance of climate change reflected in Challenge F, but could consider inclusion of energy efficiency and accessibility by public transport, as well as renewable energy.
- Objective F seeks to reduce greenhouse gas emissions, not carbon neutrality, and should recognise and address adaptation issues, such as urban heating.
- Green infrastructure is covered in the strategy and Policies 11 and 12, but consider the need for reference in Objective F.
- Core strategy can contribute to reducing emissions, but acknowledge that other measures will be required.
- Consider the need to refer to the challenge of reducing carbon emissions from the transport sector.
- Agree there is a need to ensure new development, and where possible existing communities, have in built resilience to the effects of future climate change.
- Consider expanding Objective F to refer to the risks to older people.
- Agree there is a need to refer to the role of trees in addressing urban heating, and to applying sustainable drainage systems to address surface water flooding.

- Feed in tariffs and renewable heat incentives are financial instruments and not appropriate for inclusion in the Core Strategy.
- Evidence in the Renewable and Low Carbon Energy Resource Assessment and Feasibility Study suggests the Borough has low potential for wind and biomass.
- Targets are set at national level, and more appropriately at local level through a climate change or carbon reduction strategy for the Borough. The core strategy has a part to play but cannot be the whole story.
- Consider inclusion of retrofit of existing building stock if and where core strategy can contribute.

Challenge G
- Housing needs in larger rural settlements reflected in Challenges B and G.
- Policy 5 addresses concerns about need for rigorous control over gypsy and traveller sites.
- Provision for supported accommodation such as extra care schemes is addressed in Policy 7.

Challenge H
- Safety and attractiveness of walking opportunities addressed in Policy 14.
- Challenge H highlights difficulties of access and unattractiveness of public transport.
- Need to focus new development in most accessible locations recognised in Objective H.
- Objective H could address issues of improving car parking at rail stations, cycleways and park and ride.
- Content of green travel plans and consultation on changes to public transport services not matters for core strategy.

Challenge I
- Agree there is a need for sufficient flexibility to enable the appropriate types of waste management facilities to come forward, which is addressed in Policy 16. Organic waste treatment is included in Objective I.
- Issue of bird attraction will be addressed in the criteria for Policies 16 and 17.
- Reference to waste is in line with government guidance and should be clearer than resource management to core strategy users. Objective I seeks to address the treatment gap, provision of facilities including a variety of technologies, but could consider further options for facilities in or close to North Solihull and the Urban West to reduce the need to travel.
- Challenge I reflects the issue of the treatment gap in the Borough, but could consider including the need to reduce waste. The core strategy needs to make provision for residual waste that cannot be further treated as Packington landfill is nearing the end of its life, and former mineral workings offer the opportunity for both restoration and waste management.
- Acknowledge that the need for minerals is a national objective, but the core strategy has to make local provision where minerals exist in accordance with national guidance.

Recommendations for the Core Strategy
- Consider the need for new challenges relating to the conservation of biodiversity/landscape/the natural environment and crime and anti-social behaviour, or incorporating additional material within existing challenges if appropriate.

- Consider whether the objectives should follow the vision rather than be linked with the challenges, and whether they could be refined to address the challenges more fully.
- Add explanation that the core strategy will address other issues beyond the challenges highlighted, such as those in national guidance.
- Consider the inclusion of improved links between north and south Solihull in Objective A.
- Consider whether Objective C should apply more generally across the Borough, including the larger rural settlements.
- Add reference to poor quality of the public realm to the second point on Shirley town centre in Challenge D, and to enhancing the quality of the environment in the objective.
- Consider the case for referring to Whale Tankers in the list of key economic assets in Challenge D, and to the contribution of the agricultural sector in the Borough.
- Add enhancing the rural setting to Challenge E and consider the need for a stronger objective to reinforce protection of the Meriden Gap and the Green Belt in general.
- Add points to Objective F to ensure new development, and where possible existing communities, have in built resilience to the effects of future climate change, to address the risks to older people, to refer to the role of trees in addressing urban heating, and of sustainable drainage systems to reduce surface water flooding.
- Consider referring to the challenges of reducing emissions from transport and retrofitting existing buildings in Challenge F, and the benefits of energy efficiency, green infrastructure and accessibility by public transport in the objective.
- Consider the need to refer to improving car parking at rail stations, cycleways and park and ride in Objective H.
- Consider including the need to reduce waste in Challenge/Objective I and the options for providing waste facilities close to North Solihull and the Urban West.

Chapter 4 - Vision – Solihull in 2026

Representations received:

EX: 18, 30-35, 44, 45, 67, 73, 79, 92-95, 98, 120, 128-130, 135, 140, 141, 145, 149, 151, 152, 158, 162, 166-168, 172, 174, 179, 180, 185, 186, 187, 189, 195-200, 203, 210-213, 220, 221, 224-226.

CI: 28-71, 73-76, 78-104, 108-117, 154-183, 185-198, 200-210, 212-228, 230, 232-234, 237-243, 249, 257-261, 263, 265-268, 270, 273-282, 284-287, 289, 290, 292-300, 302-313, 315-318, 320-322.

Key issues raised by the above representations:

- A significant number of respondents support the vision.
- A number of respondents suggest matters that are either too detailed or more appropriately addressed elsewhere in the Core Strategy.

Council's response to all representations listed above:

- The vision seeks to build on the Borough's reputation as an attractive and advantageous place to be without overplaying its importance, and has been developed following consultation on Challenges and Choices.
- It confirms that the benefits will be sought in all parts of the Borough, not just in the areas of greatest need such as the North Solihull Regeneration Zone and recognises that pockets of deprivation exist elsewhere. Could make explicit fair treatment of all, emphasise the Borough as a safe place to live, and cover the impacts of climate change and inter-generational equity.
- Endeavours to strike a balance between meeting local needs for new housing, employment and other development without adversely affecting the qualities that make the Borough attractive. The vision recognises the need for a variety of housing in North Solihull, the urban west, town centres and the rural area.
- The vision includes reference to the Borough's importance to the regional economy and recognises the wider importance of its key economic assets.
- The importance of the quality of the built and natural environment, the green belt and the character of the Borough is recognised in the vision.
- Could add references to the role of other centres in supporting Solihull town centre, and to cover leisure activities.
- The vision confirms the importance of an improving quality of the environment and public realm in the North Solihull Regeneration Zone, in line with the aims of the North Solihull Green Spaces Review. Could recognise the benefits of enhancing as well as conserving assets, increasing public use of assets, and expand reference to the natural environment to make explicit it covers landscape, biodiversity, green space and green infrastructure. The reference to heritage assets is considered to cover the canal network and it is not considered appropriate to list all the Borough's assets in the vision.
- The vision seeks to ensure that all who live, work and play in the Borough have equal opportunities, and is long term, so reflects the likelihood that the impact of the current recession will be temporary.
- It recognises that new housing is required to address needs and demand in a Borough that is seen as an attractive place to live, and that a variety of housing will promote mixed and sustainable communities. The vision is not considered to be the place to

include the delivery of housing numbers or broad locations for development, which are more appropriately covered in Policy 4 and the spatial strategy.

- The vision includes a reference to the local distinctiveness of the Borough's rural settlements and countryside, as well as its suburbs, but the countryside reference could be expanded to address agriculture and rural businesses.
- It already includes reference to an integrated transport network, whilst the potential High Speed 2 rail link is covered in Policy 14.
- Role of the core strategy is to contribute to low carbon economy with strategy and targets to address climate change set out elsewhere. Could add a reference to a Borough adapting to the changes in climatic conditions, as well as mitigating carbon emissions. Disagree that challenges of delivering a low carbon economy not recognised, as included as Challenge F and followed through in strategy and policies.
- Disagree with the views that provision of services and infrastructure should be added to the vision, as this is more appropriately addressed in the Implementation Plan, and that the vision is not translated into strategy and policies that will deliver the necessary development.

Recommendations for the Core Strategy

- Add 'all … regardless of background' to make explicit fair treatment of all, 'crime-free' to back up the Borough as a safe place to live, and include reference to future generations to cover the impacts of climate change and inter-generational equity.
- Consider adding references to the role of Chelmsley Wood and Shirley centres in supporting Solihull town centre, and to cover leisure activities.
- Add references to recognise the benefits of enhancing as well as conserving assets, increasing public use of assets, and to make explicit the natural environment covers landscape, biodiversity, green space and green infrastructure.
- Consider expanding the countryside reference to address agriculture and rural businesses.
- Add a reference to adapting to the changes in climatic conditions, as well as mitigating carbon emission.

Chapter 5 - Strategy – How the Vision can be Achieved

Representations received:

EX: 5, 16, 19, 20, 25, 30, 31, 34, 48, 58, 63, 73, 78, 81, 92-95, 98, 99, 120, 125, 127, 130-132, 135, 137, 138, 141, 145, 151, 156, 158-161, 163, 166, 168, 170-172, 174, 179, 180, 182, 186-189, 195-213, 219, 221, 224, 226.

CI: 37, 44, 50, 84, 86, 90, 97, 165, 173, 179, 182, 190, 196, 201, 204, 209, 216, 217, 219, 220, 234, 239, 241, 244, 252, 261, 265, 268, 275, 278, 289, 296, 298, 305, 321.

Key issues raised by the above representations:

- A significant number of respondents support various elements of the strategy.
- Concern about over reliance on housing provision in North Solihull Regeneration Zone and Solihull town centre.
- Representations urging identification of additional housing and employment land, with review of the Green Belt to enable expansion of settlements.
- Request for additional reference in strategy and a policy relating to locally specific countryside and green belt issues.

Council's response to all representations listed above:

Overall strategy

- Consider that addressing the regeneration needs of the North Solihull Regeneration Zone, utilising the potential of Solihull town centre alongside areas of the Urban West with greatest accessibility and land safeguarded for future housing needs in suitable locations, whilst meeting local needs elsewhere is the most appropriate strategy for the Borough.
- Strategy sets out the broad focus for development and balances the need for development with the protection and enhancement of the Borough's character and quality. It provides sufficient flexibility to enable the Borough's development needs to be met and recognises the need for mixed sustainable communities, accessible locations and to safeguard employment land.
- The strategy acknowledges the adjustments required to the Green Belt in North Solihull and the need for housing for certain rural settlements, but could include protection of the Green Belt other than in these areas. There is no proposal to review the Green Belt beyond North Solihull in the absence of the exceptional circumstances needed to justify alterations, although returning unsuitable safeguarded land to the Green Belt is to be considered.
- Core strategy should not include policies that would promote inappropriate development in the green belt.
- Consider the need for a reference and an additional policy relating to the protection and enhancement of the countryside, gateways to the countryside and the green belt to address locally specific issues.
- The potential for expansion of Balsall Common and Dickens Heath has been considered through the Challenges and Choices, as shown in Appendix 1 of the core strategy.
- The strategy will address local needs for affordable housing only in the smaller villages, such as Hockley Heath, which will not require any adjustment to green belt boundaries.

- Evidence in the Strategic Housing Market Assessment shows low housing vacancy rates in Solihull, which would amount to a small proportion of the Borough's housing needs only.
- The importance of considering local housing needs, which should be undertaken in partnership with local communities, is recognised.
- The strategy recognises the importance of focusing development in the most accessible locations, but could make specific reference to the need for accessibility from social housing to employment.
- The importance of high quality development is recognised in the strategy and should help to avoid adverse impacts on the character of existing urban areas and settlements. Could consider including reference to innovative design solutions, place making and local distinctiveness, although may be better addressed in Policy 3.
- The Employment Land Review indicates that sufficient employment land has been identified to meet the Borough's needs, without encroachment on the Green Belt in south Solihull. The strategy recognises the importance of the Business Parks, whilst specific uses within the Business Parks are addressed in Policy 9. Should consider the case for meeting the aspirations of the major economic assets.
- Policy 9 indicates that the Airport includes the runway extension land, but need to consider whether the green belt designation requires amendment.
- Infrastructure considerations will apply to any safeguarded land brought forward, high quality design will contribute to regeneration, crime reduction and the accessibility of services, and green infrastructure will provide a range of benefits in addition to sport and recreation, but could make this clear in the strategy.
- Protection of green infrastructure and addressing gaps in sport and recreation provision is included in the strategy, but could emphasise the importance of encouraging proposals for sports infrastructure where contributes to a healthy Borough, the creation and enhancement of green infrastructure and increasing opportunities in North Solihull.
- Consider how the core strategy could address faith issues in consultation with stakeholders.
- The strategy refers to affordable housing, whilst the full range of housing and care accommodation for the elderly is more appropriately covered in Policy 7. It recognises the need to address gaps in recreational provision, whilst Policy 11 covers the development of surplus recreational land.
- Agree need to co-ordinate the strategy with neighbouring authorities.
- The strategy refers to the options already considered, which were subject to consultation in 2008-09.
- Infrastructure requirements will be addressed in the Implementation Plan. Where necessary, a sequential test will be undertaken in accordance with PPS25 to ensure that development is directed to the areas at lowest risk of flooding.
- Consider including photographs of waterways in a range of locations, not just rural areas in further documents.
- Provision of bus and medical services are not matters for the core strategy.

Spatial strategy diagram
- The line of the rapid transit link has not yet been agreed, so could not be shown, but could consider an approach to this issue with Centro. Could consider including the canals on the spatial strategy diagram and whether a corridor of search for supporting infrastructure for canals could be identified. Environmental designations are more appropriately shown on the Proposals Map, than the spatial strategy diagram.

- Can only show the strategy for Solihull's area, not the area beyond the Borough boundary, but wider coalescence issues to be considered when analysing the potential of any sites close to the boundary.

North Solihull Regeneration Zone

- Focus on the North Solihull Regeneration Zone reflects identification of inequality and health issues as a priority challenge in the core strategy.
- Healthy eating is a matter of education and access to fresh food to reduce demand for fast food, rather than restricting supply, even if that were possible. Access to fresh food included as criterion in housing land availability assessment.
- Strategy endeavours to address the need for new employment accessible from the North Solihull Regeneration Zone and of the right type, and makes provision for small and medium sized enterprises in local centres.
- Discuss possible requirements for the emergency services at community hubs with West Midlands Police and North Solihull Regeneration, and consider including reference to the importance of design in minimising crime and anti-social behaviour.
- Strategy seeks to enhance green infrastructure but acknowledges that some poor quality green spaces may need to be replaced.
- NEC is included in the Urban West as it lies outside the North Solihull Regeneration Zone, but the strategy recognises its contribution to urban renaissance. Could add the NEC to the list of major employers in the final point.

Urban West

- Problem of cumulative impact of incremental change recognised in the strategy which seeks to avoid over intensification, to maintain character and to protect green space. However, windfall development is an important element of the housing supply in the Borough and a reduction in windfalls would require more site allocations on green field land.
- Strategy refers to play facilities, parks and open spaces and local services.
- Strategy seeks to improve Shirley town centre and refers to retail and affordable housing. Could consider a reference to new retail and market housing as well.
- Strategy provides for sufficient land for employment, and other needs and encroachment of the Green Belt is not justified.
- The strategy will retain key gaps between settlements and the urban area, such as that to the east of Marston Green. Reference to new housing in Marston Green is dependent on the response to objections to inclusion of the housing sites in this area.

Solihull town centre

- Focus on town centre reflects accessibility criteria and the potential available.
- Consider including a reference to leisure and cultural development to reflect overall strategy.
- Correct spelling error on town centre spatial strategy diagram.

Rural Area

- The strategy recognises the need to maintain gaps between settlements by retaining them in an open countryside setting, but will require liaison with adjoining local authority for the area outside the Borough. Could add a reference to the protection of the Green Belt, unless there are exceptional circumstances such as the regeneration needs of North Solihull or local housing needs.
- The strategy recognises the need to retain the distinct character of settlements, but could consider including guidance on infilling in rural settlements.
- Various submissions proposing changes to green belt boundaries will be considered.

- The strategy recognises the potential for provision of recreational opportunities in the urban fringe, but could add the need for development to be sympathetic to its rural location.
- Local needs could be defined in a separate glossary, whilst the issue of safer pedestrian routes is covered in Policy 2.
- Knowle and Dorridge are settlements in the rural area as identified on the spatial strategy diagram. Blythe Valley Park is in the rural area.
- The strategy recognises the provision for local housing needs, including affordable housing, but rural locations perform poorly against accessibility criteria for wider Borough housing needs. Policy 10 seeks to resist the loss of important local services in rural settlements.
- Consider the need for the core strategy to protect farmland and possible changes to address concerns relating to agriculture with key stakeholders.
- Could add the need for farm diversification to protect the character of settlements and the countryside, although this is implied by the need for such development to be appropriate.

