

# URS

## Sustainability Appraisal Addendum Report

Final

28 June 2013

047042498

Prepared for:  
Solihull Metropolitan  
Borough Council

UNITED  
KINGDOM &  
IRELAND



REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	20 May 2013	Addendum Report revised to take account of proposed modifications to Submission draft Local Plan	Paul Tomlinson Associate	Alex White Senior Consultant	Alex White Senior Consultant
2	27 June 2013	Minor edits following review by Solihull MBC	Paul Tomlinson Associate	Alex White Senior Consultant	Alex White Senior Consultant

REVISION RECORD					
Rev	Date	Details	Prepared by	Reviewed by	Approved by

URS  
 15<sup>th</sup> Floor, The McLaren Building  
 46 The Priory Queensway  
 Birmingham  
 B4 7LR

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# 1. INTRODUCTION

## 1.1 Local Plan

- 1.1.1 This document is the Sustainability Appraisal Addendum Report that accompanies the Submission Draft Local Plan plus Proposed Modifications being prepared by Solihull Metropolitan Borough Council ('the Council'). It follows from an Interim SA Report prepared on the Emerging Policies in 2008<sup>1</sup>, the SA Report<sup>2</sup> of the Draft Local Plan issued for consultation on 23<sup>rd</sup> January 2012 and also an August 2012 Addendum Report in support of amendments to the Draft Local Plan prior to the Examination in Public (EIP).
- 1.1.2 Following completion of the EIP and receipt of the Inspector's Interim Conclusions<sup>3</sup> on the 5<sup>th</sup> April 2013, the Council considered the recommendations and made changes to both the policies and some supporting text presented within the Draft Local Plan. The rationale for the changes to the Submission Draft Local Plan issued in September 2012 will be published for consultation along with this SA Addendum Report.
- 1.1.3 While no changes were made to the strategy, a new model policy was introduced on sustainable development to reflect the National Planning Policy Framework (NPPF). Additions or amendments were made to a further seven policies to reflect the recommendations of the Inspector. Other changes are largely to assist understanding, ensure conformity with the NPPF, reflect updated evidence and address drafting errors. A list of the proposed modifications can be found in Appendix I.
- 1.1.4 Based on the above, this sustainability appraisal considers the implications of the following modifications to the Submission draft Local Plan:
- New model policy – National Policy 1;
  - Policy P2 – Competitive Town Centres;
  - Policy P5 – Housing.
- 1.1.5 The other changes proposed following the Examination in Public would alter the probability of various outcomes associated with Policies P11 and P13 being achieved.
- 1.1.6 Local Development Documents must undergo a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) that considers the environmental and sustainability consequences of the plan<sup>4</sup>. This document is the second Addendum to the 2012 SA Report and provides further appraisal information. This approach is in accord with SA practice and should be seen as one overall "Report".
- 1.1.7 The changes introduced following the EIP would not alter the following separate assessments:
- **Impacts on European wildlife sites:** A 'Habitats Regulations Assessment' Screening Report has been prepared<sup>5</sup> and a further screening of four sites outside the Borough published<sup>6</sup>;
  - **Health Impact Assessment:** As with the SA Report, health issues are dealt within this SA Addendum Report;
  - **Equalities Impact Assessment:** A Fair Treatment Assessment (an Equalities Impact Assessment) was undertaken on the Emerging Core Strategy that included scoping of the need for an assessment of policies. The Fair Treatment Assessment was published to support the Submission draft Local Plan<sup>7</sup>.

<sup>1</sup> The Draft Sustainability Appraisal Report is available at:  
[http://www.solihull.gov.uk/Attachments/Challenges\\_and\\_Choices\\_Sustainability\\_Report.pdf](http://www.solihull.gov.uk/Attachments/Challenges_and_Choices_Sustainability_Report.pdf)

<sup>2</sup> The Sustainability Appraisal Report is available at:  
[http://www.solihull.gov.uk/Attachments/Sustainability\\_Appraisal\\_Report\\_-\\_A4\\_pdf\\_\(2\).pdf](http://www.solihull.gov.uk/Attachments/Sustainability_Appraisal_Report_-_A4_pdf_(2).pdf)

<sup>3</sup> See [http://www.solihull.gov.uk/Attachments/Interim\\_Conclusions.pdf](http://www.solihull.gov.uk/Attachments/Interim_Conclusions.pdf)

<sup>4</sup> European Parliament and Council of the European Union (July, 2001) *Directive 2001/42/EC on the assessment of certain plans and programmes on the environment* (Official Journal of the European Community – OJ No L197, 21.7.2001, p.30) as implemented by The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004, no. 1633).

<sup>5</sup> [http://www.solihull.gov.uk/Attachments/HRAA\\_Screening\\_SMBC.pdf](http://www.solihull.gov.uk/Attachments/HRAA_Screening_SMBC.pdf)

<sup>6</sup> [http://www.solihull.gov.uk/Attachments/HRA\\_-\\_Further\\_Screening\\_April\\_2012.pdf](http://www.solihull.gov.uk/Attachments/HRA_-_Further_Screening_April_2012.pdf)

<sup>7</sup> <http://www.solihull.gov.uk/ldf/15498.htm>

## 1.2 Structure of the Report

- 1.2.1 This Sustainability Appraisal Addendum Report documents the appraisal of the Submission Draft Local Plan plus the Proposed Modifications prior to consultation and subsequent adoption.
- 1.2.2 While this appraisal focuses upon those elements that have been modified since the consultation Submission draft Local Plan, the importance of providing a coherent view of the sustainability appraisal to readers instead of having to consider the previous appraisal reports has been recognised. Consequently this SA Report represents material from the earlier Appraisal Report only insofar as it is necessary to interpret the current findings.
- 1.2.3 This SA Report focuses upon the appraisal of the Submission draft Local Plan plus Proposed Modifications insofar as they may give rise to significant effects that are different to that previously reported. For ease of reference changes introduced to the policies since the Submission draft Local Plan plus Proposed Modifications are highlighted in a red font. As there remains the necessity to meet the requirements of the SEA Directive Table 1.1 outlines how these have been met below.
- 1.2.4 The key aspect to note is that reference should be made to chapters 3 and 4 of the Sustainability Appraisal Report for the Consultation draft Local Plan to gain an appreciation of both the current state of the environment and the policy context within which the draft Local Plan has been prepared.

**Table 1.1 Meeting the SEA Directive Requirements**

Environmental Report Requirements	Sustainability Appraisal Report <sup>8</sup> (Jan 2012)	Sustainability Appraisal First Addendum Report <sup>9</sup> (Aug 2012)	Sustainability Appraisal Second Addendum Report (May 2013)
a) Outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	Chapter 3	-	-
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 4	-	-
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 4	-	-
d) Any existing environmental problems which are relevant to the plan or programme, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Chapter 4	-	-
e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 3 & Appendix B	-	-

<sup>8</sup> The Sustainability Appraisal Report is available at: [http://www.solihull.gov.uk/Attachments/Sustainability Appraisal Report - A4 pdf \(2\).pdf](http://www.solihull.gov.uk/Attachments/Sustainability_Appraisal_Report_-_A4_pdf_(2).pdf)

<sup>9</sup> Sustainability Appraisal Addendum Report: [http://www.solihull.gov.uk/Attachments/SLP\\_002 Submission Draft Local Plan - Sustainability Appraisal Addendum.pdf](http://www.solihull.gov.uk/Attachments/SLP_002_Submission_Draft_Local_Plan_-_Sustainability_Appraisal_Addendum.pdf)

f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Chapters 5, 6 & 7	<ul style="list-style-type: none"> <li>Chapter 3 provides an appraisal of policies of the Submission draft Local Plan.</li> <li>Chapter 4 details the changed site allocations. No changes were introduced following the EIP.</li> </ul>	<ul style="list-style-type: none"> <li>Chapter 3 considers the Proposed Modifications to the policies following the EIP.</li> </ul>
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 5,6,7 & 8	<ul style="list-style-type: none"> <li>Chapter 3 documents the measures proposed for each policy throughout the appraisal process.</li> <li>Chapter 4 provides measures for the site allocations.</li> </ul>	<ul style="list-style-type: none"> <li>Chapter 3 considers measures that may be relevant this stage of the plan making process.</li> <li>Chapter 5 gives a summary of all mitigation and monitoring proposals and the responses by the Council throughout the plan making process.</li> </ul>
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 2 & 4	<ul style="list-style-type: none"> <li>Chapter 2 provides a summary of the methodology.</li> </ul>	<ul style="list-style-type: none"> <li>No alternative policies are considered in this report.</li> </ul>
i) A description of the measures envisaged concerning monitoring in accordance with Article 10.	Chapter 8	<ul style="list-style-type: none"> <li>Chapter 5 outlines proposed monitoring.</li> </ul>	<ul style="list-style-type: none"> <li>Chapter 4 outlines proposed monitoring.</li> </ul>
j) A non-technical summary of the information provided under the above headings.	Accompanies the draft plan <sup>10</sup> .	<ul style="list-style-type: none"> <li>A Non-Technical Summary was not prepared</li> </ul>	<ul style="list-style-type: none"> <li>A revised Non-Technical Summary accompanies the Submission draft Local Plan plus Proposed Modifications.</li> </ul>

1.2.5 The remainder of this report is structured as follows:

- **Chapter 2** – Summarises the methodology used in undertaking the sustainability appraisal;
- **Chapter 3** – Presents the appraisal of the Submission draft Local Plan plus Proposed Modifications policies;
- **Chapter 4** – Presents the mitigation and monitoring proposals.

1.2.6 The previous Appraisal Reports made reference to following technical appendices prepared:

- **Appendix A:** Statutory body comments on 2008 Scoping Report;
- **Appendix B:** Policies, plans and programmes;
- **Appendix C:** Countryside Strategy and Woodland Strategy Council commitments;
- **Appendix D:** Selected Ward Profiles;

<sup>10</sup> Non-technical Summary report: [http://www.solihull.gov.uk/Attachments/Draft\\_Local\\_Plan\\_-\\_Sustainability\\_Appraisal\\_Non\\_tech.pdf](http://www.solihull.gov.uk/Attachments/Draft_Local_Plan_-_Sustainability_Appraisal_Non_tech.pdf)



- **Appendix E:** Evolution of sustainability objectives;
- **Appendix F:** Compatibility of Objectives;
- **Appendix G:** Policy Appraisal Tables;
- **Appendix H:** Appraisal Tables for Allocation Sites

1.2.7 Only Appendix G has been revised to reflect the changes introduced in the Submission draft Local Plan plus Proposed Modifications and thus is the only appendix accompanying this report.

1.2.8 URS was commissioned to work alongside officers from the Council to prepare this second SA Addendum Report.

### 1.3 Scope of the Appraisal

1.3.1 A Sustainability Appraisal incorporating a Strategic Environmental Assessment (SEA) has been undertaken in accordance with the regulations<sup>11</sup> implementing European Directive 2001/42/EEC on the assessment of the effects of certain plans and programmes on the environment is required for Development Plan Documents. The intention is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans [...] with a view to promoting sustainable development' (SEA Directive, Article 1).

1.3.2 The Directive's definition of 'environment' includes not only the natural environment and historic environment, but also effects such as human health and material assets. It also requires a thorough analysis of a plan's effects including secondary, cumulative and synergistic effects<sup>12</sup>. Mitigation and monitoring measures are recommended to address significant effects.

### 1.4 Limitations of the Appraisal

1.4.1 This appraisal has relied upon the data and information recorded in the appendices to the Sustainability Appraisal Report. The evidence has not been updated since the Sustainability Appraisal Report was published in January 2012.

1.4.2 It is acknowledged that at the current time, there is considerable uncertainty associated with many aspects of national and local economy that have a considerable bearing upon the future development activity and the Council's ability to manage such activities. Such uncertainty affects both the projections on what a future without a plan might look like as well as the assessment of the alternative strategies.

### 1.5 Habitats Regulations Assessment

1.5.1 The HRA Screening Report<sup>13</sup> concluded that the policies and strategies described in the Plan do not give rise to direct or in-combination effects and hence the Plan was screened out from requiring an Appropriate Assessment.

### 1.6 Health Impact Assessment

1.6.1 While there is no statutory requirement to undertake a Health Impact Assessment, there is a requirement to consider the effects on human health of the plan under SEA. As part of this requirement the following approach has been adopted:

- Account is taken of health issues identified in the Joint Strategic Needs Assessment;
- Collation of information on the health plans, baseline data, health issues;
- Assessment of the health consequences of the Plan proposals and how they may be distributed across different groups;
- Recommendations to enhance the health outcomes;

<sup>11</sup> *The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004, no. 1633).*

<sup>12</sup> The Directive refers to 'effects' rather than 'impacts', since plans can have beneficial effects as well as negative effects. 'Impacts' are sometimes incorrectly seen as only being adverse.

<sup>13</sup> SMBC, 2008: Core Strategy Appropriate Assessment Screening Report

- Consultation on the health outcomes;
- Consideration of the issues raised following consultation; and
- Consideration of the need for monitoring of impacts.

## **1.7 Equalities Impact Assessment**

- 1.7.1 Local authorities have a duty under race, disability and gender legislation<sup>14</sup> to carry out an EqIA of their Plans. An EQIA encompasses race, gender, disability, age, religion/belief and sexual orientation.
- 1.7.2 The Fair Treatment Assessment (an Equalities Impact Assessment) will be available for review on the Council website.

## **1.8 Delivery Processes**

- 1.8.1 The Local Plan is proposed for adoption on December 2013

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<sup>14</sup> Race Relations (Amendment) Act 2000, requirement to produce and publish a Race Equality Scheme. Disability Discrimination Act 2005, requirement to produce a Disability Equality Scheme. Equality Act 2006 requirement to produce a Gender Equality Scheme.

## 2. METHODOLOGY

### 2.1 Introduction

- 2.1.1 Reference should be made to the description of the methodology provided in the Sustainability Appraisal Report as this section provides a brief summary to aid interpretation of the subsequent appraisal.
- 2.1.2 Readers who wish to understand the steps undertaken in defining the scope of the appraisal and the testing of the plan objectives against the sustainability objectives ought to make reference to chapter 2 of the Sustainability Appraisal Report<sup>15</sup>.
- 2.1.3 This chapter provides a summary of the methodology employed in the forecasting and appraisal of the effects and the subsequent stages of the appraisal process.

### 2.2 Sustainability Appraisal Framework

- 2.2.1 The Sustainability Appraisal Framework employed in the appraisal is presented in Table 2.1.

**Table 2.1: Updated 2011 Sustainability Appraisal Framework**

<b>Solihull Draft Local Plan Sustainability Appraisal Framework</b>	
<b>Sustainable consumption &amp; production</b>	
<ol style="list-style-type: none"> <li>1. To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups:               <ol style="list-style-type: none"> <li>a. To provide a quality of life able to help retain well-educated members of the work force.</li> <li>b. To enable the provision of offices and premises able to meet the needs of business start-ups as well as larger businesses attracted by the transport-hub and knowledge-hub that exists.</li> </ol> </li> <li>2. To reduce the number of people experiencing difficulties in accessing employment, education and training opportunities.</li> <li>3. To ensure that the location of development makes efficient use of existing physical infrastructure and helps to reduce the need to travel.</li> <li>4. Minimise the use of natural resources, such as land, water and minerals, and minimise waste, increase reuse and recycling and manage within the Borough/Sub-region:               <ol style="list-style-type: none"> <li>a. Deliver reductions in the quantity of water used in the Borough.</li> <li>b. Deliver reductions in the waste arising and to move up the waste hierarchy.</li> <li>c. To use previously developed sites where appropriate where there is no net loss of ecological value.</li> <li>d. To promote resource efficiency.</li> </ol> </li> </ol>	
<b>Climate change &amp; energy</b>	
<ol style="list-style-type: none"> <li>5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation:               <ol style="list-style-type: none"> <li>a. To deliver quantified reductions in greenhouse gas emissions by 2020 that contribute to the national 34% reduction target.</li> <li>b. To encourage reduced energy use, use of distributive energy systems and renewable energy.</li> </ol> </li> <li>6. To assist in the adaptation businesses need to become more resource efficient and also to deliver more sustainable products and services better equipped to a changing market place caused by climate change.</li> <li>7. Manage, maintain and where necessary improve the drainage network to reduce the economic losses from flooding.</li> <li>8. To ensure that development provides for adaptation to urban heating, the effects of high winds and assists in promoting behaviour change.</li> </ol>	
<b>Natural resource protection &amp; environmental enhancement</b>	
<ol style="list-style-type: none"> <li>9. To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> <li>10. To manage the landscape effects of development in recognition of the European Landscape Convention as well as the risks and opportunities associated with measures to address climate change.</li> </ol>	

<sup>15</sup> [http://www.solihull.gov.uk/Attachments/Sustainability Appraisal Report - A4 pdf \(2\).pdf](http://www.solihull.gov.uk/Attachments/Sustainability%20Appraisal%20Report%20-%20A4%20pdf%20(2).pdf)

Solihull Draft Local Plan Sustainability Appraisal Framework
<p>11. To facilitate the delivery and enhance the quality of areas providing green infrastructure.</p> <p>12. To enhance, conserve and protect buildings, sites, and the setting of historic assets in the urban environment as part of development projects.</p> <p>13. To deliver improvements in townscape and enhance local distinctiveness.</p> <p>14. Minimise air, soil, water, light and noise pollution:</p> <ol style="list-style-type: none"> <li>a. To continue to deliver reductions in particulate and nitrogen dioxide levels.</li> <li>b. To manage drainage network to ensure no detriment to surface water quality.</li> <li>c. To reduce the intrusion of urban and highway lighting.</li> <li>d. To deliver reductions in road traffic noise focusing upon those areas identified as First Priority Locations by Defra under the Environmental Noise Directive.</li> <li>e. To conserve soils thereby supporting other objectives.</li> </ol>
Sustainable communities
<p>15. To improve community capital and reduce isolation across the social gradient in the Borough:</p> <ol style="list-style-type: none"> <li>a. Ensure that the pattern of development helps reduce imbalances across the Borough.</li> <li>b. Promote employment opportunities and improve access to employment, education and health services.</li> <li>c. Improve the public realm and community facilities.</li> </ol> <p>16. Improve the supply and affordability of housing in those areas of greatest need:</p> <ol style="list-style-type: none"> <li>a. Ensure supply of housing appropriate to local needs especially in relation to affordability.</li> <li>b. Ensure urban design and layout contributes towards reducing the potential for crime.</li> <li>c. Make provision for the accommodation needs of Travellers &amp; Gypsies.</li> </ol> <p>17. Ensure the Borough's regional assets reflect wider needs and that their development is not compromised.</p> <p>18. To fully integrate the planning, transport, housing, cultural, recreational, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles:</p> <ol style="list-style-type: none"> <li>a. To design the urban fabric and services to meet the needs of an elderly population particularly one less able to rely upon private transport.</li> </ol> <p>19. Reduce crime, fear of crime and anti-social behaviour.</p> <p>20. Enhance public safety.</p> <p>21. Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all.</p>

## 2.3 B3/B4 – Forecasting and Appraisal of Effects

2.3.1 In appraising the effects of the plan, the following factors have been considered:<sup>16</sup>

- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- The probability, duration, frequency and reversibility of the effects;
- The cumulative nature of the effects; and
- The potential for effects to occur upon valued or vulnerable areas.

2.3.2 Carrying out the appraisal involves considering, for each policy, spatial strategy and site allocation, the following:

- Is it clear what is proposed?
- Who/what is likely to be affected?
- Where is the effect likely to occur?
- Is the effect likely to affect an area or population that is vulnerable or particularly valued?

<sup>16</sup> This approach to determining significance is a requirement of the SEA Directive.

- Will any social group be disproportionately disadvantaged / affected by the alternative?
- What is the magnitude of the impact based on duration, scale, uncertainty, direct, indirect, cumulative, reversible?
- Is the strategy likely to have a significant effect on the objectives?
- If so, can the effect be enhanced, avoided or its severity reduced?
- If the effect cannot be avoided, e.g. by conditions or changes to the way it is implemented, can the proposal be changed or eliminated?

2.3.3 Significance criteria capture duration, geographic scale, probability as well as whether the effect would be direct, indirect or cumulative. While the potential for an impact to be reversible is recorded, since there would not necessarily be a guarantee that resources would be available to reverse the impact, the assessment significance assumes a worst case outcome. The reversibility of the impact is then considered in making recommendations to avoid, minimise or offset its effects.

2.3.4 To aid consistency a sustainability assessment tool has been used that records the selection of the analyst against each of the assessment criteria identified above. This provides an audit trail against which the findings can be checked.

2.3.5 The assignment of significance is via rule-based criteria drawing on instruction provided by the SEA Directive. The rule-based criteria can be manually overridden by the assessor if the need arose, although this required justification and agreement by the project director.

2.3.6 To assist in judging the significant effects of policies and proposals for the Draft Local Plan, the following set of significance criteria have been prepared to guide the assessment process (see Table 2.2).

**Table 2.2: Significance Criteria**

<b>Minor</b>	Cause and effect likely affecting local areas for over 3 years but effects are unlikely to be reversible and do not cause district scale cumulative effects.
	Cause and effect either clearly not clearly established but limited to district wide effects lasting for less than 10 years. Anticipated that effects may or may not be reversible.
	Potential effects of less than 3 years duration at a regional scale which may or may not be reversible.
	Permanent local scale potential or likely direct or indirect effects that may or may not be reversible.
<b>Moderate</b>	Cause and effect likely to occur at a district scale extending between 3-10 years and that are unlikely to be reversible but do not affect regional or national resources.
	Cause and effect can be likely to or certain to occur but there will be district effects that extend for over 10 years that are unlikely to be reversible and do not affect regional or national resources.
	Cause and effect not clearly established but potential for effects upon regional or national interests for any duration that may or may not be reversible

<b>Major</b>	Cause and effect directly attributable to change of more than 10 years to the existing conditions likely to occur over a wide area at a district scale that is unlikely to be reversible.
	A potential cause and direct effect with a duration of more than 3 years that may cause cumulative effects upon regional or national interests that may not be reversible.
	A cause and effect is likely or would occur with national or regional interests being affected that may or may not be reversible

2.3.7 To assist in the communication of significant effects a traffic-light based scoring system is used (see Table 2.3).

**Table 2.3: Impact Significance**

Scoring Symbol	Label
<b>Maj+ve</b>	Major positive outcome
<b>Mod+ve</b>	Moderate positive outcome
<b>Min+ve</b>	Minor positive outcome
<b>Neut</b>	Neutral
<b>Min-ve</b>	Minor negative outcome
<b>Mod-ve</b>	Moderate negative outcome
<b>Maj-ve</b>	Major negative outcome

## 2.4 Uncertainties

2.4.1 Some uncertainties are associated with the appraisal of plans reflecting questions over funding, the timing of major projects and new housing as well as changes to the national policy framework. The appraisal identifies where uncertainties exist that have a bearing upon whether significant effects are likely to occur.

2.4.2 While it is recognised that there have been revisions to some of the datasets reported in chapter 4 of the Sustainability Appraisal Report these are not considered to bring about a change in the sustainability objectives or context against which the policy and site allocations are appraised.

## 2.5 Reporting

2.5.1 Spider diagrams have been used to present the findings in a clear manner (see Box 2.1). **Essentially, the greater the footprint of the shaded area, the better the option or policy performs in sustainability terms.** A sliding scale of 3 to -3 that has been used whereby 3 is a major positive effect, 0 is a neutral effect, and -3 is a major negative effect.

2.5.2 In the example above the option / policy is likely to have a major positive on health and well being and a moderate negative outcome for water and biodiversity. The majority of the remaining effects are either minor positive or negative, or neutral.

## 2.6 Secondary and Cumulative Effects

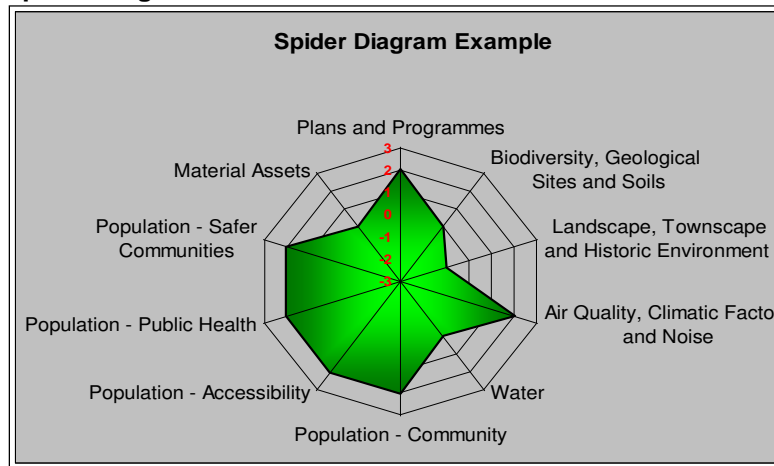
2.6.1 Secondary or indirect effects occur at some distance or time from the original effect of the plan. Such non-cumulative effects are identified and assessed mainly by considering potential links between various objectives.

2.6.2 Cumulative effects arise where several proposals that may or may not individually be significant, but in combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals

and actions and repeated removal or addition of resources due to proposals and actions. Such effects can be additive; neutralising or synergistic.

2.6.3 During the appraisal receptors have been identified that may experience cumulative effects.

**Box 2.1: The Spider Diagrams**



**2.7 B5 - Mitigation and Enhancement**

2.7.1 Annex I of the SEA Directive requires the Environmental Report to include measures to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan or programme. Mitigation can take a wide range of forms, including:

- Changes to the plan proposals or policies;
- Identification of issues to be addressed in project EIAs; and
- Proposals for changing other plans and programmes at their next revision.

2.7.2 Where potential significant adverse effects are identified mitigation measures are proposed. Also, opportunities to provide enhancement have been identified. Mitigation recommendations have been made, where appropriate, for each policy/site allocation within the Submission draft Local Plan plus Proposed Modifications.

2.7.3 As the Local Plan sets the framework for projects that may fall under the requirements to undertake an Environmental Impact Assessment (EIA), an opportunity exists while considering mitigation and enhancement measures to identify measures that are more appropriately undertaken at that stage.

**2.8 B6 - Monitoring**

Article 10 of the SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are to be monitored in order, *inter alia*, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.

2.8.1 Where likely significant effects are identified, and especially where these are adverse effects or where uncertainties are identified, proposals to monitor such effects are presented in chapter 8. This allows an evidence base to be built up for future appraisals to inform the further plans and projects as well as potentially to address uncertainties where appropriate.

2.8.2 Measures by which significant positive and negative effects can be monitored are (Stage C). These are then confirmed in the Adoption Statement (Stage D). Monitoring will be incorporated into Authority Monitoring Reports.

## **2.9 Stage C: Sustainability Appraisal Report**

- 2.9.1 Stage C involves documenting the process and findings in an Environmental or, in this case, Sustainability Appraisal Addendum Report to accompany the Submission draft Local Plan plus Proposed Modifications. A Non-Technical Summary has also been prepared.

## **2.10 Stage D: Consultation**

- 2.10.1 The Sustainability Appraisal Report has been published alongside the Draft Local Plan providing information on:

- How the Plan was developed;
- Challenges and opportunities;
- Alternatives considered;
- Consequences of the preferred option; and
- Proposals for mitigation and monitoring.

- 2.10.2 The Sustainability Appraisal Addendum Report is published alongside the Submission Draft Local Plan to aid those who may wish to make representations as part of the Examination in Public proceedings that lead towards adoption of the Draft Local Plan.

## **2.11 Stage E: Adoption**

- 2.11.1 If the sustainability appraisal finds that adoption of the Plan has the potential to result in significant sustainability effects then proposals on how such effects are monitored are to be agreed.

- 2.11.2 The Adopted Plan will have taken account of responses to consultation on the published draft Plan and on the published Sustainability Appraisal Report. An adoption statement would record:

- How sustainability considerations were integrated into the plan;
- How the Sustainability Appraisal Report has been taken into account;
- How the opinions and consultations have been considered;
- The reasons for selecting the alternatives underpinning the final plan; as well as
- The measures to be taken to monitor the effects of the strategy.

- 2.11.3 SEA guidance indicates that the existing monitoring arrangements of the plan and for other plans can be used to obtain the required information. Particular attention will be paid to the monitoring proposals to ensure that they are practical and within anticipated resource constraints.

- 2.11.4 Monitoring that will be undertaken by the Council or other organisation as identified in the Adoption Statement that will be published as soon as possible after the Local Plan is adopted, in line with Regulation 26 of the Town and Country Planning (Local Planning)(England) Regulations 2012.



## 3 APPRAISAL OF LOCAL PLAN POLICIES

### 3.1 Introduction

- 3.1.1 Based on consideration of the representations, evidence and Fair Treatment Assessment, changes were introduced to the Submission draft Local Plan following the Examination in Public (EIP). These changes have been considered to determine whether any re-appraisal is required.
- 3.1.2 As no changes have been made to the draft Local Plan objectives there has been no need to revisit their compatibility with sustainable development principles. However for the sake of completeness, the appraisal of the Consultation draft Local Plan objectives is represented in section 3.2.
- 3.1.3 This chapter provides an appraisal of the revisions to policy P2 – Maintain Strong, Competitive Town Centres; P5 – Providing Homes for All as well as the introduction of National Policy 1 Sustainable Development. In order to maintain consistency with the internal referencing of the sustainability appraisal, the appraisal of National Policy 1 is provided as section 3.25.
- 3.1.4 The Examination in Public process brought about some changes to the statements supporting individual policies such that, on occasion, they have a bearing upon the desired outcomes from the policies being successfully achieved. As a result this has had the effect of altering the appraisal, although not necessarily the appraisal score. Hence, this Appraisal Report documents the appraisal of each policy having the additional benefit of providing a single reference point for users.
- 3.1.5 For each of the policies, the chapter sets out an appraisal of the forecast effects against the sustainability framework together with a perspective on the uncertainties associated with implementation as well as possible mitigation and enhancement measures.
- 3.1.6 A discussion of the ‘reasonable alternatives’ was reported within section 3.3 of the Sustainability Appraisal Addendum Report (August 2012). As the final opportunity to consider significant alternatives was at the Examination in Public, so this Sustainability Appraisal Addendum Report does not give this aspect further consideration. Towards the end of the chapter a section draws together the mitigation and enhancement measures to identify any synergies across the policy areas.

### 3.2 B1: Compatibility of Core Strategy Objectives with Sustainability Objectives

- 3.2.1 As noted above, this section provides a summary of the appraisal provided in the Sustainability Appraisal Report of the Consultation Submission draft Local Plan plus Proposed Modifications.
- 3.2.2 Each of the Local Plan objectives was “scored” against each of the twenty-one sustainability objectives grouped into four themes – as “compatible” or “incompatible” or as having an “uncertain link” or “no link”.
- **Theme 1 - Sustainable consumption and production;**
  - **Theme 2 - Climate change and energy;**
  - **Theme 3 - Natural resource protection and environmental enhancement;**
  - **Theme 4 - Sustainable communities.**
- 3.2.3 The results of the assessment are presented in Table 5.2 and Appendix F of the Sustainability Appraisal Report. A brief summary is provided below.
- 3.2.4 The plan objective with the highest **consistency** was Objective 2: accommodate housing needs (57%). Other plan objectives that perform well against sustainability objectives include: Objective 26: Improve accessibility (52%); Objective 12: Maintain green belt (48%); and Objective 20: Green infrastructure (48%). All of these plan objectives show a strong overall synergy with sustainability objectives for the reason that they perform well in terms of *both* socio-economic and environmental sustainability objectives.

- 3.2.5 The plan objectives with the fewest synergies were Objectives 15: Decentralised energy and 33: Mineral resources reflecting that both narrowly focus upon a specific topic. Objectives 5, 24, 31 and 32 also show synergy with relatively few sustainability objectives (14%). All four are relatively focused objectives with Objectives 5 and 24 addressing a social issue (the needs of older people and those with disabilities), which do not have implications for any environmental sustainability objectives. Similarly, Objectives 31 and 32 address waste management, and so do not have implications for social sustainability objectives.
- 3.2.6 A total of 22 Plan objectives are shown to have ‘**uncertain**’ compatibility with one or more sustainability objectives as illustrated in Table 3.1. In some instances, an uncertain score has been recorded to reflect the fact that there could be some potential for *inconsistency*, depending on the approach that is taken to achieving the objective. In other instances, an uncertain score has been recorded to reflect the fact that there could be some potential for *synergy*, depending on the approach that is taken to achieving the objective.

**Table 3.1: Uncertain Compatibilities**

Plan Objective	Uncertainty
<b>Objective 2:</b> Accommodate additional development to help meet the housing needs in the Borough whilst ensuring high quality places across the Borough through continuing to improve the quality of the environment in the North Solihull Regeneration Area and the mature suburbs and, conserving the qualities of the mature suburbs and rural settlements that make those places attractive areas to live.	<ul style="list-style-type: none"> <li>Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> </ul>
<b>Objective 4:</b> Address constraints in supply including the inability to deliver affordable housing in recent years through windfall development by reducing site thresholds.	<ul style="list-style-type: none"> <li>Regeneration &amp; spatially targeted economic development to reduce inequalities.</li> </ul>
<b>Objective 6:</b> Ensure high quality design and development which integrates with its surroundings and creates safer, inclusive, adaptable and sustainable places which make a positive contribution to the Borough’s sense of place, attractiveness and to people’s quality of life.	<ul style="list-style-type: none"> <li>Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> </ul>
<b>Objective 9:</b> Support the continued success of key regional economic assets such as Birmingham International Airport, National Exhibition Centre, Birmingham and Blythe Valley Business Parks and Land Rover whilst maintaining the quality of the environment and managing congestion.	<ul style="list-style-type: none"> <li>Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation.</li> </ul>
<b>Objective 10:</b> Support the continued success of Solihull Town Centre whilst maintaining the quality of its environment and managing congestion.	<ul style="list-style-type: none"> <li>To deliver improvements in townscape and enhance local distinctiveness</li> </ul>
<b>Objective 11:</b> Encourage investment into Shirley and Chelmsley Wood Town Centres to improve competitiveness and the shopping environment.	<ul style="list-style-type: none"> <li>Minimise air, soil, water, light and noise pollution.</li> <li>To deliver improvements in townscape and enhance local distinctiveness.</li> </ul>
<b>Objective 14:</b> Reduce the Borough’s greenhouse gas emissions, so as to contribute to the national target for reduction, through a range of measures such as the location and design of development, provision of renewable and low carbon energy schemes, and promoting opportunities for low carbon travel.	<ul style="list-style-type: none"> <li>Regeneration &amp; spatially targeted economic development to reduce inequalities.</li> </ul>
<b>Objective 15:</b> Promote decentralised energy and heating networks within the Mature Suburbs and North Solihull Regeneration Area, and the generation of energy from on-site renewable sources.	<ul style="list-style-type: none"> <li>To deliver improvements in townscape and enhance local distinctiveness.</li> <li>Regeneration &amp; spatially targeted economic development to reduce inequalities.</li> </ul>

Plan Objective	Uncertainty
<b>Objective 18:</b> Ensure that new development does not increase, and where possible reduces risks such as flooding and urban heating.	<ul style="list-style-type: none"> <li>• Manage landscape effects of development and to address climate change.</li> <li>• Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> <li>• Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel.</li> </ul>
<b>Objective 19:</b> Ensure new development, and where possible existing communities have resilience to the effects of future climate change.	<ul style="list-style-type: none"> <li>• Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel.</li> <li>• Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 21:</b> Encourage the mitigation and adaptation of existing buildings to climate change.	<ul style="list-style-type: none"> <li>• Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> <li>• Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> <li>• Enhance, conserve and protect historic assets in the urban environment as part of development projects.</li> <li>• To deliver improvements in townscape and enhance local distinctiveness.</li> </ul>
<b>Objective 23:</b> To provide an adequate amount and variety of homes which are affordable by local people including homes for rent, for purchase and intermediate tenure.	<ul style="list-style-type: none"> <li>• Regeneration &amp; spatially targeted economic development to reduce inequalities.</li> </ul>
<b>Objective 28:</b> Manage transport demand and reduce car reliance.	<ul style="list-style-type: none"> <li>• Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 29:</b> Enable and increase the modal share of all forms of sustainable transport.	<ul style="list-style-type: none"> <li>• Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 30:</b> De-couple economic growth and increase in car use.	<ul style="list-style-type: none"> <li>• Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> <li>• Ensure the Borough's regional assets reflect wider needs and that their development is not compromised.</li> </ul>
<b>Objective 32:</b> To address the capacity gap between waste arising and capacity of facilities by taking advantage of opportunities to provide facilities for recycled materials, organic and residual waste.	<ul style="list-style-type: none"> <li>• Minimise air, soil, water, light and noise pollution.</li> </ul>
<b>Objective 33:</b> To provide for a total of 7.5 million tonnes of primary sand and gravel resources from sources within Solihull for the plan period to 2028, including the maintenance of a minimum 7 year landbank, whilst ensuring that provision is made to encourage the use of secondary and recycled aggregates, that sand and gravel resources are safeguarded from possible sterilisation by non-mineral development, and that environmental, restoration and aftercare criteria are met.	<ul style="list-style-type: none"> <li>• Minimise air, soil, water, light and noise pollution.</li> <li>• Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> <li>• Manage landscape effects of development and to address climate change.</li> </ul>

Plan Objective	Uncertainty
<b>Objective 34:</b> Create healthier, safer neighbourhoods.	<ul style="list-style-type: none"> <li>Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</li> <li>Manage landscape effects of development and to address climate change.</li> <li>Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 35:</b> Enable people to pursue an active lifestyle and make healthier choices.	<ul style="list-style-type: none"> <li>Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 36:</b> Meet local housing and employment needs whilst facilitating the provision of appropriate health care services.	<ul style="list-style-type: none"> <li>Reduce difficulties accessing employment, education &amp; training.</li> <li>Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel.</li> </ul>
<b>Objective 37:</b> Ensure that development does not have an adverse impact on physical and mental health and well being.	<ul style="list-style-type: none"> <li>Facilitate delivery and enhance the quality of areas providing green infrastructure.</li> </ul>
<b>Objective 39:</b> Promote a landscape scale approach to protecting and restoring the landscape of the Borough and its characteristic features.	<ul style="list-style-type: none"> <li>Enhance, conserve and protect historic assets in the urban environment as part of development projects.</li> </ul>

3.2.7 There were no sustainability objectives that were not supported by at least one Draft Local Plan objective. The least supported sustainability objectives were:

- Objective 17 - Ensure the Borough's regional assets reflect wider needs and that their development is not compromised (5%); and
- Objective 4 - Minimise the use of natural resources, increase reuse and recycling and manage within the Borough/Sub-region (10%).

### 3.3 B2: Alternatives

- 3.3.1 Under the regulations, assessing the likely significant effects of implementing the plan or programme must include consideration of *"and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme"*. There is also a requirement to provide *"an outline of the reasons for selecting the alternatives dealt with"*. This means that an audit trail is required that explains and justifies the shortlist of alternatives that have been selected for assessment.
- 3.3.2 Section 5.3 of the Consultation draft Local Plan Sustainability Appraisal Report sets out the alternatives explored in the plan development process. It included a business as usual scenario; the options considered for the growth and delivery of development as well as policy alternatives considered within Table 5.4 of the Sustainability Appraisal Report<sup>17</sup>.
- 3.3.3 Table 3.2 below sets out, where appropriate, the alternatives that were considered by the Council in preparing the Submission draft Local Plan. As noted in the table, several of the changes do not affect the direction or intent of the policy and hence did not stimulate a need to consider an alternative approach.
- 3.3.4 The Strategic Housing Land Availability Assessment (SHLAA) published in September 2010 considered the alternative site allocations which were then considered by the Council taking account of the sustainability appraisal findings and the responses to the Emerging Core Strategy consultation, as well as the Strategic Housing Land Availability Assessments.

