



FULFORD HALL FARM

**DRAFT SUBMISSION PLAN
SOLIHULL DRAFT LOCAL PLAN REVIEW (SDLPR) &
PRE-SUBMISSION SUSTAINABILITY APPRAISAL
NOVEMBER 2020**

**REPRESENTATIONS ON BEHALF OF
SUMMIX (FHS) DEVELOPMENTS LTD**

DECEMBER 2020

1. INTRODUCTION

1.1 This document with associated Appendices has been prepared by the Fulford Hall Farm consultant team (Frampton Town Planning, Icen Projects and Vectos) supported by leading Counsel on behalf of Summix (FHS) Developments Limited to set out the representations to the Draft Submission Plan Publication Version of the Solihull Local Plan Review and the Pre-submission Sustainability Appraisal.

1.2 There are a number of studies that have been commissioned that are an integral part of the representations and are attached as Appendices to this document. They are to be considered in detail as supporting evidence to this representation. The studies are:

- Vision Statement (**Appendix 1**)
- Green Belt, Landscape and Masterplanning Report (**Appendix 2**)
- Transport Mobility Strategy (**Appendix 3**)
- West Midland Rail Aspiration Study (**Appendix 4**)
- Economic Benefits (**Appendix 5**)

1.3 In summary, and based upon the evidence presented in the above reports there are important objections to the Solihull Local Plan approach that must be addressed:

1. The SMBC approach does not give proper consideration to the strategic role and function of the West Midlands green belt
2. The SDLPR does not make a satisfactory provision towards meeting the needs of Birmingham.

3. Its assessment of the potential for land within the Borough to accommodate new housing development is flawed.
4. Its assessment of the potential for land within the Green Belt in Solihull to accommodate additional dwellings (the Atkins (2016) Green Belt Assessment technical paper) is flawed, and fails to adequately consider the capacity of the housing market in Solihull to absorb higher levels of new housebuilding over the plan period
5. Acknowledging that any more substantial release of Green Belt land in Solihull would require additional infrastructure to that proposed in the SDLPR, the evidence base fails to consider reasonable alternatives that could deliver the necessary levels of development
6. SMBC should have considered in more detail the opportunities that exist to the south of Birmingham around Hollywood, Whitlock's End and Cheswick Green (Location PD5 identified in the other broad areas for growth as part of the alternative's assessment, based upon the Strategic Growth Study., for example south of Birmingham. It does not appear that area PD5, South of Birmingham has been considered fully as part of the alternatives, and is unclear as to why this reasonable alternative has not been considered, contrary to NPPG 018. The SA has failed to explain the selection and rejection of the alternative sites.
7. The SA has failed to consider mitigation measures at all, as acknowledged by the Pre-Submission SA itself, and therefore does not comply with the regulations and guidance. The information used for the selection of the allocations can therefore not be relied upon and does not provide an accurate or robust assessment, which is linked to the evidence available.

8. The failure of the Council to consider mitigation has skewed the SA and site selection process in a way that penalises more sustainable sites which will benefit from mitigation.

1.4 Having regard to the above, it is considered that the SDLPR is unsound in terms of paragraph 35 of the Framework. Consequently, we conclude on the basis of these submissions that the Council should consider the release of land at Fulford Hall Farm, Tidbury Green from the Green Belt and the allocation of this land for development.

1.5 The changes that we consider should be made to the plan to make it sound are:

- To undertake further joint work with relevant adjoining authorities to ensure the duty to co-operate is properly discharged including evidence of joint working and an indication of how any shortfall in meeting objectively assessed housing needs will be met.
- To increase the amount of housing to be accommodated within the Borough, to a figure significantly higher than the 15,017 in Policy P5 for the period 2020-2036, ideally to accommodate a further 1,500 dwellings on Sustainable Urban Extensions removed from the Green Belt south of Tidbury Green.
- To undertake a reassessment of the Green Belt options considered in the SDLPR, stating that it is necessary to remove land at Fulford Hall Farm, Tidbury Green from the Green Belt to meet the current and longer-term development needs of the Borough, and that this area will be allocated for development in the plan in accordance with the NPPF

- To identify a robust long-term Green Belt boundary around Tidbury Green taking account of the exceptional circumstances arising from the Borough's development needs to remove areas suitable for development to meet those needs whilst retaining in the Green Belt land which serves Green Belt functions and protects its strategic role in a West Midlands context
- To make any consequential changes to plan wide policies arising from the above
- The SDLPR is not sound. It is not positively prepared, not justified, not effective and is inconsistent with national policy. These submissions and accompanying reports provide an explanation of these objections

2. GREEN BELT

2.1 It is of course readily recognised that the principle of the release of land from the Green Belt will inevitably be controversial. The Green Belt boundary within the Solihull administrative area has been fiercely defended for a period of 20 years. The success of Green Belt policy in preventing unplanned growth is plainly evident.

2.2 Prevailing planning circumstances now justify a review of the Green Belt boundary. It is important however to have regard to the fact that it is the West Midlands Green Belt that is under consideration. The Framework identifies that Green Belt serves five purposes (Framework paragraph 134):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.3 Paragraph 136 of the Framework confirms that:

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can

endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

2.4 Paragraph 138 of the Framework states:

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

(underlining for emphasis)

2.5 Paragraph 139 of the Framework states:

139. When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of*

safeguarded land should only be granted following an update to a plan which proposes the development;

- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognizable and likely to be permanent.*

2.6 It is evident from the SDLPR that projected growth in the Borough’s population to 2036 has resulted in the Council concluding that that ‘new’ land has to be identified to meet housing and employment requirements.

2.7 The foreword to the Local Plan is clear in acknowledging that difficult decisions have to be made with regard to new growth. Paragraphs 2 and 3 of the Local Plan foreword states:

“2. It wouldn’t be a local plan if it didn’t have difficult decisions to make – and the most contentious is usually around the scale and distribution of new growth. The clear message from Government is that we must significantly boost the supply of homes for all our communities. We cannot keep escaping the issue; and, to maintain control of our destiny and deliver a net zero carbon future we have to deliver this plan. We share the sadness of the loss of Green Belt land but we have no option.

3. Most recognise that this new growth is needed to ensure we have places to live and jobs that we can access. Unfortunately, brownfield land alone won’t provide the solution and, reluctantly, we must release some Green Belt land. However we have

looked to minimise this and in doing so ensured the continued integrity of the significant Green Belt that remains.”

2.8 Paragraph 59 of the SDLPR states *“The two factors outlined above represent a significant shift from the starting point of the 2013 plan and requires the spatial strategy to be looked at afresh. This is in the context that to deliver the level of growth envisaged, will require significant releases of land from the Green Belt.”*

2.9 It is a popular misconception for some members of the public to believe that the Solihull has sufficient areas of developed land that could be recycled to meet these development needs. In reality there is neither the quantity of previously developed land that is suitable to meet all the development requirements, or sufficient land of suitable quality in locations that would form attractive housing locations.

2.10 Similarly, it is neither realistic or desirable to contemplate the application of planning policies that will ‘throttle’ the growth of the Solihull forcing very substantial numbers of households to ‘bypass’ Solihull and live in settlements beyond the conurbation. Past ‘regional’ planning policies reveal that such an approach disadvantages the sub-region, in the loss of investment jobs and services; disrupts social relationships between households, and imposes social infrastructure costs upon the Borough, yet with limited opportunity to extract payments by way of planning obligations from new development that has occurred beyond Solihull.