Recommendations for the Core Strategy
- Consider adding protection of the Green Belt other than to meet essential needs of North Solihull Regeneration Zone to both the Overall Strategy and the Rural Area strategy.
- Consider the need for a reference and an additional policy relating to the countryside and the green belt to address locally specific issues.
- Could add reference to the existence of adequate infrastructure to the safeguarded land point, the contribution of high quality design to regeneration, crime reduction and the accessibility of services, and reword the green infrastructure point to cover creation and enhancement and to give balanced emphasis to benefits in addition to sport and recreation. Consider including a reference to innovative design solutions, place making and local distinctiveness.
- Consider making specific reference to the need for accessibility from social housing to employment using public transport, walking and cycling.
- Consider whether the green belt designation requires amendment to reflect the Airport runway extension.
- Could emphasise the importance of increasing sport and recreation opportunities in North Solihull following consideration with local sports associations, and of encouraging proposals for sports infrastructure where contributes to a healthy Borough.
- Consider including reference to the importance of design in minimising crime and anti-social behaviour.
- Consider how the core strategy could address faith issues in consultation with stakeholders.
- Consider whether a corridor of search for supporting infrastructure for canals should be identified on the spatial strategy diagram.
- Discuss possible requirements for the emergency services at community hubs in North Solihull with West Midlands Police/North Solihull Regeneration.
- Add the NEC to the list of major employers in the North Solihull Regeneration Zone final point.
- Consider including a reference to new retail and market housing to assist improvements to Shirley town centre.

- Consider including a reference to leisure and cultural development in Solihull town centre to reflect overall strategy.
- Consider including guidance on infilling in rural settlements.
- Consider submissions proposing changes to green belt boundaries.
- Consider the need for the core strategy to protect farmland and possible changes to the Rural Area strategy to address concerns relating to agriculture with key stakeholders.
- Could add the need for recreational development in the urban fringe to be sympathetic to its rural location, and for farm diversification to protect the character of rural settlements and the countryside

Chapter 6 - Emerging Policies & Proposals

Policy 1 – Climate Change

Representations received:

EX: 68, 94, 98, 128, 129, 131, 133, 141, 151, 153, 159, 160, 170, 200, 207-213, 219.

CI: 34, 84, 85, 97, 99, 104, 106, 116, 117, 159, 161, 173, 186, 191, 195, 196, 214, 217, 224, 234, 244, 296, 299, 305, 317.

Key issues raised by the above representations:

- Some support for policy direction and inclusion of decentralised energy.
- Some stakeholders concerned that policy insufficiently ambitious, whilst others question whether it is realistic and achievable.
- Need to consider how the policy will be delivered and application to existing building stock.

Council's response to all representations listed above:

- It is widely recognised that climate change results from human activity as shown by Government legislation and targets for carbon reduction. Policy 1 recognises the need to both mitigate the effects and adapt to changes which cannot be prevented.
- The core strategy must address a range of issues including both climate change and the need for new housing, whilst Policy 1 seeks to minimise the adverse effects of new development.
- The importance of protecting the Borough's character is reflected in various challenges and policies, but the core strategy needs to address the risks associated with climate change. Strategy seeks to concentrate development in accessible locations whilst protecting the Green Belt and rural character.
- Purpose of first point is to identify specific locations that are suitable for decentralised energy, as this is not likely to be the case across the whole of the Borough.
- Targets are set at national level, and more appropriately at local level through a climate change or carbon reduction strategy for the Borough. The Core Strategy has a part to play but cannot be the whole story.
- Climate change is recognised as a priority challenge, which will have impacts on other Council objectives and activities, with a specific objective and reference in vision, and has influenced the choice of strategy. Policy needs to be realistic and achievable.
- Evidence in the Renewable and Low Carbon Energy Resource Assessment and Feasibility Study suggests Borough has low potential for wind, water and biomass.
- Consider need for policy on sustainable construction for new development to take account of the Code for Sustainable Homes, Building for Life, the West Midlands Sustainability Checklist, and technical recommendations in the Renewable and Low Carbon Energy Resource Assessment and Feasibility Study and the West Midlands Renewable Energy Capacity study.

- Standards to be consistent with national standards, such as the Code for Sustainable Homes and the Carbon Reduction Commitment Efficiency scheme with any variations to be explained and justified. Agree the core strategy should seek continued improvement in carbon reduction which the policy will allow.
- Maximising opportunities for developing or connecting to communal heating and combined heat and power alone is unlikely to deliver the necessary carbon reductions.
- Policy sets minimum standards across the Borough, but requires higher standards where decentralised networks are practical and viable. This approach is intended to provide flexibility and avoid making schemes unviable.
- Carbon standard in the policy will include energy efficiency as well as renewable energy provision, although energy efficiency is also addressed by other regulations.
- Consider the inclusion of retrofit of the existing building stock if and where the core strategy can contribute.
- Agree need to refer to the importance of trees and woodlands in mitigating and adapting to climate change, or to cross refer to Policy 12. Consider including a policy promoting or requiring green roofs on buildings with large roofs in urban areas.
- Agree need to refer to avoiding adverse impacts on the environment, particularly groundwater quality and quantity, ensure policy is consistent with and contributes to the Catchment Flood Management Plan and the Water Framework Directive, and consider the need for flood storage capacity in developed areas and/or the reduction in surface water discharge rates from major development. Agree need to consider the locally specific objectives from Catchment Flood Management Plans and the recommendations in the Strategic Flood Risk Assessment for Solihull for functional floodplains.
- Policy includes provision for sustainable drainage systems to address surface water management issues, but consider applying more widely and recognising their wider benefits or cross referring to Policy 12. Any sites proposed will be subject to a level 2 Strategic Flood Risk Assessment if there are flooding or surface water management issues.
- Potential sites are assessed for their impacts on climate change and the environment through the Strategic Land Availability Assessment and the Sustainability Appraisal.
- Waste minimisation, reuse and composting is covered in Policy 16, and consideration to be given to including guidance on anaerobic digestion.
- Accessibility is covered in Policy 2, green space, protection of the natural environment, urban cooling and wildlife in Policies 11 and 12. The Strategic Housing Land Availability Assessment includes accessibility criteria to ensure new development is as pedestrian and cycle friendly as possible.
- Agree there is a need to establish more sustainable lifestyles to protect the ecosystems that underpin the economy. Green Village initiatives could be considered by communities within the Borough, and potential promoted through core strategy.
- Feed in tariffs and renewable heat incentives are financial instruments and not appropriate for inclusion in the Core Strategy.

- Maintenance of drainage ditches in Tidbury Green, flood prevention measures in Cheswick Green, promoting or subsidising local ethical and biodegradable products, offering solar energy and changing bus routes are not matters that can be addressed through the core strategy. Importance of public transport reflected in Challenge H and Policy 14.

Recommendations for the Core Strategy:

- Consider the need for policy guidance on sustainable construction for new development.
- Consider referring to retrofitting of the existing building stock.
- Add reference to the importance of trees and woodlands in mitigating and adapting to climate change.
- Consider including a policy promoting or requiring green roofs on buildings with large roofs in urban areas.
- Add reference to avoiding adverse impacts on the environment, particularly groundwater quality and quantity and consider the need for flood storage capacity in developed areas and/or the reduction in surface water discharge rates from major development.
- Consider taking forward the locally specific objectives from Catchment Flood Management Plans and the recommendations in the Strategic Flood Risk Assessment for Solihull for functional floodplains.
- Consider applying sustainable drainage systems more widely and recognising their wider benefits.
- Consider the potential for promoting Green Village initiatives to communities through the core strategy.

Chapter 6 - Emerging Policies and Proposals

Policy 2 – Accessibility

Representations received:

EX: 6, 32, 34, 35, 94, 95, 128, 129, 131, 137, 140, 141, 151, 154, 164, 170, 172, 174, 175, 186, 200, 207 - 213, 217, 219.

CI: 305, 309.

Key issues raised by the above representations:

- General support for improved accessibility as a principle.
- General support for new development, including housing, to be linked to public transport/public transport nodes.
- Support for locating new development within a convenient distance of facilities/services.
- Concern that public transport is cut back in rural areas making accessibility more difficult.
- Some indication that wording of the policy may need improvement.

Council's response to all representations listed above:

- Policy 2 is about accessibility principles rather than referencing particular sites where accessibility may need to be considered. The further development of Policy 9 will deal with access/accessibility issues regarding Birmingham Airport.
- Improving public transport, particularly in rural areas, can be difficult for the Council because viability of services can be an issue and agencies that provide public transport are not in the direct control of the Council. Provision of better public transport is encouraged in the Core Strategy through creating development patterns that support sustainable development principles and sustainable transport which should lead to better more viable public transport.
- Focussing development in accessible locations such as town centres will help to support public transport services that can help to ensure that communities remain connected to town centre facilities.
- The Emerging Core Strategy seeks to locate development, including housing development where it will generally support sustainable transport and/or minimise the need to travel. This principle will also apply to social housing.
- Car sharing, powered 2 wheelers, road charging and electric vehicles may be dealt with through the further development of transport policies and/or a separate development plan document.
- Improving accessibility in North Solihull is a policy aim.
- The Core Strategy aims to enable less reliance on private cars by making developments accessible by alternative transport modes or by reducing the need to travel. It is difficult to meet the needs of all groups/individuals but the Core Strategy will be as inclusive as possible. To this end a fair Treatment Assessment will be undertaken.

- The further development of the emerging Core strategy transport/accessibility policies as they relate to public transport should be in further consultation with Centro.
- Agree that referencing the link between accessibility and pedestrian linkages through green infrastructure corridors should be considered through the further development of the core strategy policies.
- The Council is keen to improve provision for cycling and walking, including dedicated cycleways, where this can be done safely and where resources are available. The emerging core strategy sets the strategic aim to provide for cycling.
- The issue of the nature, extent and purpose of developer contributions will be considered through the further development of the Emerging Core Strategy.
- The further development of transport polices should include consultation with the Highways Agency over issues of phasing and planning for infrastructure to inform the further development of the Emerging Core Strategy.
- The location of development should, wherever practicable, support sustainable development principles. This is an aim of government and is rightly an aim of the Emerging Core Strategy.
- Policy 2 seeks to promote accessibility. New development can support public transport, depending on particular circumstances. This is recognised in Policy 14.
- The further development of transport polices should further consider the wording of policy 2 to ensure that the right type/density of development takes place in accessible locations to support sustainable development principles.
- Policy 2 sets out a broad policy position on accessibility. It is not necessary for the Policy to seek to reference particular sites as being accessible.
- The general principle of locating the highest density of housing where accessibility is greatest would support sustainable development principles.
- Planning applications will be considered in the context of the Core Strategy (and other development plan documents) which is focussed on promoting sustainable development principles, including sustainable travel modes.
- The Emerging Core Strategy seeks to encourage patterns of development that will enable travel choices and less reliance on the private car. It does not seek to prevent car use.
- A separate development plan document will set out requirements for car parking and access and this will include requirements for provision for the disabled.

Recommendations for the Core Strategy:

- Consider access to/accessibility of Birmingham Airport through the further development of the Emerging Core strategy.
- Through the further development of transport polices, consider the issue of how the more efficient use of transport, such as motorcycles , electric cars, road charging could be influenced.
- Consider the further development of the emerging core strategy transport/accessibility policies, as they relate to public transport, in further consultation with Centro.

- Consider referencing the link between accessibility and pedestrian linkages through green infrastructure corridors through the further development of the core strategy policies.
- Consider the issue of the nature, extent and purpose of developer contributions through the further development of the Emerging Core Strategy.
- Consider the further development of transport polices in consultation with the Highways Agency over issues of phasing and planning for infrastructure.
- Further consider the wording of policy 2 to ensure that the right type/density of development takes place in accessible locations to support sustainable development principles.

Chapter 6 - Emerging Policies & Proposals

Policy 3 – Securing Design Quality

Representations received:

EX: 56, 94, 98, 127, 128, 131, 137, 141, 144, 151, 160, 170, 171, 174, 207-213, 217, 219.

CI: 33, 116, 161, 223, 224, 305, 317.

Key Issues Raised by the Above Representations:

- An alternative policy on design has been suggested which seeks exemplary design, brings together landscape, townscape, design and heritage considerations and outlines the urban design principles that new development will be assessed against.
- Several respondents have suggested other design principles should be included in Policy 3; crime prevention, layout of car parking, links to public transport, consideration of sustainable urban drainage (SUDs), the integration of canals and waterways with new development and using the historic characterisation studies to inform the design of proposals.
- Concern that reliance in Policy 3 on other documents such as SPGS for further detail appears to be avoiding the public examination of policy.
- Support for the production and adoption of Village Design Statements and Village Plans, however, developers query who will be responsible for them, how will they be managed and consulted upon and what status they will have at planning application stage.
- Objection from developers to the adoption of Building for Life and Lifetime Homes Standards in the policy.
- Concern that the adopted SPG 'New Housing in Context' has not sufficiently protected the suburbs, is reliant on superseded national, regional and local planning policy and it should be treated as guidance not prescriptive policies.
- What is the justification for the requirement for public art in new development?

Council's Response to all of the representations listed above:

- Policy 3 focuses on how high quality designed development can be delivered in different parts of the Borough e.g. NSRZ, Urban West and the Rural Area. It refers to existing adopted documents to reduce the duplication of text and ensure that the policy is concise. Established urban design principles were considered to be sufficiently described in national policy and guidance so as not to be replicated in Policy 3, however, given the number of respondents requesting additional points to be added, an overarching urban design policy bringing all design considerations together in one policy, could be considered.
- Local communities will be responsible for producing Village Design Statements and Plans with guidance from Solihull MBC Officers. Where statements do not fulfil the requirements of a SPD, consideration will be given to adopting the documents as non-statutory guidance so that they are a material consideration in planning decisions.
- The requirement for minimum Building for Life Good/Silver standard was recommended by the Panel Report on the RSS Phase 2 Revision and its

inclusion in the Core Strategy will help to raise the quality of design. It is acknowledged that the Lifetime Homes Standard will become mandatory for new housing development in 2016 through Level 6 of the Code for Sustainable Homes. Requiring compliance with the Lifetime Homes Standard in advance of national policy will be considered as part of the Viability Assessment.

- Policy 3 requires new development to have regard to the urban design principles outlined in the adopted SPG 'New Housing in Context' so that it respects the local distinctiveness of an area. This, together with the guidance in PPS1, (paras. 37-38) and PPS3 (paras. 16, 41), is considered to provide sufficient guidance to prevent inappropriate backland development. Policy 3 acknowledges that the SPG will need to be updated in due course.
- Policy R9 of the adopted UDP required public art as part of new development; this is still considered to be appropriate but the viability of the requirement will be considered in the Viability Assessment.
- It is acknowledged that bullet point 6 of Policy 3 repeats para. 97 of Circular 01/2006, however, many planning applications do not follow this procedure and Solihull MBC is keen to ensure high quality design is achieved and evidenced through the Design and Access Statement.

Recommendations for the Core Strategy:

- Consider the need for separating Policy 3 into an overarching policy which includes a set of design principles to be considered in the design of new development proposals and detailed policies on specific design issues e.g. Sustainable Construction or Village Design Statements.
- Consider including a reference to place making and local distinctiveness in the policy.
- Consider adding a reference to HS2 to bullet point 2 of Policy 3 and clarifying the level of importance of strategic economic assets in the area.
- Consider including an additional bullet point in Policy 3 which ensures that adequate space is made for water within the design layout to support the full use of sustainable drainage systems within development.
- Need to decide what sustainable construction standards are appropriate for development in the Borough. The North Solihull Design Code currently requires housing in the Regeneration Zone to be built to at least Code for Sustainable Homes (CSH) Level 3. Need to consider the viability of compliance with the Lifetime Homes standard in advance of national requirements.
- To encourage high environmental performance in new buildings we need to consider the viability of requiring development to meet CSH/BREEAM standards in advance of national requirements.
- Need to consider how the AWM West Midlands Sustainability Checklist compares with CSH and Building for Life standards and its use as measure of a development's sustainability.

Chapter 6 - Emerging Policies & Proposals
Policy 4 – Provision of Land for Housing

Representations received:

EX: 2-6, 12, 14-16, 18, 21-27, 30-47, 49-55, 57-65, 68-90, 92, 94, 98, 100-123, 125-127, 130-132, 136-138, 140-141, 143, 144, 147-160, 163-168, 170-174, 178, 180-181, 183, 185-186, 188-189, 191, 192, 195-197, 199-202, 204-214, 217, 219-223, 225-231.

CI: 28, 31-40, 42, 44-58, 60-67, 69, 70, 73-76, 79-106, 108-117, 154-168, 170-212, 214-228, 230, 232-236, 238-247, 249, 250, 252, 254-268, 270, 271, 273-278, 289, 290, 292-299, 302, 305, 307-313, 315-318, 321, 322.