<sup>17</sup> The Sustainability Appraisal Report is available at:  
[http://www.solihull.gov.uk/Attachments/Sustainability Appraisal Report - A4 pdf \(2\).pdf](http://www.solihull.gov.uk/Attachments/Sustainability%20Appraisal%20Report%20-%20A4%20pdf%20(2).pdf)

**Table 3.2: Alternative Policies – Strategic Perspectives**

Policy	Strategic Alternatives
<b>Sustainable Economic Growth</b>	
P2 - Maintain strong, competitive town centres	<ul style="list-style-type: none"> <li>• Option of providing separate guidance for strategically important Solihull town centre, and greater or lesser restrictions on uses.</li> <li>• The change to the policy increases the emphasis on the Town Centre first policy. The alternative of not changing the Consultation Local Plan policy could have the effect of opening opportunities for less sustainable edge of town development. No other alternatives were considered.</li> </ul>
<b>Providing Homes for All</b>	
P4 – Meeting housing needs	<ul style="list-style-type: none"> <li>• Alternative approach would be a range of affordable housing targets and thresholds.</li> <li>• Retaining a minimum target of 40% affordable housing requirement although this could impede the ability to negotiate on a site by site basis, and thus compromise the achievement of other sustainability and planning objectives.</li> <li>• The alternative of including permanent residential moorings within policy P4a) was considered not to be appropriate and thus consideration was given to whether permanent residential moorings ought to be viewed as low cost market housing thereby making a requirement for all new moorings to include a proportion of permanent residential moorings.</li> <li>• A decision has been taken to address the subject of Affordable Housing within a Supplementary Planning Document alongside policy P4.</li> </ul>
P5 - Provision of land for housing	<ul style="list-style-type: none"> <li>• Over 200 sites considered and assessed, summarised in the Strategic Housing Land Availability Assessment.</li> <li>• An alternative of compromising upon the good accessibility to public transport may deliver additional sites, but would reduce delivery against the Council's Challenge A priority.</li> <li>• The inclusion of housing at Birmingham Business Park was rejected following dismissal of an Appeal.</li> <li>• Considered removal of housing site 1 – Foxglove Crescent, but no suitable site alternatives currently available.</li> <li>• Considered addressing shortfall on sites where additional capacity was possible including at the Solihull Town Centre site but this was rejected due to uncertainties over delivery.</li> <li>• Providing lower housing densities may risk a situation of being more inefficient in the use of land with a risk of delivering larger properties when the need is for smaller dwellings.</li> <li>• Alternatives considered to the re-balancing of Phase 1 at Blythe Valley Park risks delaying provision of supporting facilities at the site.</li> </ul>

Policy	Strategic Alternatives
P6 - Provision of sites for gypsies and travellers	<ul style="list-style-type: none"> <li>Alternative approach would be to include site allocations in local plan.</li> <li>Updated to reflect evidence of need.</li> <li>Clarification of the policy criteria was introduced with the alternative being potentially reduced certainty for those proposing new sites.</li> <li>Failure to make reference to the historic environment as a criterion would then not accord with national policy.</li> </ul>
<b>Protecting and Enhancing our Environment</b>	
P9 - Climate change	<ul style="list-style-type: none"> <li>Alternative approaches include identifying specific locations for decentralised networks and setting a specific renewable energy target.</li> <li>The changes proposed clarify the intent of the Council to take account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. An alternative may cause a lack of clarity as to whether the Code for Sustainable Homes and BREEAM were additional or a contribution towards the policy.</li> <li>It also recognises the need to ensure that all sections of the community, but particularly older people, children and disabled people are more resilient to the effects of climate change.</li> </ul>
P10 - Natural environment	<ul style="list-style-type: none"> <li>Could combine with open space policy to cover green infrastructure.</li> <li>An alternative would have been not to bring the policy in line with the Natural Environment White Paper and the National Planning Policy Framework risking a lack of clarity.</li> </ul>
P11 - Water management	<ul style="list-style-type: none"> <li>Originally considered incorporating in climate change policy to cover mitigation and adaptation.</li> <li>An alternative would be to potentially affect the viability of development and not enabling consideration of the different means by which the policy objectives can be attained.</li> </ul>
P12 - Resource management	<ul style="list-style-type: none"> <li>Alternative approach could identify specific industrial areas where specific waste management activities would be encouraged.</li> <li>An alternative of not making reference to existing buildings and uses could lead to the loss of opportunity to encourage waste minimisation for applications involving a change of use rather than new build.</li> <li>An alternative of not making reference to high quality design might risk situations where the relevance of policy P15 to resource management may be disputed.</li> </ul>
<b>Promoting Quality of Place</b>	
P15 - Securing design quality	<ul style="list-style-type: none"> <li>Alternative approach could integrate design within other relevant policies.</li> <li>Making reference to specific design guides, however as guidance would evolve this approach could risk causing the policy becoming inappropriate.</li> <li>Removing reference to Life Time Homes, although this could compromise the challenge of addressing housing needs of an increasingly ageing population.</li> </ul>

Policy	Strategic Alternatives
P16 - Conservation of heritage assets & local distinctiveness	<ul style="list-style-type: none"> <li>• Could address asset types or provide more detailed guidance on the Borough's characteristics.</li> <li>• An alternative would have been not to bring the policy in line with the legislation and the National Planning Policy Framework risking a lack of clarity.</li> </ul>
P17 - Green belt /countryside	<ul style="list-style-type: none"> <li>• Alternative approaches include restricting expansion of major businesses as with other development or providing a more liberal framework for investment.</li> <li>• The policy considered character and quality that are matters not relevant to Green Belt policy. The alternative may give rise to a lack of clarity.</li> </ul>
<b>Supporting Local Communities</b>	
P20 - Provision for open space, children's play, sport & recreation	<ul style="list-style-type: none"> <li>• Could combine with natural environment policy to cover green infrastructure.</li> <li>• The alternative of not providing the amendments may risk a lack of attention on the needs for children's play while not also linking the provision of open space, sports &amp; recreation to securing design quality and the natural environment could lead to a lack of clarity should conflicting objectives arise.</li> </ul>
<b>Delivery and Monitoring</b>	
P21 – Developer contributions and infrastructure provision	<ul style="list-style-type: none"> <li>• The alternative of not including policy 21 was to address the subjects through supporting text however this might reduce the weight of argument to address the cumulative impacts of development.</li> </ul>



### 3.4 Appraisal of Policy 1: Support Economic Success

#### Introduction

3.4.1 This section presents the appraisal of the Submission draft Local Plan policy on supporting economic success against the sustainability objectives as there is no change to the policy or the appraisal however the possible measures to mitigate and enhance its performance have been revised.

3.4.2 The aim of the appraisal is to establish the policy's sustainability performance and identify any improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Submission draft Local Plan.

#### Policy 1 – Support Economic Success

Solihull's key economic assets and growth drivers are located near the M42 in the area between junctions 4 to 6 that forms the M42 Gateway. This area supports more than 100,000 jobs and has strong potential for further sustainable growth that can create employment and contribute to regeneration.

i) NEC and Birmingham Airport

**The Council will support the continued development of the NEC and Birmingham Airport within their respective boundaries** defined in this Draft Local Plan to enable them to meet their future aspirations.

National Exhibition Centre ( NEC)

The NEC is a key economic driver of the local and regional economy and, located adjacent Birmingham Airport, is at the Region's international gateway. The role of the NEC is as a major events, tourism and leisure venue, serving business and leisure markets. The NEC aims to encourage visitors to stay longer on site through enhanced attractions, provide a stronger sense of arrival, strengthen its brand and be attractive to all ages and cultures. To enable the NEC to meet its future aspirations and to drive economic and employment growth, **the Council will enable a broad range of developments to enhance visitor offer, diversify facilities and increase international competitiveness.**

**Development the Council will support and encourage will include that needed for operational purposes such as new or refurbished/ replacement exhibition halls, transport facilities and other development needed to enable the NEC to enhance its international competitiveness.**

**The Council will also support a broad range of ancillary and complementary facilities needed to enhance visitor experience and support operational needs. These will include hotels, administrative offices, warehouses, catering, meeting space, appropriate leisure and other supporting development, provided it is justified in terms of scale, its support for the NEC as a whole and is appropriately located within the NEC.**

Birmingham Airport

Birmingham Airport is the principal international gateway into the region and an important part of the national airports infrastructure. It is vitally important in the local and regional economy, attracting investment and supporting business growth and international trade in key sectors.

**The Council will support and encourage further development including the extension to the main runway south of the A45, in accordance with the approved planning application, and development needed for operational purposes** such as passenger and freight facilities, terminals, transport facilities and other development that supports operational needs.

**The Council will also support a broad range of ancillary/ complimentary facilities including hotels, administrative offices car parks and other appropriate facilities needed to serve the needs of air travellers using the Airport. Proposals should be justified including in terms of scale and in terms of supporting the Airport function and are appropriately located within the Airport so as not to detract from Airport function.**



ii) Birmingham Business Park

**The Council will support and encourage the development of Birmingham Business Park within its boundary defined in this local plan to support its role prime employment location and enhance its important role as a high quality, managed business park.**

**Development that will be supported and encouraged is as follows:**

**Business development for uses falling in the Business Use Classes (B1, B2, B8 of the Use Classes Order). The Council will expect development to progress in a well planned, managed way that will maintain the attractiveness of the business park to investors and that will protect and enhance the environment including the natural environment.**

**The Council will support a broad range of supporting ancillary or complimentary uses needed to enhance the attraction of the business parks to occupiers** These could include hotels, health and fitness, leisure, childcare facilities and local facilities falling within use classes A1 to A5 (of the use Classes Order) of a scale that does not compete with existing or planned facilities outside of Birmingham Business Park.

**The Council will support the expansion of Birmingham Business Park to the south-west as indicated on the Proposals Map. The Council will expect the land to be developed as an integrated part of the business park and in a way which facilitates access by public transport.**

iii) Blythe Valley Business Park

**The Council will support and encourage the development of Blythe Valley Business Park within its boundary defined in this local plan to support its role as a prime employment location and enhance its important role as a high quality, managed business park.**

**Development that will be supported and encouraged is as follows:**

**Business development for uses falling in the Business Use Classes (B1, B2 and B8 of the Use Classes Order). The Council will expect development to progress in a well planned way and that will maintain the attractiveness of the business park to investors and that will protect and enhance the environment including the natural environment.**

**The Council will also support a broad range of supporting ancillary or complementary uses needed to enhance the attraction of the business park to occupiers. These could include hotels, health and fitness, leisure, childcare facilities and local facilities falling within use classes A1 to A5 (of the Use Classes Order) of a scale that does not compete with existing or planned facilities outside the business park.**

**At Blythe Valley Business Park the Council will support and encourage the delivery of a major quantity of employment floorspace by improving the attractiveness of the park to investors through an improved range of amenities, supported by well planned residential development that will creates overall sense of place a more sustainable location.**

**The Council will expect new facilities, including the residential element of Blythe Valley Park, to be developed within the context of a masterplan to demonstrate how integration would be achieved between existing and planned facilities and with the network of villages that lie nearby.**

iv) Jaguar Land Rover (JLR)

JLR is important to the national, regional and local economy and is a major employer. JLR remains committed to the Lode Lane plant in Solihull and has the opportunity to develop advanced manufacturing, the low carbon economy and technology that will stimulate new skills and new opportunities.

**The Council will support and encourage the development of Jaguar Land Rover within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of Jaguar Land Rover as a major manufacturer of vehicles. The reasonable expansion of the site into the Green Belt will be given positive consideration where economic need can be demonstrated and appropriate mitigation can be secured.**

v) Council considers that the above key economic assets represent an important opportunity to improve access to employment. It is also important that economic growth does not harm the quality of the environment.

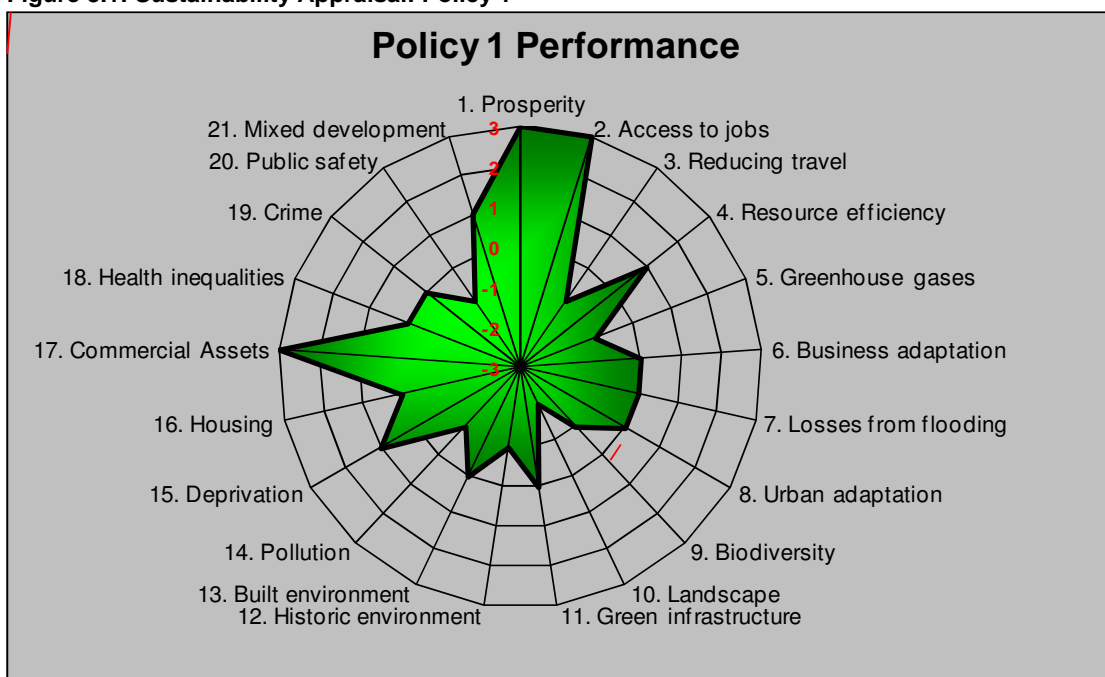
**The Council will expect development proposals that generate significant numbers of jobs to demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre. This could, for example, include public transport improvements and practical support for partnership working arrangements that will enable residents to take advantage of training arising from developments.**

**Applicants for development are expected to have regard to other relevant policies of the Local Plan, including those referring to design, climate change, access and amenity.**

### Forecast Effects

3.4.3 This policy performs in a slightly positive manner with six beneficial outcomes comprising three major positives and three minor positives as illustrated in Figure 3.1 and Appendix G. To offset the positives are seven of the twenty-one sustainability objectives that return an adverse outcome (one moderate negative, and six minor negative).

**Figure 3.1: Sustainability Appraisal: Policy 1**



SA Objective	Likely Significant Effects	Rationale
1. Prosperity	Maj+ve	Policy supports BIA, NEC, Birmingham and Blythe Valley Business Park and provides for controlled diversification of employment opportunities.
2. Access to jobs	Maj+ve	Policy has the potential to reduce the number of people with difficulties in accessing employment as proposals that generate significant numbers of jobs demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre.

SA Objective		Likely Significant Effects			Rationale				
17. Commercial Assets		Maj+ve			Policy is specifically designed to enhance the regional assets.				
10. Landscape		Mod-ve			General requirement to protect and enhance the natural environment only in the case of the business parks. Potential for adverse effects upon urban fringe landscapes.				
Local	9	Unlikely	0	Direct	7	Positive	6	Maj +ve	3
District	1	Potential	7	Indirect	5	Negative	7	Mod+ve	0
Regional	3	Likely	4	Cumul	1			Min+ve	3
National	0	Definite	2					Neutral	8
								Min-ve	6
								Mod-ve	1
								Maj -ve	0

- 3.4.4 The effects arising from the policy are anticipated to extend over the medium to long term (i.e. typically longer than 3 years and some times greater than 10 years). While most of the effects are at a local scale there are five at a district or regional scale that reflect the importance of the sites and commercial activities being undertaken.
- 3.4.5 The majority of the impacts are direct (nine) with five being indirect one cumulative effect being on greenhouse gases. Four of the indirect effects are all minor positive relate to the potential consequences that could arise from the requirement to prepare sustainability reports and the indirect risks to biodiversity along with requirements to minimise environmental impacts.
- 3.4.6 The policy is considered to have the potential for beneficial effects upon deprivation, since diversifying the range of business activities is likely to provide some opportunities for residents from North Solihull. Enhanced revenues from successful business areas could also support measures to reduce deprivation.
- 3.4.7 The number of people with difficulties in accessing employment potentially may be reduced as proposals that generate significant numbers of jobs are to demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre. However it remains unclear what is meant by “significant numbers of jobs”.
- 3.4.8 As the policy does not provide for measures to promote travel plans, sustainable travel or to take account of the impacts on the highway network, it is likely to deliver a minor adverse impact against the reducing the need to travel objective.
- 3.4.9 In terms of the climate change and energy sustainability theme there is no requirement for developers to either reduce greenhouse gas emissions or deliver exemplar standards of construction and with the absence of a requirement to deliver a sustainability report, many of the opportunities to deliver climate change and energy efficiencies fall outside the influence of the Local Plan. Further, the policy does not promote the development of low carbon business clusters and adaptation to a low carbon economy. This may put at some future disadvantage these areas since their success has been founded upon carbon based; accessible private travel that could well experience increasing costs in future years.
- 3.4.10 The proposed policy performs poorly under the natural resource protection and environmental enhancement theme with the potential for moderate adverse effects upon landscape. Only in the case of the Business Parks is there a requirement to “*protect and enhance the environment including the natural environment*”. There is no similar measure to protect the natural environment from the development to be encouraged south of the A45. In a similar manner there may be adverse effects upon the historic environment.
- 3.4.11 In considering opportunities to mitigate and enhance Policy 1 in relation to natural resources protection and environmental enhancement, there is no requirement to provide for high standards of design and promote local distinctiveness. The policy does not aid secure key sites that may be important to deliver sustainable development, nor promote the use of green roofs.

- 3.4.12 There are no measures identified to address either the potential for indirect effects upon the River Blythe SSSI or positive measures to enhance ecological connectivity, habitats or conserve soils. Nevertheless there is a general requirement to protect and enhance the natural environment, but only in the case of the business parks. Considerable potential for further adverse effects upon urban fringe landscapes with encouragement being given to development including the extension to the main runway south of the A45.
- 3.4.13 As the policy does not seek to promote exemplar design standards few enhancements to local distinctiveness will be required. Also as the policy places a requirement to “*have regard to*” other policies, so there is no requirement to minimise and mitigate environmental impacts, traffic noise and emissions, drainage and site runoff as well as light pollution affecting the rural fringe. There is no requirement for high quality design nor to minimise or mitigate potential environmental impacts, traffic noise and emissions, drainage and site runoff as well as light pollution affecting the rural fringe.
- 3.4.14 The policy makes little reference to the delivery of sustainable communities, although the creation of additional jobs may provide opportunities for some able to travel from the regeneration areas. Generally, the development promotes car based travel and given the regional scale of the employment opportunities, employees may well be drawn disproportionately from beyond the boundaries of the Borough. There are no measures by which the Council is to encourage key economic assets to deliver clear benefits across the entire community rather than to those who commute into the sites, although it is noted that only in the case of “*significant numbers of jobs*” being created would there be an obligation to demonstrate measures to improve access to employment from parts of regeneration areas.
- 3.4.15 The opportunity created for residents of North Solihull is that development at the Birmingham Business Park is to “*facilitate access*” by public transport. There is no requirement to contribute towards achieving increased public transport use. Access to Blythe Valley Business Park and the JLR site is not required to assist in addressing deprivation through enhanced accessibility by public transport or other sustainable travel modes and no travel plan is to be required.

### Managing Uncertainty

- 3.4.16 Six of the thirteen effects were considered to be likely or certain to be delivered suggesting positive outcomes. Of these a definite minor negative effect upon greenhouse gas emissions and a minor positive for mixed use development is expected. Of the four likely outcomes, there are two major positive outcomes (prosperity and commercial assets) that are likely to result along with a moderate adverse effect for landscape and a minor adverse effect on reducing travel demand also being likely (See Appendix G).
- 3.4.17 The policy results in seven potential outcomes one of which is a major positive for access to jobs.
- 3.4.18 A key element of the policy that undermines the remaining policies of the Local Plan is that “*Applicants for development are expected to have regard to other relevant policies of the Local Plan, including those referring to design, climate change, access and amenity*”. Hence all other policies are of a lesser status than that of the policy of supporting economic success.

### Mitigation and Enhancement

- 3.4.19 The following tables summarise the suggestions presented in the SA of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across the four sustainability themes.
- 3.4.20 An aspect where further attention is recommended is in **enhancing links between wealth and employment generation with the needs of the North Solihull Regeneration Area in order that direct and indirect benefits from the economic success are experienced by this community.**
- 3.4.21 Criterion (v) of Policy P1, plus policies P7, P8 and paragraph 9.3.11 are concerned with accessibility and managing travel demand. This states that the Council “*expects*” those development proposals that generate significant number of jobs to demonstrate measures to improve access to employment from areas where unemployment exists. In part this may deliver some benefits to North Solihull should suitable jobs be created. It is noted that applicants for development are to “*have regard*” to other relevant policies.

- 3.4.22 While it is expected that major developers would wish to work to the spirit of the policy framework, nevertheless there is an opportunity to **enhance the certainty that measures would be adopted to reduce the need to travel as well as improve accessibility to areas of high unemployment through the use of development briefs.**
- 3.4.23 With regard to climate change and energy, the enhancement opportunity identified in the previous 2012 SA Addendum Report suggested that an explicit requirement for major development proposals to demonstrate how they could link to local heat or energy networks when viable as well as consider inclusion of a policy to avoid sterilisation of sites for distributed heat and energy networks adapted from Policy 3. Again Policy P1 requires developers to “have regard to” these objectives. As with the earlier comments, **there is an opportunity to enhance the certainty local heat or energy networks would be investigated. This could be orientated towards future proofing and avoiding creating future delivery barriers.**
- 3.4.24 The recommendation was made in the 2012 SA Addendum Report to make provision for reduced carbon dioxide emissions under Policy 1. Again, major development proposals supporting the key economic assets in the M42 gateways are requested to “have regard to” this objective and Policy P9 and Policy P15. With corporate reporting of carbon emissions and energy costs being increasingly important, it is considered that the market place ought to drive the achievement of the climate change and energy objectives.
- 3.4.25 The 2012 SA Addendum Report suggested that Policy 1 ought to make reference to making space for water and managing flood risks as well as requiring major developers to demonstrate adaptation to climate change. As adaptation will be increasingly be seen to make sound business sense particularly for businesses located in the M42 corridor at risk from disruptions to power, transport and supply chains so the need for Policy P1 to drive certainty of outcomes towards the climate change and energy sustainability objectives may well reduce over time. Nevertheless, **there could be merits in the Council monitoring the extent to which development proposals in the M42 Gateway actively address adaptation measures.**
- 3.4.26 The policy specifically neglects consideration of the effects of development on the congested highway network either directly or in terms of the pollution and safety/community severance issues that can be generated. With the absence of a requirement for travel planning for these major destinations, impacts associated with transport are unlikely to be managed through this policy. **The Council is encouraged to give consideration within the proposed Sustainable Development and Construction Supplementary Planning Document to the capacity of the transport infrastructure given the potential for the proposed development to attract car and rail commuters from beyond the Borough.**

**Table 3.3: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider a requirement for regionally important sites to be designed to exemplar standards of sustainable construction.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9, P15 and para 11.2.2 of the Local Plan.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider the actions that will be undertaken to ensure targets are achieved.</li> </ul>	<ul style="list-style-type: none"> <li>Supporting text expresses requirement for travel plans.</li> </ul>	<ul style="list-style-type: none"> <li><b>Make the preparation of travel plans for each business park dealing with all movement patterns explicit within the policy.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>See criterion (e) of Policy P1, plus policies P7, P8 and paragraph 9.3.11 that are concerned with accessibility and managing travel demand.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider requiring major developers to provide a sustainability report demonstrating how their designs deliver sustainable development across the range of economic, materials, social and environmental factors.</li> </ul>	<ul style="list-style-type: none"> <li>Policy P9 requires energy or sustainability statements. Requirements to cover sustainability issues are also included in Policy P7, P8 and P15. See also final paragraph of P1.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Promote the development of super-fast broadband along with the integrated connection of technologies within main retail centres.</li> </ul>	<ul style="list-style-type: none"> <li>No longer relevant to policy given focus upon regional business sites.</li> <li>Covered in Policy P15 bullet 3</li> <li>See also para 7.7.13 and 11.2.3 of the Draft Local Plan.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.4: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Require all new development in the major business parks to make provision for distributed heating and energy networks.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9</li> </ul>	<ul style="list-style-type: none"> <li>Consider explicit requirement that major development proposals should demonstrate how they could link to local heat or energy networks when viable.</li> <li>Consider inclusion of a policy to avoid sterilisation of sites for distributed heat and energy networks adapted from policy 3.</li> </ul>	<ul style="list-style-type: none"> <li>See final sentence of policy P1 that requires regard to other relevant policies including policies P9 and P15 on climate change and design.</li> </ul>
<ul style="list-style-type: none"> <li>Require major development to achieve the reductions in total CO<sub>2</sub> emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable.</li> <li>The percentage reductions in CO<sub>2</sub> emissions should be based on the estimated CO<sub>2</sub> emissions of the development after the installation of energy efficiency measures related to either the, BREEAM or equivalent method has been applied.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9 and P15</li> </ul>	<ul style="list-style-type: none"> <li>Consider use of policy guidance from PPS1 on provision of local heat/energy networks to supplement policy with area wide approach to low carbon solutions under policy 1.</li> <li>Make provision for reduced CO<sub>2</sub> emissions under policy 1.</li> </ul>	<ul style="list-style-type: none"> <li>See final sentence of policy P1 that requires regard to other relevant policies including policies P9 and P15 on climate change and design.</li> </ul>
<ul style="list-style-type: none"> <li>Consider require a proportion of development area to be prioritised for low carbon businesses.</li> </ul>	<ul style="list-style-type: none"> <li>Most of the employment land in the plan is already committed and is in the process of development. Unlikely to be able to enforce such a requirement. Also ambiguity over what is a low carbon business.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Introduce policy for developers to make space for water and to manage flood risk within policy 1.</li> <li>Consider requirement upon development to demonstrate adaptation to climate change within policy 1.</li> </ul>	<ul style="list-style-type: none"> <li>See final sentence of policy P1 that requires regard to other relevant policies including policies P9 and P15 on climate change and design.</li> </ul>

**Table 3.5: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider how requirement for local distinctiveness could be delivered in the Regional Investment Areas.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P15. Seeks to promote high quality design that will contribute to a sense of place.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.6: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider encouraging new businesses to adopt local sourcing of materials and labour including through the provision of training programmes to help those with weaknesses in some skills.</li> </ul>	<ul style="list-style-type: none"> <li>See P1 (v). Insistence on local sourcing of material is beyond the scope of the Plan</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>



## 3.5 Appraisal of Policy 2: Competitive Town Centre

### Introduction

- 3.5.1 The proposed policy on delivering a competitive town centre is assessed in this section against the sustainability objectives. Beyond the Town Centre there is a presumption against development unless it is promoted by the policies and proposals of the Plan. There have been some changes, highlighted in red to the policy as well as changes to the text that supports the policy.
- 3.5.2 The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials.

#### Policy 2 – Maintain a Strong, Competitive Town Centre

The Council will maintain strong and competitive Town Centres. Town Centres will be the focus for all new developments including retail and other commercial development in line with Town Centre first approach of the National Planning Policy Framework.

##### SOLIHULL TOWN CENTRE

Solihull Town Centre will be developed and sustained as a place of quality and distinction. It will provide the civic heart of the Borough and the principal focus of commercial activity and public transport. It will be shaped and managed to ensure continued economic growth and success.

The character and quality of the town will be protected and enhanced through the promotion and careful control of new development which is sensitive to its context but adds a new dimension to visual interest, activity and economic success.

The Town Centre Strategy Map establishes:

- The extent of the town centre to focus commercial **and leisure** activity, facilitate effective and efficient patterns of movement and public transport and to provide a clear identity.
- A public realm framework as a focus for pedestrian movement and activity. New building will be required to front onto this network and focus their public activity to that frontage
- A pattern of retail frontages to ensure the effective, efficient, convenient vital and successful functioning of the town as a shopping centre
- Opportunity Sites for new development at Touchwood, Mell Square West, Lode Lane and Herbert Road/Station Road: and indicative opportunities elsewhere including Mell Square East, Lode Lane and Homer Road.

**In total, new development in the town centre will provide:**

- **Up to an additional About 34,000m<sup>2</sup> of additional comparison retail floorspace by 2021; and a further 23,000m<sup>2</sup> 2021 to 2026; and an additional 2,800m<sup>2</sup> of convenience retail floorspace to 2026.**
- **Up to an additional 35,000m<sup>2</sup> of new office floorspace**
- **Residential development, both on freestanding sites and as part of mixed use development or refurbishment schemes, will be encouraged in & around the town centre. Larger scale sites additional to the Opportunity Sites listed above will include:**
  - **Monkspath Hall Road**
  - **Station Approach**

**The development of Monkspath Hall Road shall be designed to allow for the relocation of Solihull Railway Station though such a proposal is not being put forward at this time.**

**The timing of new development will pay due regard to the need to ensure a balance of activity throughout the town centre during the whole of the plan period. A particular concern will be to ensure the continued success of both sides of High Street without either side becoming overly dominant in terms of floor space or activity.**

The timing of development will also need to pay due regard to the need to ensure the effective provision of public transport, walking and cycling routes and to avoid unacceptable levels of traffic congestion within, or on routes to and from, the town centre.

All new development will be expected to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary town centre infrastructure, especially for walking and cycling access, public transport, the public realm and on key highway links & junctions within & serving the town centre.

The provision of private parking within the town centre will be accepted for housing development and where there is clear operational need.

The provision of additional public parking will only be accepted where it can be shown that there is insufficient public parking already available to serve the development proposed.

#### **SHIRLEY TOWN CENTRE**

**Shirley Town Centre will be developed and sustained as a focus of commercial activity & services for the local community. It will be shaped and managed to secure its regeneration and economic success.**

The extent of Shirley Town Centre is defined on the proposals map. The boundary focuses commercial activity south of the junction between Stratford Road and Haslucks Green Road and in a new development west of Stratford Road which creates a new heart of the centre and better links into Shirley Park.

**Retail activity will be focused within the town centre boundary and will be required to front onto Stratford Road or the new public realm between Stratford Road and the Park. No substantial retail development will be granted planning permission elsewhere.**

**The former Powergen Building on the Stratford Road North of Haslucks Green Road will be developed in a manner which effectively connects to and complements the town centre that is a mix of residential, office, hotel, leisure or community uses but shall not include any substantial retail floorspace.**

All new development should be sensitive to local character and enhance the public realm.

#### **CHELMSLEY WOOD TOWN CENTRE**

**Chelmsley Wood Town Centre will be developed and sustained as a focus of commercial activity, services and public transport. It will be shaped and managed to secure its regeneration and economic growth and to provide a focus for the local community and an identity of which it can be proud.**

The extent of the Town Centre is defined on the Proposals Map and retail activity will be focused within it.

New development on the edge of the town centre will be encouraged to assist regeneration of both the town centre and the wider area of North Solihull. It will also be encouraged to better link the town centre and its interlink to Meriden Park and Cole Valley and enhance the public realm in and around the centre.

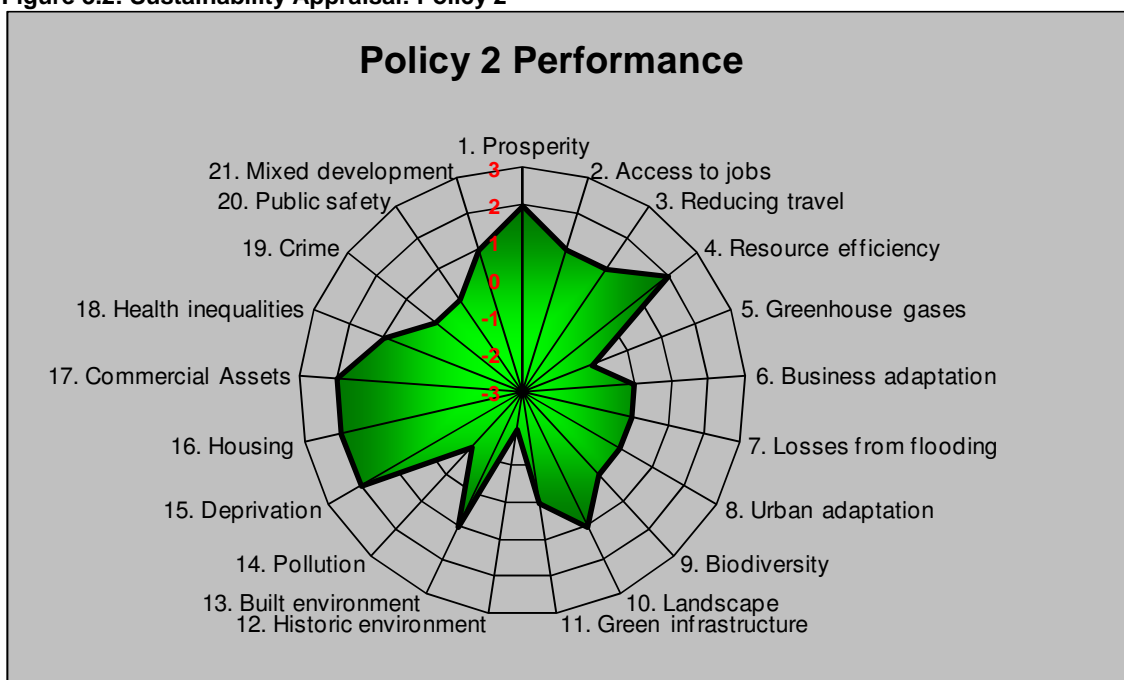
#### **MAIN TOWN CENTRE USES ELSEWHERE**

**The plan seeks to ensure the vitality of its town centres as the heart of their communities. Proposals for main town centre uses will be expected to locate in town centres. Proposals for main town centre uses elsewhere, that do not accord with the policies and proposals of this local plan, will be considered in the light of the requirements of the National Planning Policy Framework. Elsewhere there is a presumption against development unless it is promoted by the policies and proposals of the Plan. This approach is justified by the terms of the National Planning Policy Framework, the opportunities available for development in the Borough's town centres and by the findings of the Council's Retail Capacity Study.**

**Forecast Effects**

- 3.5.3 The amendment has not given rise to a substantive change in the appraisal beyond increasing the likelihood of the efficient use of demand and reducing demand for out of town commercial development from a “potential” outcome to a “likely” outcome.
- 3.5.4 This town centre policy is expected to give rise to five moderate beneficial outcomes and six minor beneficial effects (see Figure 3.2 and Appendix G). This is accompanied by one moderate adverse (historic environment). The remaining objectives deliver neutral outcomes with two minor negative effects associated with the absence of measures dealing with greenhouse gas emissions and potentially negative effects from noise and air pollution affecting local residents.
- 3.5.5 In terms of the sustainable consumption and production theme, the policy offers a beneficial outcome with two moderate beneficial outcomes (prosperity and resource efficiency, as well as minor beneficial effects on access to jobs and reducing travel). In terms of the latter objective, private parking in the town centre is accepted where there is an operational need. Additional public parking is accepted where there is insufficient public parking. This suggests parking capacity will expand to meet need and hence do little to reduce the need to travel, although the location of town centre development would make efficient use of existing infrastructure.

**Figure 3.2: Sustainability Appraisal: Policy 2**



SA Objective	Likely Significant Effects	Rationale
1 .Prosperity	<b>Mod+ve</b>	Expansion of retail premises together with local housing and improved connectivity is likely to assist targeted communities and enhance local prosperity.
2. Resource efficiency	<b>Mod+ve</b>	Potential to support efficient use of land and reduce the demand for out of town commercial development.
15. Deprivation	<b>Mod+ve</b>	With the introduction of new housing, the policy has the potential to help disadvantaged communities by providing housing close to work and retail needs.

SA Objective		Likely Significant Effects		Rationale					
16. Housing		Mod+ve		Policy assists with provision of a diverse housing offer that could contain an affordable housing element.					
17. Commercial assets		Mod+ve		A strong and attractive town centre has the potential to play a role in attractiveness of regional investment sites.					
12. Historic environment		Mod-ve		No reference to encouraging local distinctiveness or a policy towards conservation areas and listed buildings.					
Local	9	Unlikely	0	Direct	8	Positive	11	Maj +ve	0
District	5	Potential	4	Indirect	5	Negative	3	Mod+ve	5
Regional	0	Likely	9	Cumul	1			Min+ve	6
National	0	Definite	1					Neutral	7
								Min-ve	2
								Mod-ve	1
								Maj -ve	0

- 3.5.6 The policy offers a negative outcome for climate change and energy with no measures being provided for reducing CO<sub>2</sub> emissions with expanding car parking potentially leading to increased emissions. Also, there are no drivers provided to deliver urban adaptation to climate change. However policy P9 provides for local heat networks and Policy P15 addresses design quality.
- 3.5.7 The sustainability theme on natural resource protection & environmental enhancement receives mixed support from the policy. The requirement to enhance the public realm in Shirley Town Centre and Chelmsley Wood may deliver some landscape improvements although there is little indication that the landscape effects of development are to be considered or the opportunities to address climate change.
- 3.5.8 The potential enhancements to the climate change and energy sustainability theme are available by making provision for local heat/energy networks and the integration of green infrastructure and green roofs (See Table 3.8) through policy P9 and policy P15.
- 3.5.9 There is a requirement upon developers to sustain Solihull Town Centre as a place of quality and distinction. In the case of Shirley Town Centre development is to be sensitive to local character and enhance the public realm while at Chelmsley Wood development is to enhance the public realm. Overall, it is likely that some enhancement to the built environment would result.
- 3.5.10 The sustainable communities theme is supported through three moderate beneficial outcomes (deprivation, housing and commercial assets) and one minor beneficial outcome (mixed development). However the policy fails to provide measures to “design out” crime or to address public safety or the needs of an elderly population, although the policy P15 addresses these aspects.
- 3.5.11 The proposed policy makes reference to the inclusion of residential development within mixed-use developments. Provided a portion of the houses are assigned as affordable housing then there are benefits to the sustainability objectives under sustainable communities.
- 3.5.12 The effects are judged to be mainly local (nine) with five being district-wide in scale (see Appendix G). Eight outcomes were considered to be direct with five being indirect and one (greenhouse gases) being cumulative in nature. Overall there were eleven positive outcomes and three negative.

### **Managing Uncertainty**

- 3.5.13 Nine of the outcomes are regarded as being likely to occur, with four considered to have the potential to result in a significant effect. The Proposed Modifications are judged reduce the risk of edge of town retail development by promoting the pre-eminence of the town centres. This ought to result in a definite benefit in reducing the need to travel.

### **Mitigation and Enhancement**

- 3.5.14 Tables 3.7 to 3.10 summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across the four sustainability themes. No further proposals are put forward for consideration.

**Table 3.7: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider how the phasing of the development might impact upon sustainable construction techniques, maximising opportunities to reuse/ recycle materials and the impact of construction traffic.</li> </ul>	<ul style="list-style-type: none"> <li>Timing of development is focussed on the need to provide a balance of activity either side of the High Street. Sustainable development impacts are covered in the Policy and elsewhere such as P7, P8, P9 and P15</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider the extent to which re-development activities could provide for efficient delivery and waste management practices including through the use of consolidation centres to maximise retail floor space and manage delivery activities, potentially through a low carbon local delivery fleet operating from a consolidation centre (8).</li> </ul>	<p>See Policy P12 on waste management that seeks to promote and control development to prevent the production of waste.</p>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider requiring major developers to provide a sustainability report demonstrating how their designs deliver sustainable development across the range of economic, materials, social and environmental factors.</li> </ul>	<p>No specific requirement for a sustainability report but requirements to cover sustainability issues are included in Policy P7, P8, P9 and P15 (see also final paragraph of P1)</p>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.8: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Require major development to achieve the reductions in total CO<sub>2</sub> emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9 and P15.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>The percentage reductions in CO<sub>2</sub> emissions should be based on the estimated CO<sub>2</sub> emissions of the development after the installation of energy efficiency measures related to either the BREEAM or equivalent method has been applied.</li> </ul>			
<ul style="list-style-type: none"> <li>Consider a requirement for the provision of a green roof to new major retail development proposals to a) reduce energy consumption; b) reduce the heat island effect c) reduce runoff and d) provide new habitat.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9. Issue covered in a more flexible way that could include green roofs as a measure.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Could make reference to need for design to reduce energy consumption and address heat island effect.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9 and P15.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.9: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider a requirement for the provision of a green roof to new major retail development proposals to a) reduce energy consumption; b) reduce the heat island effect c) reduce runoff and d) provide new habitat .</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9 and P15</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Could identify the achievement of an effective green infrastructure as a priority within the town centre.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P2 and P15. The Town Centre is to be developed as a place of quality and distinction. This includes consideration of green infrastructure Draft Local Plan para 7.4.6 seeks to improve links to open space as part of improved urban design. P15 covers requirements for designing-in green infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Consider referencing green infrastructure within P2.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 2 makes clear that Solihull Town Centre is to be developed as a place of quality and distinction and paragraph 7.4.6 cross refers to policy P15.</li> </ul>
<ul style="list-style-type: none"> <li>Could consider specific design measures for retail outlets to support local distinctiveness.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P15 that requires all developments to conserve and enhance local character, distinctiveness and streetscape. This includes town centre proposals.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.10: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider the extent to which the re-development of the town centre caters for all ages across the community and is designed in manner to enhance public safety and reduce crime.</li> </ul>	<ul style="list-style-type: none"> <li>See Draft Local Plan para 7.4.11 and Policy P15 that promotes inclusive design and the creation of attractive, safe, active streets and public spaces that reduce the fear of crime.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider reference to affordable housing or cross reference to other policies P2 to P4.</li> </ul>	<ul style="list-style-type: none"> <li>See policy P4 on affordable housing. Cross referencing not needed as it is more about the principals involved in enabling the commercial development of the centre.</li> </ul>



### 3.6 Appraisal of Policy 3: Provision of Land for General Business and Premises

#### Introduction

- 3.6.1 The proposed policy on employment land is examined in this section against the SA objectives however there has been no change to the policy from that of the Submission Draft Local Plan. The only change introduced is that of an increase in the amount of readily available allocated land at Fore, Stratford Road from 0.5 to 2.0 ha and an increase in the available allocated land adjacent to Birmingham Business Park from 5.0 to 9.0 ha. In neither case does this affect the sustainability appraisal findings for this policy.
- 3.6.2 The aim of the appraisal is to establish the policy's sustainability performance and to identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below. Some slight amendments have been made to the proposed measures for mitigation and enhancement.

#### Policy 3 – Provision of Land for General Business and Premises

Sustainable economic growth is important to Solihull's success as an attractive place to live, work and invest. It will enable increased prosperity, opportunity, well being and quality of life and will potentially provide a better quality of life for individuals and communities experiencing high unemployment.

To encourage sustainable economic growth and provide a broad range of employment opportunities **the Council will plan for a continuing supply of employment land.** Figure 14<sup>18</sup>, below, identifies the strategic sites that comprise the Council's supply of main employment land for this purpose, adopting a plan monitor and manage approach to avoid over allocating land for this purpose that may lead to unnecessary loss of Green Belt land.

**The Council will support the allocated sites for purposes set out in Figure 14. Small-scale supporting facilities may be allowed where needed to specifically enhance/complement business use in the particular business locality and is compatible with sustainable development principles. To ensure that an adequate supply of land remains available for employment purposes, sites will be protected for their allocated purposes. Non-allocated employment sites will also be protected for employment use (Classes B1, B2, B8 and, where appropriate, waste management). Alternative uses may be allowed where the following criteria are met:**

- a) The site is relatively isolated from other business premises or is out of place in the context of other neighbouring uses, such as residential, or
- b) It is clearly demonstrated that there is no longer a need to retain the site/premises for their intended business class purpose, or
- c) In the case of vacant premises, there is no longer a reasonable prospect of attracting business development in market terms and,
- d) The alternative use will support sustainable development principles and will directly support employment locally.
- e) There is no conflict with other policies of the Core Strategy or the National Planning Policy Framework.

**The Council will encourage the retention of small and medium sized enterprises, and the creation of new ones, both in urban and rural areas as a key economic driver and to help facilitate growth in a broad variety of locations, including North Solihull as a priority, subject to the following criteria:**

- a) Form, use and scale are appropriate to character of the particular location.
- b) There is no significant harm to the local environment, including landscape quality and character.
- c) Proposals for home-working are compatible with the character of the local environment and are consistent with the amenity policies of this Local Plan.
- d) The land/premises are not in the green belt or are compliant with green belt policy.

<sup>18</sup> See Table 3.11 below

e) In the case of development in rural areas, it is consistent with the Council's countryside policies and does not undermine the quality and character of the natural environment.

The Council will expect development proposals on business sites to include the necessary infrastructure to accommodate high capacity digital communication where technically feasible.

In order to encourage sustainable access to business developments and reduce the need to travel, applicants for planning permission for business use will be expected to demonstrate the anticipated level of employment that will be generated and how this will be of benefit to meet local employment needs.

Employment development will not be allowed where it sterilises natural resources or key sites needed to secure sustainable development, particularly in regard to provision for distributed heat and energy networks.