2.11 The SDLPR seeks to perpetuate this situation adopting a head in the sand approach to meeting the provision of a realistic and significant component of the Birmingham’s housing needs. By Solihull not accommodating its ‘fair share’ will lead to increased community distances back

through the Green Belt with the consequent costs of congestion and requirement for extended physical infrastructure.

2.12 It is important that the Green Belt proposals in the SDLPR are tested on a regional basis. It should not be a SMBC issue where the administrative boundary is driving decision making. The scale of housing need impacting on Solihull is so substantial as to require an approach that is something more than a parochial 'Solihull view'.

2.13 Solihull has 11,945 hectares of Green Belt, and is currently proposing to release 574 hectares from Green Belt as new allocations, around 4.8% of the Borough's total Green Belt area.

2.14 If Solihull is to succeed in its ambitions for economic prosperity and satisfying population growth, supported by appropriate housing delivery, it must ensure an adequate, appropriate supply and range of housing. The Green Belt area around Dickens Heath, Tidbury Green, Cheswick Green and Blythe Valley Park can optimise the success more than any other area within the SMBC administrative boundaries. This is due to the strong residential sales values in this area.

2.15 A further release of land from the Green Belt south of Tidbury Green has the capability to sustain a broad and viable range of new homes from the least expensive upwards.

2.16 There is significant potential to create many new markets within the Tidbury Green area through high quality sustainable master planning; potential that can cater for a full range of housing needs, particularly households that the conurbation needs to retain and attract for its economic growth. Moreover, the connectivity benefits the site possesses provide the

opportunity to create a truly sustainable development which responds to the climate change/net zero targets of Solihull.

2.17 Simultaneous development of major areas at Dickens Heath, Tidbury Green, Cheswick Green and Blythe Valley, if planned correctly, will not conflict with each other.

2.18 Each Area has significant potential to deliver multiple outlets at the same time, ranging across the whole market.

2.19 The consequences of proceeding with the SDLPR approach are serious in a regional context. In failing to undertake an objective assessment of its housing needs and then failing to accommodate as much of them in the Solihull as possible, the Council has not been consistent with its own policies towards economic growth and the retention of economically active people. As a result, the plan has not been positively prepared.

2.20 SMBC has a vision (paragraph 39 of SDLPR) that states *‘Where everyone has an equal chance to be healthier, happier, safer and more prosperous through growth that creates opportunities for all’*.

2.21 The Borough Vision goes on to state that *“The Borough will play a part in meeting, in a sustainable manner, the needs of its housing market area so that its residents have access to a range and choice of quality accommodation”*. In our view the SDLPR vision and objective suggest a vague approach to accommodating its housing needs. Rather the SMBC approach should be more proactive in accommodating its housing requirement, to ensure sustainable patterns of

growth and travel-to-work and to capture as much of the economic benefit of that growth within the Borough. This should be an important objective.

2.22 A key part of the Plan's development is the Covid-19 Economic Recovery Plan. Therefore, the SDLPR should not be based upon deflecting and thereby exacerbating the negative trends of outward migration of the more economically active households from Birmingham. This means that the conurbation exports its economic success and wealth to the surrounding shires. The SDLPR approach to accommodating housing need is essentially negative, with too much emphasis on protection of the Green Belt, a pessimistic view of housing markets and delivery rates, rather than the positive planning of a major urban area with excellent public transport links into Birmingham.

2.23 It is considered that the provision of a significant level of attractive housing in the Tidbury Green area supported by the market, will produce a strategy that achieves sustainable development, with economic, social and environmental gains being provided jointly and simultaneously by the planning system in accordance with paragraph 8 of the Framework.

2.24 Solihull now has reached a stage in its growth that a planned release of green belt land is necessary – SMBC agree with this. A planned release of green belt is the antithesis of 'unrestricted sprawl'. It has to be acknowledged that in undertaking a planned release of green belt there will be 'encroachment of the countryside'. However, the direction of growth may mitigate the extent of impact on the purposes of Green Belt designation.

2.25 The evidence base in respect of Green Belt relies on the Green Belt Assessment dated 2016. The Site Selection Process Topic Paper (October 2020) sets out that the Green Belt Assessment

undertaken by Atkins “divides the Borough’s Green Belt in to refined parcels defined around the edge of the urban area and the rural settlements, with broad areas covering the remaining more remote Green Belt area. The boundaries of the parcels have been defined using recognisable and permanent physical features, in accordance with the NPPF” (para 28). Each area is assessed against the purposes of the Green Belt.

2.26 Purpose 5, to assist urban regeneration, was not assessed as all parcels are considered to perform equally in this respect.

2.27 The Site Selection Process Topic Paper sets out (para 30) that the Green Belt Assessment “provides a score for each Green Belt parcel depending on the extent to which it performs against each of the above purposes”. Scores are given in relation to their performance against each purpose.

2.28 The individual score for each purpose is also totaled to provide a combined score for each Green Belt parcel. Para 31 of the Site Selection Paper states that “the findings have been used to inform the site selection process where the combined Green Belt scores are interpreted as follows:”

Combined Score	Overall Green Belt performance for site assessment purposes
5 or less	Lower performing Green Belt
6 or 7	Moderately performing Green Belt
8 or more	Highly performing Green Belt

2.29 The ‘Combined Score’ is illustrated on Appendix F of the Green Belt Assessment (**Appendix 6**). Appendix F maps out the combined score of each assessed area. Importantly, what this does

demonstrate it that the land being promoted at Fulford Hall Farm scored an overall score of 6 (moderately performing).

2.30 Solihull have acknowledged that there are exceptional circumstances to justify the release of Green Belt land to meet their proposed housing need. Part of the process in selecting sites, as set out in the site selection process topic paper, is to assess the site against the purposes of the Green Belt. With an overall score of 6 (moderately performing), it is evident that Fulford Hall Farm scores on par or better than the other proposed allocations in the Blythe area (South of Shirley, West of Dickens Heath and South of Dog Kennel Lane).

2.31 This should therefore be taken into consideration when selecting proposed allocations.

3. LOCAL PLAN STRATEGY AND HOUSING REQUIREMENT

Spatial Strategy

3.1 The Local Plan sets out that the “Scope, Issues and Options consultation set out 7 broad options for accommodating growth as follows:

- a) *Growth Option A – High Frequency Public Transport Corridors & Hubs*
- b) *Growth Option B – Solihull Town Centre*
- c) *Growth Option C – North Solihull/Chelmsley Wood*
- d) *Growth Option D – Shirley Town Centre & the A34 Corridor*
- e) *Growth Option E – The UK Central Hub Area & HS2*
- f) *Growth Option F – Limited Expansion of Rural Villages/Settlements*
- g) *Growth Option G – New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements”*

3.2 The Plan acknowledges that “There is extremely limited land available that could contribute towards options A to D and therefore the Council has had to look at options E, F & G (which will require land to be released from the Green Belt)” (para 64 of Local Plan).

3.3 The Council’s strategy is therefore based upon ‘The UK Central Hub Area & HS2’, ‘Limited Expansion of Rural Villages/Settlements’ and ‘New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements’. Solihull have called this a ‘balanced dispersal’ approach, where they have sought to “strike a balance between concentrating

development in a relatively small number of locations and dispersing development over a greater number of locations”.