Key issues raised by the above representations:

- **Housing Land Provision Target** - Whether the housing provision target should be raised to meet the national household projection for Solihull or lowered to protect Solihull's character.
- **Housing Land Supply** - Whether sufficient land supply to meet the housing target has been identified and whether the windfall estimate included in the Core Strategy is appropriate.
- **Phasing** - Whether the proposed target and phasing of sites will inhibit the provision of affordable housing.
- **Safeguarded Land** - Whether there is a need to allocate more safeguarded land.
- **Suggested Housing Sites** - Whether the most suitable housing sites have been suggested for allocation.

Council's response to all representations listed above:

Housing Land Provision Target
- Three housing targets are mentioned, all are correct. Policy 4 proposes a target of 10,500 (2006-2026), which equates to 8,400 (2010-2026) when provision to date is taken into account. The Policy states that the target will be reduced to 10,000 if additional town centre capacity cannot be found (see page 29).
- The Regional Spatial Strategy did not include higher housing figures. The adopted RSS target is 8,700 (gross (2001-2021)). The RSS review preferred option included a target of 7,600 (net (2006-2026)) and the Panel recommended a target of 10,500 (net (2006-2026)).
- Housing need is high, evidenced by the household projections and the housing waiting list. The housing market is currently suppressed by recession, particularly the market for apartments, but the Core Strategy is a long-term plan. Need is still prevalent and problems associated with insufficient housing land supply are likely to amplify when recession ends.
- The Proposed housing target will not meet all projected household growth, but is considered to strike the balance between household growth and protecting the character of the Borough. Increasing the housing target would require green belt release within the Meriden gap as the remaining safeguarded land is no longer considered sustainable. The Panel reporting on the Regional Spatial Strategy recognised the advantages conferred on the region by the character

and environment of Solihull and concluded that there should not be an attempt to match trend projections slavishly in the short to medium term.

- The submission draft will provide more explanation for the policies, including the housing target.
- All housing targets are net of losses through demolition and replacement. This is set out in detail in the Strategic Housing Land Availability Assessment.
- Agree that the timeframe for the Core Strategy should be extended to cover 15 years from the anticipated date of adoption. It is anticipated that the Core Strategy will be adopted in December 2012.

Housing Land Supply

- Government advice encourages the inclusion of strategic housing sites within the Core Strategy. Only strategic sites are included within the plan. Deferring allocations to a site allocations DPD would delay housing delivery and would halt the continued supply of properly planned housing sites.
- A detailed breakdown of the identified housing land supply is provided in the Strategic Housing Land Availability Assessment, but more detailed information could be provided in the Policy 4 housing land supply table for clarity. It would be preferable to show North Solihull Capacity separately because of its priority status.
- Housing supply is larger than target because we are required to demonstrate 15 years housing land supply from the anticipated date of adoption (estimated at 2011 in the Emerging Core Strategy, but now estimated at December 2012), whereas the target ends in March 2026 (13.25 years from the anticipated date of adoption). As required the Plan also demonstrates flexibility in the event of under provision from any supply source to ensure targets can be met. This will be explained in the submission draft; so additional land may need to be identified to meet the requirement to identify 15 years housing land supply from the anticipated date of adoption.
- Land considered acceptable for housing use in principle, including Powergen,Wharf Lane and Garden Square Dickens Heath, are included within the identified housing land supply capacity and are identified as suitable housing sites by the Strategic Housing Land Availability Assessment. Such sitesdo not need to be allocated by the Core Strategy. No other previously developed sites have been identified. The windfall policy will allow other suitable brownfield sites that become available throughout the Plan period to be redeveloped.
- Solihull does not have a high rate of empty dwellings. The Council has an approved empty homes strategy and bringing vacant property back into use has already been taken into account in assessing housing need and housing land supply.
- The North Solihull Regeneration programme is looking to maximise redevelopment opportunities and is making a significant contribution towards housing land supply, but this area alone cannot provide sufficient additional housing land.
- A non-implementation discount of 13 dwellings per year has been applied to all small sites with planning permission (<15 dwellings). The capacity of large sites (15 dwellings or more) has been assessed through contact with individual land owners.

- All housing land supply estimates are net of losses through demolition and replacement. This is set out in detail in the Strategic Housing Land Availability Assessment.
- The anticipated housing capacity from sites with planning permission and the North Solihull Regeneration programme is 5,503 net additional dwellings and the contribution these sites make to affordable housing provision is relatively small. Any substantial reduction in the housing provision target would restrict new housing provision to meet existing and future market and affordable housing need into the future and would adversely impact on achieving the priority challenge of affordable housing provision and the challenge of providing an improved mix of market housing.
- The lower than anticipated rate of housing provision in North Solihull is in the context of a lower rate of provision across the Borough due to poor market conditions.
- Additional housing allocations would increase affordable housing land supply. However, new build is not the only source of affordable housing land supply. The Core Strategy will increase the provision of affordable housing and improve spread and Policy 7 (Meeting Housing Needs) will help ensure provision reflects need. The number of households who will benefit from the provision of new affordable housing will be greater than the number of dwellings built because some households on the waiting list will already be in affordable accommodation that will become available to others on the waiting list.
- A housing delivery trajectory is included in the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA, including the trajectory, will be updated when the Core Strategy Submission Draft is published. It is preferable not to include the trajectory in the Core Strategy itself as it will continuously change and will need to be kept under review.
- Land for 2,615 (not 2,496) dwellings is identified in Appendix C of the Strategic Housing Land Availability Assessment, the respondent has not taken into account 119 dwellings which are under construction. 30 (not 1) of the sites included in Appendix C has planning permission.
- The Strategic Housing Land Availability Assessment will be reviewed on an annual basis alongside the Annual Monitoring Report to ensure adequate housing land supply.
- There are no housing proposals within the rural area on green belt land, other than one small site at Balsall Common, selected to contribute towards meeting local housing need within this area of the Borough.
- No green belt alterations are proposed in the urban west. Green belt extensions in North Solihull are required to help deliver the key strategic objective of supporting North Solihull Regeneration.

Windfall Housing

- The Strategic Housing Land Availability Assessment supports the Emerging Core Strategy and provides evidence for the inclusion of windfall housing land supply within the first 10 years.
- Provision for windfall housing in suitable locations is made in Policy 4. Detailed policy will be included in the submission draft. The windfall estimate is significantly lower than provision in recent years and is proving to be a reasonable assumption with 237 (2001-2010) additional windfall dwellings granted planning permission since the call for sites started in January 2008.
- Preventing all windfall development would reduce housing land supply to meet needs, unless additional green belt land is identified for development, it would also be undesirable as it would prevent recycling of land in suitable locations. Windfall housing also helps retain population when household size is declining. Excluding a reasonable estimate of windfall development that is highly likely to come forward would be detrimental to the proper planning and delivery of infrastructure.
- Policy 2 (Accessibility) will ensure windfall housing is only provided in accessible locations and Policy 3 (Securing Design Quality) would ensure windfall housing does not adversely impact on local character and distinctiveness. The policy in the submission draft will provide greater detail on suitable locations for windfall housing.
- The development of windfall housing sites will generally be ruled out in the small villages where accessibility is poor (the Accessibility Study provides evidence of this). The number of dwellings supplied from windfall sites can be numerous and substantially increase the number of households reliant on car travel to access a range of services and facilities. The rural exceptions policy could however be extended to include development required to support local services and facilities.
- The contribution windfall sites make towards affordable housing provision has been limited by the relatively high affordable housing threshold (15 dwellings or 0.5ha and many developments have been for 14 dwellings on less than 0.5ha). Scope to lower the threshold will be considered through viability testing, with the aim of maximising the provision of affordable housing from windfall sites. Policy 7 (Meeting Housing Needs) will give the LDF greater influence over the type and size of housing provision to ensure it reflects need.

Phasing

- The phasing of housing sites is proposed to deliver the strategy with the priority for growth within the regeneration zone and urban west. All of the suggested housing allocations do not perform equally against the strategy in terms of location and suitability. The strategy could be undermined if sites are not phased, particularly the priority for growth in North Solihull and the Town Centre, as greenfield sites in south Solihull are likely to be more attractive to developers. Sites in Knowle and Bentley Heath in Phase 3 also reflect the need to address secondary school capacity.
- Affordable housing is a priority challenge of the Emerging Core Strategy. The proposed phasing reflects the spatial strategy, but is likely to have the unintended consequence of delaying the delivery of housing to meet priority housing needs for family affordable housing within the urban west and larger

villages until the last phase of the plan period and may not deliver a continuous supply of affordable housing across the Plan period. The proposed phasing should be reviewed to reconsider balancing the spatial strategy objectives with the key challenge of affordable housing provision.

Safeguarded Land

- PPG2 (Green Belt) does not require safeguarded land to be topped-up as previously designated safeguarded land is used. If green belt boundaries are reviewed the need for them to endure for as long as possible will need to be considered.

Suggested Housing Sites

- There are no sound planning reasons why any of the suggested housing sites should not be allocated for development and no more suitable alternatives have been proposed.
- All sites submitted for consideration have been appraised to ensure that the most suitable sites have been selected. It would be inappropriate to distribute housing equally across the Borough. There is a need to ensure the most suitable sites within the most sustainable locations are selected. Impact on the green belt was one of the factors considered when the green belt boundaries were defined in 1997.
- Accessibility has been a key factor in assessing the most suitable sites, ie access to a range of services and facilities plus employment without the need to travel by car.
- Initial discussions with the full range of interests have not raised any objections to any of the suggested sites in principle. Specific advice will be sought on the requirements of sites proposed for allocation and potential windfall sites, including (and not exclusively) advice relating to traffic, health, schools, archaeology, heritage, wildlife, air quality, noise, flood risk, heritage, drainage, water supply, wildlife, airport runway extension, utility providers.
- The fact that planning permission for some of the suggested sites has been refused by Planning Committee in the past and upheld on appeal does not rule sites out from consideration in the Core Strategy. Many of the sites are long-term housing sites, reserved to meet future housing need. There is now a need to release some of these sites.
- Ministers have clarified that neighbourhood planning is not an alternative to strategic planning. Neighbourhood planning would give communities the right to plan and the power to grant planning permission where a local majority approves. Neighbourhood planning is proposed as a tool for communities to promote, not prevent, development in their area to meet community needs.
- Estimates of capacity on sites are based on evidence of need, for example, in areas where the need is for predominantly smaller dwellings, higher densities have been assumed.
- The Core Strategy could indicate the current status of sites (eg. greenfield, previously developed land, green belt etc.)
- Development briefs will be produced and consulted on for each allocated site.
- There is no difference in construction between affordable and private housing.
- Meriden – development of an existing allocated housing site is due to start, 40% of the development will be affordable housing.

Site 2 – Gateway
- Only parts of site references FDB183, 186 and 188 have been suggested for development.
- We are required to identify specific sites and provide evidence of delivery where possible.

Sites 2 and 3 – Town Centre
- The Solihull Town Centre Study provides evidence of the residential capacity of Solihull Town Centre.
- Policies 4 and 7 could be merged into one policy on meeting housing need.
- The affordable housing requirement for Solihull Town Centre would be the same proportion as required from other developments. Evidence of affordable housing need is high.
- The additional 500 dwellings is not a windfall allowance as the target would be adjusted if capacity cannot be identified.

Site 4 Powergen
The release of the site is tied up with redevelopment of Shirley Town Centre. The site will become available once detailed matters of the Town Centre planning application have been resolved.

Sites 5 and 6 Marston Green
- The suggested sites are neither green belt nor public open space. Any use of the sites as public open space is informal and could be stopped by the landowners. Land was safeguarded to meet long-term housing needs in 1997 and designation re-affirmed in 2004.
- There are two suggested sites - land off Chelmsley Lane/ Coleshill Road and Moat House Farm Elmdon Road (the other sites are options, open for comment).
- Sites in Birmingham cannot be considered towards meeting Solihull's housing target.
- The development of the sites would not undermine Marston Green's village status.

Site 5 Chelmsley Lane/Coleshill Road
- The Inspector reporting on these sites in 2004 said:
  "….the site is appropriately designated as safeguarded land to meet long term housing needs and there is no case to reconsider its inclusion in the approved green belt… the site would represent a prime candidate when assessing potential housing sites in future reviews of this UDP, or if a shortfall in current housing land supply occurred".
- Development of the site will extend the park area and secure improvements to the park.
- The capacity of the site could be reduced to enable the provision of additional open space.

Site 6 Moat House Farm
- The Inspector reporting on these sites in 2004 said:

"…the site is appropriately designated as safeguarded land to meet the long-term housing needs and there is no case to return it to the green belt…this site would represent a prime candidate when assessing potential housing sites in future reviews…"

Sites 8 and 9 Dickens Heath
- The suggested sites are not within the green belt or the Meriden gap.
- Land was safeguarded to meet long-term housing needs in 1997 and designation reaffirmed in 2004.
- The development of sites would not undermine Dickens Heath's village status.
- There are no exceptional circumstances to include sites in the green belt.
- The use of the sites could not be restricted to local need, however Policy 7 will ensure provision by house type reflects evidence of local needs. Detailed requirements for each site cannot be included in the Core Strategy but a development brief will be prepared and consulted on for each site.

Site 10 Balsall Common
- Site is suggested to contribute towards meeting local housing needs in the rural east of the Borough.
- The most suitable site with the least impact on the Meriden Gap has been selected from numerous options.

Sites 11, 12 & 13 Knowle
- The suggested sites are not within the green belt. Land was safeguarded to meet long-term housing needs in 1997 and designation was reaffirmed in 2004, the impact of development on the Meriden gap was considered on both occasions.
- Sites in Knowle and Bentley Heath are included in Phase 3 to reflect the strategy, but there are also secondary school capacity problems.
- No alternative brownfield sites have been put forward.
- The Emerging Core Strategy only suggests development on the west side of Hampton Lane. Land on the east side of Hampton Lane was submitted for consideration and included in the site appraisals document (KNO84 & 88).
- A link road between Middlefield, Knowle and Warwick Road has not been suggested and would not be required to enable the development of the site.

Other Site Options
- No evidence submitted demonstrates that any of the other housing site options are more suitable than the suggested sites.
- The North Solihull Partnership submitted evidence that additional land will be required to support the regeneration programme. Needs will be examined in further detail and discussed with the Partnership.
- The safeguarded sites were designated in 1997, not all of the safeguarded land is still considered suitable for development when assessed against current national policy and the emerging strategy. The Inspector reporting on the UDP review in 2004 recommended that:
  "priority be given to assessing the suitability of safeguarded land for housing against current national policy and the latest regional strategy."

- Accessibility has been a key principle in determining the suggested location for new housing. The sustainability of the small villages cannot be improved without significant levels of new house building. Focussing growth in areas that already have good accessibility to key services and facilities will achieve a more sustainable outcome. The proposed rural exceptions site policy (Policy 7) makes provision for communities to bring forward sites where there are identified housing needs, this could be extended to provision required to meet other needs.
- The site appraisals are summaries, there is a larger database of information supporting them. We will endeavour to make the full database available when the submission draft is published.
- Guidance for producing Strategic Housing Market Assessments requires the Council to assess the housing potential of all sites so that this factor can be taken into account in considering the suitability of each site for allocation against policy objectives.
- Soft constraints are constraints that can be overcome. The sites taken forward into the submission draft will be accompanied by an infrastructure and delivery plan and will be subject to further discussion with the full range of service and infrastructure providers. This could be more clearly explained at the start of the site assessments document.
- Housing site assessments will be updated with new information for which there is evidence before the Core Strategy submission draft is published, including any implications of HS2.
- The Council cannot require land in private ownership to be used for public purposes, unless associated with development or compulsory purchased which would be prohibitively expensive.
- The Core Strategy cannot influence central Government policy on affordable housing rent.
- The Emerging Core Strategy does not suggest allocating any new housing sites in Meriden or between Cheswick Green and Shirley.
- Existing employment sites are required to meet employment needs.
- Aylesbury Hotel (east of Hockley Heath) is not within the Borough and cannot be considered for allocation in the Core Strategy.
- Site east of Station Lane Hampton-in-Arden has been appraised, see Hampton-in-Arden site ref. 214.
- A number of new sites have been suggested. These will be appraised and included in the site appraisals when they are updated and taken into account in the Core Strategy submission draft.

Recommendations for the Core Strategy:

- Extend the end date of the housing provision target from March 2026 to March 2028 to meet the requirement for the Core Strategy to plan for 15 years from the anticipated date of adoption and assess the need to identify additional housing land supply to meet this requirement.
- Provide a more detailed breakdown of housing land supply in the submission draft and clearly identify sources of land supply within the North Solihull Regeneration area.

