

- No Sources or dates are stated for the data in the infographic.

2

Our Borough

- The plan doesn’t make decisions. It is incorrect to phrase it in such a way. The decisions are made by the elected members on the Council, with only one group supporting this plan.

4

It wouldn’t be a local plan if it didn’t have difficult decisions to make

- This plan does not significantly boost the supply of homes for “all our communities”. It does so for some, disproportionately, and not for others.

4

The clear message from Government is that we must significantly boost the supply of homes for all our communities

- This plan is incompatible with the Climate Emergency and the pledges that the Council has made in that respect.

4

deliver a net zero carbon future we have to deliver this plan

- This is patently not true. There are options that involve greater or lesser loss of Green Belt land in Solihull. These are options, but some of the alternatives suggested have either not been included, or discarded.

4

We share the sadness of the loss of Green Belt land but we have no option

- There are no policy requirements on the climate impact of housing, which will mean that the Planning Department and Committee will be unable to refuse applications that cause considerable harm to the environment.

4

It is an opportunity to incorporate our Climate Change declaration into a statutory plan

This is largely due to the materials and construction methods accounting, disproportionately, for CO2 emissions of housing over the first 50 years of their use. If Climate commitments are to be met, and the principles of sustainability achieved, these need to be resolved within the document.

- This is the West Midlands Combined Authority targets, not the target passed, unanimously, by Solihull Council on 8th October 2019. This motion stated 2030 for Solihull Council to be “net carbon zero” by.

4

how to make progress towards our ambitions to be zero carbon by 2041

- Land at Arden Cross is not being maximised for housing, meaning that some benefits will not only not be realised, it will foster greater car dependency to travel to the HS2 interchange.

4

we must ensure a proper planning framework is in place so we can maximise on its benefits

- “Sustainable development” is defined by 1987 Bruntland Commission Report for the United Nations as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.

5

sustainable development

This Plan does not deliver on the purpose of Sustainable Development, as it will compromise future generations ability to meet their needs, due to the environmental impact of this plan.

- The administration have repeatedly been warned that this iteration of the plan, in part due to the process the Council has followed, is also open to legal challenge.

5

The first is to deal with the legal challenge to the 2013 plan

- It is unclear in what way this plan achieves this end. Plans have already been approved by Solihull Council for the HS2 Interchange site. However, this plan does not accommodate the necessary level of housing on the site.

5

a proper planning framework that recognises the arrival of HS2 in the Borough

- This is a tautology.

5

capitalise on maximising

<ul style="list-style-type: none"> This implies it is well served by public transport, which it is not. 	5
<ul style="list-style-type: none"> local connections 	
<ul style="list-style-type: none"> The phrasing of this statement implies that ALL aspects that can be addressed are. This is not true. 	6
<ul style="list-style-type: none"> those aspects of the declaration’s actions that can be addressed through the planning system 	
<ul style="list-style-type: none"> Whilst the authors of the plan are fully aware of the current pandemic, no adaptation to the consultation period has been made to account for this. 	6
<ul style="list-style-type: none"> But what is clear is that the Borough must create the right conditions for the recovery and having an adopted plan in place will play a key part in this 	
<ul style="list-style-type: none"> More pertinently, the manner in which the administration has acted has jeopardised the successful adoption of the plan. Documents have been uploaded or changed, without publicising this, after the consultation started. Many residents have explained difficutlies with the Council's website and process of submitting representations. Also, those who have emailed in representations are told that their submissions will be excluded if page and paragraph numbers are not included. Some residents only found out about the consultation late. Some still have no idea it is happening, in part due to no deliveries of local newspapers to residences in the Borough. 	
<ul style="list-style-type: none"> A seismic shift is taking place, where homes are becoming commercial locations, with more people working from home than at any point in history. This plan does not account for that. 	6
<ul style="list-style-type: none"> land for commercial needs has to be managed to ensure that both existing businesses can flourish whilst also providing an opportunity to attract new business into the Borough 	
<ul style="list-style-type: none"> Should state “brought”. 	7
<ul style="list-style-type: none"> bought 	
<ul style="list-style-type: none"> It is unclear what is meant by the term “aspirational housing”. It is potentially problematic given the context of the affordability ratio between house prices and earnings. 	8
<ul style="list-style-type: none"> aspirational housing 	
<ul style="list-style-type: none"> Clearly there is not equal regard given to the gaps between Shirley and the Blythe villages as others. These are the most at risk of convergence with the contiguous Birmingham/Solihull conurbation. 	12
<ul style="list-style-type: none"> Protecting key gaps between urban areas and settlements 	
<ul style="list-style-type: none"> The current situation is over provision of unaffordable housing for older people. This has been concentrated in Shirley, which this plan doesn’t address. 	13
<ul style="list-style-type: none"> A need for a range of affordable housing for older people 	
<ul style="list-style-type: none"> This is the only reference to the “Commonwealth games” in the document. Not only is no idea given as to how this will be achieved, there is little that can be done in the timescale necessary to contribute towards this goal. 	15
<ul style="list-style-type: none"> Maximise the potential of the 2022 Commonwealth Games 	
<ul style="list-style-type: none"> This is the impact of pressure “from” development. 	16
<ul style="list-style-type: none"> Impact of pressure for development 	
<ul style="list-style-type: none"> Maximising capacity of the airport is inconsistent with not only the Climate Emergency measures and objectives of Solihull Council, and the West Midlands Combined Authority, but also the Paris Agreement of 2016. 	16
<ul style="list-style-type: none"> Maximise the capacity and benefits of the recently extended runway at Birmingham airport 	
<ul style="list-style-type: none"> Additionally, the aviation industry has experieinced a significant contraction during the global pandemic. It is unclear to what extent the sector will grow in response to this. The current viewpoint of the External Auditors for Solihull Council is that airports cannot be valued at present for these reasons. 	

- The government’s own data shows that the number of Gypsy and Traveller Caravans is relatively stable. The most notable changes are the decrease in caravans on authorised socially rented sites.

As far as possible, the Council will seek to meet any remaining need within the boundaries of existing authorised sites or through an updated Gypsy and Traveller Site Allocations Plan

Any plans need to account for diversity of sites, not only pitches, if unauthorised pitches are to be minimised and avoided.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891229/Traveller_caravan_count_2020_stats_release.pdf

- Car use is the only form of available transport for parts of the Mature Suburbs that are more remote from major thoroughfares.

High car use in the Mature Suburbs and often this is the only form of available transport in rural parts of the Borough

Urban extension as a policy further compounds this problem, as very often the issues are not only demand focussed (concentrations of available transport users), but also due to connecting infrastructure. Bus companies would prefer to avoid routes with speed bumps. Also some parts of the road network are not suitable for buses, despite a local need existing. An example of such a site where this problem is compounded is BL3.

- A minimal approach to densities will also yield a minimal modal shift to sustainable travel.

sufficient density

This is incompatible with both climate and transport objectives of this document.

- Whilst Electric Vehicles are preferable to Internal Combustion Engine vehicles, they place the same infrastructure demands on the highway.

Increase the amount of EV charging points

- The wording of this is not only problematic, but misleading. The implication is that health is primarily driven by “lifestyle choices”, rather than other factors. Income and employment are more significant indicators in this respect, so should have t

Incidence of unhealthy lifestyles and behaviours

<https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

- The planting of trees sill have no impact on CO2, if there is no commitment to a net-gain of trees.

Facilitating the planting of 250,000 trees by 2030

This is particularly pertinent to site BL3, where significant numbers of trees will be lost to build housing.