- 3.4 The Plan also states that the strategy seeks to “focus significant developments in locations that are, or can be made, accessible and sustainable” (para 65 of Local Plan).

Housing Numbers

- 3.5 The Council will allocate land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036.

- 3.6 Solihull are seeking to provide the minimum level of housing need derived from applying the current standard housing methodology (12,912) and only providing 2,105 dwellings to meet the needs of Birmingham (an increase of 105 from the previous draft in January 2019)

- 3.7 The average annual housing land provision target is 938 net additional homes per year (2020-2036).

- 3.8 Paragraph 227 and 228 of the Local Plan states:

227. Solihull is one of 14 local authorities within the Greater Birmingham Housing Market Area (GBHMA). The Birmingham Development Plan (adopted January 2017) recognises that there is a shortfall of 37,900 homes, which needs to be met in the wider GBHMA up to 2031. Under the Duty to Cooperate, the Council has been working with its partners to address this shortfall.

228. *Through the Local Plan Review process undertaken to date, the Council had indicated it would test the ability to accommodate 2,000 dwellings from the shortfall up to 2031. Now that the Council has tested and established an appropriate capacity it is able to confirm the contribution to the HMA as the difference between the identified supply and the LHN. Thus the contribution to the HMA is 2,105 being the difference between 15,017 and 12,912. Thus 15,017 will be the housing requirement for the plan, this equates to an average of 938 dwellings per annum.*

3.9 The Inspector's interim findings 14th December 2018 on the North Warwickshire Local Plan would indicate that SMBC's current approach to meeting Birmingham's HMA need may not be supported by an Inspector at Examination. The following comments of the Inspector are notable:

Policy LP6 sets out the intention to provide a minimum of 5,808 dwellings to 2033. That figure reflects household projections, market factors, and a contribution of 540 dwellings towards unmet needs likely to arise in the Coventry and Warwickshire Housing Market Area. Policy LP6 also sets out the aspiration to deliver 10% of Birmingham's housing needs which the City Council is unlikely to be able to accommodate within its administrative boundaries to 2031. That 10% equates to 3,790 homes.

Whilst determining housing needs is not an exact science, I conclude that the combined total of a minimum of 9,598 dwellings to 2033 represents an appropriate figure for the housing needs of the Borough recognising its wider strategic context (i.e. 5,808 plus

3,790). However, subject to subsequent elements of this note, including in respect of reasonable alternatives, policy LP6 should refer to making provision for a single minimum housing requirement of 9,598.

3.10 The latest update from the Inspector, dated 3rd November 2020 (INSP5B) states “the Birmingham Development Plan was adopted in January 2017. That clarified the extent of the likely housing shortfall that the City Council would be unable to deliver within its administrative boundaries to 2031 (37,900 homes out of 89,000). The North Warwickshire Plan as submitted is premised on seeking to meet 10% of that prospective shortfall”. It is clear therefore that NWBC continues to maintain that 10% is a fair share and the Inspector appears not to have considered this to be inappropriate. Whilst the North Warwickshire figure of meeting 10% of Birmingham’s needs (3,790) may be an ‘aspiration’, clearly this suggests some form of pro-rata approach should be applied. The ONS 2016 mid-year population estimate for North Warwickshire is 63,229 and 211,800 for Solihull. In such circumstances it does not seem unreasonable that Solihull should ‘aspire’ to provide a greater proportion of the HMA shortfall than North Warwickshire, given its proximity to Birmingham and excellent public transport links to the conurbation. Currently the provision of 2,105 dwellings in Solihull equates to 5.5% of the HMA shortfall.

3.11 The SMBC Sustainability Appraisal states (para 5.2.5):

The GBHMA analysis indicated that based on supply assumptions at the time of the Study, and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Greater Birmingham HMA. An agreed position statement across the 14 authorities

confirmed that a significant shortfall exists across the HMA.¹⁵ However, an update position statement in September 2020 indicates that the shortfall to 2031 has been substantially reduced to around 2,600 dwellings, but that there will be a shortfall to 2036 (although the scale of this shortfall is not known).

3.12 Whilst it is acknowledged that the unmet need had reduced in the GBBCHMA to 2031, the SMBC plan period is to 2036. Moreover, the GBBCHMA analysis identified that the shortfall of 28,150 dwellings to 2031 jumped to 60,900 dwellings to 2036, therefore it is reasonable to assume that the unmet need to 2036, in which the SLPR plans for, will be much higher than the 2,600 dwellings to 2031. SMBC have not provided evidence of the unmet need expected to 2036.

3.13 It is therefore considered that Solihull should be seeking to make a higher provision towards the GBBCHMA unmet need than the 2,105 currently proposed.

3.14 On the basis of the above, that determining housing needs is not an exact science, and that meeting a proportion of Birmingham's need is essentially a political decision, we propose that Solihull should seek to accommodate at least 6,000 dwellings of the HMA shortfall, which seems reasonable given the excellent public transport links into Birmingham compared with North Warwickshire.

3.15 Fulford Hall Farm could provide a significant contribution towards meeting part of this shortfall. The merits of this site, and proposed vision, in the context of the Councils Net Zero targets for 2025, are discussed further in section 5.

4. SUSTAINABILITY ASSESSMENT, GROWTH OPTIONS AND ALTERNATIVES

4.1 There are three key areas to consider with regard to the Sustainability Appraisal:

- SA Process/Methodology
- Spatial Strategy and Assessment of Alternatives
- Site Selection Process.

SA Process and Methodology

4.2 The purpose of the SA process is set out in the NPPG [001]:

“This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the plan.”

4.3 Representations previously submitted by JAM Consult, on behalf of Summix (FHS) Developments Ltd, identified flaws in the SA and Site Assessment Frameworks used to assess the impacts of the policies and proposals. The Pre-Submission SA states that (para 2.3.13) *“it is*

considered that the SA Framework remains appropriate, and another formal refresh of the scoping report is not considered to be proportionate to this stage of plan making.”

4.4 Para 1.1.5 of the SA states:

“In summary this SA Report assesses and presents findings in relation to the following key factors:

- *An updated Spatial Strategy (and reasonable alternative options).*
- *Site allocations (and reasonable alternative options)*
- *Supporting plan policies*
- *Potential for mitigation and enhancement.”*

4.5 Since the Draft Local Plan Consultation in 2017 and the Supplementary Consultation in January 2019, the Council have reviewed the level of housing growth required. The review of the housing need has resulted in alternative options to the proposed provision set out in previous versions of the Local Plan. There have also been alterations to the Spatial Strategy (as confirmed above in Para 1.1.5 of the SA). The updated Spatial Strategy includes an increase in the provision of Green Belt sites.

4.6 Para 013 of the NPPG provides a flow chart of the SA process, which shows that the assessment of alternatives should be undertaken at Stage B of the process – ‘Developing and Refining Alternatives and Assessing Effects’. Stage B also corresponds with Regulation 18 of the Local Plan preparation.

4.7 It is therefore considered that all reasonable alternatives need to be assessed in the SA, which should be carried out as part of the Regulation 18 Local Plan Consultation and Stage B of the SA.

Assessment of Reasonable Alternatives

4.8 The Pre-Submission Sustainability Appraisal has looked at new options for housing growth. The Council considered it necessary to review spatial options to account for:

- Changes to the methods to calculate housing need that have been introduced.
- To address cross-boundary issues more explicitly in relation to unmet housing needs from Birmingham in particular.
- Updates to the evidence base and the emergence of new options for strategic growth across the HMA.