- Re-examine the proposed phasing of sites to assess whether a continuous supply of suitable affordable housing can be achieved.
- Consider the introduction of a more permissive policy to enable communities to meet local development needs.
- Consider whether additional safeguarded land is required to ensure green belt boundaries endure where they are under review.
- Reduce the housing land provision target to 10,000 as additional town centre capacity is unlikely to be identified.
- Reduce the estimated capacity of housing site 5 (Chelmsley Lane/Coleshill Road) to enable the provision of additional open space.
- Examine the need to include additional green belt land to support the North Solihull Regeneration Programme.

Chapter 6 - Emerging Policies & Proposals
Policy 5 – Provision of Sites for Gypsies and Travellers

Representations received:

EX: 13, 97, 131, 132, 134, 141, 151, 166, 170, 172, 226.

CI: 28, 35, 45, 50, 72, 81, 97, 106, 108, 109, 113, 114, 116, 117, 157, 159, 161, 164, 166, 167, 182, 186, 191, 207, 209, 212, 223, 230, 242, 264, 266, 267, 268, 273, 295, 297, 312, 317.

Key Issues Raised by the Above Representations:

- A significant number of respondents objected to the principle of providing sites for gypsies and travellers in the Borough or that they should not be treated separately in policy terms from other housing needs.
- Some consider the strategy and criteria proposed in Policy 5 are not appropriate and too restrictive to address the needs of gypsies and travellers.
- 1 new site is being promoted for gypsy and traveller use.
- Gypsies and travellers should not be allowed to build on Green Belt land and there is concern that that it may be permitted by the policy.
- Many respondents provided general comments on gypsy and traveller issues which are not matters that can be addressed by the Core Strategy.

Council's Response to all of the representations listed above:

- Under The Housing Act 2004 local authorities have a statutory duty to assess and provide for gypsy and traveller needs. National planning policy in Circular 1/2006 and PPS3 also requires that such needs be planned for and met. The Council is accordingly endeavouring to meet the needs of gypsy and travellers within the Borough through the Local Development Framework (LDF) process. Any other approach would not be "sound".
- Solihull's need for gypsy and traveller pitches was assessed through the Gypsy and Traveller Accommodation Assessment (GTAA) March 2008 and this is considered to be the most up-to-date evidence of local need; an immediate need for 17 residential pitches (2007-2012) and 9 pitches for longer term needs (2012-2017) together with transit pitches (stopping places). It also recommends that 17% of pitches (equivalent to 4 pitches) are made available for social rent. The GTAA did not identify a need for travelling showpeople sites in Solihull. The Council has agreed to meet the needs outlined in the GTAA. In a recent appeal decision in another borough in the West Midlands, the Secretary of State expressly endorsed the GTAA as indicating the appropriate level of need.
- Disagree that the policy should be incorporated into Policy 7 as Policy 7 is linked to Policy 4 in meeting the needs of the settled community. Provision for gypsies and travellers is a specific need to be addressed and also progress is measured in pitches rather than the number of dwellings provided.
- Policy 5 recognises that there are several unauthorised established sites within the Borough which do not have permanent permission and have contributed to Solihull's local need for pitches. As a first priority, therefore, the policy proposes to meet the immediate need for pitches by considering the suitability of existing unauthorised sites against the proposed criteria.

- The criteria are not considered to be too restrictive. Several sites have recently been assessed against the criteria and granted permanent permission. The Council is unaware of any tolerated sites with unsafe site conditions.
- Para. 53 of Circular 01/2006 states that 'local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for gypsy and traveller sites', nevertheless, it is considered to be a relevant material consideration in the assessment of planning applications and is proposed to be retained as such in the criteria.
- Para. 64 of Circular 01/2006 clarifies that the peaceful integration between the site and the local community is a material consideration in the assessment of planning applications.
- To accommodate the future needs of gypsies and travellers in the Borough over the plan period (post 2012), sites will be allocated through a Gypsy and Traveller Development Plan Document (DPD). The commitment to prepare a DPD has been confirmed in the Council's revised Local Development Scheme, which has been submitted to the Secretary of State.
- There will be a call for potential sites during the preparation of the DPD and it is recommended that new sites are promoted through this process. All sites suggested through the LDF process will be subject to a site appraisal which will consider the overall suitability of the site against a series of material considerations including heritage and wildlife designations. The DPD will also address the need for social rented sites.
- The approach towards development in the Green Belt reflects national guidance in PPG2. Both residential and gypsy and traveller developments are classed as inappropriate development in the Green Belt and it is for the applicant to demonstrate 'very special circumstances' to justify the development.
- National guidance in Circular 01/2006 does not capitalise the term 'gypsy and traveller', however, for politeness, we agree to change references throughout the document to 'Gypsy and Traveller'.
- The following are not matters for the Core Strategy:
  - Requiring gypsies and travellers to pay rent/taxes.
  - Breaches in planning legislation are monitored and addressed through the enforcement process.
  - All planning applications have a statutory consultation period where properties adjacent to the site are notified of the application and invited to comment.

Recommendations for the Core Strategy:

- Liaise with the Derbyshire Gypsy Liaison Council and Central and Cecil Housing Trust before finalising the draft policy.
- Consider including an additional bullet into the list of criteria as requested by the Environment Agency; 'the proposed method of draining (foul and surface) waters from the site', to prevent deterioration of water quality in the catchment.
- Consider adding a reference to heritage in bullet point 4 of the criteria.
- Amend appropriate maps within the Core Strategy to identify the extent of Green Belt and open countryside.

- Consider the need for rural exception sites for gypsies and travellers (as per Para. 47 of Circular 01/2006) through the DPD.

Chapter 6 - Emerging Policies and Proposals

Policy 6 – Provision of Land for General Business and Premises

Representations received:

EX: 3, 5, 18, 30-35, 38, 39, 41, 42, 44, 53, 79, 92, 95, 98, 105, 120, 127, 130, 131, 137, 138, 141, 144, 148, 151, 152, 156, 160, 166, 168, 170, 171,178,180, 184, 185, 186, 189, 194, 195, 221, 224-228, 231.

CI: 28, 31, 33, 35, 37-39, 42, 44-46, 49, 50, 52-54, 56-58, 61-64, 66, 67, 69, 73, 77, 79-81, 83-87, 89, 90, 92, 93, 95, 97-104, 106, 108-117, 154-157, 159-161, 163-167, 173-175, 177, 178, 180-183, 185-192, 195-198, 200, 202, 203, 205-210, 212, 215-225, 228, 230, 232, 234, 236, 238, 239, 241-247, 249, 251, 256, 257-268, 270, 271, 273-278, 289, 290, 293, 295-299, 304, 308-311, 313, 316-318, 322.

Key issues raised by the above representations:

- General overall support for the approach of using existing sites with land remaining.
- General overall support for the suggested sites.
- Some opposition to the employment site adjacent Birmingham Business Park because it takes land from the Green Belt and because there is undeveloped land remaining within Birmingham Business Park (but also some support for the site).
- Requests for a broad mix and flexibility of types of development to be enabled on employment sites. Some request residential to be included.
- No strong opposition to reallocation of existing employment sites with land to be developed but some concern that there may be too much employment land.
- Concern that employment provision should be targeted to serve local needs.
- Some support for diversification of agriculture through conversion of buildings to appropriate businesses uses.
- Some alternative sites put forward for development (mainly in the green belt). Also a request for Whale Tankers premises at Ravenshaw Lane to be granted Major Developed Site (in the green belt) status.
- Casino development is not part of required provision for general employment land. Policy 10 deals with support for centres.

Council's response to all representations listed above:

- Birmingham Business Park contributes to a regional need for high quality employment land. The suggested site adjacent the business park, together with the reallocation of existing employment sites with land remaining, provide for more general, local needs.
- The suggested land adjacent Birmingham Business Park would provide employment opportunities close to the North Solihull regeneration zone (RZ) where unemployment is persistently high and could assist in providing better links between the Business park and the RZ. The site was dismissed on

appeal in 2008 because of insufficient justification to enable the development in the green belt and in advance of the development plan process.

- Birmingham Business Park provides a variety of employment some of it locally to residents of the nearby regeneration zone. The suggested site adjoining Birmingham Business Park will also provide opportunities accessible from the regeneration zone and jobs and training may be targeted through formal planning agreements.

- Regional Investment Sites (Birmingham Business Park and Blythe Valley Business Park) have a particular role and function in supporting the Region's economy. They are separate from provision for more general, local employment land needs.

- The emerging core strategy acknowledges the need for flexibility in the type of business development on employment land. The further development of the policies will determine the range, nature and mix of uses/developments that should be enabled on employment land.

- Residential use may not be appropriate on employment land as it would not necessarily support sustainable development principles and/or could reduce the quantity of employment land that the Emerging Core Strategy seeks to provide to meet needs.

- The Emerging Core Strategy seeks to address employment issues mainly by allocating employment land where it will help to meet need, where it will be attractive to the market and where it is relatively accessible. Land has been allocated close to North Solihull where it can help to support regeneration. The land allocations will generally be suitable for a broad spectrum and scale of business use including start-up units.

- Most of the land needed for general employment purposes can be provided through re-allocation of exiting employment land allocations that have land remaining to be developed. Suggested sites are in appropriate locations within or, close to, the main urban area and have proved attractive to investment.

- Only one suggested site uses land currently in the green belt for general employment land needs. Other green belt sites put forward would have a greater impact on the green belt, would not be as accessible and/or would not be necessary to meet the required quantum of provision. Existing urban area sites are in active use and may not come forward.

- Agree that the Emerging Core Strategy should explain the status/purpose of Regional Investment Sites and the reasons for taking any green belt land for general employment purposes.

- Agree that opportunities to improve green infrastructure should be a consideration in the development of employment sites.

- The suitability of suggested employment sites has been assessed. The evidence base to the Emerging Core Strategy will give further consideration to transport/highway and infrastructure matters and will also consider the appropriateness of suggested employment sites for employment purposes, including from a market perspective.

- The issue of whether there is justification for identifying Major Developed Sites in the green belt should be given further consideration through the further development of the Core Strategy.

- Demand for employment land/premises fluctuates in response to economic performance and other factors. The Core Strategy is required to look at need for employment land over a long timescale. Need for the quantum of land for general employment purposes has been guided by the evidence base.
- The Emerging Core Strategy is limited in the extent it can match jobs with to the specific needs of unemployed residents, but it will seek to provide for a broad range of employment within the employment portfolio. Further opportunities to target employment opportunities may come forward through the development control process and improving access from areas of employment need.
- The emerging core strategy seeks to address unemployment in North Solihull and will aim to support provision for a diversity of jobs in order to create appropriate employment opportunities.
- Agree that provision of employment land in North Solihull could provide local employment opportunities and assist regeneration. All employment sites put forward have been assessed but not all have been found to be appropriate for inclusion for development.
- The emerging Core Strategy supports small scale local employment opportunities in rural settlements and also through the conversion of agricultural buildings, in appropriate circumstances. The activities of small businesses and the community/voluntary sector will not be precluded by the policy framework.
- Suggested allocated employment sites are focussed on the main urban area. The Emerging Core Strategy seeks to enable small scale employment opportunities subject to supporting sustainable development principles, environmental considerations and green belt restrictions.
- Local employment opportunities of an appropriate type and scale in rural settlements and through the conversion of agricultural buildings could include a broad range of uses including those within existing rural occupations.
- The Emerging Core Strategy seeks to retain the character of rural settlements in an open countryside setting and to support farm diversification.
- The need for archaeological assessment of employment will be considered through the further development of the Emerging Core Strategy policies.
- A level 2 strategic flood risk assessment will be undertaken of development sites, including employment sites, as part of the developing evidence base.
- The former Powergen site near Shirley Town Centre is the subject of a published development brief that encourages redevelopment for mixed uses including employment purposes (but doesn't encourage retail development).
- The Council consider it appropriate to include development sites, including employment sites, within the Core Strategy, rather than a separate development plan document.
- Jaguar Land Rover is not included in the Emerging Core Strategy for general employment purposes. The site is in operational use and is not available for redevelopment.
- The suggested employment land allocations would not in principle preclude employment development on non-allocated sites (subject to no conflict with other policy areas).

- Provision for an appropriate portfolio of employment land is an important part of attracting modern business investment and could encourage centres of excellence.
- The Emerging Core Strategy aims to make a positive contribution to the economic potential of the sub-region. It provides for development, including business/commercial development, balanced against the need to protect the environment that makes Solihull an attractive place to live, work and invest.
- Agree that employment opportunities are needed to maintain Solihull's prosperity.
- The issue of the nature, extent and purpose of developer contributions will be considered through the further development of the Emerging Core Strategy.
- Policy 9 of the Emerging Core Strategy suggests that major economic assets should be re-allocated for their respective purposes enabling related development within their boundaries.
- The Emerging Core Strategy seeks to enable key economic assets that are important to the economy of the region to meet their aspirations subject to environmental considerations.
- Current government guidance seeks to locate main town centre uses in town centres in order to promote accessibility and patterns of development that are sustainable. It would not be appropriate for the Emerging Core Strategy to seek to generally promote main town centre uses out of centre.
- The emerging core strategy aims to provide sufficient general employment land to 2026 to ensure a variety of employment opportunities are provided for, school leavers included.
- Agree that the emerging core strategy should be consistent with the local transport plan and the local economic assessment.
- Suggested employment sites would not involve loss of sports facilities.
- No evidence submitted demonstrates that any of the other site options are more suitable than the suggested sites.
- The Council's stance on HS2 is dealt with under Policy 14. There is insufficient justification to take land from the green belt to provide for commercial/mixed development related to HS2.
- Hampton Manor at Hampton in Arden, Box Trees Farm at Monkspath, land at Blackfirs Lane at Marston Green and Solihull Riding Club, Dorridge are not suggested development sites in the emerging core strategy.
- The emerging core strategy suggests sites to meet general employment land requirements. Insufficient justification to take Mar House (A34 Monkspath) from the green belt.
- Matters arising from the construction process are not directly a core strategy issue.

Recommendations for the Core Strategy:

Address the range and level of flexibility of uses considered appropriate on employment land through the further development of Emerging Core Strategy policies.

- Include an explanation of the status and purpose of Regional Investment Sites.

- Include the reasoning for taking any land from the green belt land for general business purposes.
- Consider how provision for green infrastructure would be considered in the development of employment sites.
- Further develop the Emerging Core Strategy evidence base to further assess suggested employment sites in terms of highway/transport considerations and appropriateness for employment purposes.
- Consider how archaeological assessment of employment (and other) sites will be taken into consideration through the further development of Emerging Core Strategy policies.
- Undertake a level 2 flood risk assessment of development sites.
- Consider the nature, extent and purpose of developer contributions through the further development of the Emerging Core Strategy.   .
- Further consider whether there is justification for identifying Major Developed Sites in the green belt through the further development of the emerging core strategy.

Chapter 6 - Emerging Policies & Proposals

Policy 7 – Meeting Housing Needs

Representations received:

EX: 21, 31, 44, 68, 76, 77, 88, 89, 91, 98, 100, 101, 125, 129, 131, 132, 138, 140, 147-149, 153, 154, 156, 158, 161, 162-164, 166, 170-172, 183, 185, 188, 199, 201, 202, 207-209, 211-213, 217, 219.

CI: 28, 33, 35-37, 40, 52, 57, 61, 66, 73-75, 84, 86, 89, 95, 98, 104, 108-111, 115, 156, 157, 160, 164, 165, 173, 174, 180, 181, 185, 186, 195, 205, 208, 212, 220, 222, 223, 234, 247-249, 251, 252, 256, 258-260, 263, 270, 271, 274-276, 278, 290, 295, 309, 313.

Key issues raised by the above representations:

- Meeting Housing Need - whether the housing mix (tenure and size) sought by the Core Strategy is appropriate.
- Rural Exceptions Sites - whether the Emerging Core Strategy makes adequate provision for communities to develop to meet local needs and whether the rural exceptions site size threshold is appropriate.

Council's response to all representations listed above:

Meting Housing Need
- The Emerging Core Strategy proposes than new housing should reflect need as evidenced by the Strategic Housing Market Assessment and taking account of existing provision in an area. Evidence shows little need for executive housing.
- Providing for mixed communities is one of the key objectives of PPS3 (para.25) and one of the key challenges of the Core Strategy. This cannot be achieved without policy to ensure new provision reflects local need, taking existing provision in the area to meet local need into account.
- Development briefs will be produced and consulted on for each allocated site.