- The concentration of development in the Blythe/Shirley area will increase surface water discharge into rivers.

To minimise the risk of flooding by avoiding development in high risk areas wherever possible, by applying the flood risk sequential test reducing flows to rivers by restricting surface water discharge rates during periods of high intensity rainfall, and ensuring that new development is designed so as to minimise surface water flooding risks.

A primary example of this is recent flooding in Nethercote Gardens. Development at sites BL1, 2 & 3 will undoubtedly have a detrimental impact on this.

- The Council has been made aware of deficiencies in this regard.

Work with stakeholders and partners in infrastructure delivery, including Transport for West Midlands, the CCG

Managers of GP practices have given deputations to the Council to explain that since the restructuring of the local CCG, communications on these sort of matters has deteriorated. In light of this, the objectives should state working with “primary care providers” to ensure there is no worsening of an already stretched primary care provision.

- These are inconsistent with the OECD Framework for Inclusive Growth

The Plan identifies five building blocks of inclusive economic growth

https://read.oecd-ilibrary.org/economics/opportunities-for-all_9789264301665-en#page1

Health is a key aspect of inclusive growth. In the Plan it does not recognise the importance of health for inclusive growth.

<ul style="list-style-type: none">This paragraph makes no grammatical sense and so the soundness of the assertion cannot be established.	23
<div>The outcomes from this will be that town and local centres have stable or growing 44. economies, people, business and the environment benefit from UKC and HS2, including increased access to good work, and there is more affordable and environmentally sustainable housing.</div>	24
<ul style="list-style-type: none">The growth in homes for older people is raised as a concern in this regard. <div>The Borough will retain its sense of identity</div> <p>Many residents have raised concerns with the overdevelopment of retirement living and care homes in Shirley. This is impacting the sense of identity of the area, with net increases in the number of older demographic groups. These are not only a threat to the character and identity of the area, but also to the economic viability, as younger groups</p>	24
<ul style="list-style-type: none">There is a risk of the M42 corridor ‘overheating’ in terms of economic growth. <div>It will be a Borough that continues to be economically successful and a driver for sustainable 48. growth within the West Midlands</div> <p>There are arguments to suggest that the Black Country is a good candidate for redevelopment and targeted growth policies. It is also in concordance with the current governments “levelling up” agenda. The rhetoric of this section is reminiscent of “trickle down economics”, which has been thoroughly debunked. The closest this can come to be logically consistent is if investment into North Solihull were to be delivered through this plan. Aside from the Kingshurst redevelopment, this is not present. Redevelopment of Chelmsley Wood Town Centre is a vital component of achieving this end, but is not detailed herein.</p>	24
<ul style="list-style-type: none">It is unclear what is meant by this. <div>without undermining the qualities that make the Borough attractive to people and investment</div> <p>In what way would the the qualities that make the Borough attractive to people and investment be undermined? One way is by losing significant amounts of Green Belt, which this plan does. It is therefore internally inconsistent.</p>	24
<ul style="list-style-type: none">This sentence is grammatically incorrect and has an erroneous use of “make healthier choices”. <div>Solihull will be a fairer and more equal Borough where all existing and future generations live 49. healthier lifestyles, make healthier choices and have equal opportunities to a better range of high quality and affordable housing, education, jobs and an attractive, safe environment</div> <p>Also the use of “will” as opposed to “aims to be” would be a</p>	25
<ul style="list-style-type: none">Are pitches as opposed to sites sufficient? <div>Solihull’s Gypsy and Traveller community will have been provided for</div>	25
<ul style="list-style-type: none">The process that this Plan’s consultation has followed does not lead to any degree of faith in this statement. <div>All local communities will have greater involvement in shaping their areas and neighbourhoods</div>	25
<ul style="list-style-type: none">Retaining the gap is frequently referenced, but not explicitly explained, as building within this area is included within the plan. <div>retaining the strategic Meriden Gap between the Birmingham Conurbation and Coventry</div>	25
<ul style="list-style-type: none">Again this is not detailed or explained. <div>undermining the characteristics that make it special and attractive to investment</div>	26

- Land at HS2 will have to be released from the Green Belt, but the extent to which other land is required is unclear.

26

This is in the context that to deliver the level of growth envisaged, will require significant releases of land from the Green Belt

Had the Arden Cross site been maximised for housing, alongside the Solihull Town Centre Masterplan and a new Chelmsley Wood Town Centre Masterplan, much of the Green Belt would not have needed to be released.

- This is not true, as detailed in the previous comment.

26

Nevertheless Solihull puts great value in the Green Belt and only sacrifices Green Belt if there is no other option

- The terminology has changed from “proportionate dispersal” to “balanced dispersal”.

27

balanced dispersal

Whilst the change away from “proportionate dispersal” is appreciated, it would be advisable to use “unbalanced dispersal”. This is due to the disproportionate amount of development being located in the Shirley/Blythe area, as well as the Balsall Common/Berkswell conurbation.

- Focussing on urban areas does this, but the same logic is being applied to urban extension.

27

Focussing on urban areas and sustainable urban extensions provides the best opportunity for achieving accessibility and delivering public transport improvements

By extension it becomes less true, as the further out you go, the less these principles apply. This is the case with sites BL1, BL3 and also BC3.

- Whilst the Knowle, Dorridge & Bentley Heath conurbation is contiguous, this locator is inaccurate.

29



The primary reason for the inaccuracy is that whilst Knowle will experience some expansion, Dorridge, the more sustainable of the two locales, does not. The reason for its more sustainable nature is due to the location of the train station. The new developments are located in such a way that they are likely to foster greater car dependency from their inhabitants than in many existing location nearby.

- Unclear for readers.

31

ICT

Whilst it can be assumed that ICT here refers to “Information Communication Technology”, it is ambiguous and should be specified.

- Whilst the inclusion of “inclusive economic growth” here is welcome, it is insufficient.

33

Support inclusive economic growth by supporting employment and supply chain opportunities that benefit businesses and residents across the Borough and by supporting vibrant and sustainable communities, with an emphasis on health and wellbeing, including those working, living in and visiting the Hub Area;

Not only does it imply that delivering jobs is equal to, or sufficient for inclusive economic growth, it has the potential to be interpreted in such a way as to prevent residential development that may actually contribute more beneficially towards achieving inclusive economic growth.

- The use of “incorporating” “low (zero) carbon” in conjunction invalidates the purposes of this policy.

33

incorporating low (zero) carbon

Whilst we want to see zero carbon solutions, incorporating low carbon energy principles could be as minimal as installing a single energy efficient heater. If the term “incorporating” were swapped for “maximising” and low and zero were swapped it would improve the quality of the policy. As it stands it is largely redundant due to the size of the loophole contained within it.

- The policy should state that’s residential developments will be prioritised.

34

The Council will support proposals that include passenger facilities, offices, and residential, together with associated ancillary uses (including retail, leisure and hotel developments of an appropriate scale)

- This is incompatible with the Climate Emergency targets included in the Plan.

34

or which allows the capacity of the extended runway to be maximised

The Borough will not be able to reach a zero carbon status if the number of flights in and out of Birmingham Airport is increased. I already, alone, accounts for an a higher level of emissions as the City of Wolverhampton does.

- It is unclear how such a scale is defined.

35

These could include hotels and commercial/business/service uses of a scale that does not compete with existing or planned facilities outside of Birmingham Business Park

Surely any scale of enterprise in this location would compete with equivalent existing or planned facilities outside this location. As a policy it is unenforceable in its principle, as well as the geographical remit of “outside Birmingham Business Park”.