4.9 The SA now looks at 13 options which have been split into 6 categories of housing need. The options can be summarised as below:

Alternatives		Growth Scenario	
Alternative 1	Meet Local Needs only (12,912 dwellings)	1a	Existing Local Plan plus limited Green Belt release.
		1b	Existing Local Plan and Local Plan Review Urban sites. Removes UKC Hub from site allocations to show comparison with baseline with some Green Belt release
Alternative 2	Meet Local Needs plus, including an element of HMA shortfall (plus 2000 dwellings)	2a	Existing Local Plan plus limited Green Belt release AND 2,000 at UKC Hub
		2b	2,000 at South of A45
		2c	2,000 at Balsall Common (1 of 3 broad locations surrounding settlement)

Alternative 3	Meet Local Needs plus a higher contribution to the HMA shortfall (3,000 dwellings)	3a	2,500 at UKC Hub and 700 at Amber Sites
		3b	2,500 at South of A45 and 700 at Amber Sites
		3c	2,500 at Balsall common and 700 at Amber Sites
Alternative 4	Meet Local Needs plus a higher contribution to the HMA shortfall (6,000 dwellings)	4a	2,500 at UKC Hub, and 700 at Amber Sites and 3,000 at South of A45
		4b	3,000 at Balsall Common (1 of 3 broad locations surrounding settlement, or mixture of all 3)
Alternative 5	Meet Local Needs plus a higher contribution to the HMA shortfall (9,000 dwellings)	5a	2,500 at UKC Hub, and 700 at Amber Sites and 3,000 at South of A45 and 3,000 at Balsall Common
		5b	6,000 at Balsall Common
Alternative 6	Meet Local Needs plus a higher contribution to the HMA shortfall (12,000 dwellings)	6	2,500 at UKC Hub, and 700 at Amber Sites and 3,000 at South of A45 and 9,000 at Balsall Common

4.10 The SA confirms (para 5.6.1) that “The spatial strategy correlates with Option 2a described above. The housing growth target is therefore 15,017 dwellings, which builds upon the draft Local Plan approach, but increases growth at the UK Central Hub.”

4.11 Section 5.6 of the SA sets out the ‘Outline reasons for the selection of the preferred approach’. However, it remains unclear as to why option 2 was selected over options 3 and 4, particularly given the SA appears to confirm that there is little difference between the conclusions of options 2, 3 and 4 (see table 5.4 of SA ‘Summary of Appraisal Findings for spatial options’.

4.12 The SA growth options only consider specific areas, as set shown by the growth scenarios above.

4.13 NPPG 018 sets out how the SA should assess alternatives:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.”*

4.14 In particular SMBC should have given fuller consideration to the area south of Birmingham around Hollywood, Whitlock’s End and Cheswick Green identified as Location PD5 in the Greater Birmingham Strategic Study (GBSS). Paragraph 8.124 of the GBSS states:

Whilst in part having a strategic role in broadly containing the southern edge of Birmingham, there is a complex settlement pattern which has seen the incremental growth of both the larger settlements and smaller ones across the area resulting in an urbanised character. The introduction of smaller scale additional development is unlikely

to compromise the overall strategic role of the Green Belt in this location, although detailed local appraisal would be required to determine settlement-specific effects and potential to accommodate change.

4.15 It does not appear that area PD5, South of Birmingham has been considered fully as part of the alternatives, and it is unclear as to why this reasonable alternative has not been considered, contrary to NPPG 018. The SA has failed to explain the selection and rejection of the alternative sites.

Mitigation Measures

4.16 Schedule 2 (7) of the regulations sets out the information, which should be included within the SA report, including the requirements for mitigation measures.

“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.”

4.17 The NPPG (NPPG 013) also makes it clear that Stage B of the SA process should include the consideration of mitigation measures:

“Stage B: Developing and Refining Alternatives & Assessing Effects

1. *Test the Local Plan Objectives against the Sustainability Appraisal Framework*
2. *Develop the Local Plan Options including Reasonable Alternatives*
3. *Evaluate the likely effects of the Local Plan and Alternatives*

4. *Consider ways of mitigating adverse effects and maximising beneficial effects*
5. *Propose measures to monitor the significant effects of implementing the Local Plan*

4.18 Stage B should also involve considering ways of mitigating any adverse effects, maximising beneficial effects and ways of monitoring likely significant effects.” (NPPG 017)

4.19 The Pre-Submission SA states at para 7.1.9:

“It should be remembered though that these scores do not take account of detailed mitigation that could be implemented, rather they present the ‘raw data’ for each site to allow for a fair and consistent comparison.”

4.20 Mitigation measures are a key purpose of SEA/SA, as identified by the RTPi Practice Advice Note, 2018. The advice note also provides guidance on the application of mitigation measures:

“Generally site assessment deals with the merits of the existing site, rather than with specific proposals for the site or with different uses of the site. However shortcomings of a site, e.g. a substantial distance from a health centre, may be able to be mitigated through, say, the provision of a new health facility. ‘Mitigation off’ v. ‘mitigation on’ assessment could deal with the problem of larger sites looking more problematic than smaller sites because many services will be further away from them. The ‘mitigation off’ assessment would consider a development’s potential effects based on location alone,

and the ‘mitigation on’ assessment would also consider the mitigation offered by other plan policies or site planning conditions.”

4.21 The SA has failed to consider mitigation measures at all, as acknowledged by the Pre-Submission SA itself, and therefore does not comply with the regulations and guidance. The information used for the selection of the allocations can therefore not be relied upon and does not provide an accurate or robust assessment, which is linked to the evidence available.

Site Selection Process

4.22 Solihull has identified 18 residential allocations, with 16 of them being located within the Green Belt. Sites identified in the Plan are set out the below:

Site Ref.	Site	Residential Capacity	Green Belt (y/n)
Balsall Common Area			
BC1	Barretts Farm, Balsall Common	875 homes	Y
BC2	Frog Lane, Balsall Common	110 homes	Y
BC3	Windmill Lane, Balsall Common	225 homes	Y
BC4	Pheasant Oak Farm, Balsall Common	200 homes	Y
BC5	Trevallion Stud, Balsall Common	300 homes	Y
BC6	Lavender Hall Farm, Balsall Common	80 homes	Y
Blythe Area			
BL1	West of Dickens Heath	350 homes	Y
BL2	Land South of Dog Kennel Lane	1,000 homes	Y
BL3	Whitlock’s End Farm	300 homes	Y
Hampton in Arden			
HA1	Meriden Road, Hampton-in-Arden	200 homes	Y
HA2	Oak Farm, Catherine-de-Barnes	95 homes	Y

Hockley Heath			
HH1	Land south of School Road, Hockley Heath	90 homes	Y
Knowle			
KN1	Hampton Road, Knowle	180 homes	Y
KN2	South of Knowle	600 homes	Y
Meriden			
ME1	West of Meridan	100 homes	Y
North of Borough			
NS1	Kingshurst	86 homes	N
Solihull			
SO1	East of Solihull	700 homes	Y
SO2	Moat Lane Depot	90 homes	N

SA Appraisal of Fulford Hall Farm

4.23 In getting to the point of allocating sites (as above), the sites submitted through the Council's Call for Sites exercise have been assessed as part of the SA.