Affordable Housing
- Affordable housing is one of the Core Strategy priority challenges, links to the Housing Strategy will be made in the submission draft.
- The Emerging Core Strategy is policy principles only and includes a direction to maximise the provision of affordable housing. The submission draft will contain detailed policy. An affordable housing target and threshold will be included in the submission draft, but a viability appraisal is required before specific targets and thresholds can be set and this cannot be done until there is more certainty on the location of the allocated sites. This will be available when the submission draft is published.
- The Housing Market Assessment provides evidence of a high level of backlog, current and projected affordable housing need. Of the 17,000 households on the housing waiting list, over 7,000 are assessed as being in priority housing need. The Emerging Core Strategy cannot meet all need, but will contribute towards meeting priority housing need.
- Affordable housing is allocated through 'Solihull Home Options' using the Council's housing allocations policy that defines need. This policy recognises

households who have a local connection to the Borough of Solihull and increases their priority accordingly.

- Solihull Community Housing has ambitions to build 2,000 new affordable homes by 2010. Some suitable sites have been identified in the Elmdon area.
- Between 1979/80 and 2009/10, 7,537 socially rented Council dwellings were lost through the right to buy. Because social rents are significantly below open market values, social housing requires some form of subsidy to make It economically viable. Subsidy might come from the Homes and Communities Agency, the Council or developer profit and can take the form of a grant payment or a land value reduction. As there is no subsidy available to buy off the open market, this option is not currently economically viable. However all methods of funding including those for open market purchase are kept under review by the Council.
- There is no evidence that affordable housing has stifled development, 40% has been achieved on a number of sites.
- National planning policy did not allow Council's to require affordable housing at the time Dickens Heath was granted planning permission. The Emerging Core Strategy proposes the provision of affordable housing is maximised.
- The national planning definition of affordable housing is that it should be available in perpetuity and this can be controlled through the planning permission. A general definition of affordable housing could be included in the submission draft for clarity. Affordable housing has been successfully provided as part of many developments across the Borough.
- Detailed affordable housing policy is included in the Affordable Housing SPG. The SPG will be updated following adoption of the Core Strategy.
- Affordable housing provision is monitored through the Local Development Framework Annual Monitoring Report and we could consider including indicators of affordable housing need in the monitoring framework.
- New build housing is normally more expensive than second hand housing because first occupiers are willing to pay a new build premium. The cost of providing affordable housing is met by land values, not through an increase in new build prices.
- Impact on existing house prices is not a material planning consideration that can be taken into account.

Low Cost Market Housing
- The role of low cost market housing could be further researched and it's role in policy strengthened if appropriate. However, it is unlikely to be desirable to provide low-cost market housing at the expense of affordable housing as this could impinge on meeting priority housing needs.

Supported Housing
- We are working with Solihull Care Trust to greater understand supported housing needs which will be met through an independent living strategy. Evidence from the Extra Care strategy will inform the mix of housing required from developments.

Rural Exceptions Sites

- The proposed rural exceptions site policy makes provision for communities to bring forward sites where there are identified housing needs. This could be extended to include the provision of affordable housing where there is evidence of need to support existing village services and facilities.
- The addition of a general policy to allow communities to meet local development needs for purposes other than affordable housing should be considered further.
- The number of units provided on a rural exceptions site would depend on evidence of need. It may not be appropriate to limit the size of rural exceptions sites to 15 dwellings and this should be considered further.
- The suggested policy for the location of rural exceptions housing is necessarily prescriptive to ensure housing provision in the most suitable locations.
- It is usually only possible for communities to provide affordable housing on green belt land because land values are low. Policy does not rule out provision of affordable housing on non-green belt land within villages if this is viable.

Recommendations

- Consider the introduction of policy to enable communities to meet their own development needs in additional to rural exceptions sites
- Further consider the appropriateness of the rural exceptions site size threshold.

Chapter 6 - Emerging Policies and Proposals

Policy 8 – Maintain a Strong Competitive Town Centre

Representations received:

EX: 8, 12, 15, 18, 21-27, 30-35, 44, 79, 98, 120, 127-129, 131, 135, 140, 141, 147, 152, 164, 166, 168, 174, 177-179, 182, 189, 195, 200, 210-213, 221, 224, 226.

CI: 28, 31, 33-35, 37-39, 42, 44-46, 48-50, 52-54, 56-58, 60-67, 69, 73, 74, 76, 79-87, 89, 90, 92, 93, 95-108, 110-117, 154-167, 170, 173, 174, 177, 178, 180-183, 185-192, 195, 197, 198, 200-212, 215-220, 223-225, 228, 230, 232, 234, 236, 238-243, 246-252, 255-266, 268, 270, 271, 273-278, 289, 290, 292, 293, 295, 297-299, 302, 304, 308-311, 313-318, 322.

Key issues raised by the above representations:

- General support for more shops, offices and housing in the town centre if the quality of the environment is maintained and congestion is managed (question 5a of the questionnaire).
- Concern that the level of development in the town centre will harm its attractive character and/or create traffic congestion.
- Support for the level of development suggested but some have reservations, for example concerning the nature of redevelopment that might threaten attractiveness of the centre and the type of shops that might be attracted.
- Concern that the economic downturn or the current difficulty in letting shops will negate the need for the town centre development.
- Mixed responses on residential development in the town centre. Some agree with it but some consider number of dwellings unrealistic.
- Some concern over level of office development in the Town Centre at a time when offices are not in short supply.
- General support for improved evening economy but some reservations in terms of what it would entail and how it would be policed or a safe environment provided.
- Concern that town centre infrastructure needs to be phased to enable provision of infrastructure in a timely way and to minimise disruption.
- Concern that the hierarchy of centres is not set out as envisaged by PPS4 (including a network of centres and saying what should happen in them.

Council's response to all representations listed above:

- The emerging core strategy seeks to protect the character of the town centre through high standards of urban design (including designing out crime) and protection of its historic core and parkland setting.
- Congestion will be controlled through demand management measures and provision for infrastructure guided by the further development of the evidence base.
- Traffic and highway safety issues in and around the town centre will be dealt with through appropriate traffic control measures.

- The level of development suggested for the town centre has been guided by the evidence base to the Emerging Core Strategy. This guided the amount of retail and office floorspace that needs to be planned for to the year 2026 in the context of main retail centres. The evidence base also considered centres from a qualitative perspective.
- Current government guidance (PPS4) supports strong town centres because they have an important role in creating patterns of development that are sustainable. The guidance considers retail, office and leisure development as main town centre uses that are most appropriately located in town centres.
- The Emerging Core Strategy aims to encourage a stronger evening economy. Agree that the further development of the Emerging Core Strategy should provide further explanation of the nature and management of the evening economy that might attract a broad range of residents (in accordance with PPS4).
- Policy 8 proposes that development is phased to retain the balance of development each side of the High Street and enhance High Street as a principal route.
- Agree that the further development of the Emerging Core Strategy should clarify the issue of phasing more generally. This should be in the context of securing investment, good urban design and other matters such as infrastructure provision, impacts on traders and meeting town centre aims.
- Agree that focusing shops and offices in the town centre will lead to greater employment in the centre.
- Agree that the town centre should be a main focus for retail and business development.
- Agree that minor changes to wording related to Policy 8 should be given consideration to clarify the aim of improving the environment, improving the standards of design (including civic and other space) and enhancing the character of the centre.
- The Emerging Core strategy supports development in the most accessible locations, for example Solihull Town Centre, and which helps to promote more sustainable travel modes such as walking and cycling. Improved public transport links into the centre could include improved connectivity with Solihull Station, bus stops and other facilities.
- The Emerging Core Strategy seeks to focus main town centre uses, including retail, leisure, office cultural and tourism, in Solihull Town Centre.
- Policy 8 is about measures to maintain a strong competitive town centre. Presumption against out of centre retailing is contained within PPS4 and unnecessary to repeat it in the Core Strategy.
- Mixed use could take a variety of forms, for example, might typically be retail at ground floor level with offices/residential above.
- Agree that further development should make it more attractive for business and tourism visitors.
- Agree that the boundary of the town centre, the primary shopping area and the nature of development that should be included in different parts of the centre will need to be considered through the further development of the Emerging Core Strategy in accordance with PPS4.

- The further development of the Emerging Core Strategy should consider the hierarchy of centres in the context of current government guidance in PPS4.
- Car parking in the centre will be considered in the context of the need to enable access by a variety of transport modes and in the context of the centres high level of accessibility.
- Development of the town centre will take on board the issue of flood risk and, where appropriate, flood risk assessment will be undertaken.
- Agree that the Emerging Core Strategy should encourage a broad range of shops to include types that will help to make Solihull Town Centre distinctive.
- The issue of the nature, extent and purpose of developer contributions will be considered through the further development of the Emerging Core Strategy.
- Provision for sport with strong town centre links is already made near Solihull Town Centre (Tudor Grange Leisure Centre). A sports facilities study is being undertaken as part of the Core Strategy evidence base to establish need for facilities.
- Pricing of public transport and road markings are not matters for the Core Strategy.
- The evidence base that guides the level of retail floorspace planned for in the Emerging Core Strategy will be updated, including future capacity for comparison and convenience retailing as appropriate.
- The emerging core strategy seeks to enable town centre uses in Solihull Town centre and in other accessible centres. Out of centre retailing is not precluded but would need to meet tests set in government guidance.
- The emerging core strategy seeks to strengthen Solihull Town Centre and other centres, such as Shirley and Chelmsley Wood town centres (Policy 10).

Recommendations for the Core Strategy:

- Provide further explanation of the nature of the evening economy, and its management, that will aim to attract a broad range of residents.
- Through the further development of the Emerging Core Strategy clarify the nature, purpose and context of phasing.
- Agree that changes to wording related to Policy 8 should be further considered to clarify the aim of improving the environment, improving the standards of design (including civic and other space) and enhancing the character of the centre.
- Through the further development of the Emerging Core Strategy consider the appropriate boundary of the town centre, the primary shopping area and the nature of development that should be included in different parts of the centre.
- Through the further development of the Emerging Core Strategy consider the hierarchy of centres in the context of current government guidance in PPS4.
- Consider how a broad range of shops could be attracted to the town centre that would include types that would make the town centre distinctive.
- Consider the nature, extent and purpose of developer contributions through the further development of the Emerging Core Strategy.

Chapter 6 – Emerging Policies and Proposals

Policy 9 – Support Economic Success

Representations received:

EX: 32, 33, 34, 35, 94, 95, 128, 132, 141, 152, 168, 170, 173, 174, 178, 186.

CI: 113, 305.

Key issues raised by the above representations:

- The Emerging Core Strategy should enable flexibility of uses on important business sites to enable adaptation to changing economic circumstances.
- The importance of the NEC should be acknowledged and a broad range of development should be enabled within it to support role and function (including mixed use and ancillary/complementary uses).
- Comprehensive planning should be undertaken for the locality of the Airport, NEC and Birmingham Business Park in the context of High Speed Rail 2.
- Support for acknowledgement of the importance of Birmingham Airport and the NEC and other economic assets.
- Economic growth should be required to mitigate impacts on emergency services (to contribute towards infrastructure requirements of emergency services).

Council's response to all representations listed above:

- The Emerging Core Strategy seeks to control development on Birmingham and Blythe Valley Regional Investment Sites. Policy 9 suggests mainly B1 use but would enable complimentary/ancillary uses of a suitable scale to serve park occupiers. Further consideration could be given through the further development of the Core Strategy to whether the main use of the sites should be broader than B1.
- The Emerging Core Strategy enables a broad range of developments within Birmingham Airport and the NEC to support role and function but seeks to restrict ancillary/complimentary developments to an appropriate scale. Further consideration could be given to the detailed wording of Policy 9 to ensure that the appropriate level of flexibility is provided balanced against environmental considerations.
- Agree that the emerging core strategy should consider whether the flexibility in uses proposed on Regional Investment Sites should be afforded to other important managed sites. Residential use may not be appropriate as it would not necessarily support sustainable development principles.
- The second bullet in Policy 9 appropriately seeks to 'control' development on Regional Investment sites rather than 'manage' as it better reflects the need to ensure that the sites meet their intended purpose.
- The Emerging Core Strategy seeks to ensure that key economic assets, which generate prosperity and substantial numbers of jobs in the Region, are able to meet the development needs that support them subject to environmental and other considerations. The further development of the Core Strategy will provide further guidance on the nature of supporting development that would be enabled.

- The Emerging Core Strategy (Policy 14) supports the principle of HS2. It would be premature to carry out comprehensive planning for the locality of the Airport, NEC and Birmingham Business Park in the context of the new line which has yet to be put through a formal process of public consultation.
- Car parking requirement for different types of development is dealt with in a separate development plan document (currently in the process of review).
- The issue of the nature, extent and purpose of developer contributions will be considered through the further development of the Emerging Core Strategy.
- Agree that the further development of the emerging core strategy should acknowledge the importance of waterways in promoting tourism and in supporting employment and businesses.
- The Borough's economic assets provide some jobs for residents of North Solihull. The emerging core strategy seeks to provide a broad range of jobs accessible from the North Solihull regeneration zone.

Recommendations for the Core Strategy:

- Further consider whether the main use of the Regional Investment sites should be broader than B1.
- Further consider the detailed wording of Policy 9 to ensure that the appropriate level of flexibility of development is afforded to the Airport and NEC balanced against environmental considerations.
- Address the issue of developer contributions through the further development of the Emerging Core Strategy.
- Consider whether flexibility in uses afforded to Regional Investment Sites should be afforded to other important managed sites.
- Consider the nature, extent and purpose of developer contributions through the further development of the Emerging Core Strategy.
- The importance of waterways in promoting tourism and in supporting employment and businesses should be acknowledged through the further development of the Emerging Core Strategy.

Chapter 6 - Emerging Policies and Proposals

Policy 10 – Ensure a Range of Quality Local Services

Representations received:

EX: 48, 73, 127, 131, 141, 148, 156,160,170, 176, 177, 186.

CI: 66, 173, 177, 224, 258, 300.

Key issues raised by the above representations:

- General support for Policy 10, ensuring a range and quality of local services.
- Concern that action is needed to resist the loss of village shops and services.
- Reference made to localism bill and to referencing village plans in the Core Strategy.
- Opposition/support expressed regarding a number of development proposals (not specifically referenced in the Emerging Core Strategy)

Council's response to all representations listed above:

- The further development of the Emerging Core Strategy should take account of any implications that emerge from the localism bill including the relationship between the core strategy and village plans.
- Further development of the Emerging Core Strategy should give further consideration to the role and function of Knowle centre (and other centres) and whether any specific measures are needed to support it.
- Agree that important village shops/facilities serving day to day needs should be supported and retained where practicable. Policy 10 includes this principle. Consideration could be given to its further development.
- Agree that key facilities should wherever practicable be linked to sustainable transport modes. This is a principle in the Emerging Core Strategy (Policies 2 and 14).
- Parking is referenced in Policy 13. It is an issue to be dealt with in a separate development plan document.
- Policy 10 includes the principle of strengthening Shirley (and Chelmsley Wood) town centre. Further consideration should be given to any specific proposals or quantum of development that should be planned for having regard to the evidence base.
- Agree that larger scale development should be located in centres of an appropriate size. This is already a principle of government guidance (PPS4). Policy 10 of the emerging core strategy includes the principle, for Knowle and in smaller centres, that the scale and nature off proposals should reflect the role and function of a centre.
- Policy 8 seeks to focus retail and other main town centre uses in Main centres, particularly Solihull town centre. This should help to promote accessibility and encourage a broad range of services. High density housing and other development will be subject to strong urban design measures.
- The emerging core strategy seeks to help local farms and communities by enabling appropriate employment/business opportunities in settlements and through the conversion of farm buildings.

- The former PowerGen site near Shirley Town Centre is the subject of a development brief that encourages redevelopment for mixed uses, including employment use. It does not encourage retail development.

Recommendations for the Core Strategy:

- Take account of any implications of the localism bill including the relationship between the core strategy and village plans, through the further development of the Emerging Core Strategy.
- Give further consideration to the role and function of Knowle centre (and other centres), and whether any specific measures are needed to support it (them), through the development of the emerging core strategy.
- Give further consideration to supporting/retaining important village shops/facilities serving day to day needs through the further development of the emerging core strategy.
- Through the further development of the emerging core strategy, give further consideration to whether further guidance is needed to support the principle of strengthening Shirley (and Chelmsley Wood) town centre. This should be guided by the evidence base.

Chapter 6 - Emerging Policies & Proposals

Policy 11 – Provision for Open Space, Children's Play, Sport and Recreation

Representations received:

EX: 6, 12, 18, 30-32, 34, 44, 56, 73, 81, 93, 98, 120, 124, 129, 131-133, 140, 141, 147, 148-153, 155, 156, 163, 166, 180, 185, 187, 189, 195, 198, 216, 221.

CI: 28, 31, 33-35, 37-39, 42, 44-46, 48-50, 53, 54, 56-58, 60-69, 73, 74, 76, 79, 80-87, 89, 90, 92, 93, 95, 98-100, 102, 103, 105, 106, 108-117, 154, 156, 157, 159-167, 170, 173, 174, 177-183, 185-192, 195-198, 200-212, 215-220, 223-225, 228, 230, 232, 234, 236, 238-244, 247-251, 255, 256, 258, 259-268, 270-271, 273-277, 289, 290, 292, 293, 295-299, 302, 305, 307-319, 322.