**Table 3.11: Allocated Employment Sites**

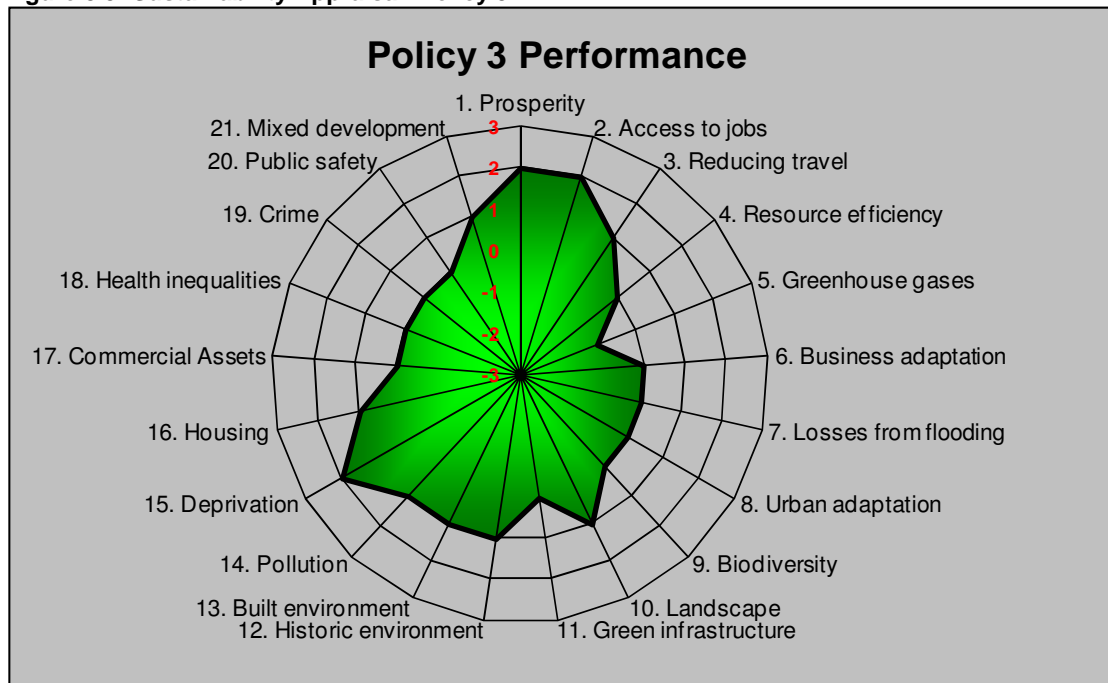
Site	Remaining Land (Ha)	Readily Available Land (Ha)	Preferred Use Class
TRW, Stratford Road	18.5	18.5	B1, B2, B8
Solihull Business Park	6.0	6.0	B1, B2, B8
Fore, Stratford Road	2.0	2.0	B1
Chep / Higginson, Bickenhill Lane	4.0	0.0	B1, B2, B8
North of Clock Interchange, Coventry Road	2.0	1.0	B1
Land adj. B'ham Business Park	9.0	0.0	B1, B2, B8
<b>Total</b>	<b>41.5</b>	<b>27.5</b>	

## Forecast Effects

- 3.6.3 This policy is envisaged to give rise to three moderate beneficial effects and nine minor beneficial effects and one minor negative effect (greenhouse gases). The remaining eight objectives are neutral (see Figure 3.3 and Appendix G). The outcomes give rise to eight direct effects and four indirect with one cumulative effect (greenhouse gases). The majority of the impacts are local in scale with three being considered district-wide. The effects typically extend for more than 10 years.
- 3.6.4 The policy is likely to provide moderate beneficial outcomes (prosperity and access to jobs but is not certain to reduce the need to travel. The climate change and energy sustainability theme is not addressed with nor are measures promoted to reduce greenhouse gas emissions or adaptation to climate change.
- 3.6.5 The outcome of the policy upon the natural resource protection and environmental enhancement sustainability objective is broadly positive with five minor positive outcomes. It is noted that this outcome is due to the requirement not to undermine the quality and character of the natural environment, i.e. to prevent adverse effects. There are no positive obligations to enhance biodiversity, contribute towards the provision of green infrastructure or to protect/enhance the historic and build environment.
- 3.6.6 Sustainability objective 21 seeks the encouragement of development that helps deliver an enhanced balance between jobs, housing and services in the local area, with easy and equitable access to opportunities for all. In this context, while policy provides for alternative uses under certain conditions. this is focused upon alternative uses of the development site. The intention of behind the sustainability objective was to encourage development that delivered a balance between employment, housing, services and community facilities and amenities across local areas. As such the intention was to view employment development proposals in the context of the wider community needs.
- 3.6.7 As the policy makes reference to supporting small and medium sized businesses, support to employment locally and meeting local employment needs with North Solihull as a priority, it is likely to deliver a moderate beneficial outcome for the deprivation objective but does not provide any support to address

health inequalities, crime and public safety (see Appendix G). The uncertainty raised by the policy is whether this would extend to address the sustainability objective 21.

Figure 3.3: Sustainability Appraisal: Policy 3



SA Objective	Likely Significant Effects	Rationale							
1. Prosperity	Mod+ve	Policy provides for the potential to allow small-scale supporting facilities as well as specific measures to encourage the small and medium sized enterprises.							
2. Access to jobs		Identifies the importance of access to business development with developers having to demonstrate how the generated employment will help meet local needs, support employment locally and help sustain small and medium sized businesses.							
15. Deprivation		References to demonstrating support for small & medium sized businesses. Also, support to employment locally and meeting local employment needs.							
Local	10	Unlikely	0	Direct	8	Positive	12	Maj +ve	0
District	3	Potential	7	Indirect	4	Negative	1	Mod+ve	3
Regional	0	Likely	6	Cumul	1			Min+ve	9
National	0	Definite	0					Neutral	8
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

### Managing Uncertainty

3.6.8 Of the significant effects assumed to arise seven are potential effects and six are considered to be likely outcomes. Of the potential effects all are associated with minor beneficial outcomes.

### Mitigation and Enhancement

3.6.9 Tables 3.12 to 3.15 summarise the suggestions presented in the SA of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across the four sustainability themes. No further proposals are put forward for consideration.

- 3.6.10 It was suggested in the 2012 SA Addendum Report that the policy provides encouragement to local carbon businesses in support the climate change and energy sustainability objectives. The intention of this proposal was not to influence the extent to which the products of businesses are low carbon, but rather to help prioritise development in areas where low carbon outcomes can be enhanced by the aggregative effect of development proposals and to support local heat or energy networks. This could be achieved by **supplementing the final clause in the policy so that it reads “Development that makes a positive contribution towards the achievement of distributed heat and energy networks would be encouraged”**.
- 3.6.11 In addressing the sustainability objectives under the sustainable communities theme, the policy perhaps could have included a desire to encourage major employers to demonstrate how they intend to support local small and medium sized companies; particularly those located within disadvantaged communities (see Table 3.15). **This could still be addressed through the Sustainable Design and Construction SPD to complement the sustainable consumption, climate change and natural resource themes.**

**Table 3.12: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Ensure that employment premises make adequate provision for waste segregation and recycling.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy 12 that seeks to prevent waste.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>This policy ought to note how it supports the regeneration initiatives in the North Solihull Regeneration Zone as two sites are Bickenhill easily accessible from the regeneration zone.</li> </ul>	<ul style="list-style-type: none"> <li>Policy requires developers to demonstrate how they meet local needs and support local employment.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.13: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider prioritising the release of employment land where opportunities to link with local energy or heat distribution networks would be more likely.</li> </ul>	<ul style="list-style-type: none"> <li>Policy protects sites needed for local energy or heat networks.</li> <li>See Policy P9</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider whether priority ought to be assigned to sites able to offer growth of a cluster of low carbon businesses.</li> </ul>	<ul style="list-style-type: none"> <li>Most of the allocated employment sites are ongoing existing sites that are part developed. Not practical to prioritise as suggested.</li> </ul>	<ul style="list-style-type: none"> <li>Consider encouragement to low carbon businesses in text to P3.</li> </ul>	<ul style="list-style-type: none"> <li>Policy P3 and its justification govern broad brush business use classes of the Use Classes Order, but is unable to allow choice between users on the basis of whether products are low carbon or not.</li> </ul>

**Table 3.14: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider a requirement that employment developments propose measures for avoiding unnecessary sterilisation of natural resources or key sites needed to secure the sustainable development of a locality particularly in regard to the provision of distributed heat and energy networks.</li> </ul>	<ul style="list-style-type: none"> <li>Policy amended to include proposal. See final paragraph of Policy P3.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>• Could make it transparent that sites selected for waste recycling businesses would reflect potential pollution and traffic management issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Waste issue addressed in policy 12.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>

**Table 3.15: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>• Perhaps the provision of flexibility could be qualified such that provision reflects the needs of the local community thus contributing towards the potential for a reduced need to travel and increasing the employment opportunities appropriate to the local community.</li> </ul>	<ul style="list-style-type: none"> <li>• Flexibility in the type of development qualified to be compatible with sustainable development principles.</li> <li>• Need to reduce the need to travel addressed by requirement on developers to demonstrate the level of employment generated and the benefit to meet local employment needs.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Encourage major employers to demonstrate how they intend to support local SMEs and adopt local supply chains and employment, particularly among those from disadvantaged communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy amended to recognise role of small and medium sized enterprises.</li> <li>• Beyond scope of plan to require adoption of local supply chains. P3 requires applicants to demonstrate level of employment generated and the benefit in meeting local employment needs.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Consider the role of mixed use development within the employment land policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Development is to be compatible with the sustainable development principles.</li> <li>• See 3<sup>rd</sup> paragraph of Policy P3</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consider making explicit a desire to encourage development that achieves enhanced local balance between jobs, housing, services and accessibility.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Policy P3 encourages sustainable economic development and employment locally. Seeking a balance between jobs, housing, services and accessibility is not a sufficiently well-defined concept to be able to sharpen or strengthen policy.</b></li> </ul>
<ul style="list-style-type: none"> <li>• Consider mechanisms to maximise local recruitment to the new employment areas rather than inward commuters.</li> </ul>	<ul style="list-style-type: none"> <li>• Addressed through the requirement to demonstrate employment generated and the benefit to local employment needs.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>None.</b></li> </ul>

## 3.7 Appraisal of Policy 4: Meeting Housing Needs

### Introduction

- 3.7.1 This section presents the appraisal of the Submission Draft Local Plan policy on housing with the aim being to establish the sustainability performance of the policy and to identify potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Submission draft Local Plan. The specific policy commitments are highlighted in the table below. No changes to this policy have been made following the Examination in Public and thus no changes result to the appraisal.
- 3.7.2 Note that the policy addresses housing traded on the open market, low cost and affordable housing as well as rural and supported housing. Some minor changes have been made to update the proposed measures to mitigate and enhance the performance of the policy.

<b>POLICY P4 – Meeting Housing Needs</b>
<p><b>(a) Affordable Housing</b></p> <p><b>The Council will require developers of allocated and unidentified sites to make a contribution to affordable housing on residential sites of 0.2 hectares or more, or housing developments of 3 or more net homes.</b></p> <p>Affordable housing includes social rented, affordable rented or intermediate - tenure housing which is available at below market price or rent and which is affordable to households whose needs are not met by the market.</p> <p>The local definition of ‘affordable’ is set out in an Affordable Housing Supplementary Planning Document (SPD) which will be updated periodically to reflect changes in local incomes and house prices.</p> <p><b>Contributions will be expected to be made in the form of 40% dwelling units on the development site, but will take into account:</b></p> <ul style="list-style-type: none"> <li>i. <b>Site size;</b></li> <li>ii. <b>Accessibility to local services and facilities and access to public transport;</b></li> <li>iii. <b>The economics of provision, including particular costs that may threaten the viability of the site;</b></li> <li>iv. <b>Whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;</b></li> <li>v. <b>The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and</b></li> <li>vi. <b>The need to achieve a successful housing development.</b></li> </ul> <p><b>Where on site provision is not feasible or viable there will be a financial contribution towards the provision of affordable housing that would not otherwise be provided, elsewhere within the Borough.</b></p> <p><b>This policy applies to all qualifying sites across the Borough and includes Gypsy and Traveller sites.</b></p> <p><b>In addition to requiring a proportion of the homes to be ‘affordable’ the Council will identify the tenure, mix and type of the homes and any requirements for homes to be designed to meet specific needs such as those of older or disabled people.</b></p> <p><b>The mechanisms and criteria for delivery of Policy 4 are set out in an Affordable Housing Supplementary Planning Document.</b></p> <p><b>(b) Rural Exceptions</b></p> <p><b>The provision of affordable housing developments on green belt land will be supported in circumstances where,</b></p> <ul style="list-style-type: none"> <li>i. <b>The development proposal is consistent with the Parish or Neighbourhood Plan; or</b></li> <li>ii. <b>There is evidence that people with a local connection to the parish area have a housing</b></li> </ul>

**need that cannot be met through affordable housing provision on an allocated housing site and the proposed development is supported by the Parish Council or Neighbourhood Group.**

**(c) Market Housing**

**Where the Council issues a development brief for a site this will include details of the likely profile of household types requiring market housing, e.g. multi-person, including families and children (x%), single persons (y%) and couples (z%), as identified by the latest Strategic Housing Market Assessment. In assessing the housing mix of allocated and unidentified sites, the Council will, in negotiations, have regard to:**

- i. Site size;**
- ii. The existing mix of market housing and local housing demand in the area as guided by the Strategic Housing Market Assessment;**
- iii. Accessibility to local services and facilities and access to public transport;**
- iv. The economics of provision, including particular costs that may threaten the viability of the site;**
- v. The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and**
- vi. The need to achieve a successful housing development.**

**The Council considers permanent residential moorings to be low cost market housing and will require a proportion of all new moorings to be permanent residential and not solely provision for touring, leisure and holiday moorings.**

## Forecast Effects

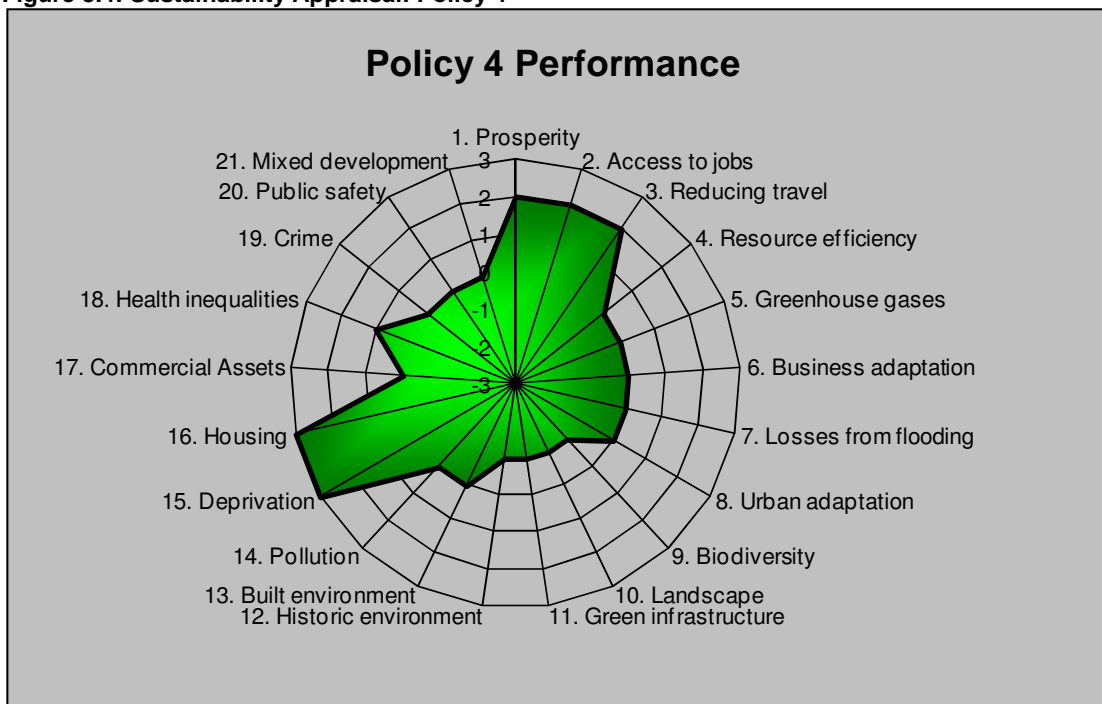
- 3.7.3 This policy performs in a positive manner with two of the twenty one sustainability objectives reporting a major beneficial outcome (deprivation and housing) and three moderate beneficial outcomes (see Figure 3.4 and Appendix G). There are four minor adverse outcomes. The majority of the consequences across the sustainability objectives (eleven) are considered to be neutral.
- 3.7.4 The effects arising from the policy are anticipated to be long term (greater than 10 years), with five occurring at a Borough-wide scale with five at a local scale. There are six direct impacts and four indirect effects.
- 3.7.5 The policy performs well on the sustainable consumption and production theme with two potential and one likely indirect beneficial outcomes, while the consequences for the climate change and energy theme are neutral as it is unclear how the costs of sustainable construction and provision of renewable energy are to be considered in tests of viability.
- 3.7.6 Delivery against the sustainable communities theme is strongly positive in terms of the effects on deprivation and housing, whereas the policy fails to deliver against the objectives of designing out crime or providing for public safety.

## Managing Uncertainty

- 3.7.7 The uncertainty associated with the forecast outcomes varies across the sustainability appraisal framework. Four of the effects are considered to be likely or definite to occur (two major positive, three moderate positive and one minor positive).



Figure 3.4: Sustainability Appraisal: Policy 4



SA Objective		Likely Significant Effects		Rationale					
15. Deprivation		Maj+ve		Supports the delivery of housing to meet the needs of low income households and potentially for those with special needs.					
16. Housing		Maj+ve		Seeks to address identified needs for affordable housing as well as provision of a range of housing sizes and types. Policy also provides for rural exceptions. In particular, it seeks to address the needs of those seeking low cost market housing, affordable housing and housing in the rural area					
1. Prosperity		Mod+ve		Affordable housing could potentially assist people to locate closer to employment or have resources to travel to work.					
2. Access to jobs		Mod+ve		Increased affordable housing provision is likely to help people find accommodation closer to areas with job opportunities.					
3. Reducing travel		Mod+ve		Suitability of sites for affordable housing judged on accessibility to local services, facilities and public transport potentially reducing travel needs.					
Local	5	Unlikely	0	Direct	6	Positive	6	Maj +ve	2
District	5	Potential	6	Indirect	4	Negative	4	Mod+ve	3
Regional	0	Likely	3	Cumul	0			Min+ve	1
National	0	Definite	1					Neutral	11
								Min-ve	4
								Mod-ve	0
								Maj -ve	0

**Mitigation and Enhancement**

3.7.8 The following tables summarise the suggestions presented in the SA of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across the four sustainability themes (see Tables 3.16 to 3.19).

- 3.7.9 As there may be an increasing challenge to match market housing with local needs and hence a need for an expansion of the subsidised housing sector delivered through housing associations, so there may be merits in encouraging new delivery vehicles combining public and private sector initiatives to deliver affordable housing.
- 3.7.10 The proposals for the climate change and energy sustainability theme are not addressed within the housing policy, but are addressed in policy 9.
- 3.7.11 The policy does not provide for measures to deliver urban cooling through vegetation, when the benefits from such cooling may well result to the elderly and young who potentially are more likely to occupy the affordable housing stock. As a result potential health benefits from designs that reduce fuel poverty and a cooling environment through the proposed Sustainable Design and Construction SPD or through development briefs.

**Table 3.16: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider opportunities for the refurbishment of housing in the vicinity of a housing development proposal in areas where energy consumption and community needs could be enhanced through a single construction programme.</li> </ul>	<ul style="list-style-type: none"> <li>Too detailed for the draft Local Plan, could not be applied to private housing. Solihull Community Housing and the Housing Associations already meet the Decent Homes Standards.</li> <li>Policy 9 proposes an SPG on allowable solutions.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider exploring whether refurbishment schemes that deliver reduced carbon emissions could be eligible under the Allowable Solutions approach.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy P9 Climate Change presumes that in the first instance the policy will be met on site by developers. All Council and housing association properties already meet the Decent Homes Standard. Paragraph 10.2.7 of the Local Plan identifies that more work on appropriate 'allowable solutions' is needed and that supplementary guidance will be produced. However 'allowable solutions' could include the refurbishment or further improvement of existing dwellings, both affordable and private, and this will be considered as part of the development of this supplementary guidance. Policy P9 highlights in the first paragraph that the Council will also be pursuing its own Affordable Warmth Strategy for Solihull and this highlights the importance the local authority places on reducing the carbon emissions of existing buildings.</b></li> </ul>
<ul style="list-style-type: none"> <li>Ensure housing provides appropriate facilities for waste management.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 12 requires that non-waste development will be required to accommodate facilities for the storage and sorting of waste arising from the development.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.17: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider requiring the developer to maximise the number of properties that are orientated so to minimise energy demand and are designed to prevent over-heating.</li> </ul>	<ul style="list-style-type: none"> <li>Policies 9 and 15 require new development to achieve the highest possible standard of environmental performance, including location and layout.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Major development shall achieve the reductions in total CO<sub>2</sub> emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable.</li> <li>The percentage reductions in CO<sub>2</sub> emissions should be based on the estimated CO<sub>2</sub> emissions of the development after the installation of energy efficiency measures related to either the Code for Sustainable Homes or equivalent method.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 9 requires new development to incorporate decentralised energy and heating networks where feasible and viable</li> <li>In locations where decentralised networks do not exist and are shown to be unviable or unsuitable, Policy 9 requires low or zero carbon energy to be provided to meet a minimum of 20% of predicted energy requirements.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider requiring the developer for a given scale of housing development to demonstrate the viability of ground source heat pumps and local grey water capture and reuse for their proposals.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 9 requires developers to incorporate decentralised energy and heating networks where feasible and viable. Policy 11 requires developers to demonstrate the highest possible standards of water efficiency including recycling grey water.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

<ul style="list-style-type: none"> <li>Consider an action to review public and private housing assets in the context of the residential heat demand map, the distribution of elderly or low income families with properties of low thermal efficiency to designate housing action areas allied to measures to tackle health inequalities.</li> </ul>	<ul style="list-style-type: none"> <li>Not a matter for the Local Plan. Housing Strategy has a Home Energy Efficiency and Affordable Warmth Strategy (2009).</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider links to a design guide to address potential for the thermal comfort of those occupying affordable housing.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>The Local Plan highlights in Policy 9 that all housing both affordable and private should meet code level 4 for Sustainable Homes. As part of the development of this policy the meeting of different levels of energy efficiency was considered to maximise the thermal comfort for occupiers as well as ensuring developments would still be viable. The additional costs of meeting code level 4 was considered as part of the Affordable Housing Viability Study and this looked at the accumulation of all the requirements of all the policies and that of meeting these requirements for both the affordable and market housing. This independent study considered that code level 4 was viable.</b></li> <li><b>Policy P15 securing Quality Design includes reference to Policy P9 to ensure “that new development achieves the highest possible standard of environmental performance”. The policy also states that the Council will prepare Supplementary Planning documents to provide necessary additional guidance. This will include guidance on addressing and mitigating the impacts of climate change, including how to meet the Code for Sustainable Homes for both affordable and private housing.</b></li> </ul>
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**Table 3.18: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider a requirement for developers to provide for a given number of trees per ha of development to maximise the cooling value to residential areas.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 10 will ensure the full value and benefits of the natural environment will be taken into account in considering development proposals, including the contribution to the potential for reducing the impacts on climate change.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.19: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>In terms of providing an appropriate mix of housing, clarify the basis on which "local" is to be defined and the extent to which the type of housing to be provided is intended to deliver the existing community need or to cater for a new community to be attracted on the basis of a changing economic profile of the area.</li> </ul>	<ul style="list-style-type: none"> <li>The draft Local Plan has been amended throughout to specify when "local" refers to the specific village/neighbourhood housing need or the Borough housing need.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider whether there ought to be a requirement for housing proposals to be designed to cater for healthy and sustainable communities.</li> </ul>	<ul style="list-style-type: none"> <li>Policy notes that the Council will have regard to achieving socially balanced and mixed communities</li> <li>Policy 5 requires design that recognises the public health agenda.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider requiring the design of housing developments to cater for the needs of an increasingly elderly population through a proportion of Lifetime homes for example.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 encourages residential development proposals to be built to Lifetime Homes Standard and to demonstrate at least the gold/silver Building for Life design standard. Specific requirements to be included in development briefs.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

<ul style="list-style-type: none"> <li>New residential development should seek to create a high quality living environment and incorporate crime reduction measures to achieve “Secure by Design” certification.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 requires applicants to adhere to the urban design principles set out in established current design guidance, including Secured by Design.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li><b>Clarify the understanding of “The need to achieve a successful housing development”. In what terms is a development to be considered successful?</b></li> </ul>	<ul style="list-style-type: none"> <li><b>PPS 3 Housing (although now superseded) sets out the national Planning Policies for housing when the Local Plan was developed and the criteria of the “need to achieve a successful housing development” in the Local Plan follows this definition. That is that new housing, and the provision of affordable housing where required, also takes into account:</b> <ul style="list-style-type: none"> <li><b>Achieving high quality housing</b></li> <li><b>Achieving a mix of housing – including type size and tenure</b></li> <li><b>Providing housing in suitable locations.</b></li> </ul> </li> <li><b>These criteria would be considered on the proposed development and would also look at the requirements of the neighbourhood and the Housing Market Area. Policy P15 and its associated SPD will provide further design guidance for residential development.</b></li> </ul>

### 3.8 Appraisal of Policy 5: Provision of Land for Housing

#### Introduction

- 3.8.1 Following from policy 4, this section focuses upon the implications of the allocation of land for housing upon sustainability and to identify any potential improvements that may strengthen the sustainability credentials of the policy. Changes to policy 5 include the increase of the housing land supply target. While there were no substantive changes to the policy, Changes to paragraph 8.4.1 of the Submission draft Local Plan recognise the value of a high quality environment in reducing out migration. New text recognises impact of substantial housing south of Shirley on infrastructure sustaining regional assets, that it would undermine growth and regeneration objectives and undermine the Meriden Gap, other major constraints including the River Blythe SSSI are recognised as major constraints to housing land supply.
- 3.8.2 A further addition to the supporting text notes that Birmingham will not be able to accommodate its 2011-31 housing needs and that some provision will be made in neighbouring areas. Following the Greater Birmingham and Solihull LEP Strategy and the Solihull Strategic Housing Market Assessment a review of the Local Plan would be brought forward and this may require a review of the Green Belt. The implications of these modifications have been incorporated into the latest appraisal. No significant amendments have been made to the proposals for mitigation and enhancement.
- 3.8.3 The specific policy commitments are highlighted in the table below with Table 3.20 providing a review of the sites for immediate release, while Tables 3.21 and 3.22 detail the release of sites in the medium and longer term.

POLICY P5 – Provision of Land for Housing
<p><b>The Council will allocate sufficient land for 3,960 net additional homes to ensure sufficient housing land supply to deliver 11,000 <del>8,665</del> additional homes in the period 2006-2028.</b> The allocations will be part of the overall housing land supply detailed in the table below.</p> <p><b>The annual housing land provision target is 500 net additional homes per year (2006-2028).</b> A trajectory showing how this target will be delivered from all sources of housing land supply is included in the Strategic Housing Land Availability Assessment and will be subject to annual review.</p> <p>The housing sites are phased to ensure a continuous supply of housing provision throughout the Plan period and a continuous supply of affordable housing. <b>Sites will not be released for development before they reach their specified phase, unless existing housing land supply falls below national planning policy deliverable housing land supply requirements. five years and the annual monitoring process has reviewed site deliverability and indicates that the trajectory is unlikely to recover over the next five years without additional land releases.</b></p> <p><b>New housing will be supported on unidentified sites in accessible locations where they contribute towards meeting identified borough-wide housing needs and towards enhancing local character and distinctiveness. Unless there are exceptional circumstances, new housing will not be permitted in locations where accessibility to employment centres and a range of services and facilities is poor.</b></p> <p><b>The density of new housing will make the most efficient use of land whilst providing an appropriate mix and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations.</b></p> <p><b>Development briefs will be prepared for each site in consultation with communities and developers and will set out the Council’s expectations for the development of each site. Each brief will provide criteria and principles for development. Development briefs will be a material consideration in planning applications and will inform pre-application discussions.</b></p>

- 3.8.4 Note there are other sources of land supply in addition to the allocations that will contribute towards housing land supply. The Strategic Housing Land Availability Assessment (SHLAA) provides estimates of how much new housing will be delivered where and in each phase<sup>19</sup>. Other sources of land supply include

<sup>19</sup> Available at: [http://www.solihull.gov.uk/Attachments/SHLAA\\_Report\\_Jan2012.pdf](http://www.solihull.gov.uk/Attachments/SHLAA_Report_Jan2012.pdf)



sites with planning permission for 1,200 dwellings that are likely to be delivered in phase 1, sites for 1,029 dwellings within the regeneration area which will be delivered during Phases 1 and 2 and 2,550 dwellings from windfall sites that will be delivered in Phases 1-3 and the majority of which will be delivered in the urban areas (see Table 3.20). The overall estimated capacity exceeds 8,665 to provide flexibility in the event of under-provision from any source of housing land supply.

**Table 3.20: Solihull Housing Land Supply 2006-2028<sup>20</sup>**

Source		Estimated Capacity
1	Housing completions (2006-2012)	2,335
<b>Future Housing Land Supply</b>		
2	Sites with planning permission	1,200
3	Sites identified in the SHLAA	158
4	Sites within the North Solihull Regeneration Area	981
5	Local Plan Proposed Sites	3,960
6	Windfall housing land supply	2,400
<b>Sub-total Housing Land Supply to meet the overall target of 8,665 additional dwellings (2012 - 2028)</b>		<b>8,699</b>
<b>Total Estimated Capacity</b>		<b>11,034</b>

**Table 3.21: Sites for Immediate Release**

Site		Site Area (ha)	Capacity Estimate
<b>North Solihull Regeneration Area</b>			
1	Foxglove Crescent (35 dwellings per ha)	1.98	70
2	Conway Road (45 dwellings per ha)	1.65	75
3	Simon Digby Chelmsley Wood (45 dwellings per ha)	4.57	200
4	Bishop Wilson and St. Andrews Scout Hut (45 dwellings per ha)	3.09	140
5	Lowbrook Phase II (45 dwellings per ha)	1.72	75
6	Chester Road/Centurion PH and adjoining land (45 dwellings per ha)	1.06	35
7	Birmingham Road (45 dwellings per ha)	1.50	70
<b>Major Urban Area</b>			
8	Solihull Town Centre – Mixed Use	43.40	300
9	Chelmsley Lane/Coleshill Road (40 dwellings per ha)	1.96	80
10	Powergen - Mixed use	3.84	130
<b>Rural Area – 40 dwellings per ha</b>			
11	Blythe Valley Park (46 dwellings per ha)	7.5	350
12	Four Ashes Road Bentley Heath	3.62	150
13	Hampton Road Knowle	2.55	100
14	Middlefield, Knowle	2.86	115

**Table 3.22: Phase 2 Sites – for Release on 1<sup>st</sup> April 2018**

Site		Site Area (ha)	Capacity Estimate
<b>Major Urban Area</b>			
15	Solihull Town Centre (Mixed use)	43.4	350
16	Aqueduct Road Solihull Lodge (30 dwellings per ha)	10.31	300

<sup>20</sup> The figures presented in this table may be subject to some slight adjustment.

17	Moat House Farm consented	-	-
<b>Rural Area (40 dwellings per ha)</b>			
18	Blythe Valley Park (50 dwellings per ha)	5.0	250
19	Braggs Farm/Brickiln Farm Dickens Heath	2.63	105
20	Griffin Lane Dickens Heath	1.19	50
21	Riddings Hill Balsall Common	1.61	65

**Table 3.23: Phase 3 Sites – for Release on 1<sup>st</sup> April 2023**

Site		Site Area (ha)	Capacity Estimate
<b>Major Urban Area</b>			
22	Solihull Town Centre (Mixed use)	43.4	300
<b>Rural Area (40 dwellings per ha)</b>			
23	Land at Cleobury Lane Dickens Heath	4.59	185
24	Land at Moat Dairy Farm Tanworth Lane	10.98	200
25	Land fronting Kenilworth Road	2.67	110
26	Land between Kenilworth Road/Windmill Road	1.17	45
27	Land off Meriden Road Hampton in Arden	2.79	110
<b>Total Capacity</b>			<b>3,960</b>

- 3.8.5 A large number of objections were received from the local community to the provision of housing on the Foxglove Crescent site. Loss of open space and part of a local nature reserve were among the reasons for the objections.
- 3.8.6 As no suitable replacement sites were identified, to maintain the housing numbers, sites beyond North Solihull were examined to determine whether their capacity/density could be increased within phase one. Site 10 – Blythe Valley Park phase one would permit an increase in capacity and density that would enable improved facilities to make the site more attractive for business investment while also avoiding additional land take from the Green Belt.
- 3.8.7 The Local Enterprise Partnership's 'City Deal Proposal' (5th July 2012) anticipates the creation of about 36,000 jobs in the M42 Gateway area. Based on maximising the potential of the cluster of key economic assets in the Gateway area, new jobs are likely to comprise a broad mix potentially providing an impetus for demand for the housing element at Blythe Valley Park supplementing the impetus that will be given through significant further business development at the site.

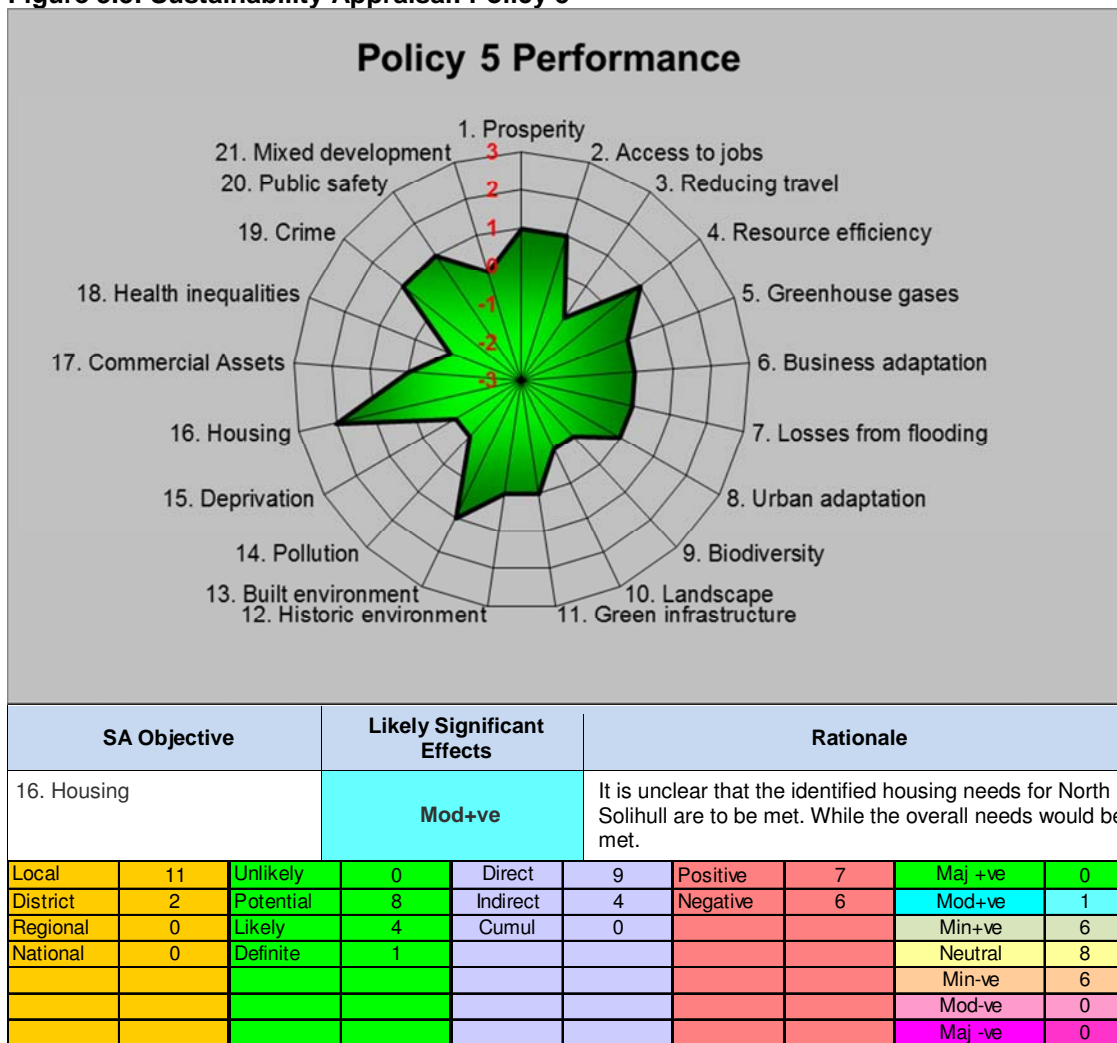
## Forecast Effects

- 3.8.8 The policy is envisaged to have the potential for a slightly adverse outcome as the previous major beneficial effect (housing) has been downgraded to moderate beneficial to reflect the uncertain effect that reduced supply within North Solihull Regeneration Area may have. Six minor beneficial effects are anticipated along with six minor adverse effects. Nine outcomes are judged to be direct with eleven outcomes being expressed at a local scale and two three at a district scale (access to jobs, and housing). The forecast consequences of the policy upon the sustainability objectives are presented in Figure 3.5 below and Appendix G.
- 3.8.9 The policy is envisaged to have the potential to provide a minor beneficial outcome under the sustainable consumption and production theme. Housing is to focus upon the urban area in the early phases with rural housing increasing in later phases. This approach has the potential to assist in helping with the affordability of housing and mobility for those where access to employment could otherwise be restricted
- 3.8.10 The reduced density of housing at Foxglove Crescent could potentially introduce increased diversity in the housing stock in North Solihull increasing the affordability of housing at the proposed density. However the transfer of 100 units from North Solihull to Blythe Valley is unlikely to benefit the affordability of housing overall in the regeneration area as no new sites can be identified for the first phase. The

increased density of housing at Blythe Valley could aid the prosperity of younger professionals working in the M42 Economic Gateway through the provision of more affordable housing.

- 3.8.11 While there remains a focus on urban areas which potentially reduces the need to travel, the third phase of housing is focused upon rural provision and is likely to increase travel needs. Although the policy requires that exceptional circumstances would be needed to allow unidentified sites to proceed where accessibility is poor, the submission Local Plan policy extends the policy to all settlements.

**Figure 3.5: Sustainability Appraisal: Policy 5**



- 3.8.12 The transfer of 130 housing units from North Solihull Regeneration Area to the edge of town Blythe Valley site and to the Powergen site is envisaged to have the potential to reduce accessibility to jobs. Although the loss of 130 housing units represents 16% of the previous provision in North Solihull, the policy could lead to increased housing pressures. In turn this may cause some to seek homes in places where public transport may not aid access to jobs to the same extent as North Solihull.

- 3.8.13 The reduction in the housing land supply figure does not affect the ability to deliver the identified housing need across the Borough because:

- The revised figure still exceeds the target, although the level of flexibility is reduced;
- The policy includes a mechanism to bring sites forward from later phases to address any shortfall, non-delivery of sites;

- The plan identifies sites for years 10-15, although this is not strictly necessary, so provides greater flexibility.
- 3.8.14 The businesses attracted to the M42 Economic Gateway are expected to recruit across the higher socio-economic groups with younger professionals potentially being served by the proposed housing. However, it is not clear that likely community choosing to locate in Blythe Valley would be provided with appropriate local employment opportunities in the M42 corridor, although some suitable jobs may well be created in the service sector.
- 3.8.15 Equally, a rural, albeit edge of town allocation in contrast to the urban allocations in North Solihull, implies increased reliance upon private transport and use of the M42 corridor thus works against the objective of reducing the need to travel.
- 3.8.16 In terms of the climate change and energy sustainability theme, the policy is neutral as it is not clear that positive outcomes would be delivered via the site development briefs.
- 3.8.17 With 37% of the new housing allocations being in the rural areas, (it will be less than 25% overall when other land supply sources are taken into account), there is a potential that both biodiversity and landscape objectives would be adversely affected. No provision is made in the policy to contribute towards green infrastructure or to consider the historic environment although these objectives may be delivered via the other policies and site development briefs. Although biodiversity and landscape may also be affected with any site, hence policy 10 is in place to ensure mitigation.
- 3.8.18 A minor positive outcome occurs for the built environment objective as the policy states that new housing is to contribute towards maintaining local character and distinctiveness, whereas housing on unidentified sites is to contribute wards "*enhancing local character and distinctiveness*".
- 3.8.19 The sustainable communities theme is where the housing policy might be expected to deliver most of the beneficial outcomes. However, the policy provides one potentially moderate beneficial outcome (housing) and two minor adverse outcome (deprivation and health inequalities).
- 3.8.20 While provision of new housing may create capacity to enable refurbishment/demolition of the Radburn housing areas, this is not evident from the policy. Also, while there is potential for the new housing to improve public safety via the development briefs, but this is not evident from the policy, although it is addressed by Policy 15.
- 3.8.21 The first phase sites provide the largest number of dwellings in the major urban area (510) closely followed by the North Solihull Regeneration Area (665). There is no subsequent provision in the regeneration area within the second phase.
- 3.8.22 During the third phase a total of 950 dwellings are proposed, these being predominantly in the rural areas (650) dwellings. This suggests that rural areas are likely to experience change with 1,235 dwellings being allocated in contrast to 2,725 in the regeneration and urban area. Any housing on sites that are currently unidentified would not be limited to North Solihull, the Urban West and the three large villages, but are most anticipated to be in the main urban area according to the Council.

### **Managing Uncertainty**

- 3.8.23 Of the twenty one objectives, five were assessed as being likely or expected to support the sustainability outcome; a further eight had the "potential" to deliver the anticipated outcome. Hence there is some uncertainty in how the policy would perform in practice. It should be noted that the one moderate beneficial effect is considered to have the potential to be delivered, while two of the six minor beneficial outcomes were considered to be a potentially beneficial outcome and four were considered likely to be beneficial.

## Mitigation & Enhancement

- 3.8.24 The following tables summarise the suggestions presented in the SA of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across the four sustainability themes. No further recommendations have been made.
- 3.8.25 Essentially, the uncertainty being addressed by the mitigation measures reflect the reliance upon site development briefs to consider the sustainability objectives; the uncertain consequences of the reduced supply of housing in North Solihull and the increased higher density provision at Blythe Valley Park. Key issues include:
- Whether the reduced provision at North Solihull contributes towards increasing deprivation and health inequalities.
  - The extent to which the housing allocations support local services, give rise to adverse landscape and biodiversity impacts and increase car based travel. This is addressed by Policies 7 and 10.
  - The manner in which site layout and links to energy/heat networks are considered from an energy and adaptation to climate change perspective. This is addressed by Policy 9.
  - The extent to which site development guides deliver safety by design and reduce crime. This is addressed by policy 15.