4.24 A site assessment framework has been established to appraise site options. Each site has been assessed according to how it performs against each of the SA objectives. Site are assessed as having positive, neutral or negative effects consistent with the range below:

- Significant positive effects more likely
- Positive effects likely
- Neutral effects
- Negative effects likely / mitigation necessary
- Significant negative effects likely / mitigation essential

4.25 The Site Selection Process Topic Paper confirms (para 37) that *“the SA site assessment framework is intended to be one of several factors that are taken into account in determining which sites to allocate or not. How a site performs against SA objectives therefore forms part of the site assessment process”*.

4.26 The site at Fulford Hall Farm has been considered within the SA (AECOM ref. AECOM130; SMBC ref. 313).

4.27 The scores of Fulford Hall Farm are summarised below:

Site Name	Proposed Allocations in Blythe Area			
	Fulford Hall Road	South of Dog Kennel Lane	West of Dickens Heath	South of Shirley (Whitlocks End Farm)
AECOM Site ID	130	89	87	224
SMBC Site ID	313	122	126, 130, 176	41
SA1. Regeneration and economic development				
SA2a. Distance to Primary School				
SA2b. Distance to Secondary School				
SA3a. Proximity to bus and train services				
SA3b. Proximity to principal road network				
SA4a. Soil				
SA4b. Minerals				
SA7. Flooding				
SA9. Enhance ecological sites				
SA10. Landscape sensitivity				
SA11. Enhance green infrastructure (2016)				
SA11a: Distance to Greenspace >2ha (2019)				
SA11b: Distance to Greenspace >20ha (1019)				
SA12. Enhance and protect historic assets				

SA14. Amenity	Grey	Orange	Grey	Grey
SA16: Housing Delivery	Green	White	White	Grey
SA17a. Distance to healthcare	Grey	Dark Green	Green	Green
SA17b. Access to leisure facilities	Green	Dark Green	Dark Green	Green
SA19a. Distance to Key Economic Assets	Grey	Green	Grey	Grey
SA19b Distance to convenience stores or supermarket	Green	Green	Green	Green

4.28 If you were to apply a scoring system to the above, of:

- Dark Green = 2
- Green = 1
- Grey = 0
- Orange = -1
- Red = -2

4.29 It can be seen that Fulford Hall Farm scores on par with South of Shirley and only slightly below Dog Kennel Lane.

- West of Dickens Heath = 6
- South of Dog Kennel Lane = 3
- Fulford Hall Farm = 0
- South of Shirley = 0

4.30 Moreover, as set out earlier in these representations, the SA has confirmed that mitigation measures *“to prevent, reduce and as fully as possible offset any significant adverse effects”*

(Schedule 2 (7) of Environmental Assessment of Plans and Programmes Regulations 2004), have not been considered.

4.31 With regard to mitigation, it is considered that a site the size of Fulford Hall Farm provides flexibility in terms of the mitigation package that can be provided. A large-scale site comes with allows any potential significant adverse effects can be designed out through the planning process (i.e. flood risk).

4.32 This point is no more evident than when considering accessibility to public transport. Fulford Hall Farm is located within reasonable walking distance of two train stations (Earlswood and Wythall). However, due to only two services being offered per hour both stations are considered as providing infrequent services.

4.33 A review of local studies and strategies identified that aspirations to increase the frequency of services along the NWR to two per hour (in each direction) (see **Appendix 4**). This would provide a material benefit to the attractiveness of rail travel to and from Tidbury Green, giving users more choice and convenience, and new development in Tidbury Green which can provide additional demand can enhance the business case for rail frequency improvements.

4.34 However, the aspirations for increased frequency along this line will need to go hand in hand with development at Fulford Hall Farm. Providing the footfall (i.e. through new homes) will generate the demand for increased services and providing increased services will generate a demand for increased footfall.

4.35 With regard to improvements to Wythall and Earlswood Stations, Network Rail have confirmed that they are “actively working with 3rd parties that have a desire to invest in the network.

Therefore, Network Rail is welcoming of funding to enhance the station facilities to serve the community and improve the interface and accessibility between the station and the local area” – see **Appendix 7**.

4.36 It is considered that the failure of the Council to consider mitigation has skewed the SA and site selection process in a way that penalises more sustainable sites which will benefit from mitigation.

Site Selection Process Topic Paper

4.37 The Site Selection Process Topic Paper adopts a two-stage approach as set out at para 40 of this document. Stage 1 takes a site hierarchy criteria approach, based on guidance within the National Planning Policy Framework (NPPF) and seeks to promote more sustainable sites ahead of those with less sustainable credentials. As the text notes at paragraph 42 *“This seeks to provide a balance and favours brownfield sites, accessible sites and sites which only impact on lower performing Green Belt to determine a site’s potential”* [original emphasis]. Each site is given a ‘priority’ score on a scale of 1 to 10 (1 being more prioritised, 10 of least priority) (see below table), with further interpretive guidance provided in the ‘Additional Description’ column within the table on page 12. Such an approach is, of course, right and proper to promote sustainable forms of development.

Priority	Category	Additional Description	RAG
1	Brownfield in urban area or settlement	Non Green Belt previously developed land (PDL) (i.e. brownfield in urban area/settlement)	G
2	Greenfield in urban area or settlement	Non Green Belt non PDL not in beneficial use (or where the impact on the beneficial use can be mitigated) (i.e. greenfield site in urban area/settlement)	G

3	Brownfield in accessible Green Belt location	Green Belt PDL in highly/moderately accessible location (i.e. located on edge of or in close proximity to urban edge/settlement boundary)	G
4	Greenfield in accessible Green Belt location with committed development	Green Belt non PDL in highly/moderately accessible location and being lost (or largely lost) as a result of committed development.	G
5	Greenfield in accessible lower performing Green Belt location	Green Belt non PDL in accessible location. Lower performing Green Belt will generally have a combined score of 5 or less in the Strategic Green Belt Assessment (GBA)	Y
6	Greenfield in accessible moderately performing Green Belt location	Green Belt non PDL in accessible location. Moderately performing Green Belt will generally have a combined score of 6 or 7 in the GBA	B
6a	Greenfield in urban area or settlement	Non Green Belt, non PDL in beneficial use (i.e. greenfield site in urban area / settlement with no or only limited potential to mitigate loss of the beneficial use.	B
7	Greenfield in accessible highly performing Green Belt location	Green Belt non PDL in accessible location. Higher performing Green Belt will generally have a combined score of 8 or more in the GBA	B
8	Brownfield in isolated Green Belt location	Green Belt PDL in isolated location, i.e. poorly accessible (other than by car) to retail, educational & medical services.	R
9	Greenfield in isolated lower/moderately performing Green Belt location	Green Belt non PDL in isolated location. Lower/moderately performing Green Belt will generally have a combined score of 7 or less.	R
10	Greenfield in isolated highly performing Green Belt location	Green Belt non PDL in isolated location. Higher performing Green Belt will generally have a combined score of 8 or more.	R

G – Allocation

Y – Potential allocation

B – Unlikely allocation

R – No allocation

4.38 Stage 2 ‘Site Refinement’ provides a more detailed consideration of potential sites against various ‘factors’. The factors which sites will be considered is set out at para 49 (see also below table) which essentially seeks to establish a potential level of ‘harm’ that may result from the development of that particular site.