Key Issues Raised by the Above Representations:

- Many respondents highlighted the value of green space for health and wellbeing and its contribution to the attractiveness of Solihull, particularly in the rural area.
- There was a strong objection to loss of green space within the Borough.
- A significant number of respondents disagreed that some development of green space should be allowed where adequate replacement or enhancement of provision is made. However, there was also some support for the approach in Policy 11.
- Several respondents identified a need for enhancement of and improved access to local green space, sports and recreational facilities and a shortage of facilities in some areas, including those for young people.
- Several sites have been suggested for sports and recreational uses and others for relocation. The Rugby Football Union (RFU) highlight that playing pitches should be protected, particularly at Sharman's Cross Road.
- Concern that the Green Spaces Strategy is unsound.
- Additions to the evidence base are required; an updated Green Spaces Strategy and an audit of existing facilities and land used for sport.
- A need for a formula to calculate on and off site public open space contributions arising from new development, including care homes, has been identified.
- Some highlighted the continued need for a Canal Strategy to provide guidance and/or sites for marina and moorings developments, which may be required to realise the canal's potential for tourism. The Core Strategy needs to recognise that the fixed nature of canals will dictate the location of supporting infrastructure which may conflict with the objective of focusing development in the urban area. The multifunctional nature and biodiversity value of canals should also be highlighted in Policy 11.
- There has been a request for all Council owned sporting land to be highlighted in the LDF and put into a charitable trust to protect the land for sports purposes.

Council's Response to all of the representations listed above:

- The description of Solihull Today, Challenge C, the Vision for Solihull in 2026 and Policy 11 all recognise the value of public open space and the green infrastructure network for health and wellbeing and its contribution to the character of Solihull.

- Policy 11 requires a presumption against loss of open space unless it is clearly surplus to requirements or where the development's contribution to wider strategic objectives clearly outweighs the benefits of the open space, for example, the regeneration of North Solihull. The policy reflects the approach in PPG17 (Para. 10-13) acknowledging that in some circumstances development of green space may be required to secure improvements to existing open space or remedy deficiencies in provision.

- The Core Strategy focuses development firstly in the NSRZ and most accessible areas within the Urban West and proposes to phase housing development in the Rural Area to the end of the plan period. Where development is proposed on open space or would result in the loss of a sports facility Policy 11 will require appropriate compensatory measures to mitigate the loss which could include quantitative or qualitative improvements; replacement or enhancement of green space in the surrounding area.

- Several consultation responses have identified needs for additional or improvements to green space provision, sports and recreational facilities in the locality, however, it is not appropriate to support individual typologies of green space listed in the adopted Green Spaces Strategy in Policy 11. All development proposals will be assessed against the standards and priorities for action highlighted in the Green Spaces Strategy and the forthcoming Indoor Facilities Strategy and will be required to address deficiencies in existing facilities. Where applicable, proposals will also be required to consider green infrastructure and address fragmentation of the network in accordance with the priorities outlined in the Green Infrastructure Study. All evidence base studies referred to in the draft Core Strategy will be available at the submission stage.

- The Council will work with local communities and Sport England to bring forward land to address identified needs for sport and recreation. Proposals for sport-led mixed use development will also need to comply with relevant town centre policies in the Core Strategy.

- The adopted Green Spaces Strategy states that there is sufficient space for football and rugby pitches within Zone 3 (Shirley) but insufficient space for cricket.

- The Green Spaces Strategy was developed through consultation with stakeholders and a household survey and it was required to comply with PPG17. Recognise that it needs to be updated and an Indoor facilities Strategy is currently being developed.

- The Council has been unable to find the resources to produce a Canal Strategy since adoption of the UDP and it is unlikely that such resources will be found in the future. Consider that British Waterways' documents provide appropriate guidance to conserve the canal network. Evidence suggests a need for offline moorings in Solihull, however, the location of the Borough's canals means that it would be likely that sites would be located where such development would be inappropriate and harmful to the Green Belt. It is not

proposed to allocate sites for off-line moorings through the Core Strategy or a DPD.

- The request for Council owned sporting land to be placed into a charitable trust for its protection is not a matter that the Core Strategy can address. Request will be referred to Leisure Services.
- The Council has increased the amount of open space in Marston Green through the creation of Marston Green Park. Policy 11 seeks to ensure that new development maintains an adequate supply of open space and provides for the increased demand on existing facilities.
- The Green Spaces Strategy provides accessibility standards for different green space typologies, including allotments and requires new green space to be provided where the standard is not currently achieved.
- The Indoor Facilities Strategy will be completed to inform the draft Core Strategy and we will consider revising the Green Spaces Strategy and producing an audit of existing facilities and land for sport which includes temporary uses.
- It is considered that Policy 12 addresses the management of green space for biodiversity value.

Recommendations for the Core Strategy:

- Develop the policy further by making it clear that open space, sports and recreational facilities are valued within Solihull and that high quality open space and facilities of a particular value to a local community, will be protected (PPG17, Para. 11).
- Consider the appropriateness of the identified sites for sport and recreational uses and whether they should be included in the Core Strategy. The developer for the Sharman's Cross site to submit a site proposal form to promote the site for alternative uses in the LDF.
- Consider the need to assess the impact on green infrastructure in the site selection process.
- Include a reference to the Green Flag standard for parks to Policy 11 to continue to encourage all parks within Solihull to achieve high environmental standards.
- Change references to green space throughout the ECS to 'open space' to accord with the terminology in PPG17.
- Consider amending the wording of bullet point 2 of Policy 11 to include enhancement of green space.
- Consider adding references in Policy 11 to requiring 'meaningful' open space in new development and highlighting its multi-functional nature.
- Include a policy in the draft Core Strategy to provide guidance on planning obligations.
- Agree to amend wording of Policy 11 bullet point 6 to; 'Support proposals that encourage greater recreational use and enhancement of the *river and* canal networks, whilst safeguarding *their biodiversity value*, heritage and natural environment'. Consider the appropriateness of adding a reference in to Policy 11 which supports the value of waterways for tourism in the Rural Area,
- Consider adding a reference to the Woodland Access Standard to Policy 11.

- Consider adding a reference in Policy 11 requiring new sport and recreational facilities to be located in areas of high accessibility by walking, cycling and public transport and consider the appropriateness of encouraging the development of a Sports Hub in the Borough.
- Consider adding a reference in Policy 11 supporting the enhancement of existing sports facilities.
- For clarity, consider separating policies on the protection of open space and the creation of open space in new development.

Chapter 6 - Emerging Policies & Proposals

Policy 12 – Natural Environment

Representations received:

EX: 98, 127, 128, 130-133, 145, 151, 160, 170, 171, 210-213.

CI: 34, 66, 84, 108, 181, 219, 265, 296, 299, 305.

Key issues raised by the above representations:

- Support for various aspects of the Policy.
- Natural England seeks the inclusion of a link between the policy on the natural environment and the challenges and objectives in the Core Strategy.
- The Environment Agency seeks a policy relating to protection of water quality and resources.
- Concern that the natural environment is not given the priority it needs, and conversely that protection of sites should be limited to those found to comply with appropriate criteria.

Council's response to all representations listed above:

- Conservation of the natural environment is not identified as specific to the Borough, but could consider the need for a reference in the challenges and objectives.
- Need for policy guidance on water quality and quantity, to cover foul and sustainable drainage, refer to flood risk, River Basin and Catchment Flood Management Plans and contribute to the requirements of the Water Framework Directive, to be considered in consultation with key stakeholder. Will continue engaging with water company over impact of new development on water so as to finalise the Water Cycle study.
- Policy direction to be further developed, but need to make clear that it applies to both urban and rural areas.
- Policy to include protection of countryside, protection and enhancement of landscape and biodiversity, development of green infrastructure and protection, enhancement and creation of assets. Level of detail to be determined.
- Consider need for specific policy reference to Green Belt.
- Policy to include protection for ancient woodland as an irreplaceable natural resource.
- Policy includes the protection, management and enhancement of wildlife sites and the provision of accessible natural green space. Local nature reserves and allotments are amongst the typologies covered by the Green Spaces Strategy and provision for new sites is included as priority where relevant, and covered in Policy 11.
- Policy seeks to protect wildlife corridors, trees and woodlands, and could be cross referenced with Policy 11 on accessible natural green space, whilst protection for suburbs is included in Policy 3.
- Agree need to make reference to local biodiversity action plan habitats and species and to the evidence base, including the Green Infrastructure study,

Countryside, Green Spaces, Nature Conservation and Woodland Strategies, and Habitat Biodiversity Audit data.

- Hedgerows considered to be included within generic reference to biodiversity, but could be included after reference to woodlands.
- Policy recognises the role of the natural environment in mitigating flood risk and urban heating and will take account of guidance in PPS1 Supplement in relation to renewable energy.
- Consider whether there is a need for further guidance on the natural environment and landscape.
- PPS9 advises that networks of natural habitats provide a valuable resource and potential wildlife sites are part of this resource. New local wildlife sites to be identified in accordance with agreed site selection criteria through the Habitat Biodiversity Audit Wildlife Sites project.
- Criteria should include mitigation for any environmental damage
- Policy seeks to conserve natural environment rather than promote growing food, but could consider the need for guidance on growing or sourcing food locally.
- High Speed 2 proposal will need to ensure protection of water quality of river Blythe and footpath network. Provision of signs on green spaces may be informative or deemed consent, but could seek to clarify issue with stakeholder.
- Promoting or subsidising local ethical and biodegradable products are not matters that can be addressed through the core strategy.

Recommendations for the Core Strategy:

- Consider the need for a link between the challenges and objectives and the policy by inclusion within an existing or a separate challenge.
- Consider the inclusion of a water quality policy as part of policy or as a separate policy covering water quality and quantity, and flood risk, in consultation with key stakeholder, and take account of recommendations and requirements of existing and emerging technical evidence.
- Need to make clear that Policy 12 applies to both urban and rural areas.
- Consider the level of detail on protection of countryside, protection and enhancement of landscape and biodiversity, development of green infrastructure and protection, enhancement and creation of assets, in consultation with landscape and ecologist.
- Consider need for reference to Green Belt, but probably as a separate policy.
- Include reference to local biodiversity action plan habitats and species in the policy and to the evidence base, including the Green Infrastructure study, Countryside, Green Spaces, Nature Conservation and Woodland Strategies, and Habitat Biodiversity Audit data in the policy and/or the supporting text.
- Consider including reference to hedgerows after woodlands to make clear included in policy.
- Consider whether there is a need for further guidance on the natural environment and landscape.
- Include mitigation for any environmental damage in criteria for new development proposals.
- Consider need for guidance on growing or sourcing food locally.

Chapter 6 - Emerging Policies and Proposals

Policy 13 – Managing Traffic Demand and Reducing Congestion

Representations received:

EX: 2, 18, 28-31, 33-35, 43-44, 45, 79, 94, 98, 120, 127, 128, 129, 131, 132, 137, 138, 141, 148, 155, 156, 160, 161, 168, 171, 173, 175, 186, 189, 195, 200, 224.

CI: 28, 31, 33-35, 37-39, 42, 44-46, 48-50, 53, 54, 56-58, 60-69, 73, 74, 76, 79-87, 89, 90, 92, 93, 95, 98-105, 109-112, 114-117, 157-167, 170, 173, 174, 177-191, 195-197, 200-212, 214-220, 223-225, 228, 230, 232, 234, 236, 238-244, 246, 249, 250, 252, 256-258, 260-262, 265-268, 270, 273-277, 283, 289, 290, 292, 293, 295-299, 302, 304, 307-318, 322.

Key issues raised by the above representations:

- General support for new investment in public transport, cycling and local measures to reduce traffic congestion rather than major new road building.
- General support for locating development where it will support sustainable transport.
- Some opposition to retention of bypass lines but also some support for road building.
- Concern that more information should be provided on planning for highway/transport infrastructure, phasing and funding and on developer contributions.
- Some concerns that resources might be better spent on maintaining roads and existing facilities rather than on managing traffic demand/congestion.
- Concern that Policy 13 measures may not negate the need for more road building.
- Some support for Park and Ride.
- Concern that further guidance is needed on highway issues and phasing and funding for infrastructure.
- Some specific locations put forward where traffic/congestion/parking measures are needed including Marston Green, Knowle and Solihull Town Centre.
- Concern that improving public transport and/or cycling facilities may not persuade people to use them.

Council's response to all representations listed above:

- Policy 13 is about managing traffic demand and reducing congestion. Further development of the Emerging Core Strategy should consider how green infrastructure issues and mitigation of the impacts of highway infrastructure should be addressed.
- The further development of the Emerging Core Strategy will develop the approach to managing traffic demand and reducing congestion, including in the Town Centre, guided by the evidence base.
- The issue of whether bypass lines will be retained will be considered through the further development of the Emerging Core Strategy.

- The evidence base to the Core Strategy will include an assessment of transport/traffic impacts on highway infrastructure.
- Issues of phasing and planning for infrastructure will be considered further through the development of the Emerging Core Strategy informed by the evidence base and in consultation with the Highways Agency.
- Delivery of the core strategy and developer contributions will be an issue for the further development of the emerging core strategy.
- The issue of traffic infrastructure and measures needed to alleviate congestion around Solihull Town Centre will be further considered through the development of the Emerging Core Strategy,
- Managing traffic Demand and Reducing congestion will not necessarily preclude all road building. Existing roads will continue to be maintained.
- The Council will consult further with Centro on relevant issues concerning public transport. This can include public transport provision issues in transport corridors, Park and Ride, measures to relieve congestion and accessibility issues.
- The Emerging Core Strategy is concerned with providing the broad policy framework for managing traffic demand and reducing congestion. It does not deal with specific individual locations where measures would be implemented.
- Cycle lanes are built to recognised standards. The Council is keen to improve provision for cycling, including dedicated cycleways, where this can be done safely and where resources are available.
- Improved public transport and cycling facilities will encourage greater use of these modes of transport.
- The Emerging Core Strategy will seek to support supports local park and ride at appropriate railway stations as a means of reducing congestion and encouraging public transport use for the main part of journeys.
- Agree that A45 Could be added to the list of key transport corridors in Policy 13.
- Policy 2 seeks to encourage patterns of development that are sustainable and which will reduce traffic by encouraging less reliance on car travel.
- Policy 2 seeks to establish general measures to promote accessibility rather than provide a commentary on the merits of different transport modes
- Car parking issues will be dealt with through a separate supplementary planning document.
- Smarter transport choices are likely to be a subject for transport assessments/green travel plans attached to new developments. The smarter routes approach could be applied outside main corridors in appropriate circumstances.
- The Emerging Core Strategy will aim to be compatible with the LTP and LEA and also the Sustainable Community Strategy. It will also aim to be compatible with current government guidance and agencies as relevant.
- Traffic impacts of development will be dealt with through transport assessments.
- Further development of the Emerging Core Strategy will deal with the general approach to park and ride and with the choice of stations.

- The location of development should, wherever practicable, support sustainable development principles. This is an aim of government and is rightly an aim of the Emerging Core Strategy.
- Traffic management measures should, in principle, be applied to alleviate traffic congestion at schools.
- Traffic management measures should be considered where congestion/highway safety is a significant issue.
- The result of not having traffic management measures could be traffic congestion and/or reduced highway safety.
- Improving public transport, particularly in rural areas, can be difficult for the Council because viability of services can be an issue and agencies that provide public transport are not in the direct control of the Council. Provision of better public transport is encouraged in the Core Strategy through creating development patterns that support sustainable development principles and sustainable transport.
- The Emerging Core Strategy clearly provides the Council's position in regard to the MSA issue (Policy 13).
- The LDF,LTP and the LEA will be complimentary to each other.
- The emerging core strategy does not seek to penalise road users. Reducing congestion will benefit road users and will help to ensure Solihull remains an attractive place to invest.
- Improvements to the public realm in the A34 and A41 corridor should enhance the character of the roads.
- Underground car parks and road tunnels are not precluded by the Emerging Core Strategy but costs may preclude these as general options and they would not necessarily assist in managing traffic demand.
- Whether or not the road system at Dickens Heath is stressful/dangerous is not specifically a matter for the Core Strategy.
- Provision of speed cameras is not an issue for the Emerging Core Strategy.