**Table 3.24: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Would the housing proposals compromise the ability of local communities to grow their own food and access open space?</li> </ul>	<ul style="list-style-type: none"> <li>Addressed by Policy 20.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Potential of focusing upon major urban area to either aid delivery of mixed use schemes could be promoted.</li> </ul>	<ul style="list-style-type: none"> <li>Total of 1100 dwellings proposed in the town centre and at the Powergen site as part of a mixed development.</li> </ul>	<ul style="list-style-type: none"> <li>The allocation of 100 units from North Solihull to Blythe Valley Park reducing the urban focus suggests a need for a further review of housing demand and provision in North Solihull.</li> </ul>	<ul style="list-style-type: none"> <li>The North Solihull Partnership has undertaken a thorough review of all housing land supply within the regeneration area and all suitable sites have been identified. The capacity of one housing site (Site 1 – Cooks Lane) has been reduced following consultation and further work commissioned by the North Solihull Partnership. No alternative sites are available within the regeneration area. Housing provision has been increased at Site 11 – Powergen, within the mature suburbs and at Site 10 – Blythe Valley Park, an extension to the mature suburbs to compensate for the reduction in the capacity of Site 1.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider additional transport needs associated with rural housing allocations.</li> </ul>	<ul style="list-style-type: none"> <li>Paragraph 7.2.16 of the justification for Policy P1 confirms the opportunity to improve public transport, pedestrian and cycle links and increased accessibility for local communities.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Explore the extent to which employment policies can encourage provision of local employment suitable for the community attracted to Blythe Valley Park and also reduce reliance upon the private car.</li> </ul>	<ul style="list-style-type: none"> <li>It may be difficult to encourage greater levels of employment for the community attracted to Blythe Valley Park, but the housing provision will enable improvements to transport and accessibility.</li> </ul>

**Table 3.25: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Constraining windfall housing in small villages may contribute to the loss of local village services where the critical population to support such facilities has been lost, thus potentially leading to increased travel and carbon dioxide emissions as well as greater social isolation. Perhaps consideration should be given to introducing a test to judge whether such windfall housing would contribute to the sustainability of local village services.</li> </ul>	<ul style="list-style-type: none"> <li>Removal of constraint on windfall housing in small villages.</li> </ul>	<ul style="list-style-type: none"> <li><b>Extent to which support for local distinctiveness and local character can be taken as enabling contribution to the support of local village services could be clarified.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Consider that these are separate issues covered by Policies P15/16 and P19 respectively.</b></li> </ul>
<ul style="list-style-type: none"> <li>There is a need to clarify what is meant by 'suitable' locations outside the main urban area. It is recommended that suitable locations should be those that will not foster car dependency.</li> </ul>	<ul style="list-style-type: none"> <li>Constraint on location of windfall housing to "suitable locations" has been removed.</li> </ul>	<ul style="list-style-type: none"> <li><b>Requirement for sites to be in accessible locations is included, this links to Policy 7.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Should the suitability of sites consider the ease to which the development could in the short or medium term be connected to a local energy or heat distribution network?</li> </ul>	<ul style="list-style-type: none"> <li>The policy makes reference to high energy standard.</li> </ul>	<ul style="list-style-type: none"> <li><b>It is not clear that connectivity to local energy or heat networks would be a consideration in the prioritisation of sites.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Connectivity to local networks covered in policy P9, but priority to sites within the urban area should assist.</b></li> </ul>
<ul style="list-style-type: none"> <li>Concentrating development has the potential for increasing the magnitude of the urban heat island.</li> </ul>	<ul style="list-style-type: none"> <li>Required by Policy 9.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider use of development briefs to provide urban cooling measures.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in preparation of development briefs.</b></li> </ul>

**Table 3.26: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>The manner in which the most suitable sites are prioritised could benefit from a robust set of criteria based on key sustainable development criteria.</li> </ul>	<ul style="list-style-type: none"> <li>Too detailed for the Draft Local Plan. This is included in the SHLAA site appraisals document.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Addition housing may lead to increased congestion with the potential to lead to adverse effects on air quality unless measures to promote public transport are locked in.</li> </ul>	<ul style="list-style-type: none"> <li>Site development briefs would examine local effects upon air quality and public transport.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider reference to prioritised use of previously developed land when sites are of equal worth across other priorities.</li> </ul>	<ul style="list-style-type: none"> <li>Considered in the SHLAA site appraisals document</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>As the policy may cause loss of existing green infrastructure (or erosion of quality) and equally help its delivery by developer contributions,</li> </ul>	<ul style="list-style-type: none"> <li>Policy 20 requires appropriate compensatory measures where loss of existing facilities is necessary.</li> </ul>	<ul style="list-style-type: none"> <li><b>Development proposals for North Solihull Regeneration Area could demonstrate net improvement in the quality of open space.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy is set out in the North Solihull strategic framework, which includes commitment to no net loss in quality of green space.</b></li> </ul>



### 3.9 Appraisal of Policy 6: Provision of Sites for Gypsies & Travellers

#### Introduction

3.9.1 The proposed policy on gypsies & travellers is examined in this section, although since the appraisal of this policy alongside the Submission Draft Local Plan, a Supplementary Planning Document has been issued and subject to its own consultation and appraisal. No changes have been made to this policy and thus the appraisal remains unchanged including the proposed mitigation and enhancement measures.

**Policy P6 – Provision of Sites for Gypsies and Travellers**

The Council will meet the identified need for 38 permanent residential pitches by 2027 as set out in the 2012 Gypsy and Traveller Accommodation Assessment. The provision of pitches to meet this need will be determined through a Gypsy and Traveller Site Allocations Development Plan Document.

The following criteria will be used in the allocation of future sites and subject to compliance with other policies in the plan, applications which perform well against the criteria and which contribute to meeting any identified unmet need, will be considered favourably.

- i. **The size and scale of the site and the number of caravans stationed is appropriate to the size and density of the local settled community;**
- ii. **Any unacceptable adverse visual impact can be adequately minimised;**
- iii. **The site is not in an area prone to flooding;**
- iv. **Any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or the historic environment can be mitigated;**
- v. **There is no unacceptable adverse impact on privacy and residential amenity for both site residents and neighbouring land uses;**
- vi. **The site has safe and convenient access to the highway network;**
- vii. **Whether Local services and facilities such as schools, health facilities, fresh food and employment are accessible by walking, cycling and public transport, or it can be demonstrated that the site is sustainable in other ways.**

**Sites in the Green Belt will not be permitted unless other locations have been considered and only then in “very special circumstances”.**

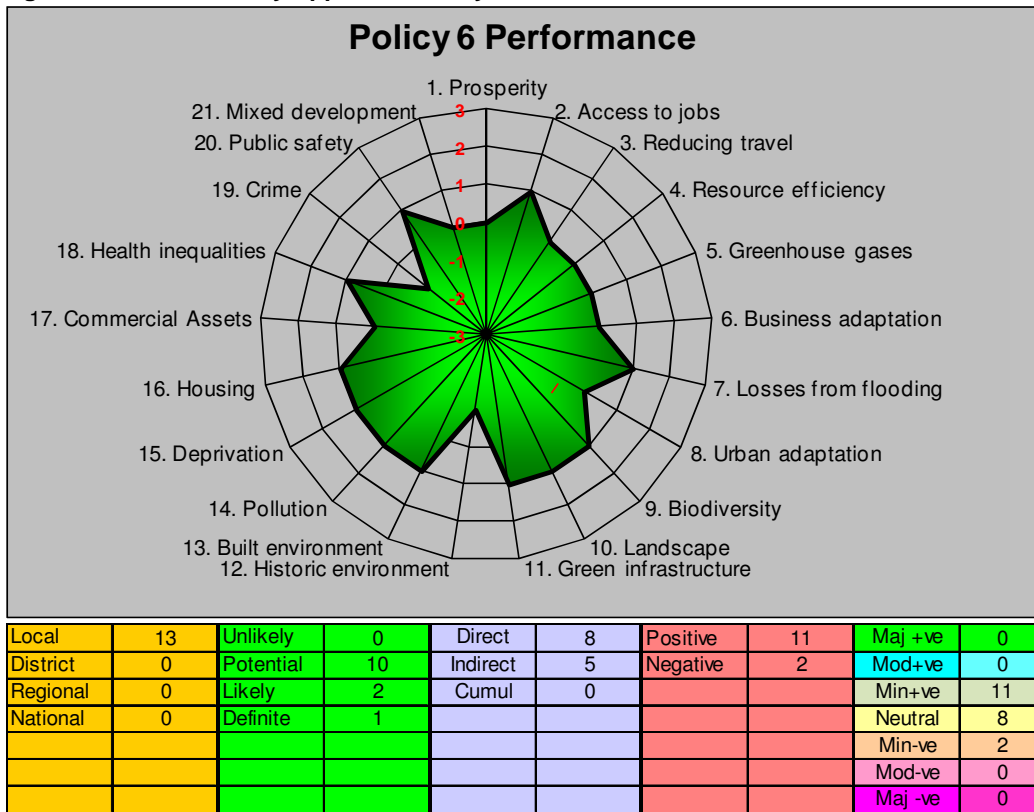
#### Forecast Effects

3.9.2 This policy was assessed as giving rise to eleven minor positive, eight neutral and two minor negative significant effects (see Figure 3.6). Given the relatively small areas involved and their highly localised influence, effects of minor significance dominate. All of the anticipated effects occur at a local-scale with eight being direct effects and five indirect. The indirect effects focus upon effects upon the natural resource production and environmental enhancement theme and also on community deprivation. Typically there is a low level of certainty surrounding these effects (see Appendix G).

#### Managing Uncertainty

3.9.3 Ten of the significant effects are associated with potential effects and a further three outcomes are likely or expected to occur. Hence there is considerable uncertainty over the outcome of the appraisal of this policy.

Figure 3.6: Sustainability Appraisal: Policy 6



### Mitigation & Enhancement

3.9.4 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies, Consultation and Submission draft Local Plan as well as the response from the Council to each stage for across two sustainability themes (see Table 3.27 and 3.28). No further proposals for mitigation have been made.

**Table 3.27: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Include provision for the protection of historic assets.</li> </ul>	<ul style="list-style-type: none"> <li>Policy P6 refers to the need for compliance with other policies in the plan. Reference to provision for the protection of historic assets is covered in Policy P16 of the plan.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider inclusion of historic assets within clause d) of the policy or within the Gypsies &amp; Travellers DPD.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Point iv of Policy P6 now includes a reference to the historic environment as part of the criteria for allocating future sites and in the determination of planning applications.</b></li> </ul>

**Table 3.28: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider how the fear of crime in neighbouring communities may be addressed.</li> </ul>	<ul style="list-style-type: none"> <li>The size and scale of Gypsy &amp; Traveller sites and the number of caravans stationed should be appropriate to the size and density of the local settled community will ensure that sites are not a dominant presence. The need for sites to be accessible to local facilities will also help to facilitate integration with neighbouring communities.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider these issues within the Gypsies &amp; Travellers DPD.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>The integration of Gypsy and Traveller sites with the wider local community is part of the 'Vision' of the Gypsy and Traveller DPD. The need for sites to be accessible to local services and facilities will help encourage social interaction and integration between communities, thereby helping to address fear of crime.</b></li> </ul>

## 3.10 Appraisal of Policy 7: Accessibility and Ease of Access<sup>21</sup>

### Introduction

- 3.10.1 The proposed policy on accessibility is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Submission draft Local Plan.
- 3.10.2 The specific policy commitments are highlighted in the table below. There were no changes introduced for the Submission draft Local Plan plus Proposed Modifications and thus the appraisal and recommendations for mitigation and enhancement have not been significantly amended.

<b>Policy P7 – Accessibility and Ease of Access</b>
<p><b>All new development should be focussed in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access.</b></p> <p><b>Development will be expected to meet the following accessibility criteria, unless justified by local circumstances.</b></p> <ul style="list-style-type: none"> <li>• Proposed housing development should be:                             <ul style="list-style-type: none"> <li>○ Within an 800m walk distance of a primary school, doctor's surgery and food shop offering a range of fresh food; and</li> <li>○ Within a 400m walk distance of a bus stop served by a commercial high frequency bus service (daytime frequency of 15 minutes or better) providing access to local and regional employment and retail centres; and / or</li> <li>○ Within an 800m walk distance of a rail station providing high frequency services (3 or more per hour during peak periods) to local and regional employment and retail centres.</li> </ul> </li> <li>• Proposed offices, retail and leisure development should be located in town centres, or other established locations including Birmingham Business Park, Blythe Valley Business Park, Birmingham Airport and NEC, as defined in Policies P1, P2 and P19. Here and elsewhere they should be within a 400m walk distance of a bus stop served by a commercially run high frequency bus service.</li> <li>• Proposed education, health and other public service facilities should be located where they are easily accessible on foot, by bicycle and bus by the local community they serve.</li> <li>• Proposals for change of use are likely to be resisted if they reduce accessibility to levels below those listed in this policy.</li> </ul> <p><b>Investment in improvements to local public transport provision, cycling and / or walking measures will be sought in association with development proposals which do not meet the accessibility criteria set out by this policy.</b></p> <p><b>Residential development proposals for fewer than 3 dwellings in urban areas west of M42 and within rural settlements will be exempt from the criteria set out above. Investment in improvements to local public transport provision, cycling and / or walking measures will continue to be sought in association with such proposals where considered necessary.</b></p> <p><b>Access to development from the strategic walk, cycle, public transport and road network will be expected to be:</b></p> <ul style="list-style-type: none"> <li>• Safe, attractive, overlooked and direct on foot, by bicycle and from public transport.</li> <li>• Safe for those vehicles which need to access the development.</li> <li>• And assessed in accordance with Policy P15 'Securing Design Quality' in the Local Plan.</li> </ul>



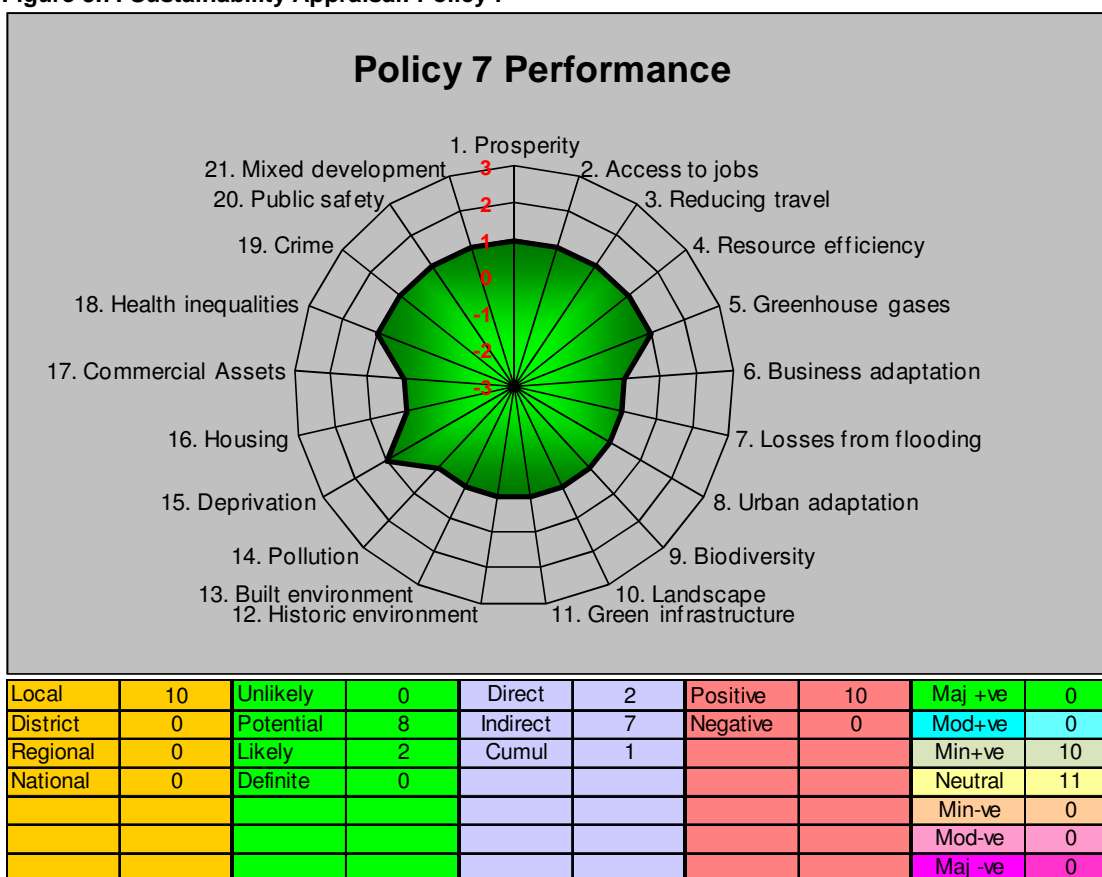



<sup>21</sup> Formerly was Emerging Core Strategy Policy 2.

**Forecast Effects**

3.10.3 This policy performs in a slightly positive manner with ten of the twenty one sustainability objectives reporting a minor beneficial outcome (see Figure 3.7 and Appendix G). All of the effects are considered to be of a local scale reflecting the manner in which the accessibility criteria are applied to individual development sites.

**Figure 3.7: Sustainability Appraisal: Policy 7**



3.10.4 The majority of the effects associated with the sustainability objectives are indirect (7) occurring primarily under the sustainable consumption and production theme where minor positive outcomes are anticipated for prosperity, access to jobs, reduced travel and resource efficiency.

3.10.5 The policy supports development in the most accessible locations, however the distance criteria proposed for residential development ought to be reviewed in the context of the housing allocations to confirm their applicability, particularly the distance to commercial high frequency bus services. It does not directly contribute towards regeneration as the policy does not highlight areas where improved accessibility may provide the greatest returns such as the North Solihull Regeneration Area. Nevertheless, improved accessibility for those reliant upon public transport may enhance access to employment and training and hence prosperity.

3.10.6 Should the policy be effective in promoting development in those areas with high levels of accessibility then there is a potential that this could contribute towards lowering greenhouse gas emissions. There are no other outcomes envisaged for the climate change and energy or natural resource protection and environmental enhancement themes.

3.10.7 In terms of the sustainable communities theme, the policy focuses upon the location of development and also provides for the enhancement of other facilities or measures to improving accessibility. It is concluded that the sustainability outcomes of policy are dependent upon local circumstances.

## **Managing Uncertainty**

- 3.10.8 Eight of the ten positive outcomes all were viewed as having the potential to occur. Two likely positive outcomes were associated with crime and public safety. This uncertainty results from the focus of the policy upon the location of development which represents only part of the equation in causing behavioural change that improved accessibility and ease of access could deliver.

## **Mitigation and Enhancement**

- 3.10.9 The following tables (Tables 3.29 to 3.32) summarise the suggestions presented in the SA of the Emerging Core Strategy Policies Consultation and Submission Draft Local Plan policies for each of the four sustainability themes. The response from the Council to these proposals is also provided
- 3.10.10 While the policy focuses on accessibility by people, it is suggested that there is a potential to influence accessibility to decentralised energy and heat networks. Over the longer term, where development is located could affect the viability of local energy and heat networks. Hence amongst the criteria by which development could be judged could be its proximity to existing or potential energy and heat networks.
- 3.10.11 The policy establishes distance thresholds for currently viable public transport services. Consequently any additional public transport use that might contribute towards the viability of a service appears not to be relevant. Consideration could be given to the potential for new development proposals to improve the viability of non-commercial public transport services and thus sites may then be regarded as being acceptable where they improve the viability of subsidised public transport services.

**Table 3.29: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Require accessibility and development measures to avoid or compensate for the loss of sites or premises providing important local facilities that are the last of the kind for the local community?</li> </ul>	<ul style="list-style-type: none"> <li>Policy seeks to avoid reduced accessibility levels, and Policy 18 resists the loss of community and social infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.30: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider prioritising development that enhances accessibility to decentralised/energy or heat networks.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 9 promotes the development of decentralised networks through a sequential approach.</li> </ul>	<ul style="list-style-type: none"> <li><b>It is suggested that development that enhances the accessibility to energy and heat networks should be encouraged.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Covered in policy P9 and not an issue for this policy.</b></li> </ul>

**Table 3.31: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Explore the potential conflict between delivering housing at the highest density with access to green space and the ability to grow local food.</li> </ul>	<ul style="list-style-type: none"> <li>The importance of green space is recognised in Policies 11, 15 and 20, whilst Policy 18 supports proposals with good access to healthy food.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider clause to ensure that higher densities does not implies loss of valued open space and impaired townscape qualities.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 seeks to ensure high quality design and Policy 20 protects important open space.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.32: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider importance of accessibility to those currently disadvantaged by poor levels of access to employment.</li> </ul>	<ul style="list-style-type: none"> <li>Covered in overall strategy and justification to policy, whilst P1 seeks to improve access to jobs.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider the accessibility needs of an increasingly elderly population with reduced mobility and increased reliance upon public or community transport.</li> </ul>	<ul style="list-style-type: none"> <li>Ease of access and accessibility for all users within the community is emphasised in the policy. The Accessibility SPD will give greater detail on how the accessibility criteria could be met.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider the extent to which new development may provide a critical mass that supports/ enables viable public transport networks to be established.</li> </ul>	<ul style="list-style-type: none"> <li>This has been considered as part of the site allocations, and accessibility is one of the prime criteria in choosing the sites. The running of these services, however, is the responsibility of public transport operators</li> </ul>	<ul style="list-style-type: none"> <li><b>Consideration could be given to whether new development proposals could improve the viability of non-commercial public transport services.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Responsibility of Centro/public transport operators. Unlikely that critical mass would ever be achieved to make subsidised services viable. Policy designed to direct development to accessible locations with realistic sustainable alternatives to car travel, with investment required for development that does not meet criteria.</b></li> </ul>
<ul style="list-style-type: none"> <li>Promote accessibility without the need for non-motorised users to traverse busy roads.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 8 requires that routes to the site from nearby services and local public transport stops are good quality, direct and attractive to use for all users.</li> <li>Policy 7 states "Access to development from the core walking, cycling, public transport and road networks will be expected to be safe, attractive, overlooked and direct on foot, by bicycle and from public transport." The potential for relieving severance will be considered in Development Briefs and through the development management process.</li> </ul>	<ul style="list-style-type: none"> <li><b>All forms of severance should be considered when examining individual development proposals.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>This will be covered by development management process.</b></li> </ul>



<ul style="list-style-type: none"> <li>Consider if housing sites compromise small employment sites or whether employment sites compromise longer term housing needs.</li> </ul>	<ul style="list-style-type: none"> <li>Addressed through Policies 1, 3 and 5.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None</b></li> </ul>
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### 3.11 Appraisal of Policy 8: Managing Demand for Travel and Reducing Congestion

#### Introduction

- 3.11.1 The proposed policy on transport demand and congestion is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials.
- 3.11.2 Justification for the policy is presented in the Submission draft Local Plan. Criterion 5 of the policy 8 was amended prior to the Examination in Public (EIP) to include a broader range of sustainable transport modes, but no further modifications have been introduced following the EIP. This change has not altered the findings of the sustainability appraisal or recommendations for mitigation and enhancement.

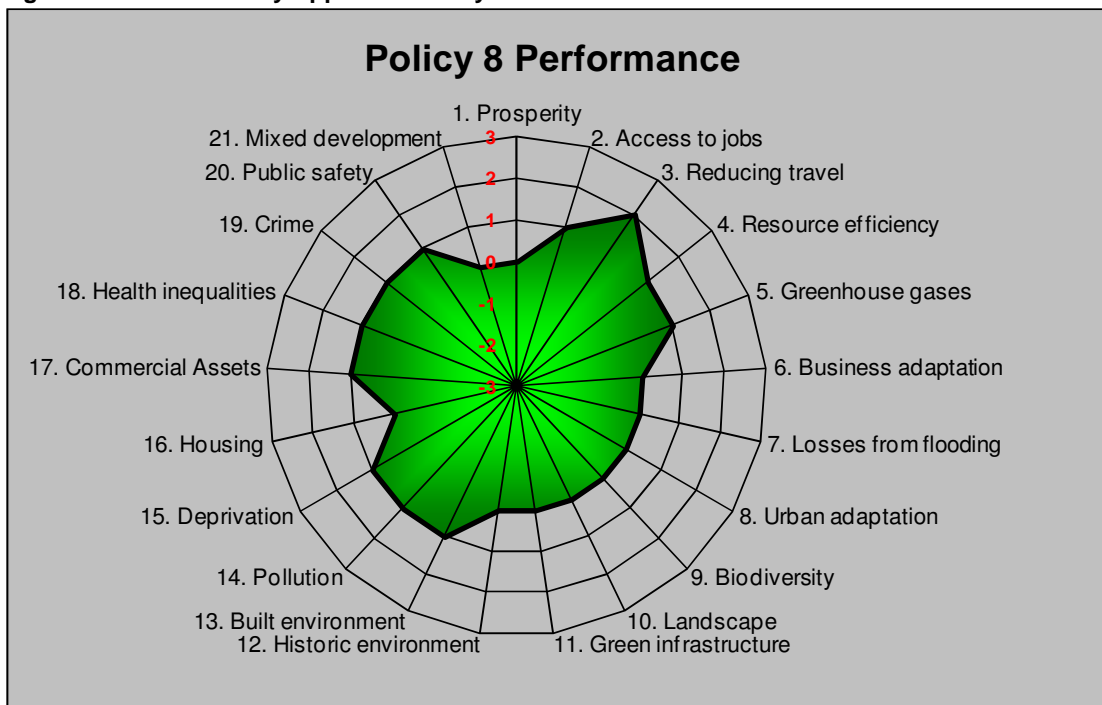
Policy P8 – Managing Demand for Travel and Reducing Congestion
<p><b>All development proposals should have regard to transport efficiency and improved highway safety for all users:</b></p> <ul style="list-style-type: none"> <li>• Development will not be permitted which results in a significant increase in delay to vehicles, pedestrians or cyclists or a reduction in safety for any users of the highway or other transport network.</li> <li>• Travel demands associated with development should be managed to minimise detrimental impact to the efficiency of the highway network;</li> <li>• Ensure new development reduces the need to travel e.g. by promoting linked trips and encouraging mixed use development where appropriate;</li> <li>• Provision for parking and servicing will be required in accordance with an SPD on managing travel demands associated with development.</li> <li>• <del>The Council will support proposals for local Park and Ride at appropriate railway stations subject to other policies in the Local Plan;</del> The Council will support proposals for strategic public transport schemes such as rapid transit, local rail schemes as identified in LTP3 and local Park and Ride at appropriate railway stations subject to other policies in the Local Plan.</li> <li>• Off-site parking provision proposed in association with economically important sites will be supported, subject to other Policies in the Local Plan, where sustainable transport links between those sites and the parking provision are of a good quality, direct and attractive to use.</li> </ul> <p>The use of sustainable modes of transport, i.e. walking, cycling and public transport, shall be promoted and encouraged in all developments by:</p> <ul style="list-style-type: none"> <li>• Ensuring the design and management of the development enables and encourages the use of sustainable modes of transport;</li> <li>• Ensuring transport planning measures are implemented to help and encourage people accessing the development to use sustainable transport modes;</li> <li>• Ensuring the routes to the site from nearby services and local public transport stops are good quality, direct and attractive to use for all users.</li> </ul>

#### Forecast Effects

- 3.11.3 Tacking both transport demand and congestion gives rise to one moderate potential positive outcome (reducing the need to travel) although this is tempered by the policies requirement to have regard to improved transport efficiency and safety which contrasts with the need to promote and encourage sustainable modes. This sets up a potential contradiction as increased highway traffic leading to delay and reduced safety is envisaged to impede the promotion of sustainable transport modes.

3.11.4 The other impacts are either neutral or minor beneficial (see Figure 3.8) and localised in their geographic extent with typically impacts having a three to ten year duration. The six direct benefits are associated with Access to jobs; Reducing travel; Resource efficiency, Built environment, Crime and Public safety (see Appendix G).

Figure 3.8: Sustainability Appraisal: Policy 8



SA Objective		Likely Significant Effects		Rationale					
3.Reducing travel		Mod+ve		The policy has the potential to reduce the travel demands of development and manage the amount of parking provided.					
Local	9	Unlikely	0	Direct	6	Positive	11	Maj +ve	0
District	2	Potential	10	Indirect	2	Negative	0	Mod+ve	1
Regional	0	Likely	1	Cumul	3			Min+ve	10
National	0	Definite	0					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

3.11.5 While the policy has the potential to assist with reducing greenhouse gases and reducing pollution these outcomes are uncertain due to the need for development proposals to “have regard to transport efficiency”.

3.11.6 The outcomes across the sustainable communities theme are a mixture of direct, cumulative and indirect minor beneficial outcomes being dependent upon local circumstances for delivery.

**Managing Uncertainty**

3.11.7 Overall the policy provides increased uncertainty in the delivery of outcomes since development proposals are required to “have regard to” rather than “to promote” transport efficiency and highway safety. However, in contrast, all development proposals are to promote and encourage all forms of sustainable transport. As noted earlier this may give rise to some contradictions in the application of the policy.

- 3.11.8 Ten of the eleven beneficial effects are considered to be potential outcomes; the remaining likely outcome being that of enhancements to the built environment as a result of promoting and encouraging sustainable modes that are of good quality, direct and attractive.

### **Mitigation and Enhancement**

- 3.11.9 Mitigation and enhancement measures identified under all four sustainability themes as part of the appraisal of the Submission draft Local Plan along with the Council's responses are presented in Tables 3.33 to 3.36. No additional recommendations have been made.

**Table 3.33: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>The basis for determining a reduction in the need to travel and the promotion of linked trips as a result of new development requires clarification.</li> </ul>	<ul style="list-style-type: none"> <li>Emerging policy 13 has been clarified such that reductions in the need to travel are from measures such as promoting linked trips and encouraging mixed use development where appropriate.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require significant planning applications to produce 'Green Travel Plans'.</li> </ul>	<ul style="list-style-type: none"> <li>The policy requires all developers to have regard to transport efficiency and improved highway safety.</li> <li>See also Draft Local Plan para 9.3.11 that requires Transport Assessments and Travel plans in accordance with details in SPD.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Clarify the benefit of locating Park and Ride facilities at railway stations.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P8 - Support for Park and Ride is about promoting transport efficiency and highway safety.</li> </ul>	<ul style="list-style-type: none"> <li><b>Ensure that the park &amp; ride proposals do not lead to increased traffic movements leading air quality issues.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Park and ride in this case is designed to reduce traffic movements as a whole by enabling travel for part of a journey by train rather than car.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider how potentially conflicting objectives between supporting development in locations well served by public transport or in locations minimise the need to travel and the protection of open space or the natural environment.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy 20 – Seeks to protect/ enhance open space.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Development proposals that generate significant quantities of freight could be directed to areas close to inter-modal freight facilities.</li> </ul>	<ul style="list-style-type: none"> <li>See Draft Local Plan para 9.3.12 to 9.3.14.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Opportunities to develop freight consolidation centres could be explored in association with the re-development of Solihull Town Centre.</li> </ul>	<ul style="list-style-type: none"> <li>Solihull Town Centre will not be extensively redeveloped. Unlikely to provide scope for freight consolidation centres.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.34: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>In evaluating options for the Hockley Heath bypass, Knowle Relief Road and Balsall Common bypass and route improvements to the A34, A41 and A452 consider assessing not only the carbon dioxide emissions of the highway and network, but also the embodied energy used as a result of their alignment and construction practices.</li> </ul>	<ul style="list-style-type: none"> <li>Proposals removed from policy. See Draft Local Plan para 9.3.15 to 9.3.19</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consideration could be given to the use of consolidation centres with town centre deliveries using dedicated low carbon vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9. Could be one of the 'adaptation measures' (7<sup>th</sup> para)</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider a policy requiring the adoption of cool pavement surfaces that reflect rather than absorb the sun such as light coloured cement, reinforced grass pavement, as well as the use of shading trees.</li> </ul>	<ul style="list-style-type: none"> <li>Policy P15 requires developments to achieve 'highest possible standard of environmental performance'. This could include, where appropriate, the measures suggested.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Provide policy support that facilitates car-pooling, electric vehicle use as well as digital connectivity and infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>See Policy P9. Could be one of the 'adaptation measures' (7<sup>th</sup> para).</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider requiring major development proposals with large parking capacity to set aside dedicated car pool and electric vehicle charging points or address through a Parking SPD.</b></li> <li><b>Consider requiring developers providing on-site car parking to demonstrate why renewable energy generation would not be viable or address through a Parking SPD.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Will be covered by SPD.</b></li> </ul>

**Table 3.35: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider the extent to which sustainable urban drainage and ecological enhancement measures can be incorporated into transport projects to be delivered during the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>Requirements for Sustainable Urban Drainage are set out in Policy 11.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.36: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider establishing policies to address the community severance and the pedestrian environment to promote public safety in areas of traffic congestion.</li> </ul>	<ul style="list-style-type: none"> <li>Severance is an amenity issue Policy P14 seeks to minimise amenity impacts. Policy 7 requires access to development to be safe whether on foot or by vehicle and to accord with Policy P15 on design.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Explore whether the communities in North Solihull likely to be those that would benefit from improved train services or whether the HS2 line would give rise to social forces leading to the displacement of the existing communities through inward migration.</li> </ul>	<ul style="list-style-type: none"> <li>The impacts, mitigation of and benefits of HS2 will be dealt with through an Action Area Plan or other mechanism at the appropriate time. See Draft Local Plan para 9.3.20 to 9.3.22</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

## 3.12 Appraisal of Policy 9: Climate Change

### Introduction

- 3.12.1 This section presents the appraisal of the Submission Draft Local Plan policy on climate change against the SA objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below. Justification for the policy is presented in the Submission draft Local Plan. As there were no changes introduced within the Submission Draft Local Plan plus Proposed Modifications there has been no change to the appraisal, however the recommended measures for mitigation and enhancement have been updated.
- 3.12.2 In July 2010 the Government confirmed its commitment to ensure that from 2016 new homes can be zero carbon. Zero carbon homes are achieved through Carbon Compliance consisting of building design measures and reducing CO<sub>2</sub> emissions on-site through low and zero carbon technologies and connected heat networks. The remaining carbon emissions are to be mitigated through "Allowable Solutions", which secure carbon savings beyond the site.
- 3.12.3 For the 2016 Building Regulations there is to be a change from design to building performance in terms of energy for new houses. As a result, the focus is turning from theoretical energy savings and towards the delivery of actual savings. Consequently, it is appropriate that the policy set out below provides for the systematic monitoring of energy use and carbon emissions linking into a Borough-wide monitoring system.

#### **Policy P9 - Climate Change**

**The Council will take full account of national and local targets for reducing greenhouse gas emissions and increasing the generation of energy from renewable and low carbon sources, when considering the location and design of new development. It will support the establishment of Renewable Energy Service Companies and community-led initiatives to reduce energy use and exploit renewable energy sources within the Borough. Where appropriate, improvements to the energy standards of existing buildings through national and local initiatives such as the Affordable Warmth strategy for Solihull and the Government's Green Deal will be promoted.**

**Developers will be expected to follow a sequential approach to carbon reduction for all new development. Where feasible and viable, new development should incorporate decentralised energy and heating networks. Where it is demonstrated that decentralised networks are not feasible or viable, development should achieve the necessary carbon reduction through on-site measures incorporating design, energy efficiency and renewable energy generation, taking account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. Where it is demonstrated that carbon reduction through on-site measures is not feasible or viable, a financial contribution toward off-site carbon reduction will be required, in the form of allowable solutions.**

**Proposals to develop decentralised energy and heating networks in the Borough will be encouraged and should be based on the latest available evidence. Any impacts from infrastructure, including on-site low carbon and renewable energy installations, on the surrounding natural, built and historic environment, including ground and surface water quantity and quality, or on residents or businesses will be considered, with significant weight to be given to the reduction of greenhouse gas emissions to be achieved. Where adverse impacts are identified, these should be minimised, or be subject to appropriate mitigation. In locations where decentralised energy and heating networks or off-gas networks exist, or have the greatest potential, such as Solihull, Shirley and Chelmsley Wood town centres, North Solihull Regeneration Zone hubs, and major business parks and developments, **developments of an appropriate scale, density and/or mix will be encouraged and developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible.****

**Where lower cost solutions such as decentralised networks are viable, developers should aim to achieve zero carbon for all new developments in excess of 50 dwellings or 1,000 square metres, unless it is demonstrated that this is not feasible or viable. Where decentralised networks are not feasible or viable at the time of application, developers will be expected to show evidence in the design of the development to enable future adoption of decentralised networks.**



**In locations where decentralised networks do not exist and are shown to be unviable, or where the scale or nature of the development is unsuitable, on-site energy efficiency measures and low or zero carbon energy generation shall be provided to meet a minimum of 20% of predicted energy requirements. Developers will be expected to demonstrate the highest viable energy efficiency standards through the location and layout of developments and the use of materials and construction techniques that minimise emissions. Where viable, higher level standards of the Code for Sustainable Homes will be encouraged.**

**Where ‘allowable solutions’ are used to offset carbon emissions, the Council will give priority to the funding of projects within the Borough.**

**This policy aims to ensure that all sections of the community are more resilient to the effects of climate change, particularly older people, children and disabled people. Developers should ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development through consideration of a range of adaptation measures, including the location, design, materials, build and operation of developments, and the provision of green infrastructure. Further guidance will be provided to assist the delivery of sustainable design and construction in a Sustainable Design and Construction document, which will include appropriate ‘allowable solutions’.**

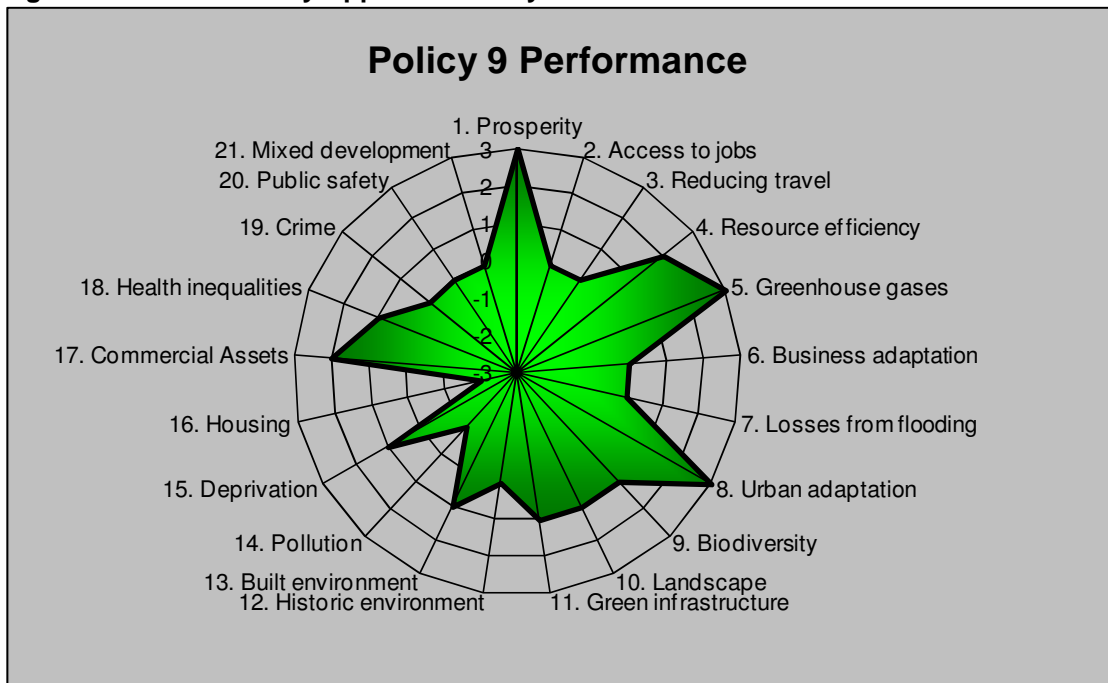
**All new developments shall provide for systematic monitoring of the energy use and carbon emissions with the capability of linking into a Borough-wide monitoring system, unless it is demonstrated that such monitoring is unnecessary. All applications shall include evidence to show compliance with this policy in the form of an energy or sustainability statement and/or within the format of the West Midlands Sustainability Checklist or an agreed equivalent.**

## Forecast Effects

- 3.12.4 This policy performs in a positive manner with eleven of the twenty-one sustainability objectives reporting beneficial outcome, three major positive (prosperity, greenhouse gases and urban adaptation) and two moderate positive outcomes as illustrated in Figure 3.9 and Appendix G. The policy potentially risks a contribution towards a moderate negative effect upon the viability of housing schemes in the context of the 2016 Building Regulations with the zero carbon requirements.
- 3.12.5 Apart from a moderate adverse effect upon housing due to issues of viability, one minor adverse effect is associated with potential effects due to possible air/odour effects associated with certain renewable energy systems.
- 3.12.6 While the potential effect upon the regional business park assets could have been the only effect of regional scale, Policy 1 exempts the regional assets from the climate change policy.
- 3.12.7 The effects arising from the policy are anticipated to be long term (greater than 10 years) although resource efficiency, biodiversity, deprivation and health inequalities) are considered to occur over a 3 to 10 year period based upon the potential for other external factors to affect the outcomes.
- 3.12.8 A total of five indirect effects are anticipated, all related to the potential for consequences upon the natural resource protection and environmental enhancement theme and the commercial assets and health sustainable communities objectives. These consequences are indirect since they are a product of how the policy is complied with on individual projects rather than due to the policy itself.
- 3.12.9 There are seven direct and one cumulative effect that are anticipated. The direct effects are associated with the prosperity, resource efficiency; urban adaptation, landscape, green infrastructure housing and deprivation (see Appendix G).
- 3.12.10 In terms of the sustainable consumption and production theme, the policy is envisaged to be likely to give rise to a major beneficial outcome focusing energy and heat networks in areas where benefits to businesses and local communities may provide energy savings. Also, the delivery of affordable solutions within the Borough is also likely to provide employment opportunities.
- 3.12.11 The policy is envisaged to give rise to moderate beneficial outcome for resource efficiency.

3.12.12 Being focused upon climate change, the policy is expected to deliver reductions in greenhouse gas emissions and also aid urban adaptation, in both cases resulting in major beneficial outcomes.

