

Solihull Draft Local Plan Supplementary Consultation, March 2019 Response of the Open Spaces Society

1. Introduction

The Open Spaces Society is Britain's oldest national conservation body, founded in 1865. The Society's aim is to protect, increase, enhance and champion open spaces, common land, village greens and public paths.

Consequently, sections 96 to 98 of the NPPF headed *Open space and recreation* are seen of particular importance.

2. Matters of interest to the Society

The Draft Plan is laid out by area, with matters of interest to the Society covered in questions dealing with Infrastructure under a number of sub-headings:

	Play and Open Space	Concept master plans	Green Belt Enhancements	Public space enhancements	Green Infrastructure
Balsall Common		*	*		
Blythe	*	*	*		
Hampton in Arden & Catherine de Barnes			*		
Hockley Heath					
Knowle, Dorridge and Bentley Heath	*	*	*		
Solihull Town Centre & Mature Suburbs		*	*		
Meriden		*	*		
North Solihull, Marston Green and Castle Bromwich				*	
UK Central Hub					*

3. Questions addressed in this response

The questions addressed by the Society are those headed *Do you agree with the infrastructure requirements?* for each area. These are Questions 3, 11, 16, 19, 22, 25, 29, and 31.

No equivalent question was asked about the UK Central Hub, so a comment has been made in response to Question 44.

4. Responses to questions

4.1 Play and Open Space

The Draft Plan requires the provision within potential development sites of play spaces and areas of open space, the best use of existing green and blue infrastructure assets, and linkage to the surrounding area.

These requirements are welcomed, but should be extended to all part of the Borough.

In addition, standards should be established with regard to the scale of provision; nearness to dwellings; phasing within the Plan period; the type and quantity of play equipment; lighting, over-looking and physical security; the segregation of public access from ecological areas; and the process for the adoption of these areas by the Local Authority.

4.2 Concept master plans

Concept master plans have been provided for some of the principal proposed sites. These are high-level schemes showing where development is envisaged within the sites and key features for retention, with the intention of securing quality development, efficient use of land, and respect for local character.

The master plan approach is welcomed, but should be extended to all part of the Borough.

Also, the master plans need to become more tightly defined during the further development of the Local Plan. The master plans should show how the policies elsewhere in the Local Plan are to be implemented in each specific site, so there needs to be careful coordination between the policies and these plans.

There should be clear allocation and protection of areas for public access, and this should be secured in perpetuity by the dedication of the land as a Village Green, or by dedication of access rights under section 16 of the Countryside and Rights of Way Act 2000. The access rights could be for horse and cycle riding, as well as for access on foot. Landowners should be encouraged to do this for their development sites, and Solihull MBC should adopt a policy to do so for land owned by the Council where it is important for public recreation.

There is no mention in the Draft Plan of the designation of Local Green Space as set out in the NPPF para 99. This mechanism should be promoted as a means of preserving openness and amenity through the Planning process.

4.3 Green Belt Enhancements

The Draft Plan notes section 141 of the NPPF, calling for enhancement of the retained Green Belt, with consideration of improved public access; opportunities for outdoor sport and recreation; improvements to visual amenity and biodiversity; and restoration of derelict land.

However, views are sought as to how this can be fulfilled.

Within the Borough, there is already an extensive network of Public Rights of Way, but this is far from perfect. Potential improvements should be seen in the context of the agricultural use of much of the land, and of the prevailing *Solihull Rights of Way Improvement Plan 2016 (ROWIP)*. Implementation of the ROWIP has been constrained by the lack of funding.

The Local Plan should mandate funding for access improvements through Section 106 agreements or Community Infrastructure Levies. The ROWIP itself could be amended to provide more demanding targets.

Best possible standards and practice should be applied for the physical state of the path network. Enhancements are required to the amenity of routes. Registration of unrecorded access rights should be encouraged and expedited. Safe routes along and across roads, for non-motorised users, should be provided, as should additional links to provide circular routes.

The Local Plan should also define how funding derived from developers will be applied to the other aspects of enhancements to the Green Belt. An ancillary document could list identified opportunities to carry forward the intentions of paragraph 141.

4.4 Public space enhancements

This heading is only used in connection with the North of the Borough. The Draft Plan calls for the continued pursuit of public realm improvements, and the mitigation of any adverse effects from re-development.

While the availability of space is a major constraint, the high population density should justify a greater emphasis on the provision and maintenance of public space for recreation and amenity.

Accordingly, the recommendation would be to apply a uniform standard, across the whole Borough, for policies defining the requirements for public access and green space. This would require detailed wording in policies so that they can be applied to areas of both high and low housing density, and to both newly-developed land and to mature areas.

4.5 Green infrastructure

Specific requirements are lacking from the section on the UK Central Hub.

As a general comment, it would be useful to apply uniform expectations and policies across the whole Borough, as noted in §4.4 above.

5. Conclusion

The Society would appreciate the opportunity to make further comments during subsequent development of the Solihull Local Plan.

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