4.39 Para 52 of the Site Selection Process Topic Paper states: *“The analysis in step 2 has been used principally to confirm whether ‘potential’ allocations in step 1 (yellow) should be included as green sites, and whether ‘unlikely’ allocations (blue) should be included as red sites in the site assessment process.”*

Factors in favour	Factors against
<ul style="list-style-type: none"> • In accordance with the spatial strategy. • Any hard constraints only affect a small proportion of the site and/or can be mitigated. • Site would not breach a strong defensible boundary to the Green Belt. • Any identified wider planning gain over and above what would normally be expected. • Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt. • If finer grain accessibility analysis shows the site (or the part to be included) is accessible. 	<ul style="list-style-type: none"> • Not in accordance with the spatial strategy. • Overriding hard constraints that cannot be mitigated. • SHELAA category 310 sites unless demonstrated that concerns can be overcome. • Site would breach a strong defensible boundary to the Green Belt. • Sites that would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt. • If finer grain accessibility analysis shows the site (or the part to be included) is not accessible. • If the site is in a landscape character area that has a very low landscape capacity rating. • If the SA identifies significant harmful impacts.

4.40 Having scored ‘9’ and therefore categorized as ‘R’, Fulford Hall Farm is not included within the step 2 assessment.

Assessment of Fulford Hall Farm, Tidbury Green

4.41 Fulford Hall Farm is given the site reference 313. The site is score ‘9’ with regards to Step 1 of the site selection process and therefore considered not suitable for allocation.

4.42 A score of '9' is considered to be “*Green Belt non PDL in isolated location. Lower/moderately performing Green Belt will generally have a combined score of 7 or less*”, as per the step 1 site hierarchy criteria table.

4.43 However, the site assessment (**Appendix 8**) commentary of Fulford Hall Farm states:

The site is within a moderately performing broad area of Green Belt, but highly performing for purpose 3: 'to assist in safeguarding the countryside from encroachment.' The site lies within a landscape character area of high sensitivity, medium landscape value, and very low capacity to accommodate change. The site has variable accessibility, which is higher to the west and lower to the east. Development would result in a disproportionate expansion to the settlement of Tidbury Green and would result in an unacceptable incursion into the countryside.

The Contribution to Purpose 3 of the Green Belt designation (safeguarding the countryside from encroachment)

4.44 The site assessment evident states that the site is a moderately performing in terms of Green Belt (with the exception of purpose 3).

4.45 Assessment of the Borough’s Green Belt is made within the Solihull Strategic Green Belt Assessment (July 2016) produced by Atkins. Findings from this document are taken forward to inform judgements made within the Sites Assessment.

4.46 The Green Belt Assessment makes the distinction between 5 ‘broad areas’ and 89 ‘refined areas’ of land for assessment, assigning a score between 0 (no performance) to 3 (higher performance) when considered against the four purposes of Green Belt (purpose 5 is not considered).

4.47 We have a number of concerns with the robustness and methodology used for assessment within this document. In relation to the Fulford Hall Farm site the Green Belt Assessment classifies it within ‘Broad Area 1’ which covers an area from Wythall in the west to Hockney Heath in the east (page 9). All Broad Areas are automatically given a score of 3 (the highest rating) “by virtue of their character and location all Broad Areas are considered to make an equal contribution to purpose 3 ‘Assist in safeguarding the countryside from encroachment’ and were therefore all assigned a score of 3 against this purpose” (page 9 para 3). We contend this is a fundamentally flawed and unsound judgement, lacking the detail needed of a district level assessment and artificially inflating the contribution of the Fulford Hall Farm site to the safeguarding of the countryside Green Belt purpose.

4.48 We stand by our detailed assessment of the potential effect to Green Belt provided within the Green Belt, Landscape and Masterplanning Report produced by LDA Design which recognises there would be a limited impact on purpose 3 of the Green Belt designation but it would not undermine the performance of remaining Green Belt in the safeguarding the countryside from encroachment of built form.

Accessibility

4.49 The accessibility assessment uses a scoring system (as set out at tables 4-1 and 4-2 of the report) to calculate an accessibility score for each site.

4.50 The accessibility scores for each site are based on distance from various facilities/services.

Table 4-1 - Scoring for Accessibility to Local Facilities

Band	Primary School	Food Store	GP Surgery
Policy P7 Accessibility Criteria (up to 800m) and provision of new facilities	100	100	100
Relaxation 1 (up to 1000m)	80	80	80
Relaxation 2 (up to 1200m)	60	60	60
Beyond (over 1200m)	5-50*	5-50*	5-50*

Table 4-2 - Scoring for Accessibility to Public Transport Services

Band	Primary School	Food Store
Policy P7 Accessibility Criteria (up to 400m for bus and 800m for rail) and provision of new facilities	100	100
Relaxation 1 (up to 500m for bus and 1000m for rail)	80	80
Relaxation 2 (up to 600m for bus and 1200m for rail)	60	60
Beyond (over 600m for bus and 1200m for rail)	5-50*	5-50*

* Those which were beyond the greatest relaxation, were banded and given a score within the bands defined in Table 4-2 based on distance to the nearest facility, relative to the other sites

4.51 Para 4.3.3 states *“The accessibility score for local facilities and the accessibility score for public transport have been added together to provide a total accessibility score for each potential*

housing site. The 324 sites have then been ranked according the total accessibility score. The higher the accessibility score, the more accessible the site is deemed to be.”

4.52 The score applied to Fulford Hall Farm is set out below:

	Acc. To Local Facilities			Acc. To Public Transport		Suitability of Walking and Cycling Routes	
Site Ref.	Pri. School	Food Store	GP Surgery	Bus	Rail	Footway and Cycling along frontage	Total Score
313	100	80	30	25	45	No footway provision along frontage	255

4.53 Figure 1e of the accessibility assessment illustrates on a map the areas within an 800m walk of a rail station which is served by at least three services per hour in either direction during peak periods.

4.54 With regard to the reason for requiring at least three services per house, the accessibility assessment states (section 2.6):

To examine access to Rail Services, Railway Stations within the Borough and up to 800m beyond the Solihull Borough Boundary were included in the study. Policy P7 states that proposed housing developments should be located within an 800m walking distance of a Railway Station providing high frequency services (three or more per hour during peak periods) to local/regional employment and retail centres.

Following instruction from SMBC, only those Railway Stations which had at least three services per hour (07:00-08:00, 08:00-09:00, 16:00,17:00, and 17:00-18:00) in at least one

direction during the peak periods (07:00-09:00 and 16:00 to 18:00) were included within this assessment.

- 4.55 This criterion therefore excludes Wythall Station and Earlswood Station, which both offer two services an hour. These two stations are also located within 800m of Fulford Hall Farm.
- 4.56 Vectos have also produced a West Midlands Rail Aspirations Study (**Appendix 4**) in relation to the potential increased opportunity for rail travel from Tidbury Green as a result of the West Midlands Rail Executives (WMRE) aspirations.
- 4.57 Wythall rail station is directly west of Tidbury Green and is connected to Tidbury Green via a pathway. It has a bus stop with one service that passes through Tidbury Green which operates once per hour.
- 4.58 Wythall rail station is an attractive and accessible rail station for residents of Tidbury Green, which could be further enhanced with improved station facilities, including additional cycling parking, and improved connectivity in the form on enhanced bus services.
- 4.59 Earlswood rail station is to the southwest of Tidbury Green. It has no pedestrian provision or bus services to it from Tidbury Green.
- 4.60 The accessibility of Earlswood rail station, particularly for residents living to the south of Tidbury Green, could be enhanced through improved cycle provision at the station and improved bus connectivity.