- Th numbers included here are inconsistent with the Arden Cross Masterplan.

36

The Hub Framework Plan (2018) shows how sustained growth will be delivered up to 2047. 85.

It predicts up to 77,500 jobs in total over that period, with over 130,000sqm of office floorspace, 225,000sqm of industrial floorspace, 90,000sqm of retail and leisure floorspace and 18,000sqm of hotel floorspace by 2033. Up to 4,000 new homes could be provided up to 2047, with about 1,000 delivered by 2033. The Hub Framework Plan also identifies potential for additional growth in an international quarter south of the mainline station, which could deliver 123,000sqm of offices and further retail, leisure and hotel development by 2033. The Hub Framework Plan is a non-statutory plan which will be updated from time to time in response to changing circumstances. The need for flexibility is important given the time period development is expected to come forward in the area – i.e. from 2018 to beyond the plan period.

The Arden Cross Masterplan was produced in July 2020 and is neither included in the supporting evidence, nor do the projections within it coalesce with the predictions in the plan. As the document supercedes the Hub Framework Plan 2018, it is of doubt whether these figures should be included here, as they are obsolete. This was raised prior to the plan being publicised, when therem was not only opportunity to correct them, but the authority was given by the administration to do so too. Having failed in this regard, the contents here are misleading, even moreso given the likely changes that are to come about since COVID19 has impacted many of the industries within the predictions.

<https://ardencross.com/wp-content/uploads/2020/08/Arden-Cross-Masterplan.pdf>

- As already stated, the Arden Cross plan was published prior to the publication of this plan.

37

emerging Arden Cross masterplan (2020)

- This is an inadequate contribution to the Housing Market Area from a site of 140 hectares.

37

500 at Arden Cross

Whilst we are aware that the site may potentially bring forward a further 2,500 homes after the plan period, it is still an inefficient use of land that is highly sustainable, once it has already been taken out of use as Green Belt (a decision that Solihull Council has no control over anyway).

- This is not clear.

37

The HS2 Base Scheme would urbanise a substantial proportion of the site, significantly impacting on its contribution to the purposes of including land in the Green Belt.

If the base design is to build a greater amount of residential properties, this is potentially a more efficient use of the land. If it is to tarmac a significant proportion of the site, for a surface level car park (as was proposed), it would be an incredibly inefficient use of the land. This is not made clear here and needs clarifying.

- No detail is given around this.

38

The prospectus for a Garden City Approach (2014) envisaged a well-planned and vibrant 92. new place. Development was to be guided by strong urban design principles and provision for strong connectivity


What is of primary significance is whether or not such an approach was given ascent, is pending, or rejected. The inclusion without this information here is misleading at best and unsound at worst.

- Whilst this principle is correct, it is not applied to other sites in the Green Belt. Namely BL2 and BL3.

39

The land will be bounded by main roads that provide strong defensible Green Belt boundaries and minimises the impact on the Meriden Gap

<div><div><div>•</div><div>Forecasts of 18 million passenger journeys per year are not only unlikely, but seemingly impossible given the impact of both COVID19 and the Climate Emergency.</div></div><div></div><div>(2018 throughput 13m passengers/year, 2033 throughput 18m passengers/year)</div></div>	39
<div><div><div>•</div><div>Forecasts no longer say this. All bets are off in this industry.</div></div><div></div><div>Forecasts for airport activity and its continuing development indicate a strong market for new investment as evidenced by the extension to the main runway that was completed in 2014.</div></div>	39
<div><div><div>•</div><div>Where has the Council made this assertion?</div></div><div></div><div>In the meantime the Council believes it is appropriate that the airport should be supported to maximise the capacity and capability of the existing extended runway, by accommodating such ancillary facilities within Site UK2</div></div>	39
<div><div><div>•</div><div>There is an important omission in the contribution that the NEC is able to make to the sustainability goals of the UKC Hub.</div></div><div></div><div>Developments at the NEC will play a key part in the place-making role that is expected 103. across the Hub Area, especially given its position between the Airport and Arden Cross</div><div>The NEC has significant amounts of roof space that would allow for viable inclusion of photovoltaic cells. In the event there are no barriers from a the position of glare. At present there are no EU regulation preventing the installation of PV cells on or near aviation interests. http://www.solar-trade.org.uk/wp-content/uploads/2016/04/STA-glnt-and-glare-briefing-April-2016-v3.pdf</div></div>	40
<div><div><div>•</div><div>This is a new component in the plan that has not been consulted upon.</div></div><div></div><div>Part of this land has also been identified as an option for a relocated Household Waste and Recycling Centre and Council Depot. Further justification for this proposal is included in Policy P12.</div></div>	40
<div><div><div>•</div><div>Again this policy is not enforceable as it is not defined.</div></div><div></div><div>These could include hotels, health and fitness, leisure, childcare facilities and local facilities of a scale that does not compete with existing or planned facilities outside the business park, particularly designated town centres as appropriate</div><div>The level of competition, and the geographical extent are not defined. There are also grammatical issues with the meaning of “particularly designate town centres as appropriate” at the end of the sentence.</div></div>	42
<div><div><div>•</div><div>A necessary component of the sustainability of this location is for public transport to be able to travel through.</div></div><div></div><div>development that will create an overall sense of place and a more sustainable location</div><div>At present, the single access and egress point, by road, makes public transport provision unviable. For the location to become viable it would need to allow for bus routes to travel through, rather than in and out of the site by the same point. In a different sense, the location adjacent to a Site of Special Scientific Interest requires protection. Development should not be permitted to threaten this either directly (by building within or adjacent to the site), or indirectly (by impacting surface water run-off in terms of volume or contamination that feeds into the River Blythe).</div></div>	42
<div><div><div>•</div><div>forecasted</div></div><div></div><div>forecast</div></div>	44
<div><div><div>•</div><div>Modal</div></div><div></div><div>mode</div></div>	44
<div><div><div>•</div><div>Streets</div></div><div></div><div>street</div></div>	44

