



**Friends of  
the Earth**

**West Midlands**

Solihull Local Plan Review  
Solihull MBC  
Council House,  
Manor Square,  
Solihull  
B91 3QB

12<sup>th</sup> December 2020

### **Solihull Local Plan Review**

To whom it may concern

West Midlands Friends of the Earth(WMFOE) would like to thank Solihull MBC for the opportunity to comment on its local plan. There is much in this plan that is supported and welcomed.

Solihull MBC has shown leadership locally and nationally with respect to Climate Change. Solihull MBC declared a climate emergency on 8<sup>th</sup> October 2019. Solihull MBC has recently committed its support UK 100's [Net Zero Local Leadership Club](#) and leader of the council Cllr Ian Courts presented at their conference on December 10<sup>th</sup> 2020. It is noted that, as yet, not all of the West Midlands local authorities have signed up.

The era of translating words into deeds is upon us.

It is up to local government to go further than national government when it is not providing the tools to enable strong action to be taken. The NPPF could and should go further however that is not to stop a local plan outstripping the NPPF by not seeing it as a bar that has to met but a level which does not show enough ambition. Has Solihull MBC considered adopting the UN Sustainable Development goals as part of its local plan? As the [RTPI has](#) noted "in the absence of a clear and coherent approach nationally it is likely that local authorities (and the planners working in them) will continue to take the lead in seeking to deliver the SDGs and achieve the goal of Sustainable Development."

There is also the area of monitoring to be considered. Since declaring a climate emergency how many planning applications which do not show enough ambition have been passed? Should not conditions be used to enable more progress to take place locally all across the borough. While the Climate Emergency 8<sup>th</sup> October 2019 only covers the operations of the council it should be a declaration to which all business and residents of the borough are also committed. The council must work with all partners to deliver on its ambitions. This local plan is an opportunity to ensure that this happens.

The plan needs to have much stronger terms by which it can be measured; it is all well and good to minimise but what is required is true reduction. This is a plan for growth and as such minimise could enable an increase in a certain activity such as car usage. The policy should be to reduce from a level at a certain time, monitor and then reduce again.

**West Midlands Friends of the Earth**  
The Warehouse Allison Street Digbeth Birmingham B5 5TH

One area in which the Solihull Local Plan should be questioned is on the crucial issue of Climate Change. The local authority is very vociferous in terms of saying what it is doing BUT when it comes to actions there seems to be a disconnect within this plan. This relates to the scale of development, the location of development, increasing sprawl and car dependency.

There is also a huge danger of this plan being out of date before it is examined, let alone printed. The pandemic of 2020, COVID 19, will have a huge effect upon planning and how we enable much more sustainable communities to evolve. The primary aim of this should be increased development within the existing urban form and the conversion of much outdated shopping centres into housing. There are within the borough many car dependant shopping venues which should be surplus to requirement. They occupy valuable land which is being badly used currently and should make way for high quality, low or even positive carbon housing.

The UK Government has recently stepped up its climate ambitions in which it aims for at least 68% reduction in greenhouse gas emissions by the end of the decade, compared to 1990 levels. Will this plan achieve the Solihull contribution to help the UK meet this target? On December 12<sup>th</sup> at the virtual climate conference to mark 5 years since the Paris accords the need for urgent action was mentioned repeatedly.

As such this plan should be viewed as unsound.

While there are numerous statements on reducing and minimising climate change emissions however given the huge amounts of growth within the plan will not the boroughs overall climate change emissions increase significantly. There will be a huge amount of concrete used in many of the infrastructure projects within this plan. How are those emissions assigned within the borough's plans and climate objectives? While the airport may be quiet currently as the issues surrounding COVID 19 alter will operations increase once again and where are the climate implications of those operations be accounted for within the plan for the future of the borough? How does the local plan fit in with the Climate Emergency Statement of Intent signed on 19<sup>th</sup> October 2019?

### **Level of Development**

The level of development proposed across Solihull will impact on the choices being made with regards to the location of development, particularly housing. The housing need identified in the plan is set out in Para 217 and the approach to meeting it is set out in para 218. The plan includes additional land for 5,270 homes.

This is based on the Government's Standard Methodology for establishing need but also allows for additional growth at UK Central (something which could be argued is double counting) as well as relying on assumptions made about the available supply of housing, including the level of windfall supply, densities and the level of development with planning permission that is not completed.

The justification for this level of housing would need additional work to test. In particular, the potential issue of town centre regeneration and the impact that might have on Solihull, especially given the likely acceleration of changes to retail patterns post-COVID-19, which is something that should be considered further in terms of additional housing capacity. There may also be opportunities to increase other areas of supply in considering windfalls, density and other supply-side issues.

There is a further issue in that the New Standard Methodology, which is more dependent on an 'affordability' calculation, would increase the annual housing need from 807 dwellings per annum (dpa) to 1011 dpa. This could lead to higher levels of housing requirement. That methodology has been subject to consultation and, as things stand, the Government has said it is minded to change the 'algorithm' to encourage town centre development.

As Robert Jenrick, Secretary of State for Housing, Communities and Local Government said in the House of Commons on the 16 November 2020, their review would, he thought, 'lead us to a different approach to distributing housing numbers across the country' so it does not seem to be a firm basis for decision making at this time.