- 4.61 A review of local studies and strategies identified that aspirations to increase the frequency of services along the NWR to two per hour (in each direction). This would provide a material benefit to the attractiveness of rail travel to and from Tidbury Green, giving users more choice and convenience, and new development in Tidbury Green which can provide additional demand can enhance the business case for rail frequency improvements.
- 4.62 The line already has the infrastructure (dual track, two way platforms) in place to support more services, money has been spent on upgrading stations along the line in recent years (2011), and demand for this rail line is expected to grow. Therefore, the increase in services should be achievable.
- 4.63 Tidbury Green is well placed to a well-developed rail network. The proposals to increase the frequency of service from hourly to bi-hourly will further enhance the rail credentials of Tidbury Green. New development in Tidbury Green can provide the additional demand to help support and justify the increase in service frequency.

Visual Sensitivity

- 4.64 The Solihull Borough Landscape Character Assessment (2016) produced by Waterman provides a consideration of the landscape character of the Borough. The assessment identifies 10 landscape character areas across the Borough, assigning each a sensitivity and capacity rating and providing guidelines for their future management.
- 4.65 The Fulford Hall Farm site is classified within 'LCA2: Southern Countryside' which covers an area of approximately 14km² to the south of Birmingham. The assessment identifies a number of key characteristics of LCA2 which include the "*strong hedgerow boundary structure across the*

majority of the area” (page 22 bullet 9) and also the *“great influence on the character of the area”* Tidbury Green has, *“acting as a gateway between the urban southern fringe of Solihull and the more rural south”* (page 22 photograph 2.3).

4.66 Whilst the document generally appears sound in its identification and description of character, we contest the methodology used to establish visual sensitivity which appears muddled and weakly justified with no explanation of how the ‘classification criteria’ have been assessed or judged (page 82 Table A.2). The assessment concludes the visual sensitivity of LCA2 to be ‘high’ – the highest possible category despite the assessment recording *“urban influences prevail near the urban edge of Solihull. Sub-urban influences are also present in and around Tidbury Green”* (page 22 para 3). The conclusion of high visual sensitivity appears to be principally based on the presence of ancient woodland within the LCA2 and the Stratford-upon-Avon canal, none of which are within the Fulford Hall Farm site.

4.67 The overestimation of visual sensitivity and consequently reduction of landscape capacity, compounded with flaws in the Green Belt Assessment has led to, in our view, the unfair discreditation of the Fulford Hall Farm site within the Site Assessment Report. It is our view, supported by the detailed and robust evidence of the Green Belt, Landscape and Masterplanning Report produced by LDA Design, the Fulford Hall Site is visually well contained, capable of accommodating appropriately designed development and any potential visual impacts that may arise would be limited in extent.

Hard and Soft Constraints

4.68 The Site Assessment lists the following ‘hard and soft constraints’ at Fulford Hall Farm.

Hard Constraints:

- Adjacent to Listed building in western part
- Listed building within eastern part
- Proximity to SSSI in southern part
- High pressure gas pipeline inner zone to south-east corner

Soft Constraints:

- Flood Zones 2 and 3 on western edge of site around River Cole
- Contaminated land on small part of site
- Overhead cables
- PROWs SL91, SL86 through the site
- Existing commercial uses on site in eastern part
- Habitats of wildlife interest

4.69 Whilst these constraints are acknowledged, they are not unusual when it comes to large scale sites. It is considered that the ‘hard’ and ‘soft’ technical constraints identified can be overcome with suitable design.

Conclusion on Site Assessment of Tidbury Green

4.70 It appears logical to categorise the Fulford Hall Farm site as priority 6 – “Greenfield in accessible moderately performing Green Belt Location” and not priority level 9 as concluded by SMBC contrary to its own evidence base. This is, in our view, a significant error in the level of priority that should be afforded to the Fulford Hall Farm site.

4.71 It is our view important judgements made in relation to Green Belt and Landscape within the Stage 2 assessment have been made based on un-robust evidence.

4.72 In addition to the above, it is our view the Stage 2 assessment of the Sites Assessment Report lacks transparency and robustness in the way it draws all of the matters for consideration together and balances them in the decision-making process. Whilst it is of course appropriate to draw on the findings of supporting assessments produced as part of the evidence base, these are balanced and concluded in space of less than a page within the Sites Assessment document with little explanation. This is, in our view, not sufficient to provide a robust justification as to why a site has been taken forward or not.

5. VISION FOR FULFORD HALL FARM, TIDBURY GREEN

- 5.1 The vision document has been prepared by Icen Projects on behalf of Summix Ltd. It sets out a series of design interventions and aspirations for the development based on established sustainable development principles that will encourage sustainable behaviour for new residents. The document and accompanying framework anticipates how changing lifestyles will affect the built environment over the coming decades.
- 5.2 This approach embraces environmental, climatic, technological, social and economic resilience, aiming to future proof the development and provide flexibility to accommodate design changes resulting from new ways of living, working and playing. It provides a high-level vision for the planning, design and delivery framework required for the project.
- 5.3 The Draft Submission Plan is ambitious in its targets for addressing climate change. Proposed Policy P9 'Mitigating and Adapting to Climate Change' seeks at paragraph 2i to *"Locate development where it minimises the need to travel, particularly by private vehicle, and maximises the use of sustainable forms of transport such as cycling, walking, public transport"*.
- 5.4 Paragraph 3ii requires *"From April 2025 for all new dwellings to be net zero carbon"*.
- 5.5 One of the objectives of the draft submission plan is to *"Reduce the Borough's net carbon emissions, and make a full contribution to the national, sub-regional and local targets for reduction – including to be at net-zero emissions by 2041"*.

- 5.6 Summix welcome the ambitiousness of Solihull in seeking to address Climate Change. It is within this context that the proposals for Fulford Hall Farm have evolved.
- 5.7 The Vision Document demonstrates how Summix can create a new neighbourhood that addresses the zero carbon aspirations for Solihull, providing detailed evidence to reinforce Summix's intent to develop an exemplar approach in not only delivering zero carbon homes, but also addressing wider emissions from the lifestyles of new residents through their day-to-day activities.
- 5.8 The land at Fulford Hall Farm, Tidbury Green is capable of delivering at least 1,200 homes. The illustrative masterplan (shown within the vision document – **Appendix 1**) shows the potential to provide a primary school, one Primary local centre; and two Secondary local centres.
- 5.9 The Masterplan provides information on the potential number of dwellings, mix of uses, transport opportunities and tree planting.
- 5.10 Through the principles of zero carbon building design, sustainable transport interventions and extensive tree planting, the development will go beyond zero carbon buildings to deliver a zero-carbon masterplan, accounting for carbon emissions from transport and carbon sequestration from tree planting. Through the adoption of passive design principles and electric heat pumps, the new homes will achieve significant reductions in carbon dioxide emissions.
- 5.11 Residual emissions will be offset to zero through the use of solar panels to generate zero carbon electricity on site. All buildings will be fossil fuel free, providing a development that is ready for

the 2050 net zero carbon economy, and contributing to Solihull's objective to be a zero-carbon borough by 2041.