<div><div><div></div><div>Commas are required between the listed characteristics.</div></div></div>	44
<div><div><div></div><div>attractive active frontages which encourage vibrant and active street life and create characterful</div></div></div>	
<div><div><div></div><div>Creating “a” legible</div></div></div>	44
<div><div><div></div><div>creating legible</div></div></div>	
<div><div><div></div><div>An erroneous “f”</div></div></div>	45
<div><div><div></div><div>to f front onto</div></div><div><div>Also issues with the fact that economic activity already exists to the east of the Stratford Road, facing onto car parks. Defining what is meant by “substantial” would assist in determining potential planning matters in the future.</div></div></div>	
<div><div><div></div><div>Coordinated by whom?</div></div></div>	45
<div><div><div></div><div>which shall be undertaken in a coordinated manner</div></div></div>	
<div><div><div></div><div>There is potential for mixed residential/commercial development here.</div></div></div>	45
<div><div><div></div><div>Chelmsley Wood Town Centre will be developed and sustained as a focus of commercial activity, services and public transport.</div></div><div><div>As more people are working from home, this kind of location is perfect for both ensuring a vibrant town centre, as well as providing for genuinely affordable and social housing.</div><div>As important as providing for good quality housing is better integrating the town centre with the surrounding community.</div></div></div>	
<div><div><div></div><div>This has the potential for detrimentally impacting upon Hobs Moat.</div></div></div>	45
<div><div><div></div><div>Proposals for main town centre uses will be expected to locate in Solihull Town Centre and/or Shirley and Chelmsley Wood town centres</div></div></div>	
<div><div><div></div><div>These are also good locations for residential properties.</div></div></div>	46
<div><div><div></div><div>Office – Opportunity sites have been identified which intensify the provision of office accommodation around Homer Road and Princes Way, which have excellent access to the town centre amenities and the train station, such accessibility being increasingly important to corporate occupiers</div></div><div><div>Again, with the advent of “working from home” having arrived, the repurposing of existing office space, as well as the promotion of developers adapting new office plans to either residential, or mixed developments, should be encouraged.</div></div></div>	
<div><div><div></div><div>Leisure and entertainment</div></div></div>	46
<div><div><div></div><div>competitive socialising</div></div></div>	
<div><div><div></div><div>This is no longer incorporated in the new Solihull Town Centre masterplan.</div></div></div>	46
<div><div><div></div><div>the location of the train station</div></div><div><div>Had this been incorporated, as was requested, it would have made this document more rigorous and sound. Given that the train station wasn’t moving, as established by the Council, there was no uncertainty over this.</div><div>Moreover, after requesting that the new Masterplan be uploaded to the supporting evidence, it has still not been, almost a week later. This is despite a decision clearly being taken that there was no obstacle to uploading corrected, or amended supporting evidence, despite being told that the consultation should not be extended for the reasons of issues and errors with the supporting evidence at Full Council, by the Cabinet Portfolio Holder for Climate Change Planning & Housing.</div></div></div>	
<div><div><div></div><div>The revised and updated masterplan now shows 1,1,78 new homes in the Town Centre. It is unclear how many of these are deliverable within the plan period. As the numbers of:</div></div></div>	47
<div><div><div></div><div>The Draft Local Plan then went on to identify which of the 1,500 new homes could 128. reasonably be expected to be delivered in the plan period, and by identifying particular opportunity sites concluded that 861 homes would be deliverable in the plan period</div></div><div><div><div>http://eservices.solihull.gov.uk/mginternet/documents/s85375/Appendix%20A.pdf</div><div>- 1,178 new homes</div><div><div><div>- 50,000sqm.officefloorspace</div><div>- 40,000 sqm of retail, leisure and active ground floor space</div></div></div></div><div>Bare little resemblance to the numbers in the Local Plan, it calls into question the reliability of this section. For the sake of a few weeks extension, this could have been resolved. However, the administration have chosen not to do so and risk invalidating this plan.</div></div></div>	

<div><div></div><div></div><div>It has not exceeded it. It has fallen short.</div></div>	48
<div><div></div><div></div><div><div>The emerging work is indicating that the level of residential development that can be 130. accommodated in the town centre is expected to at least match that assumed in the Draft Local Plan, if not exceed it</div><div>As a result of the necessary revision, it would not constitute a minor revision of the order approved by Council to be undertaken under delegated powers. As such a revised plan will need to be brought back to Full Council prior to a second consultation period.</div></div></div>	
<div><div></div><div></div><div><div>As the Cabinet Portfolio Holder has stated that Social Housing is only deliverable on sites in public ownership, whether or not this is intended should be clarified here.</div><div>Sites already in public ownership or currently being considered for development are likely to come forward in the short term</div></div></div>	48
<div><div></div><div></div><div><div>Not only is it an issue with regards to significant congestion, it has the highest concentration of road traffic accidents in the Borough.</div><div>It currently experiences significant congestion at some locations which is likely to be exacerbated as a result of future development</div><div>https://www.crashmap.co.uk/Search Data shows that RTAs, and serious RTAs that involve pedestrians are concentrated along the Shirley High Street section of the A34. This presents a challenge for the ambitions for economic recovery in this area.</div></div></div>	49
<div><div></div><div></div><div><div>This is insufficiently explained.</div><div>Improve journey reliability through improved public transport and active travel infrastructure and smarter choices engagement</div></div></div>	49
<div><div></div><div></div><div><div>A masterplan is needed to ascertain the viability of this. There is opportunity for a higher concentration of housing here.</div><div>an assumption is made that at least 100 dwellings will be delivered in the plan period.</div></div></div>	50
<div><div></div><div></div><div><div>This table constitutes unnecessary loss of Green Belt due to the amount of land made available for office space.</div><div>The table below identifies the strategic sites that comprise the Council’s supply of main employment land for this purpose, adopting a plan monitor and manage approach to avoid over allocating land that may lead to unnecessary loss of Green Belt.</div><div>https://www.rics.org/uk/news-insight/research/market-surveys/uk-commercial-market-survey/q1-2019/ Office space demand has been on a general decline since 2015. Since the growth of working from home is set to continue, and with economic uncertainties on the horizon, there is more likely to be a contraction than expansion in office space over the period of the plan. https://propertylink.estatesgazette.com/office-for-rent/solihull At the time of writing, on 13th December 2020, 144,664 square feet (13,439 sqm) of vacant office space is being advertised for rent in the borough. This encompasses a variety of central, business park, and out of town locations. Additional provision is likely to exceed market demand for the foreseeable future, with refurbishment, repurposing, and where necessary, regeneration of existing office space a more sustainable approach to addressing market demand.</div></div></div>	50
<div><div></div><div></div><div><div>Brackets are incomplete, or include an errant close bracket.</div><div>Non-allocated employment sites will also be protected for employment use (offices, industrial and warehousing) and, where appropriate, waste management</div><div>The additional bracket comes after the addition of "where appropriate, waste management". This is highly contentious as it will open up the process of relocating waste facilities into potentially inappropriate locations. This should not be how waste management sites are selected as the overlap between the use of land for employment and waste management is minimal.</div></div></div>	50
<div><div></div><div></div><div><div>If a location is viable for housing, it is compatible with home-working. This policy section makes no sense.</div><div>Proposals for home-working are compatible with the character of the local environment and are consistent with the amenity policies of the Local Plan and any made Neighbourhood Plan.</div><div>Clearly a distinction needs to be made between working from home and a home that is also a place of work for those, other than the householders, or residents of the property in question. As it stands this is unclear in the policy and is liable for misapplication.</div></div></div>	51
<div><div></div><div></div><div><div>There are issues with the size of development and the preferred use classes.</div><div>The table below includes existing allocations to be carried forward from the SLP and New 143. allocation. Although these new allocations have already been identified under Policy P1, they are included here for completeness</div><div>Under the planning policies, developers would be able to submit applications for B1, B2 or B8 usage. The challenge here is that there is only a shortfall for B8 usage. The major issue with this is a developer will be able to realise 5-20 times per square foot of rental space for offices over warehouses and distribution centres. Without protections to ensure that needed development is delivered, and surplus office space, that will result in increased redundancy of older office space, isn’t delivered. Whilst some office space that may be made redundant is suitable for repurposing as residential, much of it is not and so should be minimised, where possible. Without a policy to address this the plan does not meet climate commitments.</div></div></div>	52

- The affordability ratio has increased to 11.54, a 37% increase. Such a substantial change must be acknowledged in the plan.

Median house prices in Solihull stand at 8.42 times the median earnings of those working in the Borough

The median earnings in the borough have dropped by 10.4% in the last year, to £24,493, whilst house prices have increased. This has significantly worsened the affordability ratio of housing.
Reference must be made to how this is worsening as it is informing subsequent policy decisions that are set to worsen this.