**Figure 3.9: Sustainability Appraisal: Policy 9**



Objective	Likely Significant Effects	Rationale
1. Prosperity	<b>Maj+ve</b>	This policy identifies the North Solihull Regeneration Zone, town centres as well as major business parks as locations where decentralised energy and heating networks will be encouraged. It also promotes the establishment of Renewable Energy Service Companies. The savings being made by residents should help offset increasing energy costs and thereby aid prosperity as well as securing employment in the energy market. The policy also sets out that Allowable Solutions fund projects are to be prioritised for delivery within the Borough. Capitalising on opportunities could result in the location becoming an attractive area in which to invest.
5. Greenhouse gases	<b>Maj+ve</b>	The minimisation of greenhouse gas emissions is a key focus of this policy. It is suggested that the approach taken to the promotion of decentralised energy and heating networks is strong. A 20% standard for energy efficiency, low carbon or renewable energy has been set.
8. Urban adaptation	<b>Maj+ve</b>	Developers are to ensure resilience in the development to the impacts to climate change through a range of measures. Allowable solutions will permit adaptation measures within the Borough.
4. Resource efficiency	<b>Mod+ve</b>	The policy ought to lead to the more efficient use of energy particularly within new homes and potentially in existing homes via distributed heat networks.

Objective	Likely Significant Effects		Rationale						
17. Commercial assets	Mod+ve		This policy promotes decentralised energy and heat networks in 'major business developments' or where not viable onsite low or zero carbon energy is to meet 20% of predicted energy demand. This policy would have the potential to encourage regional assets to reflect wider needs while not compromising their own development were it not for Policy 1 to exempt the regional assets from the Local Plan policies.						
16. Housing	Mod-ve		A viability test is to be applied in seeking higher level standards of the Sustainable Homes. Viability tests are also to be applied for decentralised networks such that negative effects upon housing provision are unlikely. However the 2016 Zero Carbon Standard for new homes will pose additional costs which unless other factors change will impact on the viability of new housing schemes.						
Local	8	Unlikely	1	Direct	7	Positive	11	Maj +ve	3
District	5	Potential	8	Indirect	6	Negative	2	Mod+ve	2
Regional	1	Likely	3	Cumul	1			Min+ve	6
National	0	Definite	2					Neutral	8
								Min-ve	1
								Mod-ve	1
								Maj -ve	0

- 3.12.13 In terms of the effect of the policy upon the natural resource protection & environment theme, four of the outcomes are judged to be minor positive with the a minor negative outcome for pollution and neutral for the historic environment.
- 3.12.14 By recognising that certain community groups have the potential to benefit from the policy and given the importance of income deprivation and domestic heating, particularly to the elderly and those with long term illness, the policy has the potential to contribute to reducing deprivation and health inequalities.
- 3.12.15 Though not referenced in this policy, the value of green infrastructure in reducing the urban heat island effect is addressed in policy 12.

### Managing Uncertainty

- 3.12.16 The policy, alongside the 2016 Building Regulations, is expected to contribute to reduced emissions and enhanced adaptation to the effects of climate change. The policy is anticipated to either definitely or likely to contribute towards five sustainability objectives three of which are assessed as being major beneficial, with the other two being moderate and minor beneficial.
- 3.12.17 A total of four potential outcomes are anticipated across the natural resource protection and sustainable communities themes. The judgement that the policy results in these potential outcomes is a reflection of the fact that the consequences upon biodiversity, green infrastructure, historic environment, built environment, pollution, housing and commercial asset sustainability objectives can only be determined at a project level when the specific circumstances that dictate the outcome are known.
- 3.12.18 The potential for beneficial effects upon deprivation and health inequalities is a reflection of the uncertainty on how the application of the policy would be targeted to benefit those groups with the greatest potential to benefit.

### Mitigation and Enhancement

- 3.12.19 While tables 3.37 to 3.40 summarise the proposals made throughout the appraisal process along with the Council's responses, the following additional measures are suggested to be undertaken as part of the Council's annual monitoring requirements or as aspects to address within the proposed Sustainable Design and Construction SPD:
  - **Enhance the certainty that major developer's future proof and avoid creating future delivery barriers to local heat or energy networks when viable.**

- **Consider monitoring the extent to which development proposals in the M42 Gateway actively address adaptation measures and consider the need for advice within the proposed Sustainable Development and Construction SPD.**
- **Address the benefits of vegetation to aid urban cooling within the proposed Sustainable Development and Construction SPD.**
- **The Council ought to work with others to develop sufficient evidence to allow identification of key sites for distributed heat and energy networks.**

**Table 3.37: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Require developers of major sites to demonstrate how their design has considered options for reducing operational energy consumption and carbon emissions including by making reference to the main energy intensive operational activities to be undertaken on site.</li> </ul>	<ul style="list-style-type: none"> <li>All applications will be required to include evidence to show compliance with this policy in the form of an energy statement.</li> </ul>	<ul style="list-style-type: none"> <li><b>Larger businesses within the M42 corridor are to have “regard to” this policy.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy P1 is cross referenced to policy.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to demonstrate that they have considered the use of materials and construction techniques that minimise carbon emissions.</li> </ul>	<ul style="list-style-type: none"> <li>Policy requires consideration of materials and construction techniques to minimise emissions.</li> </ul>	<ul style="list-style-type: none"> <li><b>As above.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy P1 is cross referenced to policy.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to provide evidence that durability and low maintenance of structures and components have been actively considered in design and specification.</li> </ul>	<ul style="list-style-type: none"> <li>Resilience to the impacts of a changing climate for the anticipated lifespan of the development, including the location, design, materials, build and operation of the development is to be considered.</li> </ul>	<ul style="list-style-type: none"> <li><b>The Sustainable Design and Construction document will need to be kept relevant to emerging building technologies.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Inclusion of guidance in SPD will enable regular updating.</b></li> </ul>
<ul style="list-style-type: none"> <li>Develop a policy aimed at the establishment of Renewable Energy Service Companies to exploit the renewable energy sources available to the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>A Renewable Energy Service Company is to be promoted.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Promote the location and layout of new development so as to deliver the highest viable energy efficiency, including through the adoption of decentralised energy, reduce the need to travel and secure the highest possible share of trips made by sustainable travel.</li> </ul>	<ul style="list-style-type: none"> <li>The location and layout of development are recognised as important considerations in enhancing energy efficiency and reducing emissions.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Adopt a sequential test for major development once locations offering viable energy strategies are identified.</li> </ul>	<ul style="list-style-type: none"> <li>Developers are expected to adopt a sequential approach to carbon reduction for new development.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Explore integration of waste management with the provision of decentralised energy.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 12 includes a criterion to reduce greenhouse gas emissions.</li> </ul>	<ul style="list-style-type: none"> <li>Potentially addressed in the Sustainable Design and Construction document.</li> </ul>	<ul style="list-style-type: none"> <li>Integration of waste and renewable energy to be considered in SPD.</li> </ul>
<ul style="list-style-type: none"> <li>Promote the co-location of potential heat suppliers and major users.</li> </ul>	<ul style="list-style-type: none"> <li>Decentralised networks to be based on evidence, including location of major heat users.</li> </ul>	<ul style="list-style-type: none"> <li>Potentially covered by the policy but could be made clearer.</li> </ul>	<ul style="list-style-type: none"> <li>Integration of waste and renewable energy to be considered in SPD.</li> </ul>
<ul style="list-style-type: none"> <li>Support existing and new shops and services within walking distances of people's homes.</li> </ul>	<ul style="list-style-type: none"> <li>Addressed in Policies 7 and 19.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Promote the adaptation of businesses to both the direct effects of climate change and the indirect effects on the price of carbon and the economic drivers for low carbon goods and services.</li> </ul>	<ul style="list-style-type: none"> <li>Developers are required to ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development through consideration of a range of measures.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Review the role of Sustainable Design and Construction document in relation to all major development and also clarify the intended scope/contents.</li> </ul>	<ul style="list-style-type: none"> <li>Matter for the SPD.</li> </ul>

**Table 3.38: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Consider the adaptation measures that are appropriate for building and urban design such as brown/green roofs, urban cooling areas to lessen thermal stress for the elderly, flexibility in the use of buildings.</li> </ul>	<ul style="list-style-type: none"> <li>Consideration of adaptation measures is required.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Require developers agree run-off rates within flood risk zone 1 with the Environment Agency.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 11 provides for restriction of runoff rates to Greenfield situations.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require new major development to demonstrate contributions towards national greenhouse gas emission targets.</li> </ul>	<ul style="list-style-type: none"> <li>A key aspect of the policy.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers seeking consent for projects of a given size to a) submit evidence that they have considered the extent to which local heat sources could be networked into their proposal or b) that they have considered the practicality of making provision for future decentralised energy networks.</li> </ul>	<ul style="list-style-type: none"> <li>Developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible.</li> <li>Developers will be expected to show evidence in the design of the development to enable future adoption of decentralised networks.</li> </ul>	<ul style="list-style-type: none"> <li><b>Could add a sentence to P9 to ensure development s do not sterilise sites for distributed heat and energy networks.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Insufficient evidence to identify sites.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to show consideration of the application of green/brown roof solutions particularly as part of sustainable urban drainage solutions.</li> </ul>	<ul style="list-style-type: none"> <li>Policy allows flexibility in choice of solutions. Guidance to be provided in SPD.</li> </ul>	<ul style="list-style-type: none"> <li><b>Include green/ brown roofs and SUDs within the Sustainable Construction and Design document.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to provide for systematic monitoring of the energy use and carbon emissions with the capability of linking into a Borough-wide monitoring system.</li> </ul>	<ul style="list-style-type: none"> <li>Proposal adopted.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider including this element within the Authority Monitoring Report once the system is established.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered as part of annual monitoring process.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to show evidence of giving consideration to the use of energy from renewable/low carbon sources.</li> </ul>	<ul style="list-style-type: none"> <li>Zero or low carbon sources are required to deliver 20% of predicted energy requirements where no connection to decentralised heat or energy network is in place.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider whether the 20% requirement should reflect the type of housing being provided.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Evidence does not support differential requirement by type of housing.</b></li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>To minimise the impact of overheating, new commercial and residential development should demonstrate reduced reliance on air conditioning systems, integrate green infrastructure and where feasible provide an accessible green roof.</li> </ul>	<ul style="list-style-type: none"> <li>Consideration of adaptation measures is a requirement.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider including suitable measures within the Sustainable Construction and Design document.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to show evidence of providing flexibility in their design for the future adoption of renewable energy technologies.</li> </ul>	<ul style="list-style-type: none"> <li>To be captured through the Sustainable Construction and Design document.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to consider the impacts of climate change when planning the location, design, build, and operation of their development. This should include requirements that will ensure steps are taken to provide for adaptation to high winds.</li> </ul>	<ul style="list-style-type: none"> <li>Developers are required to ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development.</li> </ul>	<ul style="list-style-type: none"> <li><b>Explore adaptation measures within the Sustainable Construction and Design document.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD.</b></li> </ul>
<ul style="list-style-type: none"> <li>Adopt a policy that caters for the replacement, decommissioning and site restoration when current renewable technologies become outdated.</li> </ul>	<ul style="list-style-type: none"> <li>Policy requires impacts of infrastructure to be considered.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Encourage new developments with parking facilities to be designed to provide for the charging of electric vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunity may be addressed within the Sustainable Construction and Design document.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider establishing with the power utility companies measures to ensure efficient operation of installed low carbon technologies by residential users.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Not a matter for a local plan.</b></li> </ul>



Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider preparation of a schedule of Allowable Solutions measures capable of delivering benefits.</li> </ul>	<ul style="list-style-type: none"> <li>To be considered in SPD.</li> </ul>
<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider application of the policy for major housing schemes delivered over several years.</li> </ul>	<ul style="list-style-type: none"> <li>Policy sets out approach for major schemes where decentralised networks are viable.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider the training needs of officers and the enforcement actions that may be practical for poorly performing energy systems.</li> </ul>	<ul style="list-style-type: none"> <li>Not a matter for a local plan.</li> </ul>

**Table 3.39: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Require applications for major development proposals to show how sustainable urban drainage systems also contribute towards supporting local biodiversity objectives but do not create areas where insect borne vectors and pests could become established.</li> </ul>	<ul style="list-style-type: none"> <li>Addressed by policy 11.</li> </ul>	<ul style="list-style-type: none"> <li>Future health implications not addressed by Policy 11. Perhaps the health implications would be best addressed in the Sustainable Construction and Design document.</li> </ul>	<ul style="list-style-type: none"> <li>To be considered in SPD.</li> </ul>
<ul style="list-style-type: none"> <li>Consider a policy that supports the protection and enhancement of wildlife corridors to aid adaptation to climate change for mobile species.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 10 provides for the landscape scale approach to the natural environment and the potential for reducing the impacts of climate change.</li> </ul>	<ul style="list-style-type: none"> <li>Consider the preparation of a landscape scale plan for the natural environment defining a strategy to define and reduce the impacts of climate change.</li> </ul>	<ul style="list-style-type: none"> <li>To be considered during joint working as set out in policy P10.</li> </ul>
<ul style="list-style-type: none"> <li>Consider a policy towards provision being made for capturing run-off for beneficial use on the development or nearby.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 11 requires recycling of rain water.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Give consideration to the landscape, historic environment and townscape effects and</li> </ul>	<ul style="list-style-type: none"> <li>Policy requires consideration of such effects.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012	Response
opportunities associated with measures to address climate change and decentralised heating/energy systems.			
<ul style="list-style-type: none"> <li>Promoting sustainable urban drainage systems without reference to urban biodiversity could potentially result in negative effects, as could the installation of decentralised energy/ heat networks.</li> </ul>	<ul style="list-style-type: none"> <li>Policy requires impacts of infrastructure to be considered. Policy 11 requires sustainable drainage systems to contribute toward conservation of biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Localised elevated noise and gaseous emissions, as well as potentially traffic impacts could be associated with decentralised energy generation.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts arising from decentralised energy systems are to be assessed.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.40: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Require developers to demonstrate that the immediate and longer term risks of the project to the local community have been identified and a plan developed with the local community to manage risks into the future.</li> </ul>	<ul style="list-style-type: none"> <li>The local community impacts of climate change are to be understood by developers to arrive at their proposals.</li> </ul>	<ul style="list-style-type: none"> <li><b>While developers will be required to consider the impacts of energy and heat network infrastructure on residents, it is proposed that issues of resilience to climate change ought to refer to community resilience and not just resilience of the proposed development. Primarily this is envisaged to relate to flood risks.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Flood risk is addressed in policy P11.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require developers to contribute to increasing the local resilience to severe weather conditions such as provision of trees or amenity water areas to contribute to urban cooling.</li> </ul>	<ul style="list-style-type: none"> <li>The policy requires resilience to impacts of changing climate.</li> </ul>	<ul style="list-style-type: none"> <li><b>Allowable Solutions measures may be capable of supporting local resilience measures.</b></li> <li><b>Perhaps CIL or S106 funds could be used to contribute to resilience measures where provision is driven by other CIL/S106 requirements.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD. River and surface water flood management covered in the Infrastructure Delivery Plan, which highlights potential delivery mechanisms.</b></li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Encourage community-led initiatives to reduce energy use and deliver renewable and low carbon energy.</li> </ul>	<ul style="list-style-type: none"> <li>The policy supports establishment of Renewable Energy Service Companies and community-led initiatives.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li><b>Set out the basis for the 20% low / zero carbon compliance figure and consider the implications for different housing type.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Based on evidence in the Camco report.</b></li> </ul>

### 3.13 Appraisal of Policy 10: Natural Environment

#### Introduction

3.13.1 The proposed policy on the natural environment is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below. There has been no change to the policy from that of the Submission draft Local Plan, although an additional sentence concerning the role of the Habitat Biodiversity Audit Partnership in providing updates to the network of Local Wildlife Sites that was inserted to the supporting text would not affect the sustainability appraisal or the proposed recommendations for mitigation and enhancement.

Policy P10 Natural Environment
<p>The Council recognises the importance of a healthy natural environment in its own right, and for the economic and social benefits it provides to the Borough. <b>The full value and benefits of the natural environment will be taken into account in considering all development proposals, including the contribution to the green economy and the health of residents, and the potential for reducing the impacts of climate change. Joint working with neighbouring authorities will be supported, recognising the need for a landscape scale approach to the natural environment and conservation of biodiversity.</b></p> <p><b>The Council will seek to protect, enhance and restore the diverse landscape features of the Borough, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness. Development should take full account of national and local guidance on protecting and restoring the landscape and the areas in need of enhancement, including guidance relating to the countryside. Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible or necessary.</b></p> <p><b>The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new native woodlands and other habitats and to protect, restore and enhance ancient woodland and green infrastructure assets across the Borough. Protection of ancient woodland, designated sites and priority habitats shall include the establishment of buffers to any new development. Development should be informed by the latest information on habitats and species, and take full account of national and local guidance on conserving biodiversity, opportunities for biodiversity enhancement and for improving and restoring the Borough’s green infrastructure. When appropriate, development should seek to enhance accessibility to the natural environment, especially for disabled people.</b></p> <p><b>The Council will protect areas of national and local importance for biodiversity and geodiversity, where it is reasonable, proportionate and feasible to do so. Development likely to have an adverse affect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if the reasons for the development clearly outweigh the nature conservation value of the site and the national policy to safeguard such sites. Where development may have an adverse affect on a Site of Special Scientific Interest, developers will be expected to incorporate measures to enhance the condition of the site, unless it is demonstrated that it is not feasible.</b></p> <p><b>Development likely to have an adverse affect on a Local Nature Reserve or a Local Wildlife or Geological Site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives. Where development would have an adverse affect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites in accordance with the Green Infrastructure study, unless it is demonstrated that it is not feasible.</b></p> <p><b>Outside designated sites, developers will be expected to take full account of the nature conservation or geological value, and the existence of any habitats or species included in the Local Biodiversity Action Plan, or sites in the Local Geological Action Plan. Developers will be required to undertake a full ecological survey and to deliver a net gain or enhancement to biodiversity, unless it is demonstrated that it is not appropriate or feasible. In considering the need for green space improvements associated with new development, developers should have</b></p>

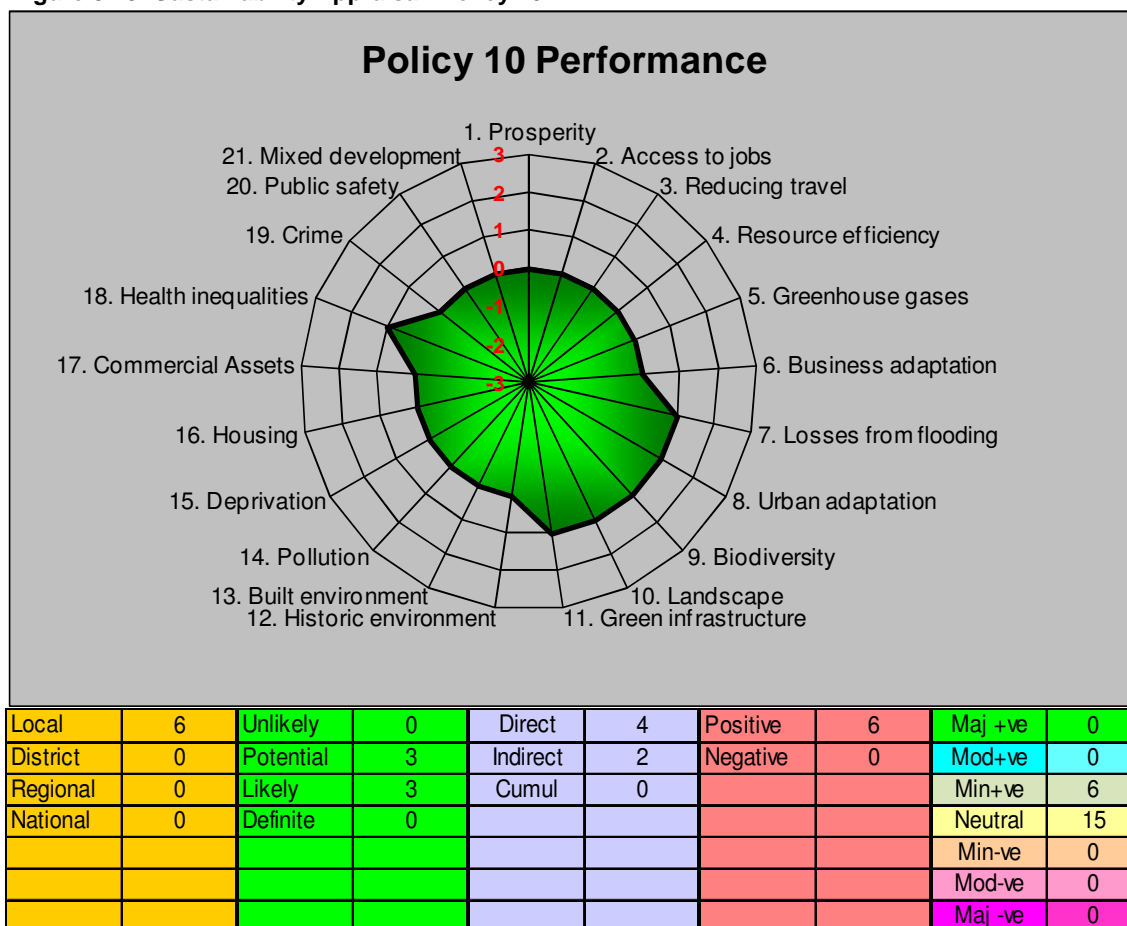
regard for the standards and priorities in the Green Spaces Strategy in relation to accessible natural green space.

Where development is likely to have significant harmful effects on the natural environment, as a result of the development itself, or the cumulative impact of developments, developers must demonstrate that all possible alternatives that would result in less harm have been considered. Where development is permitted, appropriate mitigation of the impacts and compensation where relevant will be required to deliver a net gain in biodiversity, landscape character and local distinctiveness. Enhancements should be undertaken either on the site, or in its vicinity, but where it is demonstrated that this is not possible, offsetting in alternative strategic locations within the biodiversity or green infrastructure network, to deliver biodiversity or other objectives may be considered. Where appropriate, developers should demonstrate compliance with this policy through an ecological statement or by relevant information in the West Midlands Sustainability Checklist.

**Forecast Effects**

3.13.2 This policy is slightly beneficial as there are six minor positive outcomes across the twenty one objectives comprising the sustainability framework (See Figure 3.10 and Appendix G). All other objectives report neutral outcomes.

**Figure 3.10: Sustainability Appraisal: Policy 10**



3.13.3 The policy gives rise to six positive outcomes across the climate change, natural resource protection and the sustainable communities themes.

3.13.4 The policy does not perform as highly as it might since its positive intentions are predicated upon development occurring that causes a need for mitigation measures. Thus the benefits are traded for

losses caused by development proposals. It is not clear whether the clause “*Where development is permitted, appropriate mitigation of the impacts and compensation where relevant will be required to deliver a net gain in biodiversity, landscape character and local distinctiveness*” applies to any development not having an effect upon a designated site.

- 3.13.5 It is evident that there is no certainty that enhanced biodiversity, landscape or other aspects of the natural environment such as soils; would result from the policy. For example, the policy states that:
- Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible or necessary;
  - Development should .... take full account of .... opportunities for biodiversity enhancement and for improving and restoring the Borough’s green infrastructure;
  - Where development may have an adverse effect on a Site of Special Scientific Interest, developers will be expected to incorporate measures to enhance the condition of the site, unless it is demonstrated that it is not feasible;
  - Where development would have an adverse effect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites in accordance with the Green Infrastructure study, unless it is demonstrated that it is not feasible;
  - Outside designated sites .... developers will be required to .... deliver a net gain or enhancement to biodiversity, unless it is demonstrated that it is not appropriate or feasible.

### **Managing Uncertainty**

- 3.13.6 Of the six beneficial effects three are considered to result in a likely outcome, the other three having the “potential” to deliver a beneficial outcome.

### **Mitigation and Enhancement**

- 3.13.7 Table 3.41 below provides the proposals emerging from the appraisal and the Council’s responses. No additional recommendations have been provided.

**Table 3.41: Natural Resource Protection & Env. Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Consider limiting the amount of housing that can be serviced via quiet lanes to preserve local character and protect natural resources.</li> </ul>	<ul style="list-style-type: none"> <li>Reflected in choice of sites and avoiding remote rural locations.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require that net gain in biodiversity is achieved at an appropriate geographic scale.</li> </ul>	<ul style="list-style-type: none"> <li>The policy requires that a net gain in biodiversity where feasible for non-designated sites. A requirement upon developers to enhance designated sites unless it can be demonstrated not to be feasible also exists.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider clarifying the term “feasible”. Perhaps there would be merit in separating ecological and engineering delivery and management issues from financial viability.</b></li> <li><b>Consider applying the requirement to all major development proposals regardless of the impact on biodiversity of the proposals.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Matter for developers to demonstrate. Requirement will apply irrespective of the size of the development.</b></li> </ul>
<ul style="list-style-type: none"> <li>The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health.</li> </ul>	<ul style="list-style-type: none"> <li>These measures can be examined as part of enhancement measures to be explored by developers. Policy 11 provides for the opening of culverts.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider whether the 2006 GI strategy meets the Natural Environment White Paper expectations and defines measures for delivery of a landscape scale strategy for biodiversity &amp; GI enhancements.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>The Solihull Green Infrastructure study provides a vision for green infrastructure in the Borough and recommends preparation of a strategy.</b></li> </ul>

### 3.14 Appraisal of Policy 11: Water Management

#### Introduction

- 3.14.1 This section presents a review of the appraisal of the Submission draft Local Plan policy on water management against the SA objectives. While changes to the policy are proposed, there is no change to the recommended measures for mitigation and enhancement.
- 3.14.2 The specific policy commitments are highlighted below with the changes introduced following the Submission draft Local Plan being presented in red. Justification for the policy is presented in the Submission draft Local Plan.

Policy P11 Water Management
<p><b>All new development should have regard to the actions and objectives of appropriate River Basin Management Plans</b> in striving to protect and improve the quality of water bodies in and adjacent to the Borough, including the Rivers Blythe and Cole and their tributaries. <b>Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.</b> <b>The Council will expect developers to demonstrate that all proposed development will be served by appropriate sewerage infrastructure and that there is sufficient sewage treatment capacity to ensure that there is no deterioration of water quality, or that the delivery of any development will not be delayed by the need for additional water treatment provision.</b> <del>Developers shall engage in early discussions with water companies to ensure that appropriate sewerage infrastructure is provided in a timely manner to serve any proposed development.</del></p> <p>The Council recognises the need for water efficiency in all new development. <b>Developers shall demonstrate the highest possible standards of water efficiency</b> through the use of water efficient fittings and appliances, and where appropriate, recycling of potable, grey water and rainwater in order to minimise consumption.</p> <p><b>All new development shall incorporate sustainable drainage systems, unless it is shown to be impractical to do so.</b> Developers shall ensure that adequate space is made for water within the design layout of all new developments to support the full use of sustainable drainage systems, and shall demonstrate that improvements to the water environment will be maximised through consideration of a range of techniques. Wherever possible, sustainable drainage systems will be expected to contribute towards wider sustainability considerations, including amenity, recreation, conservation of biodiversity and landscape character, as well as flood alleviation and water quality control.</p> <p>Developers shall explore opportunities to contribute towards the objectives of relevant Catchment Flood Management Plans. Wherever possible, development should promote the reduction of flood risk by seeking to reinstate the natural floodplain, the de-culverting of watercourses and the limiting of surface water runoff to green field rates via the use of sustainable drainage techniques. On all development sites larger than 1 hectare, surface water discharge rates shall be limited to <b>the equivalent site specific Greenfield runoff rate. Greenfield rates of 5 litres per second per hectare.</b> Developers will be expected to demonstrate that the layout and design of a development takes account of the surface water flows in extreme events so as to avoid flooding of properties, both within and outside the site. Applications for new development where there is a flood risk issue should be accompanied by a site flood risk assessment. Developers are encouraged to secure reduction of flood risk by the provision or enhancement of green infrastructure, wherever possible.</p> <p>Existing flood defence infrastructure will be protected and <b>development that would compromise the flood defence function will be permitted only if it is demonstrated through a flood risk assessment that the risk both within and outside the site, and to sites further downstream is not increased.</b></p> <p><b>New development will not normally be permitted within areas at risk of flooding. Where it is clearly demonstrated that there are no other viable sites at lower risk of flooding, consideration will be given to development in such locations, providing that it is designed to be safe from the</b></p>

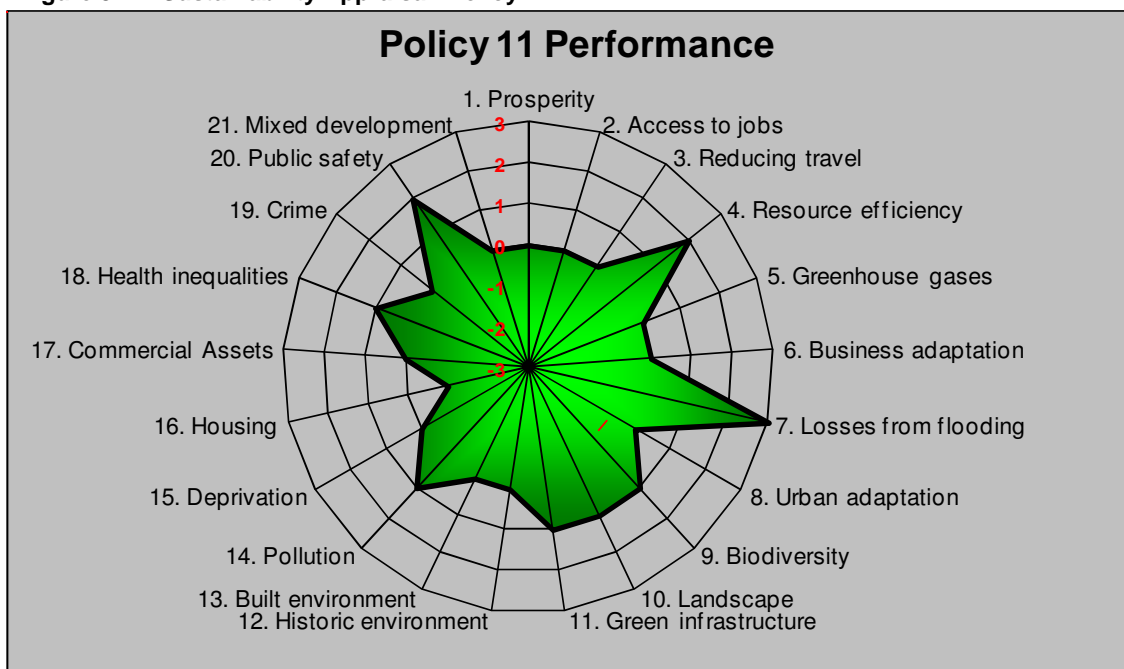


**effects of flooding and will minimise flood risk on the site and reduce risks elsewhere.**

**Forecast Effects**

- 3.14.3 The amendments introduced for the Submission draft Local Plan plus Proposed Modifications increase the likelihood of a beneficial outcome against the pollution objective, at least insofar as water pollution is concerned.
  
- 3.14.4 It is considered that this policy would have a positive contribution towards the sustainability objectives as it delivers one major beneficial and two moderate beneficial outcomes and a further five that are minor beneficial (see Figure 3.11 and Appendix G). Only one minor adverse effect is considered to be possible, namely an adverse effect upon the viability of housing schemes where the setting aside of land for water potentially could reduce the amount of development on the site and hence may adversely affect the viability of the proposed development.

**Figure 3.11: Sustainability Appraisal: Policy 11**



SA Objective	Likely Significant Effects	Rationale
7. Losses from flooding	<b>Maj+ve</b>	The policy focuses upon sustainable urban drainage, controls on runoff rates, requires that site with the lowest risk of flooding where no alternatives exist will only be considered when safety measures are taken and measures to reduce flood risk on site and elsewhere are in place.
4. Resource efficiency	<b>Mod+ve</b>	Developers are required to demonstrate the highest possible standards of water efficiency including recycling of potable, grey water and rainwater where practical.
20. Public safety	<b>Mod+ve</b>	Cumulatively the effect of the policy is likely to reduce the risk to public safety as a result of flooding.

Local	6	Unlikely	0	Direct	6	Positive	8	Maj +ve	1
District	3	Potential	2	Indirect	1	Negative	1	Mod+ve	2
Regional	0	Likely	4	Cumul	2			Min+ve	5
National	0	Definite	3					Neutral	12
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

- 3.14.5 The policy is envisaged to give rise to only one outcome for the sustainable consumption and production theme with a likely moderate beneficial outcome on resource efficiency. While a major beneficial outcome for flooding is the outcome anticipated under the climate change and energy theme.
- 3.14.6 Four minor positive outcomes are likely to arise under the natural resource protection theme (biodiversity, landscape, green infrastructure and pollution).
- 3.14.7 Within the sustainable communities theme there is likely to be a moderate beneficial outcome for public safety, as well as a potential minor positive outcome for health inequalities due to the integration of amenity and recreational elements within the sustainable urban drainage measures. A potential minor negative outcome is anticipated for housing since the requirement to ensure adequate space for water may have adverse effects upon the viability of development sites.

### **Managing Uncertainty**

- 3.14.8 Of the eight beneficial outcomes all but one are considered to be likely or definite outcomes. The only potentially beneficial outcome is that of health inequalities. It is judged that the integration of amenity and recreational elements of Green Infrastructure within sustainable urban drainage schemes have the potential to provide some opportunities to reduce health inequalities where disadvantaged communities are served. The effect of the policy change is to increase the probability that beneficial effects would result for water quality as a result of the revised approach towards sewerage treatment infrastructure.

### **Mitigation and Enhancement**

- 3.14.9 Suggestions were put forward for the climate change and natural resource themes along with comments from the Council are presented in Table 3.42 and 3.43, with no additional mitigation proposals being identified.

**Table 3.42: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Consider requiring the developer for a given scale of housing development to demonstrate the viability of ground source heat pumps and local grey water capture and reuse for their proposals.</li> </ul>	<ul style="list-style-type: none"> <li>The need to adopt renewable technologies is captured in policy 9. Specific technologies are a matter for the developers to explore supported by the Sustainable Construction and Design document. The efficient use of water is a requirement of policy 11.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Where cost, energy use and carbon costs feature in the decision not to adopt grey or rain water harvesting, then in the case of major development proposals, the calculations should extend beyond the site to include the savings associated with the entire water cycle.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.43: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Urban design policy should address issues such as provision of green or brown roofs and rainwater harvesting.</li> </ul>	<ul style="list-style-type: none"> <li>Rain water harvesting is one measure that developers may consider in establishing water efficiency. This aspect would be addressed in the Sustainable Construction and Design document.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health.</li> </ul>	<ul style="list-style-type: none"> <li>Reinstatement of natural floodplains and de-culverting of watercourses forms part of the new policy.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Consider clarifying whether GI contributions to reducing flood risk can be required for beyond the development site boundary as this may increase cost effectiveness.</li> </ul>	<ul style="list-style-type: none"> <li>Off-site contribution can be required on a development specific case where essential through a formal agreement.</li> </ul>

### 3.15 Appraisal of Policy 12: Resource Management

#### Introduction

3.15.1 The policy on waste management is examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold text below with the changes introduced for the Submission draft Local Plan presented in red. Justification for the policy is presented in the Draft Local Plan. The only change made following the Submission Draft Local Plan as to emphasis self-sufficiency within the Borough rather than work towards self-sufficiency across the Coventry-Solihull-Warwickshire sub-region. This was not considered to affect the sustainability performance of the policy and thus no changes were made to the proposals for mitigation and enhancement.

Policy P12 Resource Management
<p><b>The Council will promote and control new development to prevent the production of waste within the Borough wherever possible and will encourage prevention from existing buildings and uses. Where this is not feasible, waste shall be treated as a resource to be reused, recycled, or from which value will be recovered, with management to be as high up the waste hierarchy as possible.</b> Disposal of waste shall be a last resort, to be considered only when all other options have been exhausted.</p> <p><b>Management of waste shall seek to maximise the contribution to economic development and employment in the Borough, especially within and accessible to the North Solihull Regeneration Zone. Waste operators will be expected to demonstrate that the greenhouse gas emissions from the operations involved and associated transport of waste from source to processing facility have been minimised.</b></p> <p>The Council will seek to address the waste capacity gap in the Borough through this policy, so that an equivalent tonnage is provided within waste management facilities to that arising by 2028, <del>or if this is not feasible, will work towards self-sufficiency within the Coventry Solihull Warwickshire sub-region.</del></p> <p>Wherever possible, <b>on-site management of waste shall be preferred, unless the activities would result in unacceptable harm through impacts on the environment, transport or on neighbouring uses, or it is demonstrated that management elsewhere would have wider sustainability benefits.</b></p> <p><b>Strategically important waste management sites within the Borough, where waste management activities will be supported in principle, are identified on the spatial strategy diagram.</b> These sites include the site of the former Arden Brickworks in Bickenhill, which contains the household waste recycling centre, and a range of other waste management operations, the materials recovery facility at Meriden Quarry, the composting facilities in Berkswell, and the Moat Lane and Chapelhouse Depot waste transfer stations in the Urban West and North Solihull Regeneration Zone.</p> <p>When investigating the suitability of sites for waste management operations in the Borough, <b>the potential for consolidating or expanding waste management facilities at the former Arden Brickworks site, for the co-location of complementary waste operations at Berkswell and Meriden quarries, and for locating waste management facilities on appropriate industrial sites within the Borough shall be considered.</b> Where it is not possible or appropriate for new operations to be developed on-site or in these locations, <b>developers shall consider the potential of sites within the Area of Search for waste management facilities identified on the spatial strategy diagram.</b></p> <p><b>The Council will have regard to the following criteria in considering the suitability of sites for waste management facilities:</b></p> <ul style="list-style-type: none"> <li>• The contribution towards national and local waste management strategies, objectives and targets, including the Solihull Municipal Waste Management strategy 2010-2020;</li> <li>• The contribution towards economic development and employment in the Borough, particularly in or accessible from the North Solihull Regeneration Zone;</li> <li>• The contribution to national and local targets to reduce greenhouse gas emissions, taking account of those resulting directly from the operations (Policy 9), and those from the transport of wastes from the source of arisings to the end management;</li> </ul>

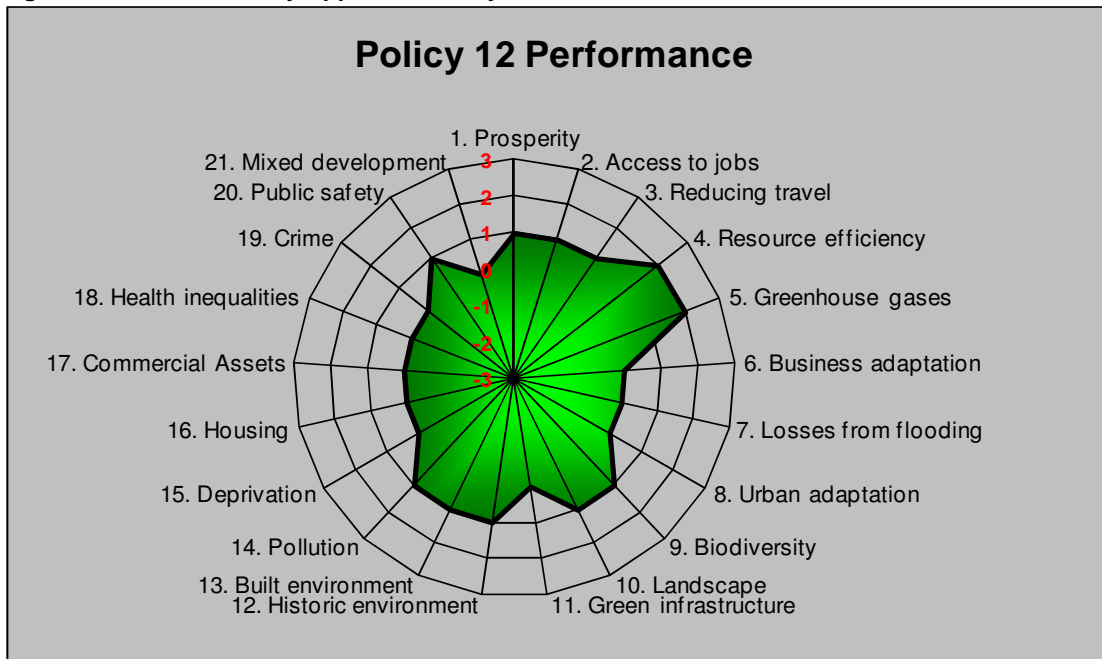
- The potential for on-site management associated with development and other uses;
- The potential for the development of shared facilities for more than one waste planning authority where these would accord with this policy;
- The potential for the co-location of complementary activities where there are no adverse cumulative impacts;
- The contribution towards the restoration of former mineral workings in the Borough;
- The suitability of the site for the type of wastes and operations involved, including whether the activity can take place within a building or other enclosure;
- The impacts on transport infrastructure, including the potential for the use of alternative modes to road transport, and highway safety;
- The compatibility of waste management activities with neighbouring uses, including the nature of the wastes, operations, hours of working and any cumulative effects where waste management activities already exist;
- The availability of suitable previously developed land and/or redundant buildings;
- The impact on the Green Belt, taking account of policy in the NPPF and Policy 17 of this plan;
- The impact on the environment, including the protection of water resources and quality (Policy 11), conservation of biodiversity (Policy 10), high quality design (Policy 15), the protection of the historic environment and built heritage (Policy 16), and on air quality from emissions and dust
- The impact on amenity and health, including visual intrusion, noise and vibration, litter, odour, vermin and bird attraction, including the impact on aerodrome safeguarding.

**In considering non-waste management development proposals, the Council will take into account any adverse impact on the strategically important waste management sites and the potential of the Area of Search for waste management facilities identified in this plan. Non-waste development will be required to accommodate facilities for the storage and sorting of waste arising from the development, and developers will be expected to demonstrate satisfactory provision for waste management through a Site Waste Management Plan or similar supporting evidence.**

## Forecast Effects

- 3.15.2 This policy is judged to give rise to two moderate beneficial outcomes (resource efficiency and greenhouse gases), nine minor beneficial outcomes and no adverse effects (see Figure 3.12 and Appendix G). Principally by being explicit on the criteria for the location of waste management activities the potential for adverse effects has been managed. Indeed, the potential for moderate adverse effects upon historic features and the landscape been removed.
- 3.15.3 Within the sustainable consumption and production theme, the policy gives rise to positive outcomes across the four sustainability objectives. The prosperity and access to jobs outcomes are anticipated to be potential minor positive, while the outcomes upon reducing travel and resource efficiency are more certain generating a moderate beneficial outcome (resource efficiency) and a minor positive (reducing travel).
- 3.15.4 The policy has the potential to deliver a moderate beneficial outcome for the climate change and energy theme and the potential for three minor beneficial outcomes within the natural resource protection theme.
- 3.15.5 Enhancing public safety is the only outcome anticipated under the sustainable communities theme. Here the policy gives consideration of the health and safety issues of waste management activities including pollution, odour, vermin and bird attraction including the impact on aerodrome safeguarding.