5.12 Sustainable transport measures will provide considerable reductions in emissions when compared to a 'standard' development, facilitating the switch to electric vehicles and active transport measures. Residual transport emissions will be offset by extensive tree planting. The 9.2ha of green space is estimated accommodate nearly 14,000 new trees which will absorb approximately 750 tonnes of carbon dioxide per year.

5.13 The new masterplan will enable a collective identity of low impact lifestyles. The interventions will encourage the community and residents to not only adopt more sustainable lifestyles but will allow them to monitor their impacts. As such, this approach has the potential to act as a 'pathfinder' project for SMBC, demonstrating how their zero-carbon intent can be delivered more widely across the borough.

Mobility

5.14 The unique blend of size, location and proximity to two mass transit nodes, delivering people into not just the heart of Birmingham City, but a part of the City destined for substantial HS2 related economic growth, makes this site special.

5.15 The policy thrust is that all new development should be focussed in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access. It is to reduce transport's impact on our environment, improving air quality and reducing carbon emissions. To do this it seeks to ensure that walking and cycling are a safe and attractive option

for many journeys, and that development is located in the most sustainable locations, these being close to mass transit corridors.

5.16 The COVID 19 pandemic has accentuated the need for new large-scale development to be designed in these ways, to be resilient to crises by maximising local living, and to be easily accessible from and to mass transit and other shared travel systems. The pandemic has accelerated the intergenerational and behavioural trends that were evident pre COVID, and larger developments, such as Fulford Hall Farm, have the opportunity to take best advantage of that.

5.17 The proposed Mobility Strategy seeks to focus upon accommodating people movement and providing safe and efficient active travel routes to key local amenities. The Mobility Strategy therefore adopts the approach of prioritising movement in this order:

- Virtual mobility
- Active travel
- Shared travel
- Single occupancy car travel

5.18 Walking and cycling corridors within the site will link to adjacent development areas and the town centre. These corridors will also provide linkages to existing public transport facilities in the vicinity of the site.

5.19 The site's location offers travel choice and inclusive mobility for all modes of travel which will aid in promoting social inclusion and sustainable mobility habits from the outset.

Net Zero Policy Framework

5.20 As discussed above, the Solihull Local Plan is ambitious in its targets for achieving zero carbon development. It is therefore considered appropriate to propose a policy framework for development at Fulford Hall Farm:

Suggested Policy BL4 – Fulford Hall Farm

1. The Site is allocated for at least 1,200 dwellings on land identified on Plan 1 **(Appendix 9)**
2. Development of the site will be broadly consistent with the vision and objectives of the Local Plan, in particular policies set out below and the Fulford Hall Farm Vision document:
 - a. Policy P7 (Accessibility and Ease of Access)
 - b. Policy P8 (Managing Travel Demand and Reducing Congestion)
 - c. Policy P9 (Mitigating and Adapting to Climate Change)
 - d. Policy P10 (Natural Environment)
 - e. Policy P15 (Securing Design Quality)
 - f. Policy P19 (Range & Quality of Local Services)
 - g. Policy P20 (Provision for Open Space, Childrens Play, Sport, Recreation and Leisure)
3. Development at Fulford Hall Farm will as a minimum accord with Policy P9 ‘Mitigating and Adapting to Climate Change’ for all new dwellings to be net zero, and the development as a whole will achieve a net zero target.
4. The masterplan, as set out in the Fulford Hall Farm Vision document, will: reduce the need to travel by car, which will minimise carbon dioxide emissions at source, through reduced vehicle and building emissions; generate zero carbon electricity from renewable technologies; and make provision of approx. 9ha of land for new tree planting to absorb carbon dioxide from the atmosphere.
5. Detailed sitewide carbon analysis will include assessment of the carbon sequestration potential of the planting within the landscape and tree avenues.

6. Development will have regard to the site-specific Sustainability Framework within the vision document.
7. Infrastructure requirements will include:
 - h. Primary school
 - i. 1 primary Community Hub (including mobility hub);
 - j. 2 secondary Community Hubs;
 - k. Measures to facilitate non car access to nearby rail stations; and
 - l. Formal and informal open space provision.

6. Conclusions

6.1 In summary, and based upon the evidence presented in the above reports there are important objections to the Solihull Local Plan approach that must be addressed:

1. The SMBC approach does not give proper consideration to the strategic role and function of the West Midlands green belt
2. The SDLPR does not make a satisfactory provision towards meeting the needs of Birmingham.
3. Its assessment of the potential for land within the Borough to accommodate new housing development is flawed.
4. Its assessment of the potential for land within the Green Belt in Solihull to accommodate additional dwellings (the Atkins (2016) Green Belt Assessment technical paper) is flawed, and fails to adequately consider the capacity of the housing market in Solihull to absorb higher levels of new housebuilding over the plan period
5. Acknowledging that any more substantial release of Green Belt land in Solihull would require additional infrastructure to that proposed in the SDLPR, the evidence base fails to consider reasonable alternatives that could deliver the necessary levels of development
6. SMBC should have considered in more detail the opportunities that exist to the south of Birmingham around Hollywood, Whitlock's End and Cheswick Green (Location PD5 identified in the Strategic Growth Study. It does not appear that area PD5, South of Birmingham has been considered fully as part of the alternatives, and is unclear as to why this reasonable alternative has not been considered,

contrary to NPPG 018. The SA has failed to explain the selection and rejection of the alternative sites.

7. The SA has failed to consider mitigation measures at all, as acknowledged by the Pre-Submission SA itself, and therefore does not comply with the regulations and guidance. The information used for the selection of the allocations can therefore not be relied upon and does not provide an accurate or robust assessment, which is linked to the evidence available.
8. The failure of the Council to consider mitigation has skewed the SA and site selection process in a way that penalises more sustainable sites which will benefit from mitigation.

6.2 Having regard to the above, it is considered that the SDLPR is unsound in terms of paragraph 35 of the Framework. Consequently, we conclude on the basis of these submissions that the Council should consider the release of land at Fulford Hall Farm, Tidbury Green from the Green Belt and the allocation of this land for development.

6.3 The changes that we consider should be made to the plan to make it sound are:

- To undertake further joint work with relevant adjoining authorities to ensure the duty to co-operate is properly discharged including evidence of joint working and an indication of how any shortfall in meeting objectively assessed housing needs will be met.
- To increase the amount of housing to be accommodated within the Borough, to a figure significantly higher than the 15,017 in Policy P5 for the period 2020-2036,

ideally to accommodate at least 1,200 dwellings on Sustainable Urban Extensions removed from the Green Belt south of Tidbury Green.

- To undertake a reassessment of the Green Belt options considered in the SDLPR, stating that it is necessary to remove land at Fulford Hall Farm, Tidbury Green from the Green Belt to meet the current and longer-term development needs of the Borough, and that this area will be allocated for development in the plan in accordance with the NPPF
- To identify a robust long-term Green Belt boundary around Tidbury Green taking account of the exceptional circumstances arising from the Borough's development needs to remove areas suitable for development to meet those needs whilst retaining in the Green Belt land which serves Green Belt functions and protects its strategic role in a West Midlands context
- To make any consequential changes to plan wide policies arising from the above
- The SDLPR is not sound. It is not positively prepared, not justified, not effective and is inconsistent with national policy. These submissions and accompanying reports provide an explanation of these objections