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofworkbylocalauthorityashetable7>
Using Barclays mortgage calculator, a 2 person household, both on the median wage in Solihull (from 2020 of £24,493), with half the average UK household expenditure (here a monthly amount of £1,268, half the £2,537.6 - calculated from a weekly expenditure of £585.60 quoted by the ONS), with £50,000 in savings, would still only be able to afford a £124,000 mortgage. As the lowest priced 2 bedroom property available for rent in Solihull on Rightmove.co.uk is currently £595 per calendar month, it seems highly unlikely that the average family will be able to afford to buy in the borough, given that saving £50,000 would be impracticable under the circumstances.

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/april2018tomarch2019>

<https://www.barclays.co.uk/mortgages/mortgage-calculator/borrowing-calculator/#/borrow>

<https://www.rightmove.co.uk/property-to-rent/find.html?locationIdentifier=REGION%5E1220&maxBedrooms=2&minBedrooms=2&sortType=1&propertyTypes=&includeLetAgreed=false&mustHave=&don'tShow=&furnishTypes=&keywords=>

55

- This policy is not only misguided, it has the potential to significantly worsen the issue of affordability in the borough.

There is a need for more housing that can provide opportunities for households to ‘downsize’, thereby releasing family housing for resale and re-letting

Provision of retirement properties is problematic on several fronts.

1. Providing houses for downsizing only frees up the most unaffordable housing in the borough. It does not offer opportunities for people trying to get a foot on the housing ladder. This is because enough wealth is not stored in affordable properties to allow for any net gain from downsizing, or costs of care absorb any cash surpluses.
2. Building more specialist retirement and care premises results in people moving into the borough for the purposes of retirement, as there is a perception in the region that care provision is good in the borough, whether right or wrong.
3. Jobs in care professions are notoriously undervalued and underpaid. Expanding the sector in the borough, to provide for care of those from outside the borough, will increase lower paid jobs. This will worsen the the affordability ratio.
4. The fact that people cannot afford to work in care professions and live in the borough creates greater pressure on the regions transport infrastructure, with people having to travel in to work from further away.
5. Exemptions given, at a local authority level, for affordable housing contributions exacerbates the problem. This means that the provision of retirement properties worsens the provision of affordable housing in the borough.

The only solution to this problem is to address provision for truly affordable housing, and homes for social rent. This is the only way people will be able to save the necessary amount to buy, or if they are not buying, to afford to live in the borough that they might work in, providing care for other residents.

55

- A definition of affordability needs to reflect the ratio between house prices and earnings. ‘Discounted’ housing, especially if only in the order of 20% lower than market prices, does not address affordability.

New homes should be affordable

55

- There is over provision of this type of housing in the borough.

housing for older

56

- The Council has had this target for some time and has never met it.

Contributions will be expected to be made in the form of 40% affordable dwelling units on all development sites that meet the threshold, but will take into account

It currently delivers under 30% ‘affordable’ housing. Unless there is policy change to increase this provision this will remain an ambition rather than a requirement.

56

- The viability assessments documents details that developers have substantial costs, which means that affordable housing provision is jeopardised.

The economics of provision, including particular costs that may threaten the viability of the site

Transparency of financial transactions are required to ensure that developer profits are not exceeding 20%, via transfer payments to other entities, thus hindering the provision of affordable housing.

56

<ul style="list-style-type: none"> These need to be detailed exhaustively so as to prevent misapplication of the principle. 	56
<div>Whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site</div>	
<ul style="list-style-type: none"> This is ambiguous, but appears to make reference to retirement properties that have been addressed in previous comments. 	57
<div>The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and</div> <div>If so, as a policy it needs to be removed, or a more detailed explanation given, to prevent the misapplication of this policy.</div>	
<ul style="list-style-type: none"> Further diversification is required in provision, with greater flexibility to adjust. 	57
<div>65% social rent with 35% provided as shared ownership</div> <div>It is possible that this is better managed via a Supplementary Planning Document to update this component.</div>	
<ul style="list-style-type: none"> This is significantly in excess of the 40% target given in this plan. 	58
<div>The HEDNA identified a need for 57827 affordable homes per annum. The scale of need 165. means that the Council is justified in seeking to secure as much affordable housing as viability allows</div>	
<ul style="list-style-type: none"> There are issues in terms of worsening inequality from this policy approach. 	58
<div>Therefore any development may need to provide for needs arising in another part of the Borough</div> <div>The more social rent and affordable housing is provided in the North of the borough, and the less it is provided for in other parts of the borough where need also arises, the worse inequalities and outcomes become. To the greatest extent possible, there needs to be onsite provision, so that major development more closely reflect the borough as a whole.</div>	
<ul style="list-style-type: none"> The particular costs will need to be defined. 	61
<div>The economics of provision, including particular costs that may threaten the viability of the site;</div> <div>As previously mentioned, there needs to be closing of any loopholes that allow for transfer pricing to diminish the provision of affordable housing in favour of market housing.</div>	
<ul style="list-style-type: none"> Further considerations need adding: 	63
<div>Applications for specialist housing for older people and younger adults with disabilities will be supported where</div> <div>Primarily, that “specialist housing for older people will not be permitted in areas where existing provision is over 25% higher than the borough average”. Areas are defined as wards, including those immediately adjacent. The purpose behind this addition is to support diverse communities and to not create pressures on other care provision. An area where this problem has already arisen is in Shirley. Whilst the exemption of primary care provision might prevent some provision in the short term, the character and viability of the area will be impacted if the demographic composition is disproportionately moved over a longer timeframe. This can be avoided by including this exception to promote a more proportionate dispersal of the relevant housing types. Similarly, the pandemic has taught us that primary healthcare provision is something that can come under immediate strain from exogenous shocks. However, there are latencies in the failing of care provision, due to the funding formula for GP surgeries, that can make recruitment harder after demographic shifts have already taken effect. Safeguards are needed that are more robust than those allowed for in the plan.</div>	
<ul style="list-style-type: none"> Comments made in relation to specialist care for older people are equally applicable here. The same exception should be included here. 	64
<div>Applications for care homes (Use Class C2) for older people and younger adults with disabilities will be supported where</div>	
<ul style="list-style-type: none"> The consultation question amalgamated the 2 distinct groups. This was pointed out in consultation responses. 	65
<div>Consultation responses to the 2016 Draft Local Plan also supported provision for older people and those with disabilities</div> <div>Whilst there are many similar adaptations to properties of older people and those with disabilities, but these are generally reserved to of older people with disabilities. Lumping the two distinct categories together is misleading and liable to lead to worse outcomes. One significant distinction is that households of adults with lifelong disabilities experience greater income inequality. For this reason the housing market for older people who develop disabilities or challenges with mobility, and those born with disabilities, is significantly different.</div> <div>https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf</div>	

- Again, these should have geographical governors applied to prevent concentrations in locales.

65

age-restricted general market housing

- Whilst this paragraph is true, it is misleading.

65

Policy P4E supports the Council’s adult social care approach. Suitable general needs 203. housing and specialist schemes both contribute to older and disabled people having good housing options. This brings long term benefits for both adult social care and the National Health Service. The policy also supports one of the priorities of the Birmingham and Solihull Sustainability and Transformation Partnership to improve the health and wellbeing of the population by working with local partners, particularly focussing on employment, education, housing and work

Appropriate housing does yield benefits for the provision of care to individuals in the housing (for example with promoting their independence and with the inclusion of mobility aids like hoists), but the concentration in certain areas can have detrimental impacts both for those with care needs and the wider community.

It is important to avoid these outcomes, not only for the health reasons listed, but also to avoid any possibilities of societal stigma or worsening intergenerational divisions. These too can lead to worse outcomes for the individuals and the wider community, as well as its cohesion.