Recommendations for the Core Strategy:

- Consider the issue of whether bypass lines will be retained through the further development of the Emerging Core Strategy.
- Consider how green infrastructure issues and mitigation of the impacts of highway infrastructure should be addressed through the further development of the Emerging Core Strategy.
- Add A45 to the list of key transport corridors in Policy 13.
- Consult further with Centro on relevant issues concerning public transport, including public transport provision issues in transport corridors, Park and Ride, measures to relieve congestion and accessibility issues.
- Consult further with the Highways Agency over issues of phasing and planning for infrastructure to inform the further development of the Emerging Core Strategy.
- Further development of the Emerging Core Strategy will further consider the general policy approach to park and ride and choice of stations through the further development of the emerging core strategy.

- Develop the approach to managing traffic demand and reducing congestion, including in and around the Town Centre through the further development of the emerging core strategy.
- Further consider delivery of the core strategy and the nature of developer contributions though the further development of the emerging core strategy.
- Consider the issue of traffic infrastructure and measures needed to alleviate congestion around Solihull Town Centre through the further development of the Emerging Core Strategy.

Chapter 6 - Emerging Policies and Proposals

Policy 14 – Supporting Sustainable Transport

Representations received:

EX: 6, 12, 94, 98, 120, 128, 131, 137, 138, 141, 152, 154, 160, 161, 166, 168, 170-173, 175, 210-213, 221, 224-227.

CI: 28, 31, 33-35, 37-39, 42, 44-46, 48-50, 53, 54, 56-58, 60-65, 67-69, 73, 74, 76, 79-87, 89, 90, 92, 93, 95, 97-106, 108-111, 113-117, 155-167, 170, 173, 174, 177-191, 195-212, 214-220, 223-225, 228, 230, 232, 234, 236, 238-244, 246-252, 254-268, 270, 273, 274, 276-278, 283, 289, 290, 292, 293, 295-299, 302, 304, 305, 307-318, 322.

Key issues raised by the above representations:

- General support for new investment in public transport, cycling and local measures to reduce traffic congestion rather than major new road building
- General support for promoting sustainable transport.
- Support for improving bus and rail services generally, especially those serving rural areas.
- Support for better public transport links to developments/facilities.
- Some concerns over reliability and affordability of public transport (various particular locations mentioned for improvement).
- Some support for metro links from Birmingham Airport to Birmingham City centre (including Birmingham Airport and the City Council).
- General support for improving cycling facilities, especially for dedicated cycleways. Some concern about the safety of cycling and the safety of existing cycle routes.
- Mixed response to HS2 some support and request further emphasis and planning for the line. Others concerned about possible impacts.
- Support for improving North-South Links within the Borough.
- Some specific locations put forward where traffic/congestion/parking measures are needed including Marston Green, Knowle, Solihull Town Centre, Castle Bromwich (these are dealt with under policy 13 responses).

Council's response to all representations listed above:

- Policy 13 seeks to support local park and ride at appropriate railway stations as a means of reducing congestion and encouraging public transport use for the main part of journeys.
- The further development of transport polices should include further consultation with Centro on relevant issues concerning public transport, including public transport provision issues in transport corridors, Park and Ride, measures to relieve congestion and accessibility issues.
- The further development of transport polices should include consultation with the Highways Agency (and Network Rail) over issues of phasing and planning for infrastructure to inform the further development of the Emerging Core Strategy.

- The further development of transport polices should include consultation with Birmingham City Council to ensure that there is consistency with those of the Birmingham Core Strategy.
- The further development of the Emerging Core Strategy will consider the affects of development on infrastructure requirements including highway infrastructure needed to control and limit congestion.
- Agree that minor changes to wording in Policy 14 should be considered to clarify/improve reference to walking and cycling.
- The Emerging Core Strategy supports development in locations well served by public transport or where good public transport can be provided/sustained. It would not reflect government policy to enable development in other locations unless it was of a nature that served a local need and travel was not a significant issue.
- The Emerging Core Strategy generally seeks to reduce car dependency and the need to travel in order to reduce CO2 emissions. This could lead to better health and less pollution but these are not necessarily the main aim of more sustainable travel modes.
- The location of development should, wherever practicable, support sustainable development principles. This is an aim of government and is rightly an aim of the Emerging Core Strategy.
- Improved public transport and cycling facilities will encourage greater use of these modes of transport.
- Focussing further retail and other commercial uses on motorway junctions would not necessarily support sustainable development principles and could put further pressure on the strategic highway network.
- The emerging core strategy is focussed on supporting sustainable development principles, including sustainable travel modes. Planning applications will be considered in the context of the Core Strategy (and other development plan documents).
- Improving public transport, particularly in rural areas, can be difficult because viability of services can be an issue and agencies that provide public transport are not in the direct control of the Council.
- Provision of better public transport is encouraged in the Core Strategy through creating development patterns that support sustainable development principles and sustainable transport which should lead to better more viable public transport and may encourage a greater diversity in public transport routes.
- The Core Strategy aims to enable less reliance on private cars by making developments accessible by alternative transport modes or by reducing the need to travel. It is difficult to meet the needs of all groups/individuals but the Core Strategy will be as inclusive as possible. To this end a fair Treatment Assessment will be undertaken.
- A separate development plan document will set out requirements for car parking and access and this will include requirements for provision for the disabled.
- The Council is keen to improve provision for cycling and walking, including dedicated cycleways, where this can be done safely and where resources are available.

- HS2 is in its early stages and has yet to undergo formal public consultation by the government. If it remains a proposal it is unlikely to come to fruition until either late in the Core Strategy timeframe or beyond it. In these circumstances the Emerging Core Strategy should not go further than to reflect the position of the Council i.e. in principle support for the line and its station.
- Further development of the Emerging Core Strategy will consider the North – South links issue and whether to specifically highlight Solihull Station/bus interchange.
- Delivery of the Core Strategy and the issue of developer contributions will be an issue for the further development of the Emerging Core Strategy.
- Agree that the further development of the emerging core strategy should acknowledge the importance of waterways in widening travel choices.
- The emerging Core Strategy is a policy directions document. Policies within it, including those related to transport will be further developed as necessary to provide greater level of guidance.
- The Core Strategy is concerned with broad policy and strategic development proposals. It will not necessarily comment on less strategic issues.
- Existing roads will continue to be maintained.
- The plan supports proposals, by Centro, to improve rail services at Whitlocks End, to encourage more journeys to be made by train. Improvements to Services to Wythal would be a matter for Centro.
- Underground car parks and road tunnels are not precluded by the Emerging Core Strategy but costs may preclude these as general options and they would not necessarily assist in managing traffic demand.
- Provision of speed cameras and public transport fares are not issues for the Emerging Core Strategy.
- Reducing car dependency and encouraging public transport use are already aims of the Emerging Core Strategy.
- Policy 14 is about the broad policy framework for supporting sustainable transport. The development of specific cycling/walking routes is not generally a Core Strategy issue.
- The LDF, LTP and LEA will be complimentary to each other.
- Provision for sustainable transport will be an issue for the consideration of appropriate planning applications through transport assessments. Not directly a core strategy issue.
- Support/encouragement of sustainable transport will help to maintain the attractive character of the Borough, particularly if congestion is reduced and accessibility is improved.

Recommendations for the Core Strategy:

- Consult further with Centro on relevant issues concerning public transport, including public transport provision issues in transport corridors, Park and Ride, measures to relieve congestion and accessibility issues.
- Consult further with the Highways Agency over issues of phasing and planning for infrastructure to inform the further development of the Emerging Core Strategy.

- Consult further with Birmingham City Council on the development of transport policies to ensure that there is consistency with those of the Birmingham Core Strategy.
- Consider further through the development of the Emerging Core Strategy the affects of development on infrastructure requirements, including highway infrastructure needed to control and limit congestion.
- Consider minor changes to wording in Policy 14 to clarify/improve reference to walking and cycling.
- Consider further, through the development of the emerging core strategy, North –South links issues and whether to specifically highlight the role of Solihull Station/bus interchange in this regard.
- Consider further, through the development of the Emerging Core Strategy, the issue of infrastructure requirements and developer contributions.
- Consider the importance of waterways in widening travel choices through the further development of the emerging core strategy.

Chapter 6 - Emerging Policies & Proposals

Policy 15 – Conservation of Heritage Assets and Local Distinctiveness

Representations received:

EX: 93, 98, 131, 132, 137, 139, 141, 143, 144, 171, 187, 210-213.

CI: 28, 50, 65, 114, 161, 191, 209, 229, 231, 291, 297, 299, 305.

Key Issues Raised by the Above Representations:

- Strong support for the need to protect heritage in Policy 15, a key feature of Solihull.
- Additional points are suggested for inclusion in Policy 15 and amended wording of the policy is proposed. Alterations include adding further landscape characteristics into the historic environment policy and references to areas of historic character, the Solihull Historic Environment Record (HER), archaeological sites, historic farmsteads and the historic core of Knowle.
- Strong concern that it is not clear what baseline information has been gathered, considered and applied in the development of the Emerging Core Strategy and the site selection process e.g. Historic Landscape Characterisation, Warwickshire Urban Survey, Settlement Studies and the Historic Farmsteads Project. Concerns regarding the impact on the historic environment at SHLAA sites 187 (Fordbridge), 6, 47, 80 (Hampton-in-Arden), 86 (Dickens Heath), 85, 123 (Knowle), 21 (Marston Green) and the sites submitted in Shirley.
- Concern that there is no reference to archaeology in the Core Strategy or the evidence base. It is recommended that archaeological assessments of each of the suggested sites are undertaken.
- There is support for encouraging the preparation and use of Conservation Area Appraisals and Village Design Statements in the policy.
- The Council should adopt the recommendations of the Hampton-in-Arden Conservation Area Review.
- Some support for the reference to canals in the list of heritage assets to be conserved particularly if it forms part of a wider Canal Strategy. However, the Council needs to be mindful that the policy is not too restrictive so that it discourages improvement and use of the waterways.

Council's Response to all of the representations listed above:

- Agree that the historic environment makes an important contribution to the character of Solihull. Policy 15 seeks to conserve Solihull's historic assets and ensure that new development is responsive to local distinctiveness.
- Policy 15 seeks to conserve the Arden landscape as well as historic parks, gardens and other landscape assets but the Council could consider widening this to include designed landscapes, mature suburbs etc.
- The definition of 'heritage assets' in PPS5: Planning for the Historic Environment (2010) covers buildings, monuments, sites, places, areas or landscapes and, as such, includes Conservation Areas and sites of archaeological interest. However, for clarity, the Council could consider adding *including Conservation Areas and sites of archaeological interest'* to the end of

first characteristic for conservation in Policy 15. Alternatively, this could be outlined in the supporting text to the policy.

- The evidence base, which includes Solihull's HER and the Historic Landscape Characterisation (HLC), was used to identify the key characteristics of Solihull for conservation listed in Policy 15. The final HLC report is required to inform the draft Core Strategy.

- Recognise that the Emerging Core Strategy policies need to be further developed to provide more detail. The draft Core Strategy needs to demonstrate that there is an adequate evidence base for the historic environment and describe the methodology of how it has been used to inform the document and the selection of sites. Need to consider whether this is best included in a supplementary topic paper or the supporting text to the policy.

- As yet, Solihull is not included in the Extensive Urban Survey, which aims to develop a greater understanding of the development of historic settlements within Warwickshire. For Solihull, this would include Solihull, Hampton-in-Arden and Knowle. Need to consider whether the Council should commission the Extensive Urban Survey to supplement the evidence base.

- The Settlement Studies and a Borough wide Characterisation study are being finalised and will be used to inform the draft Core Strategy and published alongside.

- The Historic Farmsteads Project has been published since the Emerging Core Strategy was prepared. Officers will contact Warwickshire County Council to discuss the conclusions of the study and any financial implications of using the results/data to develop the Core Strategy.

- Include the Buildings at Risk and Conservation Areas at Risk registers in the evidence base and use the data to inform the draft Core Strategy and the selection of sites. Solihull has a local list of heritage assets, however, need to consider whether this could be updated with the help of the local community.

- Scheduled monuments are included in the HER, which was used to inform the selection of sites, however, the Council could also consider the impact on potential or undesignated archaeological sites. The need to undertake an archaeological assessment of all suggested sites will be considered.

- Acknowledge the need to support the preparation of Conservation Area Appraisals, as there are only three up-to-date Conservation Area Appraisals in the Borough and suggest this is included in the policy. Policy 3encourages local communities to produce Village Design Statements and it is not necessary to duplicate the reference to these in Policy 15. Village Design Statements will be prepared by communities with guidance from the Council.

- Draft Conservation Area Appraisals for Hampton-in-Arden and Berkswell are due to be published for public consultation shortly. Once published, these will be considered as part of the evidence base and used to inform the draft Core Strategy.

- Consider the policy achieves a balance between the protection of historic character and the viability of development by requiring proposals to conserve all heritage assets as appropriate to their significance, i.e. the most significant assets are afforded the greatest conservation.

- The draft Core Strategy will consider whether it is still appropriate to prepare a Canal Strategy as previously identified in the UDP.

Recommendations for the Core Strategy:

- Consider the need to add a reference to Conservation Areas and archaeology in the list of characteristics for conservation in Policy 15 or clarify that they are included in the definition of heritage assets in the supporting text to the policy.
- Consider the inclusion of historic farmsteads in the list of characteristics for conservation.
- Consider including a reference to the historic core of Knowle in the list of characteristics for conservation.
- Consider the appropriateness of separating and re-wording the last bullet point of Policy 15 and removing the specific reference to the mitigation and adaptation to climate change.
- Include a reference in the policy to encouraging the preparation and use of Conservation Area Appraisals and consider the need for a monitoring indicator on the number of Conservation Areas with up-to-date appraisals, to measure progress.
- Consider including a reference to creating local distinctiveness in the policy, which could be particularly relevant for areas such as North Solihull.
- Need to consider whether the policy contains sufficient guidance to inform appropriate rural diversification.
- Develop Policy 15 to include supporting text, monitoring indicators and appropriate guidance which demonstrates how the conservation of heritage assets will be achieved, for example, by requiring applicants to consult the HER when designing development proposals.
- Consider including a reference in the draft Core Strategy which supports local communities prepare Village Plans and/or Neighbourhood Plans, which are proposed through the Localism Bill.
- Ensure the Infrastructure Delivery Plan (IDP) identifies the ways in which planning obligations such as Community Infrastructure Levy or S106 Agreements can be used to implement the vision for the historic environment.
- Consider the need for a Heritage SPD to provide additional guidance.

Chapter 6 - Emerging Policies & Proposals

Policy 16 – Waste Management

Representations received:

EX: 8, 43, 67, 94, 128, 129, 131, 132, 137, 141, 151, 168, 170, 171, 193.

CI: 83, 109, 177, 191, 208, 248, 257.

Key issues raised by the above representations:

- Some support for general direction and various elements of the emerging policy.
- Some stakeholders seek consideration of resource management rather than waste.
- Need for target to address treatment gap.
- Need for facilities close to where waste arises, ie in North Solihull and Urban West, as well as or as alternative to facilities in rural area.
- Policy should support a wide range of technologies including anaerobic digestion, re-manufacture and repair.

Council's response to all representations listed above:

- Policy covers waste minimisation, re-use and recycling, and reference to waste is consistent with guidance, but could include a reference to the waste hierarchy. Ensure consistency with waste hierarchy.
- Approach seeks to close gap between waste arising in Borough and capacity of waste facilities identified in technical evidence, but could include target relating to the treatment gap.
- Policy to encourage appropriate new and expanded waste management facilities on industrial estates in North Solihull and the Urban West, as well as facilities not appropriate to urban areas in suitable locations in the rural area, but does not identify any sites in or close to Knowle or Dorridge.
- Could add other technologies, such as anaerobic digestion, and re-manufacture and repair.
- Approach is based on encouraging waste minimisation and increasing facilities for alternative forms of management rather than disposal to landfill.
- Further details of capacities and movements, where known or can be quantified, to be included in a background report rather than the policy.
- Consider impact of policies on fly-tipping. Impact of fly-tipping on green spaces in North Solihull will be addressed by policy to rationalise spaces to ensure provide function and improving overall quality.
- Maintains policy in Unitary Development Plan 2006 to support waste management activities at the site at Arden Brickworks, Bickenhill, which was found to be suitable in the Strategic Non Housing Land Availability Assessment.
- Existing waste to energy plant in Coventry will continue into the 2020s, but there are no plans to replace it. The council will look at alternative approaches to increase re-use, recycling and recovery in accordance with the waste hierarchy.

- Policy identifies Berkswell Quarry as suitable for co-location of waste management activities, but could make reference to composting facility and identify on spatial strategy diagram.
- Agree a need to make reference to the impacts of relevant waste management activities on aerodrome safeguarding, the need for site waste management plans for proposed development, the provision for on-site waste management infrastructure, and the need to explore the potential for rail freight connections to facilities.
- Policy recognises the potential of Berkswell and Meriden Quarries for co-location of appropriate waste management facilities and includes area of search for residual facilities, which will be identified on the LDF proposals map.
- Impact of ageing population and of need for supported housing on waste management , and the domestic recycling process more appropriately addressed via the Municipal Waste Management Strategy.
- Mineral Safeguarding Area for coal identified on the eastern edge of the Borough, which explains reference in assessment of Site 79.
- Preparation of the local development framework is a statutory function and hence one of the core activities for the council.
- Consultation on specific waste management proposals not a matter for the Core Strategy.