## **Distribution of Development**

In seeking to meet the identified level of need, the Council has considered a number of options for locating housing. These are set out in Para 62 of the Plan. Options A-D are broadly urban brownfield approach, while Options E-G require incursions into the countryside (which is also Green Belt). The Council claims in Para 63 that there are 'extremely limited' options in looking for land. However, this is something which may be open to challenge. The issues set out above regarding Urban Regeneration would come into play.

However, even Options E-G are not homogeneous and there are choices about how much the plan relies on UK Central, on Urban Extensions and on Extensions to settlements outside the conurbation, such as Dickens Heath, Balsall Common, Knowle and Dorridge. There the need to travel and reliance on the car are likely to be higher, even taking account of some rail provision. Without examining this in detail there seems to be a significant reliance on housing development at the edge of those settlements. If additional capacity could be identified within the urban area this could mitigate the need for these sites.

Then there is the possible increase in the density of housing development on these sites. One might wish to consider this in relation particularly to UKCentral which is more closely linked to the NEC and Airport.

In terms of industrial development there are some existing green field business parks, but they are largely fixed with some additional development close to the Jaguar Plant. Access to these sites is clearly important. While the location of housing is likely to have the biggest impact on traffic growth and hence CO2 emissions these sites also need to be considered.

## **Transport Growth**

The plan includes a section on transport. This includes reference to the HS2 proposals which has huge climate change implications. The plan refers to bypasses of Balsall Common, Hockley Heath and Knowle (Para 282). Further examination of the supporting transport evidence would allow a more in-depth consideration both in terms of the need for these bypasses and the likely traffic impacts of the proposed housing sites, which may undermine their benefits.

More positively the plan includes positive policies in relation to sustainable transport, as well as emphasis on Rapid Transit and Metro (Para 281) and four key projects are set out in Policy P8A. Clearly, these have a role to play, especially given the level of development around the Airport/NEC/UKCentral and there it will also be important Post-COVID-19 to ensure a recovery of Public Transport Usage. However, it is likely that the impact of growth from development (which could be scrutinized via the Solihull Traffic Impact Assessment Report which is among the supporting documentation to the Plan) would be the most pressing issue for Climate Change and may undermine such positive transport policies with huge increases in car usage.

## **Design of Development**

There are accompanying 'Concept Masterplans' for development, which seem largely to have been provided by developers. At least some of them, particularly those in less accessible locations, appear to be designed on a largely traditional cul-de-sac, car orientated and non-permeable basis.

The exact design is, of course, an issue which is determined during the planning process itself. However, it seems to me that the overall approach of the Plan to design and embedding sustainable travel and other design features which favour reducing CO2 emission, is something that needs to be included in individual policies, especially if the Planning Reforms anticipated in Planning for the Future come into place which would reduce opportunities for input once development is given general approval.

There is also the related issue of access to services as some sites will be on the edge of settlements with limited services. This applies to both the lack of services already and whether new services will be provided on the site itself

### **Direct Policies to Mitigate Climate Change**

Policy P9 largely covers the direct policies on Climate Change Mitigation and this includes improving energy efficiency, district energy and new renewable energy sources. It is noted that this is not directly linked to the various issues raised above and is largely about how things are built. Given that development patterns could themselves have significant impacts on climate change this may be something that needs addressing, especially if it is not covered by other policies within the plan or addressed in the Sustainability Appraisal.

Energy policies should show real ambition. There are a large number of roof spaces across the borough upon which renewable technologies could be placed for the generation of solar power both electricity and hot water. It is all well and good for certain targets in new developments which of course should be more ambitious but the existing roof spaces should also be considered especially when plans for refurbishments and alterations come forward.

While the opportunity for certain forms of renewable energy production may be limited by the Green Belt nature of much of the surrounding countryside yet the Green Belt in many places is being sacrificed to meet growth.

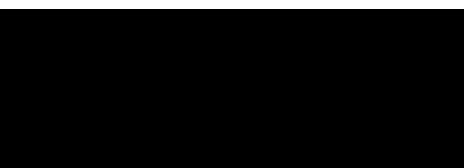
While the plan refers to district heating the policy refers to expecting 'major developments, particularly in Solihull Town Centre and the UKC Hub Area, to connect to or contribute towards existing or planned district energy and/or heat networks.' By putting the emphasis on those areas, where density is higher and there is more commercial involvement, this could allow other large developments, particularly housing, to continue with current energy approaches.

In terms of resource management there does seem to be some determination to move up the waste hierarchy and to cover all forms of resource management'. Indeed the title of the policy Resource Management is a huge step forwards. Why, then, are there no policies covering biogenic wastes and the use of Anaerobic Digestion to remove biogenics, organic matter, from the residual waste stream and create a new source of energy generation. Will all biogenic resources arising from within the borough be treated by composting or will AD be deployed? It is essential that as the volumes in this stream reduce, as they should if the reduction policies are successful, modular treatment is employed so as capacity can be reduced. There is mention in the Solihull Plan as to the dependency of the borough on the waste of energy facility in Coventry. While this may fulfil a financial issue it does conflict with the proximity principle as per para 350 "*National guidance expects communities to take more responsibility for managing their own waste, which can be equated to managing an equivalent tonnage of waste to that arising in their areas.*" There is no mention that food waste will have to be collected separately from 2023 and this should then be treated locally. This will require treatment facilities within the borough during the lifetime of this plan.

Could the principles of P15, Securing Design Quality, also be applied to application for alterations and redevelopment?

Thank you for the opportunity to partake in the formulation of the plan and WMFOE look forward to future involvement.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Chris Crean  
On behalf of West Midlands FOE