- This paragraph is problematic, when taken in the context of the previous policy and justifications, as well as the previous consultations.

66

The population growth among adults aged 18-64 with disabilities is less pronounced than 218. among older people, but the Council must develop affordable housing as an alternative to residential care. It is expected that this need will mainly be met by the Council directly commissioning the required provision.

The 2016 consultation grouped “older people” and “those with disabilities”. Here we see that it was imprecise to do so, as the provisions for the latter group is more stable than the growth in the former.

There was also, therefore, a potential for bias in respondents who were considering one group when answering in relation to the other.

The Plan justifies its growth in provision for older people, in part, based on this inaccurate measure.

Part of the reason why it is imprecise is that the much needed provision for those living with disabilities is less commonly seen. The provision of housing for older people is very much seen already. Indeed it is very often the target demographic complaining about the proliferation in these kinds of housing.

- This is not defined.

67

AMR

- These contribute to density and excluding them could lead to inefficient use of land.

67

but exclude land for other development requirements such as open space, SuDS and strategic highway infrastructure

- This policy could result in stagnant design and prevent addressing climate commitments.

67

Responding to local character and distinctiveness

Attractive design does not correlate with homogeneous design. Indeed, common complaints around design often correspond to the lack of diversity on housing and lack innovation in design.

Where this becomes problematic is with particular regard to sustainable house designs. Whilst sustainable housing can be designed to high standards, the kinds of housing which have the lowest impact on the environment in terms of CO2 from their materials, construction, and energy efficiency performance of the finished building, will often have differences in appearance to the majority of modern brick-built homes. As such, any policy which potentially prevents diversification of design, materials and methods, can limit the Borough’s ability to meet climate commitments.

- Figures from the latest ONS projections put these numbers as follows:

68

90,937 Households at 2030 97,259 10 year difference in number of households 6,322 Annual average increase in no. of households 632

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

2020 - 91,050

2030 - 96,602

10 year difference in household numbers - 5,552

Averagre increase in the number of households - 555

- These figures, according to the most recently published ONS data (cited earlier), are as follows:

68

Median house price	£277,500
Median workplace earnings	£32,970
Affordability ratio	8.42

Median house price - £282,754

Median workplace earnings - £24,493

Affordability ratio - 11.54

- The calculation should therefore be as follows:
- 68

Affordability increase ²⁸	27.6%
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$(11.54 - 4)/4 \times 0.25 + 1 = 47.1\%$

- Corrected figure is as follows:
- 68

Adjusted household projections annual average increase (ie the LHN)	807
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$555 \times 1.471 = 816.4$
Rounded up to 817

- Corrected figure is as follows:
- 68

No. of dwellings required during plan period – Minimum LHN	12,912
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$817 \times 16 = 13,072$

- It is unclear whether or not it is appropriate to adjust the figure of 817 dwellings per year by the same factor, due to recent changes in travel patterns and employment rates.
- 68

UK Central Hub area remain at 2011 census levels then a small increase to 816 dpa would be justified. Over the plan period this would result in a need for Solihull of 13,056

Similarly, if policies of provision of housing for older people were to be applied as in this current iteration o

Similarly, if policies of provision of housing for older people were to be enacted as in this current iteration of the plan, the number of people over 65 may disproportionately increase, especially if accounting for over 20% of people 70 and over downsizing. This would likely result in the proportion of working people being lower.

The uplift included in the original calculations amounted to 9 dwelling per year, but the calculations were based on 2011 census data and projections of patterns that are liable to change significantly in light of COVID19.

- This figure is considerably lower than anticipated. A figure of 1,211 is a very low estimate of what is deliverable within the plan period.
- 69

961

Not only does the revised Solihull Town Centre Masterplan revise the original calculations, the potential for converted office space, much like what has already happened near to Solihull Station, will allow for an increase in delivery within the plan period. A modest estimate would put the potential increase at between 200-300 additional dwellings, based on current town centre vacant office space, suitable for conversion to residential properties amounting to 2680 square meters of space. Allowing for 50 sqm of space per property, there is the equivalent of 53 properties of vacant office space currently in the town centre.

There is a further 4,852 sqm of sub-optimal vacant office space in the town centre. Again, this would allow for around 97 properties of space.

Allowing for loss of floorspace in conversions, as well as for the potential demand for offices recovering in the future, it is not unreasonable to allow for between 200-300 additional dwellings over the 15 year plan period. Proposed changes to planning policy will have the potential to accelerate delivery of these kinds of housing, as well as increase the numbers delivered.

With supportive policy these numbers can be increased significantly, but for the purposes of critiquing this plan, a figure of 250 additional dwellings is added to the calculation here.

- These figures are based on lower land efficiency than is beneficial.
- 69

2,740

With only a 10% increase in land efficiency, delivery of 3,014 dwellings on the same land is achievable within the same plan period.

- This site is not deliverable based on multiple grounds:
- 71

BC3

- Heritage impact on the Berkswell Windmill
- Unsustainable location, due to distance from Berkswell train Station.
- Ecological assessments due to the protected species on the site.

It is important to note also the disproportionate amount of housing located in the Balsall Common/Berkswell area. It represents around 30% of the total allocated sites. This amounts to 1,615 projected new dwellings in a settlement of around 7,000 inhabitants.

• Site BL1 is unsustainable due to its proximity close to ancient woodland.		72
BL1	Furthermore, the northern portion of the site reduces the gap between the distinctive settlements of Shirley and Dickens Heath. Closing this gap will increase the risk of convergence.	
• Site BL2 is not sustainable of grounds of convergence.		72
BL2	<p>The site has no defensible boundaries and leaves a minuscule gap between the distinctive settlements of Monkspath and Cheswick Green. Convergence of the sites should not be allowed.</p> <p>Furthermore, the parcel of land designated as Public open Space in the masterplans should be removed from the allocation. Not only does this threaten the setting of the listed Light Hall Farm heritage asset, it also encroaches upon housing in Blackford Road and Tanworth Lane. The Land here is also prone to flooding, as well as having the potential for rapidly displacing surface water run-off into other areas that flood.</p>	
• Site BL3 was the last site to be included in the plan and is not sustainable.		72
BL3	<p>The site was included at the supplementary update stage of consultation due to removal of the previously included Site/Allocation 13. The land at site BL3 is the highest scoring land on the Green Belt Assessment Report from July 2016. The land is currently home to a Christmas tree farm. In its current usage it offers significant carbon sequestration, which it will not be possible to replace. Most importantly, the land in question provides a necessary gap between the distinctive settlements of Shirley and Dickens Heath. There is no defensible boundary on the most pertinent side to any potential convergence and so should not be included.</p> <p>The sites BL1-3, when taken in conjunction with Site 11 which is currently under construction, amount to an equivalent of 39% of allocated sites.</p> <p>When taken in conjunction with the disproportionate amount of windfall development in Shirley, primarily that of retirement properties, the pressure on infrastructure is problematic. A manager of a GP group of practices gave a deputation to Full Council before this consultation was approved, explaining that the pressure on local health services is unsustainable. These pressures are compounded, rather than caused by COVID19. Concentrating further allocations in this area will have significant deleterious effect on the health and wellbeing of people within the area. Alternatives to provision of this site in particular have already been cited.</p>	
• Site BL3 does not accord with these policies.		82
	For major residential development provide access to a high frequency bus service within 400m of the site; and/or 800m of a rail station providing high frequency services;	
• This is poorly defined.		83
	<p>Are located in accordance with the spatial strategy in seeking to reduce the need to travel and that essential travel can be met by forms of sustainable transport in addition to the private car;</p> <p>A developer can say that a site is accessible by bike if there is a road to it. However, ensuring that it is “safe” and “practical” to access the site by sustainable forms of transport is integral to promoting sustainable travel. Many who do not walk or cycle may not be aware of some of the dangers and detractors that accessing properties with poor surface condition, non-segregated space, and poor lighting can pose. Too many new developments are fostering greater car dependency by failing on one or more of these components.</p>	
• An unacceptable impact needs quantifying.		83
	<p>Do not have an unacceptable impact on public highway safety</p> <p>Acceptance is a subjective term. There are multiple sites in the plan that will have an unacceptable impact on public highway safety, from a residents point of view. Examples of this will be in relation to BC3, with traffic onto Windmill Lane having poor visibility, whilst also increase traffic volumes on the Kenilworth Road. There is every likelihood that more people will use this route as a cut-through, with potential for increased speeding. Similarly, plans for sites BL1 and 3 will push increased traffic onto Haslucks Green Road and Bills Lane. Both have serious concerns over pedestrian safety and have become accident hotspots.</p>	
• This appears to be a failing in relation to the A34.		86
	<p>Such assessments will have regard to the impact of the proposed development but should also factor in the cumulative impacts on the surrounding highway network, having regard to other known development proposals and planned infrastructure works where appropriate</p> <p>Significant amounts of windfall development have taken place there in recent years. Sections have over 25,000 vehicle movements, in each direction, on a daily basis. These numbers are growing and will likely increase significantly with further development. The consideration here are not only around the impact on the network, increasing congestion and travel times, but also the impact on health, well-being and safety of the associated traffic. The volume is also a barrier to economic growth of Shirley High Street, as rather than acting as a beneficiary of passing trade, it becomes isolated by people not wanting to visit, or cross the road.</p>	