Recommendations for the Core Strategy:

- Include a reference to the waste hierarchy and encouraging management of waste further up the hierarchy.
- Consider the need for a target to meet the treatment gap or a proportion of it by the end of the Plan period.
- Consider adding other technologies, such as anaerobic digestion that are best located away from urban areas, and re-manufacture and repair, which may be suitable on specified industrial estates in urban areas.
- Consider impact of policies on fly-tipping.
- Consider making reference to composting facility at Berkswell Quarry as suitable for co-location of waste management activities and identify on spatial strategy diagram.
- Include reference to the impacts of relevant waste management activities on aerodrome safeguarding, the need for site waste management plans for proposed development, the provision for on-site waste management infrastructure, and the need to explore the potential for rail freight connections to facilities.

Chapter 6 - Emerging Policies & Proposals
Policy 17 – Minerals

Representations received:

EX: 8, 18, 30-35, 44, 94, 98, 120, 125, 127, 131, 132, 137, 141, 144, 146, 151,152, 154, 169, 189, 193, 195, 225, 226.

CI: 28, 31, 33, 35, 37-39, 42, 44-46, 48-50, 53, 54, 56-58, 61-67, 69, 73, 74, 79-81, 83-87, 89, 90, 92, 93, 97, 98, 99-102, 104, 106, 109-112, 114-116, 155-161, 163, 165-167, 173, 174, 177, 178, 180-183, 185-191, 195, 197, 198, 200-203, 206-210, 212, 215-220, 223-225, 228, 230, 232, 234, 236, 238-243, 256, 258, 260, 262-266, 268, 274, 275, 277, 289, 290, 292, 293, 295-299, 307-311, 313, 316-318, 322.

Key issues raised by the above representations:

- A significant number of respondents support the emerging policy. A number of others have no view or feel there was insufficient information to enable informed comment.
- Need for guidance on any development associated with the extraction of underground coal or coal bed methane.
- Additional sites put forward for consideration for sand and gravel extraction.
- Some concerns about the impacts of mineral extraction and the need to ensure strict controls and restoration.

Council's response to all representations listed above:

- Mineral Safeguarding Areas identified for sand and gravel where evidence suggests there are likely to be viable resources. Request for early discussions if Hockley Heath Parish affected in the future not a matter for the Core Strategy.
- Safeguarding refers to protection of mineral resources from surface development that might sterilise the resources and neither implies nor prevents extraction.
- Guidance indicates that Areas of Search for coal relate to shallow coalfields not deep coal mines. The only coal resources are deep underground, being extracted from Daw Mill colliery. Part of the Mineral Safeguarding Area for coal is covered by permitted development rights associated with the former Coventry Colliery, now proposed for extraction from Daw Mill.
- Areas currently licensed for coal bed methane to be identified in consultation with key stakeholders and any implications of production and processing to be ascertained.
- The core strategy needs to make provision for the sub-regional apportionment of aggregates in accordance with national guidance. The sub-regional apportionment for the metropolitan area takes into account the use of secondary and recycled materials.
- The Core Strategy needs to make provision for a minimum 7 year landbank of aggregates in accordance with national guidance, but could amend reference to sand and gravel landbank to make clear 7 years is a minimum.

- Consider additional sites submitted for potential sand and gravel extraction and identify further preferred areas or specific sites as appropriate.
- Extraction within the preferred area identified would be limited by constraints such as the Site of Special Scientific Interest, heritage assets, local wildlife sites, woodlands, water quality and flooding, and by the need to provide landscaping and buffer zones.
- Identify whether any archaeological interest that would be affected by extraction of preferred area for sand and gravel extraction.
- Whilst deep coal mining takes place from Daw Mill, could include guidance to assist consideration of proposals for any associated surface infrastructure.
- Policy covers mitigation of environmental and transport impacts, but need to ensure that it enables sensitive and effective management of extraction, including compensation for any environmental and transport impacts.
- Policy covers mitigation of environmental impacts, but ensure protection for water quantity and quality included and agree approach with key stakeholder.
- Policy covers mitigation of environmental and transport impacts, but need to ensure that it covers noise pollution, length of extraction, subsidence, screening, dust pollution, controls over lorry routing, working hours and requirements for aerodrome safeguarding.
- Policy requires full restoration, including the potential for enhancing the natural environment and for a range of uses such as recreation, but should ensure that it will contribute to Arden landscape character.
- Guidance on waste management is provided in Policy 16, which recognises that some provision for the disposal of residual waste that cannot be treated further will be required.
- Whilst existing quarries are remote from rail, could include need to consider potential for rail freight connections to mineral sites.
- National guidance advises that mineral extraction need not be inappropriate development in the green belt provided that high environmental standards are maintained and restoration is undertaken.
- The emerging core strategy includes the policy direction only, with further detail to be provided in the draft core strategy which will be subject to consultation in due course.
- Consultation on specific mineral proposals not a matter for the core strategy
- Income from mineral extraction is not a planning matter, although the council is not a significant landowner in areas with known resources.

Recommendations for the Core Strategy

- Identify areas currently licensed for coal bed methane in consultation with key stakeholders and ascertain any implications of production and processing.
- Amend the reference to a sand and gravel landbank to 'a minimum of' 7 years in line with guidance.
- Consider additional sites submitted for potential sand and gravel extraction and identify further preferred areas or specific sites as appropriate.
- Consider any archaeological interest that would be affected by extraction of minerals from the preferred area for sand and gravel extraction.
- Include guidance to assist consideration of proposals for surface infrastructure associated with deep coal mining and to protect local communities.

- Ensure policy enables sensitive and effective management of extraction, including compensation for any environmental and transport impacts.
- Ensure protection for water quantity and quality included and agree approach with key stakeholder.
- Ensure policy covers noise pollution, length of extraction, subsidence, screening, dust pollution, controls over lorry routing, working hours and requirements for aerodrome safeguarding.
- Ensure that restoration of mineral sites will contribute to Arden landscape character.
- Include need to consider potential for rail freight connections to mineral sites.

Miscellaneous Representations

Representations received:

EX: 7, 17, 18, 32-35, 46, 53, 94, 96, 131, 132, 135, 138, 140, 142, 143, 148, 149, 154, 155, 161, 170, 172, 190, 199, 203, 210-213, 218, 225, 227.

CI: 34, 37, 46, 57, 62, 63, 68, 101, 109, 111, 156, 163, 198, 215, 250, 254, 263, 265, 277, 292, 293, 299, 307, 310.

Key issues raised by the above representations:

- Revocation of the Regional Spatial Strategy and its implications for the core strategy.
- Concern that greater emphasis on health issues required.
- Concern about the lack of cultural content.

Council's response to all representations listed above:

- Need to consider the revocation of the Regional Spatial Strategy and sub-regional issues in developing policies, and ensure adequate justification for policies and proposals.
- Health issues included in Challenges and Objectives and in Strategy, but could consider whether further references should be made to reflect its importance. Ensure core strategy informed by the Marmot Review Fair Society, Healthy Lives 2010. Currently health is treated as a cross cutting issue, but could consider whether a specific section would be better. Care Trust and Education representatives are included on the LDF Steering Group, and improving health and reducing health inequalities is one of the objectives in the Sustainability Appraisal.
- Some references to culture and leisure in Policies 8 and 9, but acknowledge that there is a need to give these issues greater emphasis. Consider the inclusion of policy guidance on libraries, museums, art galleries, leisure and entertainment with key stakeholders.
- Crime and affordable housing are already included, but see responses to representations on Chapter 2 Solihull Today and Chapter 3 Challenges and Objectives.
- Sustainability is embedded in the core strategy, which will be subject to a full sustainability appraisal.
- The core strategy is a long term plan that looks beyond short term economic cycles and endeavours to achieve a consensus and reflect the views of as many people as possible.
- The core strategy should not include policies that would promote inappropriate development in the green belt.
- Localism Bill is not yet legislation, and core strategy needs to reflect national and local policy as well as the input from the community. Could promote the preparation of Neighbourhood Plans by local communities in consultation with the Council.
- Supplementary planning documents and village design statements included in Policy 3, but could include parish and village plans in appropriate policies. Need to ensure that the core strategy takes account of relevant policies and

findings in existing parish and village plans, and key issues for parishes where plans not yet in existence. The content of village plans and design statements is a matter for the local community in consultation with the Council.

- Policy 10 seeks to resist the loss of important village services.
- The core strategy seeks to balance the need for development with the protection and enhancement of design quality, local services, green space, the natural and historic environment, and to balance local and wider needs.
- Infrastructure needs and funding, including education, health, community safety and environmental concerns to be addressed in an Implementation Plan, in consultation with key stakeholders and infrastructure providers.
- Consider the need to include policies guiding development control in the core strategy, or in a separate development plan or supplementary planning document, to include the promotion of the use of the West Midlands Sustainability Checklist.
- Amend the references to Birmingham International Airport to Birmingham Airport. Agree that Appendix 3 should differentiate between employment and mineral sites, and that the title of Appendix 4 on the airport expansion land should exclude the word 'main'. Consider the future status of the airport runway extension land, which has been granted planning permission. The airport operator has been consulted as recommended by the Civil Aviation Authority.
- No sports grounds are suggested for possible development.
- The option 1 plan replicates one of the options included in Challenges and Choices. The Alternative Spatial Strategy Options in the core strategy makes clear that the preferred strategy incorporates elements of the other options as well.
- The High Speed 2 rail link is subject to a separate consultation by the Government when any concerns can be raised.
- The role of the farming community in managing the countryside is acknowledged and could be recognised in policy relating to the countryside and green belt.
- See responses to representations relating to Marston Green in Chapter 5 Strategy and Policy 4. The core strategy does not seek to overdevelop any area but to meet the requirements for new development in the most sustainable way.
- Unclear what role the core strategy could have in the digital inclusion agenda.
- Seek input from key stakeholders into the Fair Treatment Assessment to ensure it meets the needs of all groups.
- Protection and enhancement of historic environment assets is included in the objectives of the Sustainability Appraisal.
- The public right of way SL22 north of Grove Road, Knowle would not be blocked by the suggested housing site 12 at Middlefield, as it was diverted to the field edge in 1994.
- The following are not considered to be matters for inclusion in the core strategy; funding for local groups, appropriateness of parish boundaries, enforcement of airport noise restrictions, council house lettings criteria, budget cuts, benefits, adult care spending, population control, land ownership, street furniture, pedestrian crossings, disabled parking and road construction.

- National Grid is included on the LDF consultation database, and to be consulted in appropriate circumstances.

Recommendations for the Core Strategy:

- Consider the revocation of the Regional Spatial Strategy and sub-regional issues in developing policies, and ensure adequate justification for policies and proposals.
- Consider whether further references to health issues should be made to reflect their importance, or whether a specific section would be better, and ensure core strategy informed by the Marmot Review.
- Consider the inclusion of policy guidance on libraries, museums, art galleries, leisure and entertainment with key stakeholders.
- Promote the preparation of Neighbourhood Plans by local communities in consultation with the Council.
- Include references to parish and village plans in appropriate policies and ensure that the core strategy takes account of relevant policies and findings in existing parish and village plans, and key issues for parishes where plans not yet in existence.
- Consider the need to include policies guiding development control in the core strategy, or in a separate development plan or supplementary planning document, to include the promotion of the use of the West Midlands Sustainability Checklist.
- Amend the references to Birmingham International Airport to Birmingham Airport, differentiate between employment and mineral sites in Appendix 3 and delete the word 'main' from the title of Appendix 4 on the airport expansion land, and consider the future status of the airport runway extension land.
- Recognise the role of the farming community in managing the countryside in policy relating to the countryside and green belt.
- Seek input from key stakeholders into the Fair Treatment Assessment to ensure it meets the needs of all groups.

Representations on the Evidence Base

Representations received:

EX: 16, 120, 130, 131, 137, 143-145, 148, 149, 151, 161, 172, 199, 210-213.

Key issues raised by the above representations:

- Concern that some evidence not available or completed.
- Concern that some evidence may be out of date.
- Concern that some policies not based on adequate evidence.

Council's response to all representations listed above:

- Need to update existing evidence where out of date to be considered.
- Reference to the key evidence used for individual policies to be included.
- Viability assessment of core strategy to be undertaken.
- All evidence to be available at submission.
- See response to Policy 7 on housing need.
- Policy 12 to include nature conservation, countryside and woodland strategies, and habitat biodiversity audit.
- Policy 15 to include historic landscape characterisation, extensive urban, farmsteads and historic towns studies, conservation area appraisals, heritage at risk evidence and archaeological information.
- Environmental agencies to be consulted on appropriate evidence base studies.
- Local flood risk management plans to be included in evidence base and the findings to be reflected in the core strategy.
- Consider preparing topic papers to include demonstration how evidence used to develop policies.

Recommendations for the Core Strategy:

- Consider whether there is any need to update existing evidence where out of date.
- Include reference to the key evidence used for individual policies.
- Viability assessment of core strategy to be undertaken.
- All evidence to be available at submission.
- Include nature conservation, countryside and woodland strategies, and habitat biodiversity audit in evidence base for Policy 12.
- Include historic landscape characterisation, extensive urban, farmsteads and historic towns studies, conservation area appraisals, heritage at risk evidence and archaeological information in evidence base for Policy 15.

Representations on the Consultation Process

Representations received:

EX: 2, 3, 5, 16, 38, 39, 49, 66, 77, 100, 120, 123, 142, 148, 149, 153, 154, 156, 160, 161, 225.

CI: 39, 74, 85, 99, 100, 102, 114, 186, 208, 218, 311.

Key issues raised by the above representations:

- Some concerns about the publicity and the consultation process.

Council's response to all representations listed above:

- Deadline for responses was 11 weeks and extended for parish councils and residents associations to 13 weeks in recognition of the compact with parish councils. Late responses have also been accepted.
- All evidence base studies will be available when the submission draft is published.
- All data contained in the settlement studies is publicly available. The settlement studies bring this data together to create a profile for each area. Settlement studies will be available when the submission draft is published and the Emerging Core Strategy is examined.
- All consultation material made clear that alternative sites could be considered. There have been many representations received from residents in areas where there are no suggested sites.
- All site options, and their site appraisals, including the long-term housing sites were part of the consultation.
- The site appraisals have been widely consulted on alongside the policy principles in advance of the draft plan.
- Consultation on the Core Strategy commenced in 2008 with input from the community through the LDF Stakeholder Conference and the preparation and publication of the Issues and Options consultation stage 'Challenges and Choices'.
- The Emerging Core Strategy comprises policy directions and not finalised policies and all community and stakeholder views will be taken into consideration to progress the strategy further.
- In addition to the Council's website and local libraries, the consultation was advertised in local newspapers, the free paper 'Your Solihull' which is distributed throughout the Borough and posters were displayed in the main town centre. Letters were sent to all Ward Councillors and Parish Council Chairs as well as a large number of community groups within the Borough and neighbouring authorities registered on our consultation database. Officers attended and gave presentations at numerous events throughout the consultation period and gave further presentations when asked to do so.
- Our Communications team have been informed of the non-distribution of 'Your Solihull' in the Berkswell Parish last autumn.
- The on-line questionnaire worked successfully on the whole with almost 200 submissions, but comments on the questionnaire options will be considered for any future consultations.

- We have received consultation responses in a variety of formats and all have been taken into consideration.
- Three officers and a number of Planning Aid colleagues were in attendance to answer questions at the Solihull Town Centre 'Drop-In Session'. Attendance was significantly greater than all the other events, increased by the front-page newspaper article the previous day showing the town centre as a Manhattan landscape.
- Consultation has been carried out in accordance with Chapter 2 of The Council's Statement of Community Involvement. With regard to 'Drop-in-Sessions', 'Questionnaires', 'Inviting views in writing', 'One-to-one meetings', notes were taken during public meetings that were attended and recorded. During the drop-in sessions and stakeholder meetings we asked attendees to respond in writing using either the leaflet, on-line questionnaire, in writing or via a local community representative group such as Parish Council.
- Localism Bill not yet legislation, but the Council will consider reviewing its consultation process for future consultations if necessary.
- Will seek to involve community groups where appropriate in developing core strategy.

Recommendations:

- Consider need to have more officers available for Town Centre consultation events.
- Follow-up letters inviting comment will be sent to community, interest groups or stakeholders that have not responded to the Core Strategy.