Figure 3.12: Sustainability Appraisal: Policy



SA Objective	Likely Significant Effects	Rationale							
4.Resource efficiency	Mod+ve	By encouraging the prevention of waste and then to enable the recovery of value high up the waste hierarchy this policy is likely to deliver improved resource efficiency. Non-waste development will also be required to provide facilities that deliver satisfactory provision for waste management.							
5.Greenhouse gases		Reducing the transport of waste as well as a requirement upon waste operators to demonstrate minimised greenhouse gas emissions from their operations is likely to lead to reduced emissions. Furthermore, minimising waste to landfill has the potential exists to reduce methane released from landfills.							
Local	9	Unlikely	0	Direct	11	Positive	11	Maj +ve	0
District	2	Potential	7	Indirect	0	Negative	0	Mod+ve	2
Regional	0	Likely	3	Cumul	0			Min+ve	9
National	0	Definite	1					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

**Managing Uncertainty**

3.15.6 Of the eleven beneficial outcomes across the sustainability objectives that this policy delivers, seven are considered to have the potential to occur with four being likely or a definite outcome (Reducing travel; Resource efficiency, and Public safety and Built environment). The potentially beneficial outcomes for greenhouse gases and natural resource protection are driven by a requirement for the Council to give consideration to the effects of waste management proposals upon these sustainability objectives. As such beneficial outcomes are more likely but are not certain being determined at a project level.

**Mitigation and Enhancement**

3.15.7 A series of mitigation and enhancement measures were identified across the four sustainability themes during the previous appraisals. The majority of these recommendations were incorporated into the revised policy included in the Submission Draft Local Plan (see Tables 3.44 to 3.47).

**Table 3.44: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Explore the use of the public sector purchasing power to deliver reductions in the amount of material purchased that is then disposed of as waste.</li> </ul>	<ul style="list-style-type: none"> <li>Does not come within remit of local plan.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Present measures to drive strategy up the waste management hierarchy.</li> </ul>	<ul style="list-style-type: none"> <li>Revised policy seeks to drive the strategy up the waste management hierarchy.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>In determining locations for waste facilities consider the greenhouse gas emissions resulting from the movement of waste and recycled product as a factor.</li> </ul>	<ul style="list-style-type: none"> <li>Waste operators required to demonstrate that emissions from operations and associated transport of waste from source to processing have been minimised.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Provide support for new technologies to deliver sustainable waste management.</li> </ul>	<ul style="list-style-type: none"> <li>Policy provides flexibility to enable new technologies to contribute to resource management.</li> </ul>	<ul style="list-style-type: none"> <li><b>Explore opportunities to promote waste management technologies via Affordable Solutions.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD.</b></li> </ul>

**Table 3.45: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Determine implications of alternative waste management strategies upon greenhouse gas emissions across the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>Developers are required to demonstrate minimisation of greenhouse gas emission from both the movement of waste and site operations.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.46: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Establish site selection criteria that address the potential for adverse effects upon visual amenity and historic landscape.</li> </ul>	<ul style="list-style-type: none"> <li>The revised policy addresses these aspects.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.47: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Ensure that all new developments make adequate provision for the segregation and storage of waste prior to collection.</li> </ul>	<ul style="list-style-type: none"> <li>The revised policy addresses these aspects.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>



### 3.16 Appraisal of Policy 13: Minerals

#### Introduction

- 3.16.1 The proposed policy on minerals is examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold below. This policy is proposed to modified as highlighted below, in a manner which increases the protection of SSSI areas and this is reflected in the revised appraisal below. No further proposals for mitigation or enhancement are made.
- 3.16.2 Justification for the policy is presented in the Submission draft Local Plan.

Policy P13 Minerals
<p><u>Mineral Safeguarding Areas</u></p> <p><b>Mineral Safeguarding Areas</b> for important underground coal resources in the eastern part of the Borough, and for sand and gravel aggregate resources between Berkswell, Hampton and Meriden and east of the NEC and M42, including sites for important associated infrastructure and to meet potential needs <b>are defined on the spatial strategy diagram/proposals map.</b></p> <p><b>The Council will permit the search for new minerals, including coal bed methane resources, whether within or outside the Mineral Safeguarding Areas, providing that the criteria for minerals development proposals are met.</b> Permission for exploration will not necessarily imply that a subsequent consent for mineral extraction will be forthcoming.</p> <p><b>Within these MSAs, proposals for non-mineral development will only be permitted where it can be demonstrated that the development will not result in the sterilisation of mineral resources or the loss of important infrastructure or sites for potential infrastructure needs in the areas. Prior to development, developers will be expected to ensure that all safeguarded minerals that would be affected are extracted, unless it is demonstrated that the resources have no economic value, extraction is not feasible or would result in excessive costs or delays, or that there is an overriding need for the development that outweighs the need to safeguard the mineral resources.</b></p> <p><u>Alternative materials</u></p> <p><b>The Council will promote the use of alternative materials, such as secondary and recycled aggregates in all new development within the Borough.</b> Provision for alternative materials will be encouraged on sites for significant development within the Borough, where appropriate. <b>Permanent facilities will be encouraged within the area of search for appropriate waste management facilities defined on the spatial strategy diagram/proposals map.</b></p> <p><u>Provision for primary sand and gravel extraction</u></p> <p><b>Provision for primary sand and gravel resources will be made through a mixture of specific sites, preferred areas and/or areas of search to meet the identified requirement of 7.5 million tonnes over the plan period.</b> These will include sites already granted planning permission where not included in the current sub-regional landbank.</p> <p>Preferred areas for primary sand and gravel extraction are identified at Marsh House Farm, Hornbrook Farm and west of Berkswell Quarry, which will provide around 2.5 million tonnes and are defined on the spatial strategy diagram/proposals map.</p> <p><b>Extraction of any site or part thereof that will impact on an adjacent Site of Special Scientific Interest will be permitted only if the necessary avoidance and/or mitigation is incorporated to protect the SSSI.</b></p> <p>Areas of search for primary sand and gravel extraction are identified between Berkswell, Hampton and Meriden and east of the NEC and M42 to meet the shortfall in provision, and are defined on the spatial strategy diagram/proposals map. However, inclusion within an area of search does not imply that all of the mineral resources are viable or that extraction would be acceptable. <b>Sand and gravel extraction outside the areas of search may also be permitted, if there is evidence that insufficient mineral resources from the areas of search are likely come forward within the plan period, or that</b></p>

**production targets will not be met.**

Mitigation, restoration, aftercare and after use

**Proposals for mineral working or related infrastructure will be assessed against the following criteria:**

- Contribution towards national and local strategic objectives or wider needs including national and local targets for minimising carbon emissions and using alternative materials;
- Contribution towards the local and sub-regional economy and the regeneration of North Solihull;
- Opportunities for the co-location of related uses and wider benefits such as the production of secondary or recycled aggregates;
- Impact of the proposed activities, including any associated infrastructure, on surrounding land uses and amenity, taking account of the nature of the operations, duration, hours of operation, noise, dust vibration, air pollution, visual impacts and, in respect of underground extraction, the impact of subsidence;
- Impact on the local and sub-regional transport network, including the routing of lorries to and from the site and the potential for rail freight;
- Impact on the environment, landscape, built heritage and archaeology, nature conservation interests, ground and surface water quantity and quality, best and most versatile farmland, agricultural businesses and aerodrome safeguarding;
- Measures for mitigating any environmental, transport or other impacts or for compensation for loss or damage where appropriate, including the provision of appropriate buffers between extraction and environmental or other assets;
- The potential for subsidence, migration of gases and contamination of ground water associated with underground extraction;
- Restoration to a safe and high quality condition with appropriate aftercare in accordance with agreed restoration and aftercare schemes and within an agreed period following the cessation of extraction
- Reclamation to an agreed use, which should prioritise the contribution the site could make to green infrastructure, the conservation and enhancement of biodiversity, including Local Biodiversity Action Plans, the enhancement and restoration of the Arden landscape, flood risk management, appropriate recreation uses and agriculture, as well as the availability of suitable infill material if appropriate.

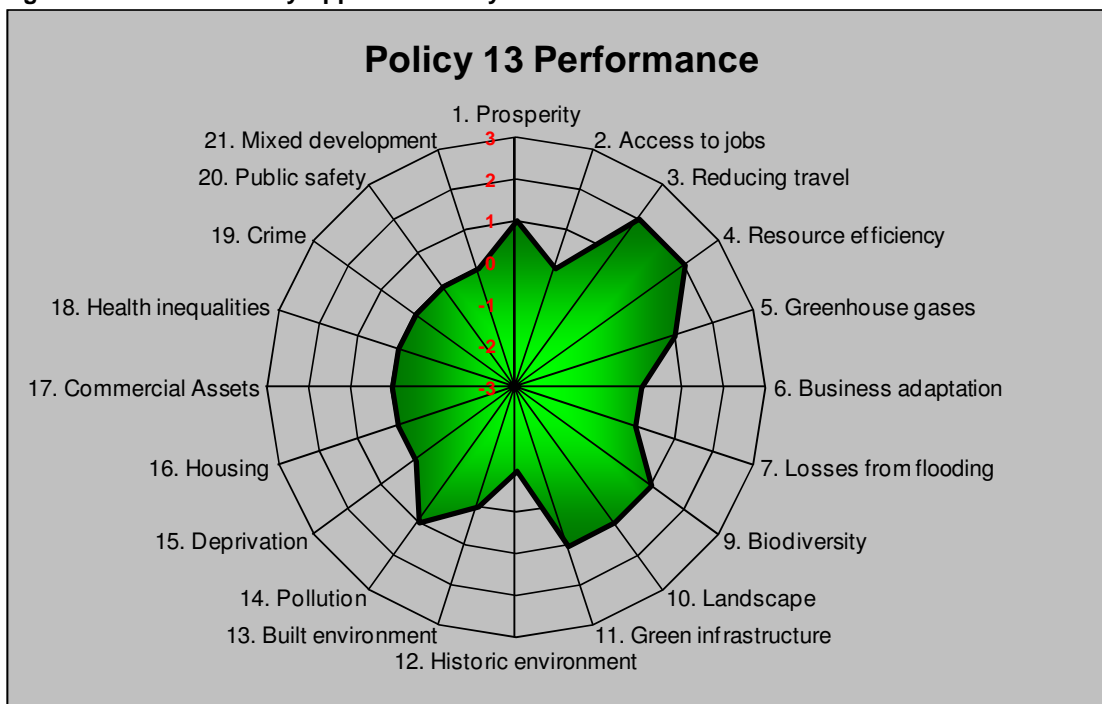
**Proposals for ancillary uses will be permitted where they are located within the extraction site, are limited to the life of the permitted reserves and minimise the impacts on environmental assets, transport infrastructure and surrounding occupiers and uses. The Council will support proposals for complementary recycling facilities, which should be as close as possible to the point of extraction or disposal.**

## Forecast Effects

- 3.16.3 This policy gives rise to two moderate positive outcomes (reducing transport and resource efficiency) along with six minor positive outcomes, with one minor negative outcome (see Figure 3.13 and Appendix G). The opportunity to convert the array of minor positive outcomes to moderate beneficial is constrained by the geographic scale of the effects being essentially local rather than across the Borough.
- 3.16.4 The policy has the potential to deliver positive outcomes across three of the four objectives under the sustainable consumption and production theme. While the moderate positive outcome on resource efficiency is considered to be a definite outcome, the minor positive outcome upon prosperity and the moderate beneficial outcome on reducing travel are both considered to be potential outcomes.

- 3.16.5 There is a possibility that the policy could give rise to a minor beneficial outcome for greenhouse gases under the climate change theme, whereas there are five minor beneficial and one minor adverse outcome for the historic environment under the natural resource protection theme. The changed wording of the policy increases the probability of beneficial biodiversity outcomes. The negative outcome for the historic environment objective is as a result of the policy providing for the “assessment” of effects upon the historic environment rather than the delivery of a positive outcome.
- 3.16.6 No outcomes are anticipated against the sustainable communities theme.

**Figure 3.13: Sustainability Appraisal: Policy 13**



SA Objective		Likely Significant Effects		Rationale					
3.Reducing travel		Mod+ve		Local production minimises the importation of materials from elsewhere with consequential savings in transport that potentially benefit the entire Borough. The policy also encourages the co-location of recycling facilities and ancillary uses that may also contribute towards reducing travel.					
4.Resource efficiency		Mod+ve		Protects mineral resource from sterilisation, promotes the use of secondary aggregates and recycling of resources with efficiencies to emerge from the co-location of operations.					
Local	7	Unlikely	0	Direct	8	Positive	8	Maj +ve	0
District	2	Potential	5	Indirect	0	Negative	1	Mod+ve	2
Regional	0	Likely	0	Cumul	1			Min+ve	6
National	0	Definite	4					Neutral	12
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

### **Managing Uncertainty**

- 3.16.7 Of the nine significant effects identified for the policy against the sustainability framework, there are four definite beneficial outcomes (resource efficiency, biodiversity, consideration of landscape and the minimisation of pollution risks.) The remaining outcomes are all considered to give rise to potential direct effects.

### **Mitigation and Enhancement**

- 3.16.8 A series of mitigation and enhancement measures were identified under the sustainable consumption and production and natural resource protection themes with the Council providing responses as noted in Tables 3.48 and 3.49. No further recommendations have been made for consideration alongside the Submission draft Local Plan plus Proposed Modifications.

**Table 3.48: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Consider introducing a policy on the management of recycled and secondary aggregates as part of the halving waste to landfill initiative.</li> </ul>	<ul style="list-style-type: none"> <li>Policy provides for co-location of secondary or recycled aggregates with mineral sites and the location of permanent facilities within the Waste Management Facilities area of search. The contribution made by development to the use of alternative materials is also recognised.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider introducing a policy to promote the use of recycled and secondary aggregates in public building works.</li> </ul>	<ul style="list-style-type: none"> <li>The policy provides for the use of alternative materials, such as secondary and recycled aggregates in all new development within the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.49: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012	Response
<ul style="list-style-type: none"> <li>Establish landscape scale mitigation strategy for biodiversity in accordance with the Natural Environment White Paper.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 10 addresses landscape scale approach, which will be pursued outside the local plan process.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider developing a long term landscape strategy within which individual mineral extraction operations are to take into account in their working and restoration strategies.</li> </ul>	<ul style="list-style-type: none"> <li>This approach has been considered in the past but has not been pursued.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Consider making reference to the need to protect the historic environment of the area.</li> </ul>	<ul style="list-style-type: none"> <li>The policy addresses the need to assess proposals in terms of the impact on built heritage and archaeology.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Examine the formulation of a strategy to protect villages from the cumulative effects of mineral extraction.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts on settlements included in criteria.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

<ul style="list-style-type: none"> <li>Consider the implications of High Speed 2 on mineral demand.</li> </ul>	<ul style="list-style-type: none"> <li>Presents difficulties due to the uncertainty over the project and the timescales involved. Proposals recognise that there may be need to extract sand and gravel earlier in the plan period to avoid possible sterilisation.</li> </ul>	<ul style="list-style-type: none"> <li><b>It is presumed that the 7.5 Mt excludes allowance for HS2 that is envisaged to impact at the end of the plan</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy allows for extraction where resources would otherwise be sterilised irrespective of the position relating to the primary sand and gravel requirement.</b></li> </ul>
<ul style="list-style-type: none"> <li>Enhance the policy dealing with soils, restoration and after use to set out clear objectives as to the desired future state following mineral operations.</li> </ul>	<ul style="list-style-type: none"> <li>Contributions of a restored site to green infrastructure, biodiversity, the Arden landscape, flood risk management, recreational use and agriculture is recognised.</li> </ul>	<ul style="list-style-type: none"> <li><b>The policy covers all eventualities but perhaps could make reference to a landscape scale strategy for the rural area that sets the framework within which the objectives can be developed into measures.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Policy P10 recognises the need for a landscape scale approach to the natural environment.</b></li> </ul>

### 3.17 Appraisal of Policy 14: Amenity Policy

#### Introduction

3.17.1 The proposed policy on amenity is examined in this section against the sustainability objectives to establish the policy's sustainability performance and identify potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold below. As there was no change made to this policy for the Submission Draft Local Plan or following the Examination in Public, so the appraisal and recommendations for mitigation and enhancement remain unchanged.

3.17.2 Justification for the policy is presented in the Submission draft Local Plan.

#### Policy P14 Amenity

**The Council will seek to protect and enhance the amenity of existing and potential occupiers houses, businesses and other uses in considering proposals for new development, and will:**

- **Permit development only if it protects and enhances the amenity of existing and proposed occupiers and would be a good neighbour**
- **Consider the visual and other amenities of potential occupiers and users of new developments close to overhead power lines and substations. Developers will be expected to locate and design new developments so as to minimise the visual and other amenity impacts**
- **Support the development of electronic communications networks including telecommunications and high speed broadband.** The Council will have regard to the needs of telecommunications operators, any technical constraints on location of telecommunications apparatus, the potential for sharing sites, the impact of development on its surroundings, the sensitivity of the environment and the design and external appearance of telecommunications apparatus. **Development in or adjacent to sensitive locations will be permitted only if there is no other technically suitable location that both meets operational requirements and causes less environmental harm and any mast is at a distance of at least twice its height from the nearest residential properties**
- **Safeguard important trees, hedgerows and woodlands, encourage new and replacement tree and hedgerow planting** and identify areas that may be suitable for the creation of new woodlands. **Priority will be given to locations that enhance or restore the green infrastructure network and to the planting of species characteristic of the Arden Warwickshire landscape**
- **Encourage better air quality in and around the Borough through the adoption of low emission zone initiatives** such as those involving the use of electric vehicles for freight and public transport. **Development that would contribute to air pollution, either directly or indirectly will be permitted only if it would not hinder or significantly harm the achievement of air quality objectives or any relevant Air Quality Management Plan, and it incorporates appropriate attenuation, mitigation or compensatory measures**
- **Require proposals for development on land known or suspected to be contaminated to include appropriate information to enable the potential implications to be assessed and to incorporate any necessary remediation**
- **Seek to minimise the adverse impact of noise. Development likely to create significant noise will be permitted only if it is located away from noise sensitive uses or it incorporates measures to ensure adequate protection against noise. Noise sensitive development will be permitted only if it is located away from existing sources of significant noise, or if no suitable alternatives exist, the development incorporates measures to reduce noise intrusion to an acceptable level**

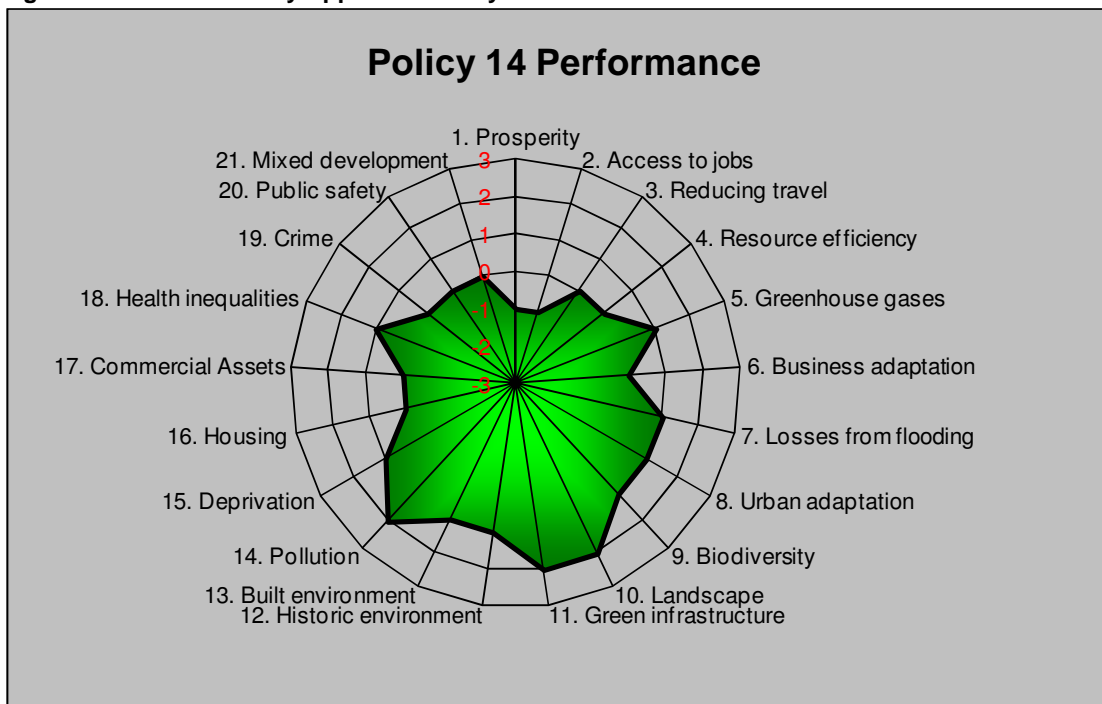
- **Protect the amenity of residential and shopping areas, community facilities and open space from bad neighbour uses.** Development that would be seriously harmful because of smell, noise or atmospheric pollution will not be permitted, whilst development that would be potentially harmful to such areas will be expected to incorporate appropriate attenuation, mitigation or compensatory measures. **In locations close to existing bad neighbour uses, the Council will not permit new residential or other sensitive development, unless the effects can be satisfactorily mitigated as part of the development**
- **Protect those parts of the countryside in the Borough that retain a dark sky from the impacts of light pollution.** Development involving external lighting outside established settlements will be permitted only where significant lighting already exists, or the benefits of the development clearly outweigh the impact of the lighting on the countryside. **Any lighting scheme should be the minimum required for the purposes of the development and should avoid light spillage and harmful effects on biodiversity**
- **Protect the tranquil and locally distinctive areas in the Borough by guiding new development, particularly those that will create significant noise,** either directly or through associated transport, to locations that will avoid or minimise adverse impacts.

## Forecast Effects

- 3.17.3 This policy gives rise to three moderate positive outcomes (landscape, green infrastructure and pollution) along with eight minor positive outcomes, and two minor negative outcomes (see Figure 3.14 and Appendix G). The opportunity to convert the array of minor positive outcomes to moderate beneficial is constrained by the geographic scale of the effects being essentially local rather than across the Borough. Only three effects are considered to be likely to be Borough-wide – those identified as being likely to give rise to a moderate beneficial outcome,
- 3.17.4 In the context of the sustainable consumption and production theme, the policy is considered to have the potential to constrain employment opportunities by permitting development only if it protects and enhances the amenity of existing and proposed occupiers. The policy does however provide support for high speed broadband may mitigate the effect on employment.
- 3.17.5 Within the climate change and energy theme, the policy is anticipated to give rise to three potential minor beneficial outcomes on greenhouse gases, flooding and urban adaptation. The adoption of a low emission zone should also contribute towards reducing greenhouse gas emissions, while the provision of green infrastructure should assist with reducing losses for the flooding and urban adaptation objectives.
- 3.17.6 Across the six objectives within the natural resource protection & environment theme, the policy provides three likely moderate beneficial outcomes (landscape, green infrastructure and pollution. In addition there are three minor beneficial outcomes (biodiversity, historic environment and built environment).
- 3.17.7 Only two objectives within the sustainable communities theme deliver potential minor beneficial outcomes (deprivation and health inequalities). Support for broadband may assist in access improvements to employment, education and health services and potentially reduce imbalances across the Borough. Also, the potential low emission zone as well as improved broadband may contribute towards reducing health inequalities particularly for those living in high trafficked areas.
- 3.17.8 Most of the outcomes from the policy are judged to be indirect and local reflecting the policy itself typically in the short to medium term duration although those outcomes within the climate change and energy theme were considered to occur over the longer term (see Appendix G).



Figure 3.14: Sustainability Appraisal: Policy 14



SA Objective	Likely Significant Effects	Rationale
10. Landscape	Mod+ve	New development is to protect and enhance the existing amenity with safeguarding of important vegetation, the planting of species characteristic of the Arden Warwickshire landscape is likely to lead to improvements in the landscape and demonstrates that landscape issues are to be considered in development decisions.
11. Green infrastructure	Mod+ve	The policy ought to contribute to the enhancement of green infrastructure.
14. Pollution	Mod+ve	The policy provides for the protection of tranquil areas, protection from light pollution, controls on noise generating development, the adoption of a low emission zone and the avoidance of significant harm to the achievement of air quality objectives or an air quality management plan.

Level	Count	Unlikely	Potential	Likely	Definite	Direct	Indirect	Cumul	Positive	Negative	Maj +ve	Mod+ve	Min+ve	Neutral	Min-ve	Mod-ve	Maj -ve
Local	10	0	9	4	0	5	8	0	11	2	0	3	8	8	2	0	0
District	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regional	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
National	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Managing Uncertainty**

3.17.9 Of the 13 significant effects identified for the policy against the sustainability framework, only four generate likely outcomes (consideration of landscape, green infrastructure, built environment and the minimisation of pollution risks). The remaining outcomes are all considered to give rise to potential effects although the potential effects within the sustainable consumption and production as well as the climate change and energy themes are considered to be indirect effects.

## Mitigation and Enhancement

- 3.17.10 Mitigation/enhancement proposals made during the appraisal of the Emerging Core Strategy been addressed by the Council as presented in Tables 3.50 to 3.53.
- 3.17.11 The outcomes from the policy remain subject to considerable uncertainty being mainly dependent upon the actions of others for their delivery. **Perhaps the main aspect where mitigation/enhancement could be delivered would be in relation to the need for frequent reviews of open space requirements to ensure an up to date evidence base to inform the preparation of site development briefs.**

**Table 3.50: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>In determining that existing public open space is surplus to requirements, the Council ought to take into account future rather than existing needs to reflect the changing nature of the local community and future development activity.</li> </ul>	<ul style="list-style-type: none"> <li>This topic is considered in policy 20 – open space.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.51: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Reference the need to protect and enhance open spaces within the most built up parts of the district to provide mitigation against the urban heat island effect.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 9 requires developers to ensure resilience to the impacts of a changing climate through a range of adoption measures including green infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.52: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>The protection and planting of street trees ought to be encouraged to enhance amenity and mitigate urban heating effects.</li> </ul>	<ul style="list-style-type: none"> <li>The policy provides for the protection of trees.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.53: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider the layout and the number of houses served by access roads for new housing areas so as to maximise the opportunity for safe play areas adjacent to housing for parental supervision.</li> </ul>	<ul style="list-style-type: none"> <li>To be addressed through development briefs for each site. Policy 5 addresses open space, sports and recreation. Also policy 15 provides for creation of attractive, safe streets and spaces.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Make reference to the particular issues surrounding open space provision (and possibly also access to the countryside) associated with the North Solihull Regeneration Area.</li> </ul>	<ul style="list-style-type: none"> <li>Open space covered in Policy 20. Access to River Cole valley of greater benefit given severance from countryside by roads.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Promote the adoption of green gyms in communities experiencing high levels of health inequalities.</li> </ul>	<ul style="list-style-type: none"> <li>Issue is reflected in Policy 18, although specific reference considered to be too detailed for local plan.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health.</li> </ul>	<ul style="list-style-type: none"> <li>The de-culverting of watercourses and contributing towards amenity, recreation, biodiversity and landscape is recognised in policy 11.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

### 3.18 Appraisal of Policy 15: Securing Design Quality

#### Introduction

- 3.18.1 The proposed policy on design quality is examined in this section against the sustainability objectives to establish the policy's sustainability performance and identify potential improvements to strengthen its sustainability credentials. There was no change made to this policy for the Submission draft Local Plan or with the Proposed Modifications following the EIP beyond an update to reflect the new Building for Life scheme. This has not affected the appraisal or changed the recommendations for mitigation and enhancement. Justification for the policy is presented in the Submission draft Local Plan.

<b>Policy P15 – Securing Design Quality</b>
<p><b>All development proposals will be expected to achieve high quality, inclusive and sustainable design</b>, which meets the following key principles:</p> <ul style="list-style-type: none"> <li>• <b>Conserves and enhances local character, distinctiveness and streetscape quality and ensures that the scale, massing, density, layout, materials and landscape of the development respect the surrounding natural, built and historic environment;</b></li> <li>• <b>Ensures that new development achieves the highest possible standard of environmental performance through sustainable design and construction and the location and layout of the development in accordance with the guidance provided in Policy 9 – Climate Change;</b></li> <li>• <b>Secures the sustainable long-term use of new development through flexible, robust and future-proofed design e.g. digital connectivity;</b></li> <li>• <b>Makes appropriate space for water within the development, using sustainable drainage (SuDS) principles, to minimise and adapt to the risk of flooding.</b> Further guidance is provided in Policy 11 – Water Management;</li> <li>• <b>Conserves and enhances biodiversity, landscape quality and considers the impact on and opportunities for green infrastructure at the earliest opportunity in the design process.</b> Further guidance is provided in Policy 10 – Natural Environment;</li> <li>• <b>Integrates the natural environment within the development through the provision of gardens, quality open space and/ or improved access to, enhancement or extension of the green infrastructure network</b> Further guidance is provided in Policy 20 – Open Space, Sport and Recreation.</li> <li>• <b>Creates attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce the fear of crime.</b></li> </ul> <p><b>Development proposals will also be expected to contribute to and where appropriate, create a sense of place.</b> Such measures may include; reflecting heritage assets and their setting in the design process, <b>integrating</b> landscape into the development, promoting diversity through a mix of uses within the site, or the installation of public art.</p> <p><b>All residential development proposals should be built to the Lifetime Homes standard and demonstrate at least the <del>'Good/Silver' Building for Life (BfL) design standard</del> how they meet Building for Life 12 or its equivalent.</b> However, the Council will take into account the economics of provision, including particular costs that may threaten the viability of the site. All residential development will be expected to adhere to the guidance set out in the New Housing in Context SPG until this has been updated and the Council will prepare Supplementary Planning Documents to provide necessary additional guidance.</p> <p><b>Applicants should adhere to the urban design principles set out in established design guidance;</b> Urban Design Compendium 1 and 2 (2007), By Design (2000 and 2001), Manual for Streets 1 (2007) and 2 (2010), Car Parking: What Works Where (2006), Building for Life and Secured by Design principles, or their equivalents.</p>

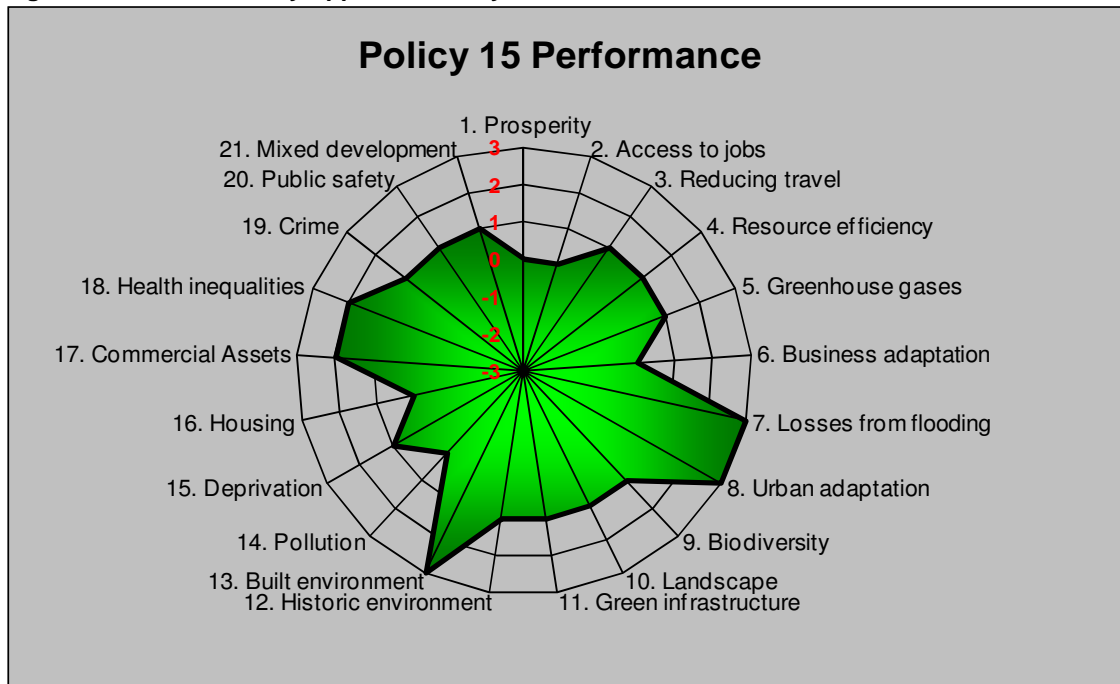
**Development at key economic assets within the M42 Economic Gateway; the National Exhibition Centre, Birmingham Airport, Birmingham Business Park and Blythe Valley Park, will be expected to be of the highest quality to reflect their strategic importance.**

Applicants are encouraged to engage with Officers early in the design process through pre-application discussions and will be required to demonstrate that they have followed the robust Assessment-Involvement-Evaluation-Design process outlined in the national guidance on Design and Access Statements. Major development proposals are required to demonstrate how the local community has been consulted and engaged in the design process. Significant development proposals will also be encouraged to engage with the national and regional design process.

## Forecast Effects

- 3.18.2 The policy performs in a positive manner across sixteen of the twenty one sustainability objectives and as can be seen from Figure 3.15 there are three major beneficial outcomes, two moderate beneficial and thirteen minor positive outcomes.
- 3.18.3 The potential minor adverse outcomes identified in the Submission draft Local Plan policy arose from a risk that high design standards may adversely affect the viability of some housing projects. The potential for the negative effects upon prosperity and housing provision have been addressed in the Submission draft Local Plan policy that now states that the implications on project viability are to be part of the considerations. Consequently, the adverse effects are not now expected enabling a minor positive to be assigned.
- 3.18.4 In terms of the outcomes against the four sustainable consumption and production theme, two minor positive outcomes are likely (reducing travel and resource efficiency), with one neutral outcome (prosperity). This potential effect on the viability of development, particularly in areas less able to sustain development cost has been addressed by the policy change. Overall the policy should support “community capital” and thus deliver the improved public realm, community facilities and access improvements that form part of the sustainability objective.
- 3.18.5 Two major positive outcomes are likely (losses from flooding and urban adaptation) within the climate change and energy theme. This is accompanied by a potential minor positive outcome for the greenhouse gas emissions.
- 3.18.6 Four of the six natural resource protection objectives record likely minor positive outcomes (biodiversity, landscape, green infrastructure and the historic environment). While the policy records a neutral outcome against the pollution objective, it also delivers a definite major positive outcome for the built environment. It is noted however, that the policy states that “*development at key economic assets within the M42 Economic Gateway; the National Exhibition Centre, Birmingham Airport, Birmingham Business Park and Blythe Valley Park, will be expected to be of the highest quality to reflect their strategic importance*”. Hence there is uncertainty how this policy works in relation to policy 1 which states that development in these areas is to “*have regard to other relevant policies*”.
- 3.18.7 For the sustainable communities’ objective, the policy seeks to deliver quality design across the Borough rather than being focused upon the regeneration zone. The issue of short term needs and longer term aspirations for sustainable well-designed developments is also a consideration in balancing the potential implications of the policy upon the prosperity, deprivation and housing sustainability objectives.
- 3.18.8 The outcomes from this policy are envisaged to last for over 10 years and extend over the major duration of the Core Strategy and beyond. Some of the outcomes are more likely to occur over the short to medium term (3-10 years) basically being affected by the uncertainties associated with how the sustainable communities’ objectives may perform as a result of wider economic trends.
- 3.18.9 As noted above, while ten of the outcomes are considered to be a direct consequence of the policy, and eight are considered to be either cumulative or indirect in nature. The cumulative effects arise for the resource efficiency, greenhouse gases, losses from flooding, built environment and health inequalities objectives (see Appendix G).

Figure 3.15: Sustainability Appraisal: Policy 15



SA Objective		Likely Significant Effects		Rationale					
7. Losses from flooding		Maj+ve		Promotion of SuDS, adherence to urban design principles and guidance as well as green infrastructure should contribute towards reducing losses from flooding.					
8. Urban adaptation		Maj+ve		Highest possible standards of environmental performance including design, construction, location and layout and links with policy 9 on climate change.					
13. Built environment		Maj+ve		This policy seeks to maximise delivery of a quality built environment across the Borough.					
17. Commercial assets		Mod+ve		The design standards ought to assist in enhancing the status of the regional assets.					
18. Health inequalities		Mod+ve		With measures across the Borough, enhanced design and the creation of accessible public spaces with reduced crime, each cumulatively is likely to contribute towards helping to meet the needs of the elderly population and promote healthy lifestyles.					
Local	13	Unlikely	0	Direct	10	Positive	18	Maj +ve	3
District	5	Potential	3	Indirect	3	Negative	0	Mod+ve	2
Regional	0	Likely	14	Cumul	5			Min+ve	13
National	0	Definite	1					Neutral	3
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

### **Managing Uncertainty**

- 3.18.10 Of the eighteen outcomes, fifteen are considered to be likely or definite outcomes. There are three minor positive considered to offer a potential outcome. Not surprisingly these also match up with the indirect effects and a cumulative effect identified above (see Appendix G). The Supplementary Planning Documents could increase the certainty that beneficial outcomes can result from the policy.

### **Mitigation and Enhancement**

- 3.18.11 Tables 3.54 to 3.57 summarise the recommendations provided during the appraisal along with the responses of the Council.



**Table 3.54: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Urban design policy could address issues such as use of recycled materials.</li> </ul>	<ul style="list-style-type: none"> <li>Consider the requirement in Policy 15 for sustainable design and construction is sufficient to encourage use of recycled materials. Policy 15 also refers to Policy 9, which provides further detail</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider a SPD or Developer Briefs to provide for design for the segregated storage of waste.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Will be addressed in SPD.</b></li> </ul>
<ul style="list-style-type: none"> <li>Urban design policy could explicitly address promotion of mixed use of space through good design.</li> </ul>	<ul style="list-style-type: none"> <li>Reference to the urban design principles set out in established guidance delivers this measure.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Require non-commercial development to demonstrate which BREEAM standard would be achieved.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 requires all development to achieve the highest possible standard of environmental performance. The policy justification clarifies that this should be evidenced by an appropriate national standard such as BREEAM.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

**Table 3.55: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Does the protection of mature residential suburbs compromise the delivery of decentralised/ community heating systems.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 requires all development Borough wide to conserve and enhance local character and distinctiveness as well encouraging the highest possible environmental standards.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Design of the public realm ought to not just address public art but also provide for adaptation to climate change and provide features that assist in providing cooling areas particularly for the elderly as well as designing for more stormy winds conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 requires development to be future proofed which includes considering adapting to the future effects of climate change. Bullet point 7 of the policy highlights the Council's requirements for well designed public realm.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider a SPD to designing for extreme weather events.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>To be considered in SPD.</b></li> </ul>

**Table 3.56: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Urban design policy should address issues such as provision of green or brown roofs and rainwater harvesting.</li> </ul>	<ul style="list-style-type: none"> <li>To be addressed within the Sustainable Design and Construction SPD.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>The protection and planting of street trees ought to be encouraged to enhance amenity and mitigate urban heating effects.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 14 provides for the protection of trees.</li> </ul>	<ul style="list-style-type: none"> <li>Consider the reference to conservation and enhancement of landscape quality in Policy 15 will give sufficient protection. The policy could also give a cross reference to Policy 14.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consider that cross reference to policy P10 Natural Environment provides adequate reference to tree planting.</b></li> </ul>

**Table 3.57: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Would the design principles address the integration of sustainability objectives?</li> </ul>	<ul style="list-style-type: none"> <li>Policy 15 strives to raise the standard of design across the Borough. This will also help to improve the quality of the environment in the North Solihull Regeneration Area</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Design principles should encompass designing out crime and enhancing public safety.</li> </ul>	<ul style="list-style-type: none"> <li>The policy addresses the designing out of crime and enhancing public safety.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

### 3.19 Appraisal of Policy 16: Conservation of Heritage Assets and Local Distinctiveness

#### Introduction

- 3.19.1 The proposed policy on heritage assets and local distinctiveness is examined in this section against the sustainability objectives. There was no change made to this policy for the Submission draft Local Plan or following the EIP and hence no change in the appraisal or for mitigation and enhancement.
- 3.19.2 The justification for the policy is provided in the Submission draft Local Plan. Specific policy commitments are highlighted below.

**Policy P16 – Conservation of Heritage Assets and Local Distinctiveness**

The Council recognises the importance of the historic environment to the Borough’s local character and distinctiveness and its cultural, social, environmental and economic benefits and the effects this has on civic pride.

The Council considers the following characteristics make a significant contribution to the local character and distinctiveness of the Borough and **where applicable, development proposals will be expected to demonstrate how these characteristics have been conserved:**

- The historic core of Solihull Town Centre and its adjacent parks.
- The historical development and variety of architectural styles within the Mature Suburbs and the larger established rural settlements of Meriden, Hampton-in-Arden, Balsall Common, Knowle, Dorridge, Bentley Heath, Hockley Heath, Cheswick Green and Tidbury Green.
- The Arden landscape, historic villages, hamlets, farmsteads, country and lesser houses and the distinct medieval core of historic rural settlements including Berkswell, Barston, Temple Balsall, Meriden Hill, Walsal End, Hampton-in-Arden, Bickenhill and Knowle.
- Parks, gardens and landscape including common, woodland, heathland and distinctive fieldscapes as defined in the Warwickshire Historic Landscape Characterisation.
- The canal and railway network, including disused railway lines and the working stations at Solihull, Olton, Dorridge and Shirley, together with associated structures.

**Development will be expected to preserve or enhance-heritage assets as appropriate to their significance, conserve local character and distinctiveness and create or sustain a sense of place.** In Solihull, heritage assets include; Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas and also non-designated assets; buildings, monuments, archaeological sites, places, areas or landscapes positively identified in Solihull’s Historic Environment Record as having a degree of significance meriting consideration in planning decisions, such as those identified on the Local List.