- Standards in this area need to be developed.

86

The Council will expect an evidence-based approach in forecasting parking demand

Very often parking surveys are done at unrepresentative times of the year, or day.
Numerous parking surveys were conducted during the pandemic and were accepted, despite the evidence being unsound. Weight should be given to the evidence of residents and interested parties, other than the applicant, to demonstrate where issues already exist and equivalent demand from other properties.

- New road building is incompatible with the climate commitments of the Council and Combined Authority.

87

This justifies the provision of an alternative route that could accommodate through traffic, and provide a basis for new residential developments to access the network in an appropriate manner

There are issues over induced demand with increased road building. Also, increased road building runs the risk of reducing available land for housing. This in turn places greater pressure on the Green Belt.

- Whilst all the Challenges and Objectives sections appear to have varying degrees of misapplication through the document, this is the most egregious one.

88

Mitigating and adapting to Climate Change

A policy section that includes road building cannot be described as mitigating, nor adapting to Climate Change. It can only be described as exacerbating Climate Change.

- Need to recognise that Solihull only contributes 6% of land to nature’s recovery. This is the lowest of Warwickshire, Coventry and Solihull.

90

The Borough’s high quality green and blue infrastructure (GI) is one of its greatest assets.
299.
Our longest river, the River Blythe, is a designated SSSI, 14 of our parks have Green Flag awards and our suburbs are characterised by tree-lined streets. High quality, well-connected GI is our Natural Capital and has multiple benefits, which include:

<https://www.warwickshirewildlifetrust.org.uk/magazine> pages 4-6 of Issue 164, Summer 2020.
The paragraph as it stands is misleading. It does not give a balanced view of shortcomings of the Borough’s environmental position.

- This needs defining.

91

From April 2025 for all new dwellings to be net zero carbon

There is a diversity of applications of carbon counting in relation to housing. Some only look at the energy performance of building, covered by the EPCs (Energy Performance Certificates). This is a necessary, but insufficient measure of the environmental impact of buildings.
Whilst recognising the impact of building in unsustainable locations has on the environment, the plan doesn’t seem to follow its own guidance in site selection.
Moreover, the materials and carbon that are embedded in the construction of buildings is what the policy here needs to capture. Unless the building are decarbonised in their construction phase.

<https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house>
Whilst there will be dispute over the true carbon cost of building a house, the article above states 80 tonnes of CO2 go into the construction of a house. If this is accurate, Solihull will be producing 1.2 million tonnes of CO2, over the course of this plan, just on the construction of the 15,000 homes.
A fully grown tree (and not a sapling) can absorb 29kg of carbon per year. To absorb the amount of carbon involved in the construction of these houses would require an additional 2.7 million fully grown trees across the course of the plan. Whilst the commitments to tree planting are welcomed, they are of an order of magintude that does not scratch the surface of the problem here.

<https://www.viessmann.co.uk/heating-advice/how-much-co2-does-tree-absorb>

- Carbon offsetting schemes need to be heavily regulated and a last resort.

92

and carbon offsetting schemes

Too many schemes are not sufficiently well accredited. They can end up “greenwashing” the issue of climate impact, without addressing the problems. Any carbon offsetting schemes will only be accepted when all other alternatives have been demonstrated to be unviable. When this is the case, examination of the carbon offsetting schemes must be open and transparent, to prevent for abuse of the principles, that do not meet the environmental costs created by development.

- Throughout this section there appears to be a missing of the drivers and impacts of Climate Change.

99

Protecting and Enhancing our Environment

Whilst there is clearly positive movement in terms of recognising the importance of the natural environment on this matter, it misses many of the drivers.
There is no regard given to the carbon impact of building these homes, nor any mention of how this can and will be mitigated.
There is little detail on preventing the need for offsetting or why it is less desirable.

- Whilst this is acceptable for older properties that are subjected to energy efficiency improvements, it is inadequate for new homes. 93

of Band ‘C’ by 2030

Whilst I’m sure the authors of this report recognise this, but it should be detailed here that this only applies to retrofitting and that new builds will be Band A or higher.

- There are often good cases for using open ground for PV energy. 94

proposals which harm the openness and permanence of the Green Belt are not considered ‘appropriate development

Whilst the efficient use of land would always promote roof space usage over ground for PV cells, there are often economic cases for using open space.

The example of the Heart of England Community Energy project utilised land that was impacted by foot and mouth disease, so was unviable for agricultural usage. It allowed for a 15 megawatt array that can be returned to use as Green Belt in the future, if desired, whilst also donating £30,000 per year to community projects.

In equivalent instances, hampering the viability might reduce the social benefit that a project is able to deliver and so should be given weight in any consideration.

<https://www.hecommunityenergy.org>

- Why only “given substantial weight”? 94

Proposals for low carbon design such as Passivhaus or accelerating Building Regulations to zero carbon will be given substantial weight.

Surely energy performance should be required from developers, not only to prevent against fuel poverty, but also to prevent the need and associated costs of retrofitting buildings to bring them up to future standards.

- This is too weak a commitment for the reasons already mentioned. 95

Developments should also consider whole-life performance and costs. The consideration of a range of adaptation measures, including the location, design, materials, build and operation of developments, and the provision of green infrastructure, will be given substantial weight.

Merely “giving consideration” will not address climate commitments and will jeopardise meeting them.

- This document doesn’t exist at present so it is impossible to see if it is sound. 95

Council’s Climate Change SPD

- This is relatively weak. 97

In the circumstances where development, which otherwise meets the objectives of the Plan, is likely to have significant harmful effects on the natural environment, as a result of the development itself, or the cumulative impact of developments, developers must demonstrate that all possible alternatives that would result in less harm have been considered and robustly discounted.