**All applications and consents that affect the historic environment will be expected to have considered and used the evidence in the Solihull Historic Environment Record to inform the design of the proposal. This should be explained in the accompanying Design and Access Statement or, for significant proposals, in a Heritage Statement.**

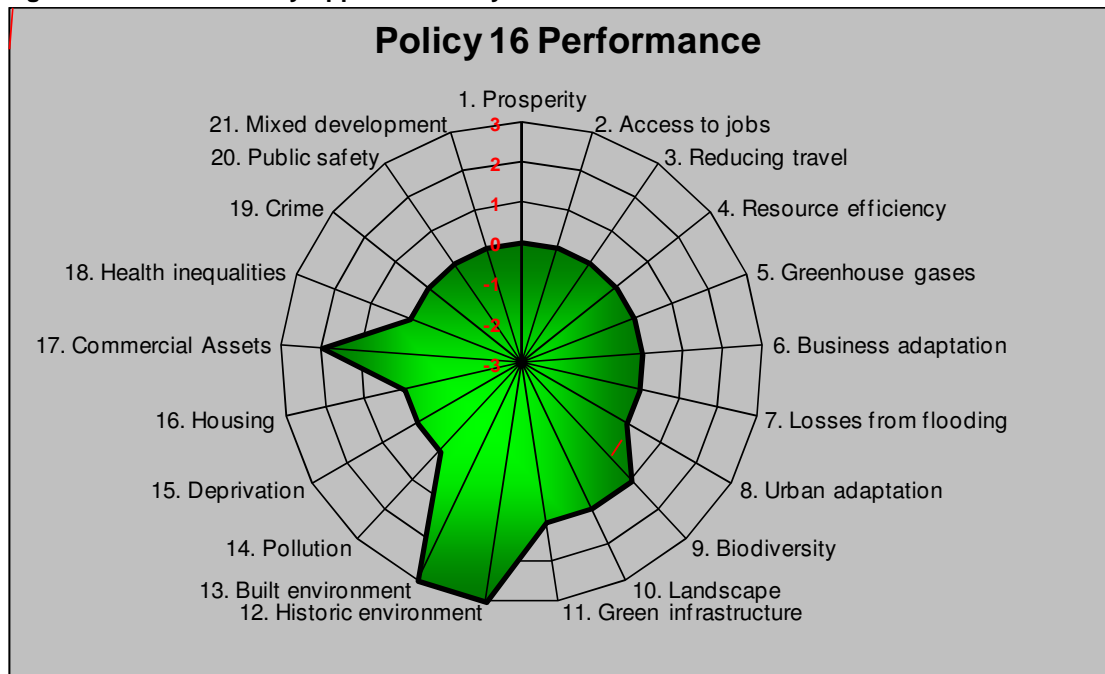
**Proposals seeking to modify heritage assets for the mitigation of and adaptation to the effects of climate change will be expected to be sympathetic and conserve the special interest and significance of the heritage asset or its setting.**

#### Forecast Effects

- 3.19.3 This policy largely results in neutral effects upon the sustainability framework (15 neutral objectives), however it does give rise to two major beneficial (historic environment and built environment), one moderate beneficial impact and three minor beneficial outcomes with no adverse effects.

3.19.4 Not surprisingly the impacts of the policy occur within the natural resource protection and environmental enhancement theme although there is a potential moderate beneficial effect upon commercial assets (see Figure 3.16).

Figure 3.16: Sustainability Appraisal: Policy 16



SA Objective		Likely Significant Effects		Rationale					
12.Historic environment		Maj+ve		Recognises different historic environment resources and their role in delivery of local distinctiveness.					
13.Built environment		Maj+ve		Likely to enhance local distinctiveness and identity.					
17.Commercial assets		Mod+ve		Through enhancing local distinctiveness the policy has potential to support attractiveness of RIS.					
Local	3	Unlikely	0	Direct	2	Positive	6	Maj +ve	2
District	3	Potential	3	Indirect	0	Negative	0	Mod+ve	1
Regional	0	Likely	0	Cumul	4			Min+ve	3
National	0	Definite	3					Neutral	15
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

3.19.5 The policy delivers positive outcomes across the natural resource protection and sustainable communities themes with only neutral outcomes anticipated for the sustainable consumption and climate change themes.

3.19.6 Five of the six sustainability objectives under the natural resource protection theme give rise to two definite major positive outcomes with three minor positive outcomes two of which have the potential cumulative outcomes.

3.19.7 The effects of the policy are mainly anticipated to occur over the longer term and a generally a result of the cumulative effects of individual change resulting from the policy.

### **Managing Uncertainty**

- 3.19.8 Three of the forecast effects are considered to have the potential to deliver beneficial effects upon biodiversity, green infrastructure and the commercial assets objectives with the other three being considered to definitely contribute towards the landscape, historic and built environment objectives.

### **Mitigation and Enhancement**

- 3.19.9 No mitigation and enhancement measures have been identified for this policy.

### 3.20 Appraisal of Policy 17: Countryside/ Green Belt

#### Introduction

- 3.20.1 Countryside and greenbelt issues are examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Submission draft Local Plan.
- 3.20.2 No changes to the policy were introduced due to the EIP and hence no changes have been made to the appraisal or the recommendations for mitigation and enhancement.

#### Policy P17 – Countryside / Green Belt

The Council will safeguard the “best and most versatile” agricultural land in the Borough and encourage the use of the remaining land for farming. **Development affecting the “best and most versatile” land will be permitted only if there is an overriding need for the development or new use, and there is insufficient lower grade land available, or available lower grade land has an environmental significance that outweighs the agricultural considerations, or the use of lower grade land would be inconsistent with other sustainability considerations. Development involving farm-based diversification will normally be permitted, providing it is in an appropriate location, of a scale appropriate to its location, and does not harm the Green Belt, conservation or enhancement policies.**

**The Council will not permit inappropriate development in the Green Belt, except in very special circumstances.** In addition to the national policy, the following provisions shall apply to development in the Borough’s Green Belt:

Development involving the replacement, extension or alteration of buildings in the Green Belt will not be permitted unless it is demonstrated that it will not harm the need to retain smaller more affordable housing.

Limited infilling will not be considered to be inappropriate development within the Green Belt settlements, providing this would not have an adverse effect on the character of the settlements. Limited infilling shall be interpreted as the filling of a small gap within an otherwise built-up frontage with not more than two dwellings

The reasonable expansion of established businesses in the Green Belt, will be allowed where the proposal would make a significant contribution to the local economy or employment

Where the re-use of buildings is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.

Where waste management operations involving inappropriate development are proposed in the Green Belt, the contribution of new capacity towards the treatment gap identified in the Borough may amount to very special circumstances, providing the development accords with the waste management policy of this plan.

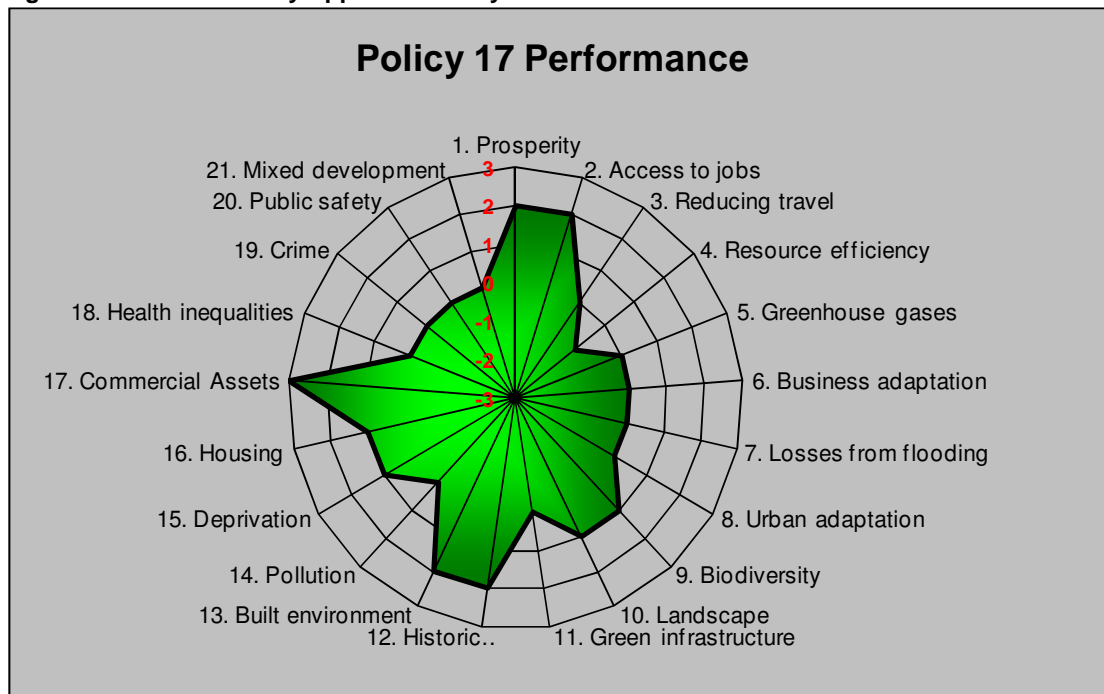
The small settlements of Hampton-in-Arden, Hockley Heath, Meriden and Catherine de Barnes are inset in the Green Belt and are not therefore subject to Green Belt policy. Nevertheless, the Council, **in considering applications for development in these settlements, will take into account the importance of their rural setting and of their attributes, such as historic buildings, open space, density of development, landscape and townscape that contribute towards their special character.** Immediately beyond the inset boundary, strict Green Belt policies will apply.

#### Forecast Effects

- 3.20.3 The policy is forecast to result in 9 positive outcomes with one minor adverse effect. Key amongst the positive outcomes is the potential that through enhancing local distinctiveness and the rural identity that the regional investment assets retain and enhance their status. Furthermore, the policy does not

compromise the expansion of these assets. Along with this major beneficial outcome, four moderate beneficial and four minor beneficial outcomes are anticipated (see Figure 3.17).

Figure 3.17: Sustainability Appraisal: Policy 17



SA Objective	Likely Significant Effects	Rationale							
17. Commercial Assets	<b>Maj+ve</b>	Through enhancing local distinctiveness the policy has potential to support attractiveness of RIS.							
1. Prosperity	<b>Mod+ve</b>	Provides exemption to the Green Belt policy for the expansion of large businesses where there is a contribution to the local economy or employment especially when accessible from North Solihull.							
2. Access to Jobs	<b>Mod+ve</b>	Provides an exemption to Green Belt policy for major expansion offering employment accessible from North Solihull.							
12. Historic environment	<b>Mod+ve</b>	Provides for the consideration of the effects of development on the special character of rural settlements that ought to lead to protection and conservation of historic assets.							
13. Built environment	<b>Mod+ve</b>	Provides for limited infill and requires that development in the small settlements consider their special characteristics.							
Local	5	Unlikely	0	Direct	8	Positive	10	Maj +ve	1
District	4	Potential	9	Indirect	2	Negative	0	Mod+ve	4
Regional	1	Likely	0	Cumul	0			Min+ve	4
National	0	Definite	1					Neutral	11
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

3.20.4 Of the ten outcomes two are indirect (biodiversity and deprivation). Biodiversity may be protected as being a consideration in the decision to accept development involving the best and most versatile agricultural land. Deprivation may be reduced due to the potential for employment accessible from North Solihull to contribute to reducing deprivation in the regeneration area not being constrained by the Green Belt. The other outcomes are all direct with five having the potential to be of district or regional scale.

- 3.20.5 The policy has the potential to deliver one major beneficial outcome (Commercial Assets), four moderate beneficial outcomes (prosperity and access to jobs, historic environment and built environment) and one minor beneficial outcome (resource efficiency) result.
- 3.20.6 While neutral outcomes are forecast for the climate change and energy theme, four potential outcomes are anticipated for the Natural Resource Protection & Environmental Enhancement theme (two minor positive outcomes - biodiversity and landscape and two moderate outcomes - historic environment and built environment).
- 3.20.7 In terms of the sustainable communities theme, two minor positive (deprivation and housing) and one major beneficial outcome (commercial assets) are anticipated. The effects upon deprivation are considered to be a potential beneficial outcome as green belt release for existing businesses applies across the Borough rather than focused releases in support of sites readily accessible from North Solihull.

### **Managing Uncertainty**

- 3.20.8 Only one outcome from the policy is considered to be definite to occur, the remaining nine all have a potential to occur primarily been dependent upon the manner in which individual development proposals in the Countryside/ Green Belt respond to the policy.
- 3.20.9 A key factor causing uncertainty in the anticipated outcomes is the extent to which “reasonable” expansion of existing businesses in the Green Belt would be permitted. The uncertainty focuses upon the phrase “reasonable expansion” since this implies that the business must currently be located into the Green Belt. While the policy would preclude large scale inward investment that would be new to the area unless within the remit of policy 1, the policy could be interpreted as allowing existing businesses located anywhere within the Borough to expand by new premises within the Green Belt.

### **Mitigation and Enhancement**

- 3.20.10 No mitigation and enhancement measures were previously identified although it was suggested that the following terms be clarified:
- “reasonable expansion of established businesses into the Green Belt”;
  - “a significant contribution to the local economy or employment”.



## 3.21 Appraisal of Policy 18: Health and Well-Being

### Introduction

- 3.21.1 This section presents a review of the appraisal of the Submission draft Local Plan policy on support health and well-being against the sustainability objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The policy commitments are highlighted below.
- 3.21.2 No changes have been made to this policy following the EIP and thus no change to the appraisal or the recommendations for mitigation and enhancement. Justification for the policy is presented in the Submission draft Local Plan.

<b>Policy P18 – Health and Well Being</b>
<p><b>The potential for achieving positive health outcomes will be taken into account when considering all development proposals. Where any adverse health impacts are identified, the development will be expected to demonstrate how these will be addressed or mitigated.</b></p> <p>The Council will expect new development proposals to promote, support and enhance physical and mental health and well being. Support will be given to proposals which:</p> <ul style="list-style-type: none"> <li>• Provide opportunities for formal and informal physical activity, exercise opportunities, recreation and play;</li> <li>• Contribute to a high quality, attractive and safe public realm in accordance with Policy P15 on Design, to encourage social interaction and facilitate movement on foot and by cycle;</li> <li>• Contribute to the development of a high quality, safe and convenient walking and cycling network;</li> <li>• Improve the quality and quantity of the green infrastructure network in the Borough, particularly in the North Solihull Regeneration Zone and in areas where green infrastructure is identified as lacking. The protection and enhancement of physical access, including public rights of way to open space and green infrastructure will also be supported;</li> <li>• Deliver new and improved health services and facilities in areas where they can be accessed by sustainable transport modes. Facilities for primary medical care should be identified and planned for.</li> <li>• Increase access to healthy food by sustainable transport modes and provide opportunities for growing local produce. The Council will resist the loss of areas which currently enable local produce to be grown.</li> <li>• Provide additional homes which are designed to meet the needs of older people and those with disabilities, and housing which enables older people to downsize from larger homes.</li> <li>• Improve the energy efficiency of housing.</li> </ul> <p>New residential development will be expected to be built to the Lifetime Homes standard in accordance with Policy P15 Design, to ensure that homes are adaptable and enable people to live independently for longer. Such developments should maximise internal insulation and opportunities for solar gain and wherever possible, developments should also seek to incorporate private amenity space.</p> <p>Development proposals should incorporate planting, trees, open spaces and soft surfaces wherever possible in order to secure a variety of spaces for residents, visitors or employees to use and observe.</p> <p>The loss of community and social infrastructure will be resisted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• It can no longer continue for commercial or operational reasons;</li> </ul>

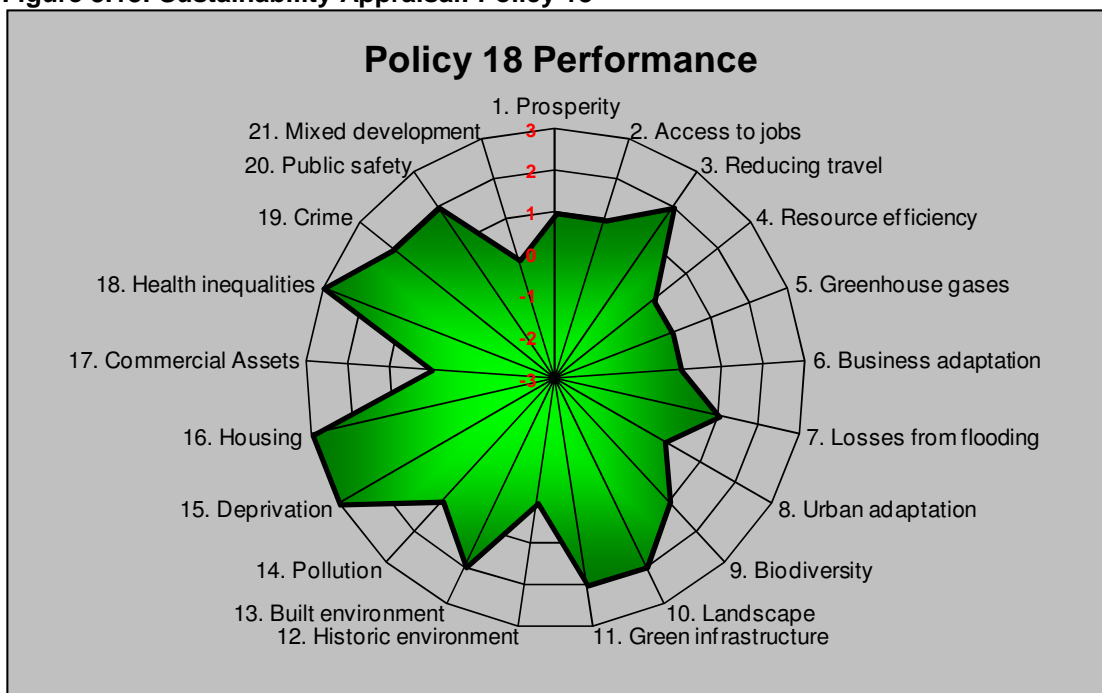
- There are identified benefits of the use being discontinued;
- Adequate alternative provision can be made in a manner which meets the needs of the community affected.

The Council will resist development proposals for hot food takeaways in areas where there is already a high concentration of such uses.

### Forecast Effects

3.21.3 This policy emerged from observations on the Emerging Core Strategy policies and also recognition of the public health agenda in the National Planning Policy Framework. Unsurprisingly, the policy generates a highly positive outcome upon the sustainability framework delivering three major beneficial, six moderate beneficial impacts and five minor beneficial outcomes with no adverse effects. A further seven sustainability objectives were scored as neutral, although opportunities exist to convert a further two to beneficial effects.

**Figure 3.18: Sustainability Appraisal: Policy 18**



SA Objective	Likely Significant Effects	Rationale
16. Housing	<b>Maj+ve</b>	Development of housing that delivers high performance standards will address the strong link between housing standards and public health.
15. Deprivation	<b>Maj+ve</b>	Measures to deliver Life Time homes, energy efficient housing, with positive measures to promote well-being are expected to contribute towards addressing some of the deprivation issues found in parts of the Borough and also meeting the needs for older people who increasingly experience disabilities and some forms of deprivation.
18. Health inequalities	<b>Maj+ve</b>	Incrementally new development is likely to contribute towards reducing health inequalities by improved recognition of the health agenda during the formulation and consideration of development proposals. The policy provides for additional homes designed to meet the needs of older people and those with disabilities, and housing which enables older people to downsize from larger homes

SA Objective	Likely Significant Effects		Rationale						
3. Reducing travel and promote sustainable modes	Mod+ve		Policy has a strong focus upon improving physical fitness that coincides with the objective of promoting sustainable modes of transport.						
10. Landscape	Mod+ve		Landscape improvements are likely to be associated with improvements to the green infrastructure and the creation of an attractive public realm.						
11. Green infrastructure	Mod+ve		Direct improvements to green infrastructure are anticipated across the Borough.						
13. Built environment	Mod+ve		The built environment is likely to be enhanced as a result of measures associated with delivering a high quality, attractive and safe public realm, as well as from resisting domination of hot food takeaways.						
19. Crime	Mod+ve		The policy is likely to help to reduce crime and the stress caused through improved consideration and delivery of design solutions.						
20. Public safety	Mod+ve		The policy is likely to help to reduce public safety and the stress caused through improved consideration and delivery of design solutions.						
Local	5	Unlikely	0	Direct	10	Positive	14	Maj +ve	3
District	9	Potential	4	Indirect	4	Negative	0	Mod+ve	6
Regional	0	Likely	5	Cumul	0			Min+ve	5
National	0	Definite	5					Neutral	7
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

- 3.21.4 Of the fourteen positive effects nine are considered to be of a district-wide scale, the other five being local. A total of ten of the effects were considered to be direct consequences of the policy with four being indirect (all minor positive effects). Further details can be found in Appendix G.
- 3.21.5 In terms of the sustainable consumption and production theme, the policy is envisaged to deliver a moderate beneficial outcome and two potential indirect benefits particularly for those living in regeneration areas in terms of prosperity and access to employment.
- 3.21.6 The policy also has a potential to contribute towards reducing some local risks associated with flooding through the promotion of green infrastructure.
- 3.21.7 Across the six natural resource protection objectives, there are three likely or definite moderate beneficial outcomes at a district scale (landscape, green infrastructure and the built environment). Two minor beneficial local outcomes are also likely or possible for biodiversity and pollution.
- 3.21.8 Not surprisingly it is under the theme of sustainable communities that the three major beneficial outcomes result. These are supported by two moderate positive outcomes for crime and public safety.

### Managing Uncertainty

- 3.21.9 As can be seen from the table above, ten of the fourteen positive scores were considered to be likely or definite outcomes. The potential outcomes were anticipated for prosperity, access to jobs and abating the losses from flooding and pollution all of which affect the determinants of health.

### Mitigation and Enhancement

- 3.21.10 As there is a strong link between climate change and public health, the Council could seek to draw together these themes with measures promoting the provision of shade and cooling areas within the scheme designs.

- 3.21.11 While the justification for the policy recognises the links between pollution and community engagement/ social isolation, the policy as proposed relies upon those proposing development to demonstrate that adverse effects would be addressed or mitigated. It is suggested that preamble to the policy would benefit from making it clear to developers may need to address links between high noise levels and stress as well as the effects of odour and air quality upon public health.
- 3.21.12 As a wider observation, the Council may wish to consider whether the application of the policy should be restricted to major development proposals rather than all development proposals.

### 3.22 Appraisal of Policy 19: Range and Quality of Local Services

#### Introduction

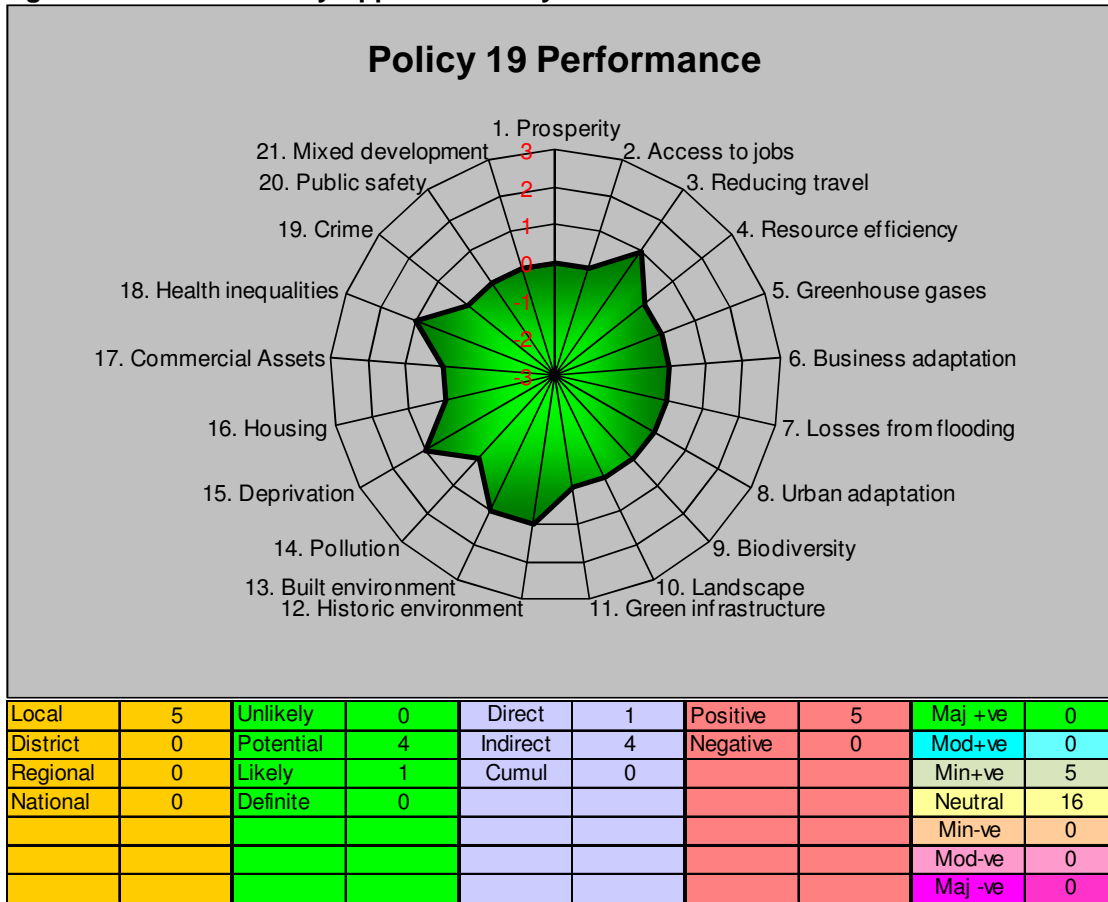
- 3.22.1 The proposed policy on local services is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. No changes have been made to the Submission draft Local Plan following the EIP and hence there are no changes to the appraisal or to recommendations for mitigation and enhancement. Justification for the policy is presented in the Submission draft Local Plan. The specific policy commitments are highlighted below.

Policy P19 – Range and Quality of Local Services
<p><u>Local Centres, including:</u> Knowle, Dorridge, Castle Bromwich, Marston Green, Balsall Common Hobs Moat, Kingshurst, Aran Way, Craig Croft, Dickens Heath, Hatchford brook, Shelly Farm, Meriden, Olton.</p> <p><u>Parades and Local Shops</u></p> <p><u>Local centres</u> Solihull has a variety of local centres which need to be developed and sustained in a way which ensures their continued sustainability and economic success. <b>The scale and nature of new development should reflect the centre’s role and function in serving local needs, the opportunity to reduce the need to travel or the need to sustain the economic viability and vitality of the centre.</b> Appropriate development could include retail, leisure, community and other facilities. <b>All new development will need to be sensitive to local character and enhance the public realm.</b></p> <p><u>Parades and local shops</u> Local retail parades and local shops providing for day to day needs, including those serving villages, will be sustained. Proposals for change of use or new development will be granted planning permission where this role would not be prejudiced. <b>All new development will need to be sensitive to local character and enhance the public realm.</b></p>

#### Forecast Effects

- 3.22.2 This policy has a limited impact upon the sustainability objectives with five minor positive effects. The remainder of the outcomes are considered to be neutral (see Figure 3.19).
- 3.22.3 Not surprisingly the policy has a distinct local focus to its minor beneficial outcomes. The policy has the potential to contribute towards reducing the need to travel through the retention of local shops and services, although it has no implications for climate change and energy.
- 3.22.4 In terms of the natural resource protection theme the policy is likely to have a direct minor positive effect upon the built environment given the requirement for development to be sensitive to local character and enhance the public realm. However the outcome for the historic environment is envisaged to deliver a potentially minor beneficial outcome as development is to be sensitive to local character.
- 3.22.5 Only two objectives within the sustainable communities theme deliver indirect minor beneficial outcomes for deprivation and health inequalities, both a function of the policy’s intention to sustain local shops and services which potentially provide health benefits to the elderly and those with disabilities.

**Figure 3.19: Sustainability Appraisal: Policy 19**



**Managing Uncertainty**

3.22.6 Of the five effects upon the sustainability framework from this policy only one is likely to result in a likely positive effect, while four have the potential to deliver a minor beneficial outcome.

**Mitigation and Enhancement**

3.22.7 The appraisals identified mitigation and enhancement measures under the sustainable communities theme that are presented below in Table 3.59 along with the responses from the Borough Council.

**Table 3.59: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consideration could be given to identifying locations where community severance (transverse, longitudinal and temporal) occurs to develop solutions to enhance accessibility to local services for all members of community regardless of the time of day or season.</li> </ul>	<ul style="list-style-type: none"> <li>No longer relevant to this policy as revised.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Consider restrictions on the provision of fast food takeaways to provide public health benefits.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 18 provides for restrictions on hot food outlets.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>
<ul style="list-style-type: none"> <li>Promote local and independent retailing by the provision of a range of smaller units and by new development needing to provide for a range of unit sizes.</li> </ul>	<ul style="list-style-type: none"> <li>No longer relevant to this revised policy.</li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>	<ul style="list-style-type: none"> <li><b>None.</b></li> </ul>

### 3.23 Appraisal of Policy 20: Provision of Open Space, Children’s Play, Sport, Recreation and Leisure

#### Introduction

3.23.1 The proposed policy on open space and recreation is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. There was no change made to this policy for the Submission draft Local Plan or following the Examination in Public and hence the appraisal and consideration of mitigation and enhancement measures are unaltered.

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

##### Existing public open space, children’s play, sports and recreational facilities

The Council recognises the importance and multi-functional benefits of public open space, sports and recreational facilities within the Borough and will **support the enhancement of existing facilities and open space. Loss of existing facilities through development will not be permitted where they are of value by to the local community for recreation, visual amenity, nature conservation or make an important contribution to the quality of the environment or network of green infrastructure, unless:**

- **it can be demonstrated that the open space or buildings are clearly surplus to requirements, or**
- **the need or benefits of the development clearly outweigh the loss.**

**In such circumstances, the Council will require appropriate compensatory measures for the loss. Enhancement of open space or buildings shall be in accordance with Policy P15 – Securing Design Quality and Policy P10 – Natural Environment.**

The Council supports the principle of designating land as Local Green Space. Where designation would be appropriate, necessary and where the open space meets the criteria outlined in national guidance, the Council will support designation of Local Green Spaces in neighbourhood plans.

##### Provision of new public open space, children’s play, sports and recreational facilities

**The Council will require provision for and maintenance of appropriate open space, sports and recreational facilities as an integral part of new development. This should address identified shortfalls in local provision, outlined in adopted Council strategies and provide for the resultant increase in population from the development.** Provision should accord with the local standards and priorities for action outlined in the adopted Green Spaces Strategy (2006) and future revisions, the forthcoming Indoor Sports Facilities Strategy and Green Infrastructure Strategy. **Where the minimum standard for children’s play and youth facilities is already met, developments will be expected to give more generous provision.**

**To ensure a high quality living environment for the occupiers of all new residential development, including supported housing schemes for the elderly and those with disabilities, provision should be made for informal amenity space, in accordance with Policy 15 - Design. Proposals for family housing will be expected to provide opportunities for safe children’s play in accordance with the Design for Play and the Free Play Network’s 10 Design Principles.**

**To promote healthy lifestyles in the workplace, major commercial development proposals, (over 1ha or 1,000 sq.m) will also be required to provide new open space and/or contribute to enhancement of the green infrastructure network, in accordance with Policy 15 – Design and Policy 10 – Natural Environment.**

##### Provision of new indoor sports and leisure facilities

The Council will support proposals for new or improved sports and leisure facilities providing that the development:

- **Addresses any shortfall in provision outlined in the forthcoming Indoor Sports and Recreation Facilities Strategy or the adopted Green Spaces Strategy (2006).**
- **Reflects the ‘town centre first’ principle outlined in national guidance and is of a scale and size appropriate to the hierarchy of Town Centres as defined in Policies 2 - Town**



**Centre, 1 - Economic Success and 19 - Local Services.**

- **Is situated within an accessible location as defined in Policy 7 – Accessibility, where the development is easily accessible to the local community and is well served, or is capable of being well served, by public transport, walking and cycling.**
- **Accords with other Green Belt and Amenity policies in the Plan.**

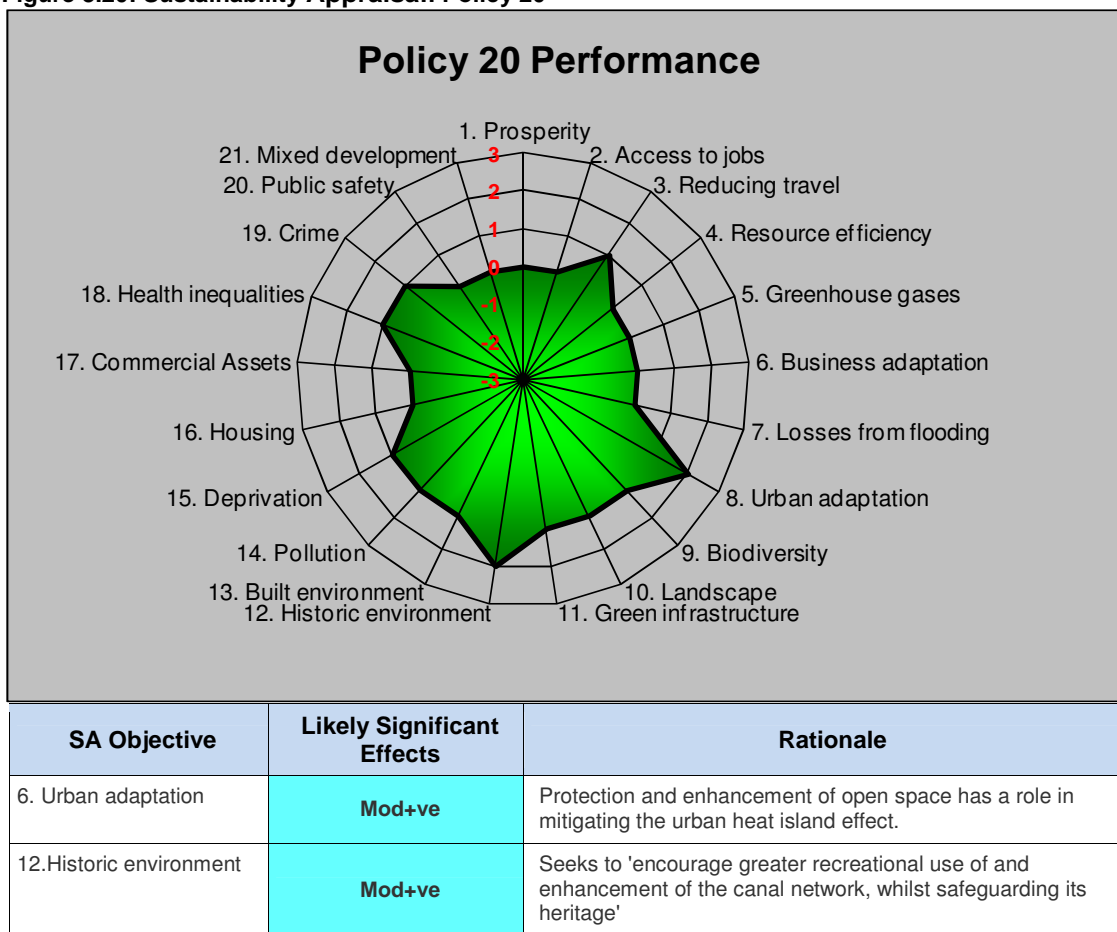
Subject the above the criteria, the Council will **support proposals for shared sports facilities at educational centres, where the facility also serves the local area.**

Waterways  
**The Council will support proposals that encourage greater recreational use and enhancement of the river and canal network providing that the development safeguards the historic and natural environment and purpose of the Green Belt, in accordance with Policies 10 – Natural Environment, 16 – Heritage Assets and Local Distinctiveness and 17 – Countryside and Green Belt.**

**Forecast Effects**

3.23.2 The introduction of a link to policy 15 – securing design quality - is considered to increase the likelihood of contributing towards reducing crime and the fear of crime through design, albeit subject to not threatening the viability of the proposed development. Similarly the link to policy 10 is anticipated to increase the likelihood of biodiversity enhancements.

**Figure 3.20: Sustainability Appraisal: Policy 20**



Local	9	Unlikely	0	Direct	4	Positive	11	Maj +ve	0
District	2	Potential	3	Indirect	6	Negative	0	Mod+ve	2
Regional	0	Likely	7	Cumul	1			Min+ve	9
National	0	Definite	1					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

3.23.3 This policy is based upon policy 11 from the Emerging Core Strategy and performs in a similar positive manner giving rise to two moderate beneficial effects with a further nine minor beneficial effects. A total of ten outcomes against the sustainability framework are neutral.

3.23.4 The nine of the eleven effects are considered to be of a local scale with six being an indirect consequence of the policy.

### Managing Uncertainty

3.23.5 Of the eleven recorded beneficial effects three were regarded as having the potential to occur with seven being likely to occur or definite outcomes. This represents an improved level of certainty over the earlier draft of the policy.

### Mitigation and Enhancement

3.23.6 Mitigation and enhancement measures identified in previous appraisals are presented below together with the response from the Council. No additional measures are proposed

**Table 3.60: Sustainable Consumption and Production**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>The provision of adequate private garden land for family housing could be at the expense of community allotments or public open space or additional affordable housing.</li> </ul>	<ul style="list-style-type: none"> <li>The policy no longer refers to private gardens but requires all residential development to include informal amenity space and, in particular, family housing to provide opportunities for safe children’s play, which gives flexibility in the type of amenity space provided. Provision of new open space should accord with the priorities for action outlined in the Green Spaces Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>In determining that existing public open space is surplus to requirements, the Council ought to take into account future rather than existing needs to reflect the changing nature of the local community and future development activity.</li> </ul>	<ul style="list-style-type: none"> <li>Any loss must be clearly surplus to requirements.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.61: Climate Change and Energy**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider high energy conservation and renewable energy standards for indoor recreational facilities.</li> </ul>	<ul style="list-style-type: none"> <li>Proposals for indoor sports facilities would need to accord with Policies 9 – Climate Change and 15 – Design which require development to have the highest possible environmental performance.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Reference the need to protect and enhance open spaces within the most built up parts of the Borough to provide mitigation against the urban heat island effect.</li> </ul>	<ul style="list-style-type: none"> <li>Policy provides protection where the site makes an important contribution to the quality of the environment or network of green infrastructure. Heat island effects can be considered as part of the contribution to the quality of the environment.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.62: Natural Resource Protection and Environmental Enhancement**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider the consequences of increased recreational activity and local biodiversity interests through the provision of appropriate design and planting strategies.</li> </ul>	<ul style="list-style-type: none"> <li>To be addressed at the project proposal scale.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>The policy could reference the role of open space in framing and defining local character and distinctiveness.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 16 – Heritage Assets identifies key characteristics of the natural environment which make a significant contribution to local character and distinctiveness.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**Table 3.63: Sustainable Communities**

Mitigation/Enhancement Proposal	Response	August 2012 Proposals	Response
<ul style="list-style-type: none"> <li>Consider the layout and the number of houses served by access roads for new housing areas so as to maximise the opportunity for safe play areas adjacent to housing for parental supervision.</li> </ul>	<ul style="list-style-type: none"> <li>Site layout is a matter for individual planning consents, however safe play provision is included in the policy.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Make reference to the particular issues surrounding open space provision (and possibly also access to the countryside) associated with the North Solihull Regeneration Area.</li> </ul>	<ul style="list-style-type: none"> <li>See Monitoring Framework. Policy 20 will continue to monitor the change in value of open space in North Solihull Regeneration Area to ensure the programme remains on track to deliver an improvement.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<ul style="list-style-type: none"> <li>Promote the adoption of green gyms in communities experiencing high levels of health inequalities.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 20 supports the general enhancement of existing open space, which could include the use of green gyms.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

**3.24 Appraisal of Policy 21: Developer Contributions and Infrastructure Provision**

**Introduction**

3.24.1 The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. There was no change made to this policy following the Examination in Public and hence there are no changes to the appraisal.

<b>Policy P21 – Developer contributions and infrastructure provision</b>
<p><b>Development will be expected to provide, or contribute towards provision of:</b></p> <ul style="list-style-type: none"> <li>• <b>Measures to directly mitigate its impact and make it acceptable in planning terms</b></li> <li>• <b>Physical, social and green infrastructure to support the needs associated with the development</b></li> </ul> <p><b>Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Local Plan.</b></p> <p><b>The Council will, where appropriate, seek to secure site-specific measures through planning obligations.</b></p> <p><b>The nature and scale of any planning obligations sought will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.</b></p> <p><b>Developer contributions in the form of the Community Infrastructure Levy will contribute towards strategic infrastructure required to support the overall development in the Local Plan</b></p> <p><b>The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan, preparing Development Briefs and other LDF documents if necessary.</b></p>

**Forecast Effects**

3.24.2 The introduction of Policy 21 has the potential to provide beneficial outcomes across those sustainability objectives that are capable of being supported. Hence contributions toward infrastructure provision may enhance efficiency in the operation of the district and thus contribute to prosperity. Given that cumulatively such contributions to improved efficiency could occur across the Borough, so a major beneficial effect is anticipated.

3.24.3 Assuming that the policy directs and builds upon the national incentives to reduce greenhouse gases such as through contributions towards low carbon decentralised heating systems, then a moderate beneficial effect may emerge from the cumulative effects of the policy. The policy is also anticipated to have the potential to give rise to local minor beneficial effects on resource efficiency, flooding, biodiversity, landscape and green infrastructure as well as crime and public safety as illustrated in Figure 3.21.

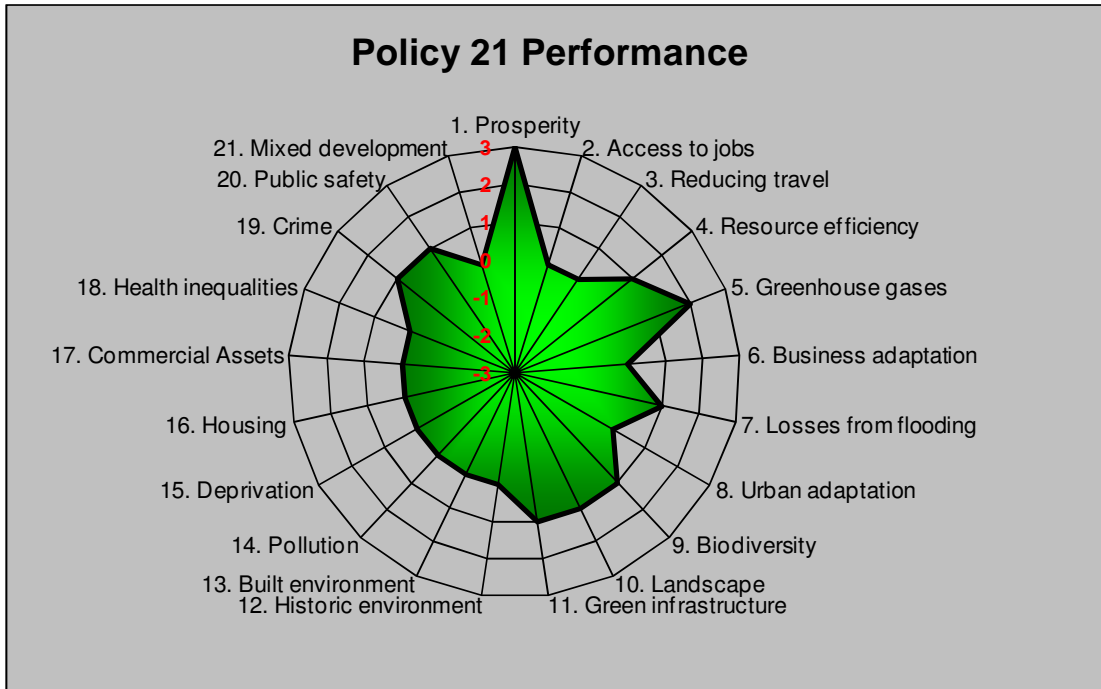
**Managing Uncertainty**

3.24.4 Of the nine identified outcomes that support the sustainability objectives, all but the major beneficial effect upon prosperity are considered to have only the potential to deliver the identified outcome, since they are dependent upon the conclusions of individual development proposals.

**Mitigation and Enhancement**

3.24.5 No mitigation and enhancement measures have been identified.

**Figure 3.21: Sustainability Appraisal: Policy 21**



SA Objective		Likely Significant Effects		Rationale					
1. Prosperity		Maj+ve		Contributions towards infrastructure provision as a result of the policy are expected to contribute towards the efficient operation of the district and thus contribute to prosperity.					
5. Greenhouse gases		Mod+ve		Potential for contributions to be directed towards decentralised energy systems and heating networks to reduce carbon emissions.					
Local	7	Unlikely	0	Direct	0	Positive	9	Maj +ve	1
District	2	Potential	8	Indirect	0	Negative	0	Mod+ve	1
Regional	0	Likely	1	Cumul	9			Min+ve	7
National	0	Definite	0					Neutral	12
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

## 3.25 Appraisal of National Policy 1: National Planning Policy Framework Presumption in Favour of Sustainable Development

### Introduction

- 3.25.1 The National Planning Policy Framework introduced a presumption in favour of sustainable development which is to be reflected within policies of Local Plans. The aim of including this Planning Inspectorate's model policy is to ensure the Local Plan is based upon and reflects how the presumption in favour of sustainable development will be applied at a local level. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials.

#### National Policy 1 – National Planning Policy Framework Presumption in Favour of Sustainable Development

**When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.**

**Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.**

**Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:**

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted.**

### Forecast Effects

- 3.25.2 The inclusion of National Policy 1 has the potential to provide beneficial outcomes across six of the twenty-one objectives comprising the sustainability framework. The policy has the potential for one moderate beneficial effect (commercial assets) and five minor beneficial effects including (prosperity, access to jobs, deprivation, housing and mixed development). The policy has a neutral effect for both the climate change and energy and the natural resource and environmental enhancement objective themes (see Figure 22).

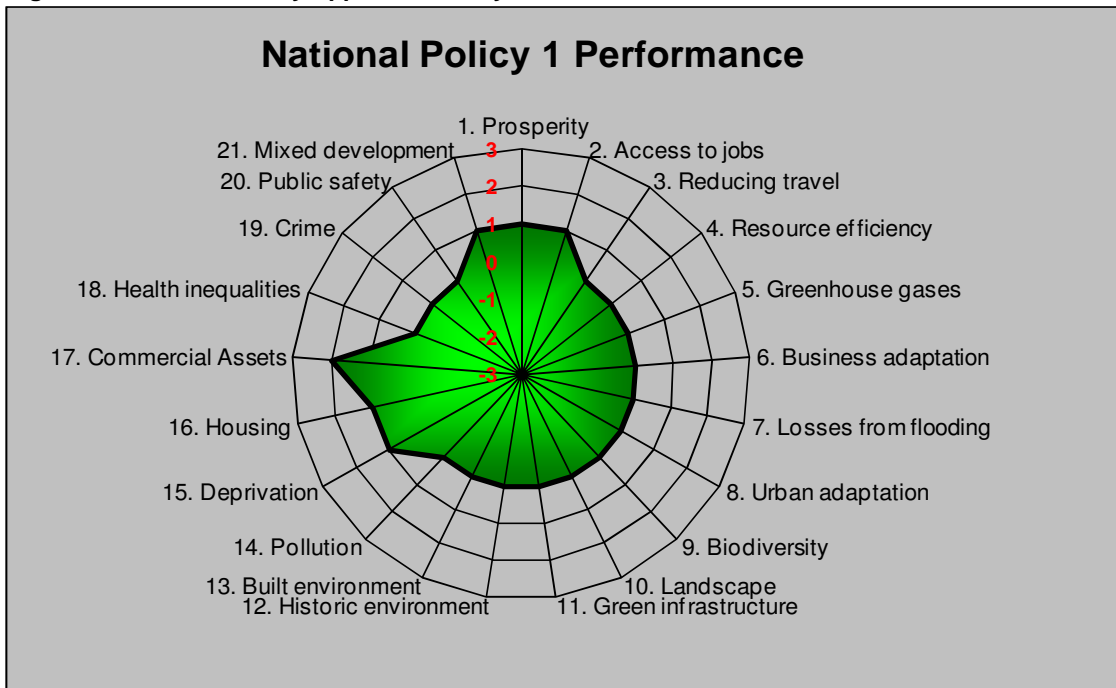
### Managing Uncertainty

- 3.25.3 Of the six recorded positive effects of national policy 1, all have the 'potential' to deliver their objective, five of which are expressed at the local scale with one at the Borough-wide scale (commercial assets).

### Mitigation and Enhancement

- 3.25.4 No mitigation and enhancement measures have been identified.

Figure 3.21: Sustainability Appraisal: Policy 21



SA Objective		Likely Significant Effects		Rationale					
17. Commercial Assets		Mod+ve		Potential for improving economic social and environmental conditions via the Council working with applicants to find the best solutions for proposals.					
Local	5	Unlikely	0	Direct	4	Positive	6	Maj +ve	0
District	1	Potential	6	Indirect	2	Negative	0	Mod+ve	1
Regional	0	Likely	0	Cumul	0			Min+ve	5
National	0	Definite	0					Neutral	15
								Min-ve	0
								Mod-ve	0
								Maj -ve	0



## 3.26 Policy Performance

### Introduction

- 3.26.1 This section considers how the various policies interact across the entire range of sustainability objectives. Appendix G provides copies of the appraisal tables generated for each of the draft policies.

### Sustainability Objectives v Draft Local Plan Policies

- 3.26.2 In considering how the policies from the Submission draft Local Plan plus Proposed Modifications perform across the sustainability objectives (see Table 3.64) it is evident that there is a strong beneficial performance against the following sustainability objectives (in order of performance recognising the forecast number of major, moderate and minor outcomes):

- **Prosperity:** A total of fourteen policies provided support to this objective with one detracting as result of policy 14 - amenity. Eight of the policies have the potential to deliver the forecast positive outcome with six being likely to deliver the forecast outcome.
- **Built environment:** This objective is supported by fourteen policies with eleven considered to be likely or definite in the delivery of the forecast beneficial outcome. The remaining three (policies 6, 9 and 17), were recognised as having the potential to deliver beneficial outcomes.
- **Deprivation:** The strong performance against the deprivation objective is interesting given that fifteen policies could contribute positive outcomes. One policy (policy 5 – land for housing) has the potential to deliver an adverse outcome due to the potential for increased pressures being placed on housing in North Solihull through the loss of 130 units from Foxglove Crescent. Eleven of the policies have the potential to deliver a positive outcome with five being considered to be likely or definite to deliver the forecast beneficial outcome.
- **Resource efficiency:** For this objective a total of twelve policies provided contributions towards beneficial outcomes. One policy was considered to give rise to a definite outcome (policy 13 – minerals), while five were likely to deliver the forecast outcome. One policy (policy 17 – Countryside/Green Belt) had the potential to operate against the objective.
- **Health inequalities:** This objective is supported by thirteen policies, with one (policy 18) that is envisaged to definitely contribute to a beneficial outcome. A further four policies are likely to contribute a beneficial outcome. In eight cases, a potential to deliver a beneficial outcome was identified with one policy (policy 5 – Land for Housing) having the potential to contribute to an adverse outcome.
- **Landscape:** Fifteen policies were considered to contribute towards beneficial outcomes for this sustainability objective. Twelve of these policies were envisaged to be likely or expected to deliver a contribution towards a beneficial outcome with the remaining six having the potential to have a beneficial outcome. Policy 1 was considered to be likely to give rise to an adverse outcome with policies 4 and 5 also having the potential to give rise to adverse outcomes.
- **Commercial assets:** Eight policies provided contributions towards beneficial outcomes for this sustainability objective. Two were considered to be likely to achieve the forecast outcome with six having the potential to deliver a beneficial outcome.
- **Reducing the need to travel:** Eleven policies provided contributions towards a beneficial outcome for this objective with seven the potential to deliver a beneficial outcome and four being likely or expected to deliver a beneficial outcome. Policies 1 and 5 were considered to be likely to work against the objective of reducing the need to travel.
- **Access to Jobs:** A total of eleven policies support access to jobs of which four are considered likely to contribute towards a beneficial outcome for the objective and a further eight having the potential to do so. One policy (policy 14 – Amenity) has the potential to deliver an adverse outcome.

Table 3.64: Sustainability Objectives v Draft Local Plan Policies

	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21	NP1	
1. Prosperity	Likely	Likely	Likely	Potential	Potential	Potential	Potential	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential
2. Access to jobs	Potential	Likely	Likely	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential
3. Reducing travel	Likely	Definite	Potential	Potential	Definite	Potential	Potential	Potential	Potential	Potential	Likely	Likely	Potential	Potential	Likely	Potential	Potential	Definite	Potential	Potential	Potential	Potential	Potential
4. Resource efficiency	Potential	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Likely	Likely	Definite	Potential	Likely	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential
5. Greenhouse gases	Definite	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential
6. Business adaptation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7. Losses from flooding	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8. Urban adaptation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9. Biodiversity	Potential	Potential	Likely	Potential	Potential	Likely	Potential	Potential	Potential	Likely	Likely	Potential	Definite	Potential	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential
10. Landscape	Likely	Potential	Likely	Potential	Potential	Likely	Potential	Potential	Potential	Likely	Likely	Potential	Definite	Potential	Likely	Potential	Potential	Potential	Potential	Potential	Potential	Potential	Potential
11. Green infrastructure	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12. Historic environment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13. Built environment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14. Pollution	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15. Deprivation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16. Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17. Commercial Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18. Health inequalities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19. Crime	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20. Public safety	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21. Mixed development	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Moderate to Adverse

Minor Adverse

Neutral

Minor Beneficial

Moderate Beneficial

Major Beneficial

- 3.26.3 In contrast, the policies performing least well against the following sustainability objectives in reverse order of performance (i.e. business adaptation performs the least well):
- **Business adaptation to climate change:** No policies were considered to interact with the objective of encouraging the economic base of the Borough to adapt to the market changes and economic consequences of climate change.
  - **Mixed development:** Six policies are considered to contribute towards a beneficial outcome for this objective, two were considered to definitely deliver with the remaining four having the potential to deliver a beneficial outcome for the objective.
  - **Pollution:** There are nine policies considered to contribute beneficial outcomes against the sustainability objective for pollution, however four are considered to have the potential or be likely to contribute adverse outcomes (policies 1, 2, 5 and 9). Six of the nine policies are considered to have the potential to contribute beneficial outcomes with the remaining three being likely or definitely to result in a beneficial outcome.
  - **Historic environment:** A total of eight policies were considered to deliver beneficial outcomes with five giving rise to adverse outcomes. Only in the case of policies 3, 15 and 16 are likely or definite beneficial outcomes anticipated. Policies 1, 2, 4, 6 and 13 were considered to have the potential to operate against this objective.
  - **Crime:** Seven policies are envisaged to deliver beneficial outcomes for this objective with five policies being considered likely to deliver a beneficial outcome and two having the potential to do so. Policy 6 was considered to have the potential of contributing an adverse outcome by not explicitly reflecting a fear of crime that residential communities may hold.
  - **Greenhouse gases:** A total of eight policies provided support for a beneficial outcome to the greenhouse gases objective with policy 9 being expected to contribute to a beneficial outcome. Three policies were considered to have adverse outcomes for the sustainability objective (policies 1, 2 and 3). Policies 1 and 2 were expected or were likely to work against the sustainability objective, while there was a potential for policy 3 to operate against the objective.
  - **Urban adaptation:** Five policies were considered to offer the contributions towards beneficial outcomes for this sustainability objective with policies 9, 15 and 20 definitely or being likely to lead to beneficial outcomes with policies 10 and 14 having the potential to make beneficial contributions.
  - **Public safety:** Of the ten policies that interact with public safety, Policy 1 has the potential to deliver an adverse outcome as a result of the increased traffic envisaged to be stimulated by the development activity. Of the nine other policies; policies 5, 7, 11, 12, 15 and 18 were considered to be either definitely or likely to deliver positive outcomes, while policies 6, 8 and 21 were considered to have the potential to contribute to positive outcomes for the objective.
- 3.26.4 In terms of the sustainability themes, interactions leading to beneficial or adverse outcomes with the sustainability objectives are the greatest for the natural resource (eighty-seven) and sustainable communities themes (seventy-three). In contrast there are fifty- four for sustainable production and twenty-three-interactions for the climate change and energy theme.
- 3.26.5 In considering the possibility of the delivery of likely or definite outcomes, the climate change and energy theme performs least well with eight interactions of which six are beneficial and two are adverse. Whereas in the case of the natural resources and environment enhancement theme there are forty-one interactions likely or are expected to deliver beneficial outcomes. One adverse outcome is likely the interaction of policy 1 with the landscape objective.
- 3.26.6 In terms of the sustainable communities theme, thirty-one interactions are considered to be likely or are expected to deliver beneficial outcomes, with no adverse outcomes that are considered to be likely or expected to arise.
- 3.26.7 In part this is an academic review since what is important is that each policy is effective in the delivery of the plan objectives and seeks to perform well against the sustainability objectives.

## Draft Local Plan Policies v Sustainability Objectives

3.26.8 In taking an overview of how the policies perform across the array of the sustainability objectives, it is evidence that the following provide good coverage by delivering likely or expected beneficial outcomes for the sustainability themes:

- **Policy 15 – Securing design quality:** The delivery of design quality is assessed as providing beneficial outcomes across eighteen of the twenty-one sustainability objectives with fifteen of the beneficial outcomes considered to be likely to or expected to occur.
- **Policy 18 – Health and well being:** This policy provides strong support across a wide range of sustainability objectives reflecting the many ways in which the effect of the plan upon employment, housing and the environment influences public health. This policy delivers moderate beneficial outcomes with no adverse effects with ten of the fourteen interactions being considered likely or definite to deliver the forecast outcome.
- **Policy 9 – Climate Change:** This policy delivers three major beneficial outcomes for prosperity, greenhouse gases and flood risk, as well as two further moderate and six minor beneficial outcomes. It does however, risk leading to a moderate adverse effect upon the housing objective and a minor adverse effect on air pollution due to decentralised energy production. While two of the outcomes are considered to be definite, the majority (eight) have potential to occur.
- **Policy 3 – Land for general business:** Delivering three moderate beneficial and nine minor beneficial outcomes for the sustainable consumption & production theme, this policy nevertheless has the potential to work against the greenhouse gases objective. Seven of the interactions between the policy and the sustainability objectives have the potential to occur with six being considered to be likely.
- **Policy 17 – Countryside/Green Belt:** By enhancing local distinctiveness, this policy has the potential to enhance the attractiveness of the area to support regionally important development. It was also considered to give rise to four moderate and four minor beneficial outcomes. A minor adverse outcome was scored on resource efficiency. However there was considerable uncertainty with these outcomes with all but one of the 10 outcomes having only the potential to occur.
- **Policy 12 – Resource Management:** This policy delivers two moderate and nine minor beneficial outcomes with none that are adverse. Four of the outcomes are either likely or expected to result with a further seven having the potential to occur.
- **Policy 20 – Provision of Open Space:** Two moderate and nine minor beneficial outcomes are forecast for this policy with no adverse effects. Seven of the outcomes are considered to be likely and one definite, with the remainder being likely.
- **Policy 2 – Maintain Strong, Competitive Town Centres:** Although this policy has the potential for adverse effects upon the historic environment and to cause likely adverse outcomes for the pollution objective, it is envisaged to give rise to nine likely or expected beneficial outcomes.
- **Policy 14 – Amenity Policy:** Although this policy gives rise to three moderate and eight minor beneficial outcomes it also has the potential to deliver two that are minor adverse. Nine of the thirteen outcomes have the potential to occur.

3.26.9 The policies 8, 17, 19 and 21 are judged to deliver the lowest level of performance across the sustainability objectives on the basis that they deliver the smallest number of likely or expected beneficial outcomes with all except one of the interactions for each policy having only the potential for a beneficial outcome.

## Inter-relationships (Cumulative & Synergistic Impacts)

3.26.10 This above approach to the appraisal of the policies examines each policy individually to explore their strengths, weaknesses as well as their potential to deliver the against the sustainability objectives. In reality planning policies are frequently applied together acting upon the development proposal as necessary.

- 3.26.11 An enhanced test of the sustainability of the Submission draft Local Plan plus Proposed Modifications requires an overview of the possible collective performance of the policies. This collective performance can partly be judged by the overall likelihood of the policies delivering against the sustainability objectives.
- 3.26.12 An examination of the likelihood of delivering against the sustainability objectives reveals that nearly half of the possible interactions were addressed by the draft policies. Of the 237 non-neutral outcomes, 62% (147) delivered minor beneficial outcomes, 17% (41) moderate beneficial and 8% (19) major beneficial. In terms of the adverse outcomes 11% (27) were minor adverse with only 1% (3) being moderate adverse.
- 3.26.13 Approximately 11% of the interactions between the sustainability objectives and draft policies were anticipated to be expected to deliver the forecast outcome, with a further 32% being considered likely to deliver the outcome and 57% having the potential to deliver the forecast outcomes. Consequently, much of the uncertainty is a reflection of the flexibility afforded in the policies during the process of considering development proposals. On one hand, such flexibility can be seen to create uncertainty for developers, while on the other it enables the policies to be applied in a pragmatic manner to suit local circumstances. Nevertheless, as 41% of the policy interactions with the sustainability objectives are likely or are expected to deliver beneficial outcomes, the policy framework appears to be less robust than might otherwise be the case.
- 3.26.14 The following topics emerge from the analysis:
- M42 economic gateway sites;
  - Supporting Employment Opportunities for North Solihull;
  - Green Belt;
  - Housing provision;
  - Transport and accessibility;
  - Climate change;
  - Health and well-being;
  - Local distinctiveness;
  - Public safety and crime;
  - Natural environment.

**M42 Economic Gateway Sites**

- 3.26.15 Planning decisions affecting the regional employment sites in the M42 Economic Gateway are guided by Policy 1 - Support economic success. There is however a need to “have regard to” the other Draft Local Plan policies. This weakens case for the application of other policies in these development decisions.
- 3.26.16 As a result of policy 1, development proposals by major businesses in such prominent and sought after locations are not being asked to deliver exemplar of sustainable development. It could be expected that such development delivered high standards of sustainable construction; a high quality public realm enhancing local distinctiveness while also contributing towards the Local Plan objective of reducing inequalities through their procurement, employment and training programmes that could be targeted at assisting in the regeneration of North Solihull. Introduction of the National Policy brings an opportunity to further the prosperity, access to jobs and the commercial assets objectives where there is an absence of relevant policies or they are out of date.

**Supporting Employment Opportunities for North Solihull**

- 3.26.17 Development within the M42 economic gateway is envisaged to generate funds for the Borough Council which could be used in a progressive manner to encourage business activities, training, education, transport, housing and other public health measures to enhance the abilities of communities in the regeneration areas to access employment opportunities. Unfortunately the Draft Local Plan does not set out a clear vision on how inequalities are to be addressed beyond encouraging the retention of small and medium sized enterprises across the Borough. Indeed, it might be argued that development in the M42



economic gateway would attract the businesses offering employment opportunities that the regeneration community currently may not be best equipped to exploit.

### **Green Belt**

- 3.26.18 The policies enable the release of Green Belt land where significant employment opportunities are being created. For example, policy 1 states that “*The reasonable expansion of the site into the Green Belt will be given positive consideration where economic need can be demonstrated and appropriate mitigation can be secured*”. While Policy 17 states that “*The reasonable expansion of established businesses in the Green Belt, will be allowed where the proposal would make a significant contribution to the local economy or employment.*”
- 3.26.19 Policy 17 would appear to permit expansion (it is not clear what reasonable expansion means or how it is defined) by any business into the Green Belt regardless of where they are currently located. While the test of making a “*significant contribution to the local economy or employment*” would benefit from some further definition.
- 3.26.20 It is not clear how the loss of Green Belt can be mitigated or that the returns for the residents of the Borough especially those experiencing inequalities are clearly evident. Given the high levels of accessibility afforded by the motorway and rail network, many of the benefits could accrue to non-Solihull residents.
- 3.26.21 Housing allocations are also permitted to take land from the Green Belt in accordance with policy 4. In this case, such proposals are first to have been considered through a Parish or Neighbourhood Plan and there is to be evidence that people with a local connection have a housing need. Also, this need must not be able to be met through affordable housing provision on an allocated housing site. Finally, the proposed development is to be supported by the Parish Council or Neighbourhood Group. It has recently emerged that there will be an early review of the Local Plan in order to consider forthcoming housing research and the potential implications of a demand for housing from Birmingham. This may lead to a need to review the Green Belt.

### **Housing Provision**

- 3.26.22 The provision of affordable housing is a key issue as there are some 13,310 people on the housing waiting list as of April 2011<sup>22</sup>. Also, forecasts suggest that between the years 2008 to 2033 some 3,000 households between the ages 65-74 and 5,000 aged above 85+ will create new needs for adapted housing<sup>23</sup>.
- 3.26.23 Should the delivery of affordable housing not be met then this could well have adverse consequences upon labour mobility as well as contributing toward health inequalities as people remain in unsuitable housing conditions.
- 3.26.24 In terms of meeting the housing needs of the elderly, a failure to deliver the requisite number and designs could result in elderly people remaining within unsuitable housing increasing the risk of accidents. Further, it may lead to constraints on housing availability for younger members of the community.
- 3.26.25 Failure to deliver the specialist housing for the older age groups could lead not only to use of unsuitable properties, but also to the use of expensive hospital beds where respite care and hospice care is not available.
- 3.26.26 While provision of new housing may create capacity to enable refurbishment/demolition of Radburn housing areas, this is not evident from the policy.

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<sup>22</sup> Communities and Local Government, 2012: Live Tables – Table 600 Rents, lettings and tenancies  
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/livetables/>

<sup>23</sup> Communities and Local Government, 2012: Live Tables – Table 414 Household Projections by Age and District.  
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/227222/>

- 3.26.27 While there remains a focus on allocating housing within urban areas that potentially reduces the need to travel, the allocation of houses at Blythe Valley Park and away from North Solihull is envisaged to increase reliance upon the private car unless effective public transport services can be secured. The third phase places an emphasis upon rural provision and is thus likely to increase travel needs further. This suggests that rural areas are likely to experience change with 1,235 dwellings being allocated.
- 3.26.28 With a quarter of the new housing being in the rural areas, there is a potential that both biodiversity and landscape objectives would be adversely affected. Nevertheless revisions to the supporting text recognise the implications that substantial housing growth would have upon infrastructure, growth, regeneration objectives, the Green Belt and the River Blythe SSSI. No provision is made in the policy to contribute towards green infrastructure or to consider the historic environment although these objectives are addressed in other policies and may be delivered via the site development briefs.
- 3.26.29 The policy states that new housing is to contribute towards maintaining local character and distinctiveness, whereas housing on unidentified sites is to contribute wards "*enhancing local character and distinctiveness*".

### **Transport and Accessibility**

- 3.26.30 While there are two policies focusing upon transport, Policy 2 provides for the provision of additional public parking where there is insufficient public parking already available.
- 3.26.31 Policy 8 requires that all development proposals should have "*regard to*" transport efficiency and improved highway safety for all users. However this sets up a potential conflict with the requirement upon all developments to promote and encourage sustainable transport modes. With a predict and provide approach to car parking provision and the requirement to have "*regard to*" transport efficiency and highway safety, there is a chance that increased traffic flows could be experienced in the town centres. As a consequence the policy may increase the concerns of pedestrians and cyclists and cause delays to public transport users thereby impeding the second part of the policy.

### **Climate Change**

- 3.26.32 While Policy 9 is devoted to addressing climate change, the development activity generated as a result of Policy 1 is only to "*have regard*" to the climate change requirements. A further difficulty arises in relation to housing and the need to deliver affordable housing since reducing greenhouse gas emissions and enhancing resilience to climate change may well come at a higher cost to the developer if not the local community.
- 3.26.33 There is a delicate balance needed between addressing the immediate affordable housing needs and that of addressing climate change. However with an increasing number of people experiencing fuel poverty (a state that is unlikely to decline), enhanced energy efficiency will deliver benefits by helping to reduce health inequalities particularly for an increasingly elderly population.
- 3.26.34 The policy framework weakly considers adaptation to climate change dealing with flood risk and sustainable urban drainage. There are no measures that help to promote business adaptation thereby helping to deliver sustainable economic development. Enhancing the public realm in terms of adaptation to high winds and temperatures and provision of green infrastructure provide opportunities for improvement could be considered through the proposed Sustainable Design and Construction SPD along with addressing the needs of an increasingly elderly population in terms of cooling vegetation and the provision of rest areas.
- 3.26.35 The climate change policy promotes the development and provision for heat and energy networks. It also makes provision for development to pay for a wide variety of other measures to reduce emissions or address the impacts of climate change across the Borough (these are termed Allowable Solutions). With this provision coming into force by 2016, a strategy defining the possible measures will be needed soon if the implications on project viability are not to constrain development processes.

- 3.26.36 Much of the extent to which this policy is effective is dependent upon keeping the proposed Sustainable Design and Construction Supplementary Planning Guidance up to date reflecting the rapidly changing technologies in this area. Effectiveness is also dependent upon the manner in which site development briefs embrace the concept of designing in energy efficiency, reduced emissions and adaptation measures.

### **Health and Well-being**

- 3.26.37 A policy has been introduced to promote health and well-being that gives important recognition to the manner in which housing makes a contribution towards public health.
- 3.26.38 The policy also addresses part of the link between food and health in those areas with a high concentration of hot food take-ways to be resisted. However, the policy does not go further and limit such uses in close proximity to schools and public parks.
- 3.26.39 While the policy recognises links between pollution and community engagement/social isolation, the policy as proposed relies upon those proposing development to demonstrate that adverse effects would be addressed or mitigated.
- 3.26.40 The main approach to improving health and well-being is through the provision of employment opportunities for the communities experiencing health inequalities. Hence this suggests a targeted approach that strongly links with the wider regeneration agenda, although this is not evident from the Submission Draft Local Plan.
- 3.26.41 The next most important approach is that of ensuring good quality housing appropriate to the life-stages and needs of the individuals and in this regard the housing policy together with the health policy should deliver benefits.
- 3.26.42 Addressing the risks associated with road accidents, crime and safety can be seen as the next theme to address health inequalities and here, the policies on transport provide mixed outcomes for the health agenda.
- 3.26.43 Altering the behavioural aspects is another aspect where spatial planning can enhance health outcomes and the policy partly addresses this by a capacity approach to the number of fast food outlets. In contrast, other authorities have taken an approach of precluding the location of new fast food outlets in close proximity to schools.
- 3.26.44 A final health opportunity relates to the design of the public realm to cater for an increasingly elderly population and the effects of climate change.

### **Local Distinctiveness**

- 3.26.45 The Draft Local Plan provides several policies (policies 5, 10, 15, 16 and 20) where the objective is to protect and enhance local character and distinctiveness key to the economic vitality of the Borough. This should help promote a local sense of identity. Indeed, policy 16 emphasises the importance of creating a sense of place. This opportunity could have links to public health and the needs of the elderly where increasing dementia sufferers might be aided by the creation of distinct identities that assist with their orientation.

### **Public Safety and Crime**

- 3.26.46 Six policies provide a link with crime and safety, although in the case of policies 8 and 21, a beneficial outcome is only a potential outcome. While policies 7, 15, 18 and 20 (accessibility, travel, design quality, health and open space) are likely to provide beneficial outcomes for public safety and crime with additional supporting text requiring consideration of the impacts upon social infrastructure provision, e.g. emergency services and community facilities. Policies 2, 3 and 4, which deal with development proposals, miss the opportunity to promote measures although the site development brief is a means by which this could be addressed.



**Natural Environment**

- 3.26.47 The policies focused on the natural environment provide some protection to natural resource and environment sustainability theme with policy 7 being the only one to have no links, while policies 1 and 4 have the potential to have adverse outcomes for the natural environment theme. Where beneficial outcomes are anticipated, then most of the links result in minor beneficial outcomes. Proposed Modifications to the Submission draft Local Plan could well increase the likelihood of beneficial outcomes associated with mineral developments. Opportunities to provide a strategic landscape scale approach to biodiversity mitigation, allowable solutions, green infrastructure and public health could be explored, potentially via a supplementary planning document.

**4**

## 5 MITIGATION & MONITORING

### 5.1 Introduction

4.1.1 At this stage in the Local Plan preparation process, opportunities to include mitigation measures are severely constrained as new positions ought not to be introduced following the EIP. Nevertheless, this section considers whether any measures beyond that of amending the Submission draft Local Plan plus Proposed Modifications should be considered. This chapter also deals with views on potential indicators to be deployed to monitor the sustainability performance of the draft Local Plan as part of the Authority Monitoring Reporting.

### 5.2 Mitigation and Enhancement Measures

4.2.1 The appraisal of the Draft Local Plan plus Proposed Modifications has identified a few aspects where mitigation measures to enhance delivery of sustainability objectives could be developed once the plan is adopted. These are to:

- Sustain economic success of the businesses in the M42 economic gateway while ensuring benefits flow for all of the Borough’s residents;
- Achieve sustainability gains across all four themes without compromising the attractiveness of the Borough for development;
- Manage the consequences of an increasingly elderly population.

4.2.2 The scope to introduce further measures in response to the Proposed Modifications is limited. Nevertheless, possible enhancement measures for the four sustainability themes along with the Council commitments that potentially could be delivered via the Sustainable Design and Construction SPD are presented below along with other recommendations accepted by the Council.

Sustainable consumption and production	Climate change and energy
<ul style="list-style-type: none"> <li>• Enhance the certainty that major developers would adopt measures to reduce the need to travel as well as improve accessibility to those areas where unemployment exists through the use of development briefs.</li> <li>• Review the role of Sustainable Design and Construction Supplementary Planning Document (SPD) for all major development and clarify its contents – While the Council advise that waste and renewable energy is to be considered in the SPD, consideration should be given to development in the M42 Gateway.</li> <li>• Consider opportunities to promote waste management technologies via Affordable Solutions – To be addressed in a Supplementary Planning Document.</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance the certainty that major developer’s future proof and avoid creating future delivery barriers to local heat or energy networks when viable.</li> <li>• Consider monitoring the extent to which development proposals in the M42 Gateway actively address adaptation measures and consider the need for advice within the proposed Sustainable Development and Construction SPD.</li> <li>• Consider adding the following clause “Development that makes a positive contribution towards the achievement of distributed heat and energy networks would be encouraged” to policy P3.</li> <li>• Consider use of development briefs to provide for urban cooling measures – Accepted by the Council. The Sustainable Design and Construction SPD ought also to address the benefits of vegetation to aid urban cooling.</li> <li>• Consider requiring major development proposals with large parking capacity to set aside dedicated car pool and electric vehicle charging points – To be addressed in a SPD.</li> </ul>

	<ul style="list-style-type: none"> <li>• Consider requiring developers providing on-site car parking to demonstrate why renewable energy generation would not be viable. To be addressed in a Supplementary Planning Document.</li> <li>• The Council ought to work with others to develop sufficient evidence to allow identification of key sites for distributed heat and energy networks.</li> <li>• Include green/brown roofs and SUDs within the Sustainable Construction and Design Supplementary Planning Document – Accepted by the Council.</li> <li>• Develop strategy for Allowable Solutions in time for its 2016 introduction to reduce uncertainty for developers – Accepted by the Council.</li> </ul>
<b>Natural resources &amp; env. enhancement</b>	<b>Sustainable communities</b>
<ul style="list-style-type: none"> <li>• Consider the preparation of a landscape scale plan for the natural environment to define and reduce the impacts of climate change – To be considered through joint working with neighbouring authorities.</li> <li>• Frequent reviews of open space requirements to ensure up to date evidence base to inform the preparation of site development briefs.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop elements within the Sustainable Design and Construction SPD that focus upon sustainable communities to complement the themes of sustainable consumption, climate change and natural resource themes.</li> <li>• Undertake frequent reviews of open space requirements to ensure an up to date evidence base to inform the preparation of site development briefs.</li> <li>• Develop measures to deliver direct and indirect benefits from employment growth in the M42 Gateway for the residents of North Solihull.</li> </ul>

### 5.3 Monitoring Indicators

- 4.3.1 The Authority Monitoring Report (AMR) forms part of the LDF and provides the means to assess, the implementation of the Local Development Scheme (LDS) and the extent to which LDD policies are successfully implemented. The AMR is therefore a mechanism through which adjustments to policies in the Local Plan can be made, based on monitoring results.
- 4.3.2 While the sustainability performance of the Local Plan has evolved from that of the Emerging Core Strategy, for the remaining significant effects monitoring can be undertaken through a flexible manner. It is worth noting that monitoring in the context of the SEA Directive does not necessitate the assembly of a time series of data observations
- 4.3.3 The SEA Directive requires monitoring be undertaken to identify unforeseen adverse effects arising from the plan in order to enable remedial action to be taken. For this reason, local planning authorities should consider how to react if significant effects indicators reveal any unforeseen adverse effects, or effects which exceed acceptable limits.
- 4.3.4 Monitoring is the responsibility of the Council in association with other bodies, such as the Environment Agency. Given the reduced financial resources, the funding of monitoring is likely to be restricted.

4.3.5 Proposals for monitoring the significant effects of the plan are presented in Tables 5.1 to 5.4 for each of the sustainability themes.

4.3.6 While there are considerable number of proposals for monitoring set out in the tables, it is suggested that given resource constraints that the following could be considered as priority indicators:

**Sustainable consumption & production**

- Percentage of young unemployed;
- Travel to work patterns;
- Change in number of jobs within 400m of a high frequency bus service;
- Area of green belt land taken for development.

**Climate Change and Energy**

- The extent to which development proposals in the M42 Gateway actively address adaptation measures;
- The actual energy saved and generated by renewable and conservation measures by major development proposals each year;
- Growth in the population employed in sectors considered to be resilient to the effects of climate change.

**Natural Resource Protection & Environmental Enhancement**

- Number of consented development proposals with net beneficial ecological effects;
- Number of consented development proposals negatively affecting the integrity of wildlife corridors;
- Net number of trees planted due to major development proposals;
- Number of development projects that detract from either the historic landscape or elements of the historic environment;
- Length of culverts opened up into open watercourse and the length of watercourse restored.

**Sustainable Communities**

- Percentage of jobs in Solihull filled by local residents;
- Annual affordable housing completions;
- Annual number of housing for the elderly;
- Proportion of people employed at the regional assets who are resident in the Borough.

**Table 5.1: Monitoring Proposals for Sustainable Consumption & Production Theme**

Monitoring	Frequency	Responsibility
<b>Sustainable consumption &amp; production</b>		
<p><b>Employment:</b> Policies may not reduce inequalities across the Borough through regeneration, education/training and job opportunities.</p> <ul style="list-style-type: none"> <li>• Number of small business units established per year within 400m of a high frequency bus service.</li> <li>• Workforce engaged in new technology, low carbon and care services.</li> <li>• Number of jobs located in North Solihull.</li> <li>• Number of jobs created due to the transport and knowledge hubs.</li> <li>• Level of qualifications amongst the younger members of the workforce.</li> <li>• Percentage of young unemployed.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>
<p><b>Population:</b> Retaining a balanced workforce able to locally resource the needs of businesses operating within the Borough.</p> <ul style="list-style-type: none"> <li>• Percentage of people who express satisfaction with their quality of the environment.</li> <li>• Travel to work patterns.</li> </ul>	<ul style="list-style-type: none"> <li>• Bi-annual monitoring with action to rectify adverse trends.</li> <li>• Ten yearly census data and local surveys.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> <li>• Office of National Statistics.</li> </ul>
<p><b>Accessibility:</b> Mixed messages within the policies on access to work by sustainable transport.</p> <ul style="list-style-type: none"> <li>• Change in the number of jobs within 400m of a high frequency bus service based on the 2010 Solihull Strategic Accessibility Study.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>
<p><b>Material Assets:</b> Improve resource efficiency and reduce demands on landfill.</p> <ul style="list-style-type: none"> <li>• Area of greenbelt land taken for development.</li> <li>• Reduce quantity of household waste generated per household.</li> <li>• Management of waste higher up the waste hierarchy.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>

**Table 5.2: Monitoring Proposals for Climate Change and Energy Theme**

Monitoring	Frequency	Responsibility
<b>Climate Change and Energy</b>		
<p><b>Greenhouse Gas Emissions:</b> Policies may not deliver the rate of reduction in GHG required.</p> <ul style="list-style-type: none"> <li>Annual emissions of greenhouse gases across the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>DECC.</li> </ul>
<p><b>Energy Use and Renewable Energy:</b> Action needed to ensure policies deliver expansion of local heat and energy networks as well as delivery of energy efficient and production of renewable energy in new development.</p> <ul style="list-style-type: none"> <li>The actual energy saved and generated by renewable and conservation measures by major development proposals each year.</li> <li>Amount of energy consumed by street lighting.</li> </ul>	<ul style="list-style-type: none"> <li>Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>
<p><b>Employment Resilience:</b> Build employment based upon businesses resilient to direct and indirect effects of climate change and economic dislocation.</p> <ul style="list-style-type: none"> <li>Growth in the population employed in sectors considered to be resilient to the effects of climate change.</li> <li>The extent to which development proposals in the M42 Gateway actively address adaptation measures.</li> </ul>	<ul style="list-style-type: none"> <li>Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>
<p><b>Resilience to Adverse Weather Conditions:</b> Deliver a public realm that protects those vulnerable to the effects of climate change.</p> <ul style="list-style-type: none"> <li>Area of “cooling” features within main public thoroughfares.</li> </ul>	<ul style="list-style-type: none"> <li>Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>

**Table 5.3: Monitoring Proposals for Natural Resource Protection & Environmental Enhancement Theme**

Monitoring	Frequency	Responsibility
<b>Natural Resource Protection &amp; Environmental Enhancement</b>		
<p><b>Biodiversity, Geodiversity and Soil Resources:</b> Policies seek to minimise losses rather than meet national objectives of reversing decline.</p> <ul style="list-style-type: none"> <li>• Number of consented development proposals with net beneficial ecological effects.</li> <li>• Number of consented development proposals negatively affecting the integrity of wildlife corridors.</li> <li>• Length of culverts converted to open channels with wildlife habitats.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>
<p><b>Landscape, Open Space, Green Infrastructure:</b> While policies support enhancing the public realm the focus ought to be on maximising the multiple benefits for the resources expended.</p> <ul style="list-style-type: none"> <li>• Net number of trees planted due to major development proposals.</li> <li>• Number of healthy trees removed that were subject to tree preservation orders.</li> <li>• Number of development projects providing a positive contribution to Arden Landscape Guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>• Bi-annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>
<p><b>Historic Environment &amp; Townscape:</b> Policies are focused upon promoting local distinctiveness and protecting the historic assets across the Borough.</p> <ul style="list-style-type: none"> <li>• Number of development projects that enhance either the historic landscape or elements of the historic environment.</li> <li>• Number of development projects that detract from either the historic landscape or elements of the historic environment.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> </ul>
<p><b>Water Quality:</b> Climate change and increased abstraction could lead to increased water quality problems not addressed by the Local Plan.</p> <ul style="list-style-type: none"> <li>• Length of culverts opened up into open watercourse and the length of watercourse restored.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>• Borough Council.</li> <li>• Environment Agency.</li> </ul>

**Table 5.4: Monitoring Proposals for Natural Resource Protection & Environmental Enhancement Theme**

Monitoring	Frequency	Responsibility
<b>Sustainable Communities</b>		
<p><b>Deprivation and Social Exclusion:</b> Policies do not link economic development activities with addressing deprivation and exclusion to the extent possible.</p> <ul style="list-style-type: none"> <li>Percentage of jobs in Solihull filled by local residents.</li> <li>Percentage of Super Output Areas that fall within the 20% most deprived areas using the index of multiple deprivation.</li> <li>Percentage of people who say they are satisfied with their local area as a place to live.</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>
<p><b>Housing:</b> While the Local Plan has a strong housing policy the extent to which local needs, particularly for the elderly and special needs groups are met along with housing affordability are key.</p> <ul style="list-style-type: none"> <li>Annual affordable housing completions.</li> <li>Annual number of housing for the elderly.</li> <li>Number of gypsy and traveller pitches available.</li> </ul>	<ul style="list-style-type: none"> <li>Annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>
<p><b>Public Health:</b> The Local Plan provides a policy on public health, although other policies delivering further car based mobility and development may constrain delivery of positive outcomes.</p> <ul style="list-style-type: none"> <li>Proportion of planning applications catering for an ageing population.</li> <li>Percentage of people who consider themselves to be in good health.</li> <li>Percentage of people undertaking physical activity.</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> <li>Health &amp; Well-Being Board.</li> </ul>
<p><b>Crime and Safety:</b> The design of the public realm can have an influence on perceptions of crime and actual crime levels hence the extent that the Local Plan policies deliver enhancements to the public realm that reduce crime is of interest.</p> <ul style="list-style-type: none"> <li>Total crime per 1000 people.</li> <li>Proportion of residents feeling safe after dark.</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> <li>Police.</li> </ul>
<p><b>Culture &amp; Recreation:</b> Focus is upon the extent to which interventions deliver improvements in health inequalities and promote healthy lifestyles.</p> <ul style="list-style-type: none"> <li>Percentage of residents expressing satisfaction with recreation and open space provision</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>
<p><b>Regional Assets</b></p> <ul style="list-style-type: none"> <li>Proportion of people employed at the regional assets who are resident in the Borough.</li> <li>Floorspace consented per year.</li> <li>Longest duration to determine a planning application affecting such regional assets.</li> </ul>	<ul style="list-style-type: none"> <li>Minimum of five yearly monitoring with action to rectify adverse trends.</li> </ul>	<ul style="list-style-type: none"> <li>Borough Council.</li> </ul>