Powers to refuse development on the grounds of negative effects on the natural environment. It is too easy to produce a report saying why a developer cannot do anything to prevent or mitigate environmental harm, especially so given the moral hazard inherent within associated industries.

- Errant full stop. 97

wetlands and heathland. To halt and

- Development cannot be allowed to have adverse effects on SSSIs. 98

Development likely to have an adverse effect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if, in exceptional circumstances, it can be demonstrated that the benefits of the development clearly outweigh the nature conservation value or scientific interest of the site and the national policy to safeguard such sites. Where development is permitted that may have a direct or indirect adverse effect on a Site of Special Scientific Interest, developers will be required to incorporate measures to enhance the condition of the site and contribute to its favourable status.

As SSSIs are predominantly waterways in our borough, any negative impacts are liable to yield downstream consequences also. River SSSIs are also vital as wildlife corridors, so must be given the greatest degree of protection possible.

- Again, this is inadequate.

98

Development likely to have an adverse effect on a locally designated site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives

It is not detailed how the weighting of wildlife is counted against benefits of housing. The fear here is that in the calculations, wildlife will always lose.
Whilst there are clearly tradeoffs in all development, without clear guidelines and protections, ultimately resulting in applications for locations that will result in adverse impacts on wildlife being refused, the cumulative environmental detriment will be irreconcilable.

- Again, “wholly exceptional circumstances” needs clear definition.

98

Development likely to have an adverse impact on ancient woodland and/or veteran trees will not be permitted unless there are wholly exceptional circumstances.

Ancient woodlands and veteran trees are by their nature irreplaceable (in the lifetime of any person).
Their importance is not only from their heritage contribution, but the unique habitats that they provide for many species.
It is considered unacceptable to have development that will have adverse impact on ancient woodland and/or veteran trees in almost every instance imaginable.

- Whilst it will not be achieved by protecting them alone, they do need protection. Insufficient protection is afforded by this plan.

100

biodiversity conservation will not be achieved by protecting Sites of Special Scientific Interest alone.

Exemptions that allow for harm to be effected upon SSSIs are incompatible with environmental protection.

- If the installation of drainage systems makes a site unviable it should mean that the developer has the choice to proceed or back out.

102

Drainage systems shall deploy surface features within the development site for water quality purposes, unless these are demonstrated to be unviable

Placing the onus on the Borough and the environment to accept environmental damage to waterways, which in turn could pose a risk to other properties from potential related flooding, is not an acceptable compromise.

- Many residents will have concerns over potential miscalculation in drainage to watercourses.

102

Where a developer proposes that a site discharges to a watercourse, appropriate modelling and supporting calculations must be provided to ensure sufficient receiving capacity exists. The Environment Agency must be consulted if a proposal relates to a Main River or an Area of Critical Drainage Problems

The River Cole will be impacted by surface water from both sites BL1 and BL3.
Liability from this should rest with the developer, to prevent against moral hazard in report generation.

- The catchment of flooding consideration areas is significant.

103

New development will not normally be permitted within areas at risk of flooding.
Where it is clearly demonstrated that there are no other viable sites at lower risk of flooding, consideration will be given to development in such locations, providing that it is designed to be safe from the effects of flooding and will minimise flood risk on the site and reduce risks elsewhere. Applications for new development where there is a flood risk issue must be accompanied by a site specific flood risk assessment Such assessments should be completed having regard to this policy and National Guidance.

There are risks posed to properties in Nethercote Gardens, which has the potential to be exacerbated by development of sites BL1 and BL3.
Development that risks other peoples properties, or residencies cannot be permitted, even if the site becomes unviable as a result.
There are issues of flooding data being seriously outdated already, with land with 1 in 100 year risk of flooding experiencing 5+ incidences in the last 20 years.

- The policies within the plan will allow for further deterioration to watercourses that are already below required standards.

104

At March 2016, one part of the River Blythe was classified ‘bad’, three parts ‘poor’ and one part ‘moderate’. For the length of the River Cole within the Borough, a decline has been measured from ‘moderate’ status in 2009 to ‘poor’ status in 2015.

Irrespective of what changes may happen within legislation, further deterioration of these watercourses is impermissible. For these reasons, development that will detrimentally impact watercourses must not be permitted.

- The revision to the original Water Cycle Study is not provided as supporting evidence.

104

The Council has undertaken an update to the Water Cycle study for the Borough, in 336. consultation with the Environment Agency and Severn Trent Water. The study demonstrates that the level of development and the site allocations proposed in the plan are capable of being delivered without significant water and sewerage infrastructure improvements

The original document is here: <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Water-Cycle-Study-2017.pdf>
The only equivalent updated document is this: <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Water-and-Flood-Risk.pdf>
The water and flood risk document contains no maps so the impact of new or amended sites on flood risk is not visible for those concerned by any potential risk.

<div><div></div><div>The concentration of BL1,2 and 3 in an area with flooding risks compound effects.</div></div> <div><div>This applies to Sites BC1, , BL1, BL2, BL3, HA1, KN1, KN2, ME1, SO2, UK1 and UK2. This more detailed assessment defines flood zones where relevant and provides guidance on the parts of sites where development should and should not take place, as well as considering opportunities for enhancement.</div></div>	<div>106</div>
<div><div></div><div>This policy should have been included for prior consultation as it has been buried here.</div></div> <div><div>Land within Site UK2 Land at Damson Parkway, (which is allocated for employment purposes in Policy P1 and Policy UK2) could potentially accommodate a relocated Household Waste and Recycling Facility</div><div>Many residents in neighbouring areas will no idea of the potential location of the facility, and will have strong view that will not be incorporated in the decision making process.</div></div>	<div>108</div>
<div><div></div><div>Noise from HMOs where walls are adjoining other properties must be considered.</div></div> <div><div>Proposals for new large HMOs (properties containing more than 6 unrelated individuals) will therefore be considered against this policy having regard to impact on amenity and character in particular</div><div>Where necessary, sound proofing should be fitted to mitigate against noise nuisance between such properties.</div></div>	<div>118</div>
<div><div></div><div>On site, wherever possible.</div></div> <div><div>investigated</div><div>Desktop modelling or surveys of noise are often inadequate for analysing potential impacts. Encouragement to do on site analysis, by giving preferential weighting where this is done, is a good way of addressing potential noise pollution probelms before they occur.</div></div>	<div>119</div>
<div><div></div><div>This should be given additional weighting to encourage cooperation and reduce amenity impact.</div></div> <div><div>the potential for sharing sites</div></div>	<div>120</div>
<div><div></div><div>Qualifying the amount and also quality of the space is essential.</div></div> <div><div>Ensure new developments include useable private outdoor amenity space and provide public and private open spaces where there is a choice of areas of shade, shelter and access to recreation that will benefit people, wildlife and provide flood storage and carbon management</div><div>A development in Balsall Common has a ‘play area’ which is approximately 2 meters wide, byy 3 meters long, with 3 tree stumps set into the ground. It is not functional as a play area, but would likely conform to this policy in its current form.</div></div>	<div>124</div>
<div><div></div><div>This is not sufficiently robust as to ensure carbon reductions in design.</div></div> <div><div>including through</div></div>	<div>124</div>
<div><div></div><div>This policy is not sufficiently robust.</div></div> <div><div>consider the protection and management of the existing tree stock on site</div><div>Again, this is another area where moral hazard is rife. Truly independent assessment of tree stock is needed, as well as strong er protections to existing stock.</div><div>An additional challenge to climate commitments is the reduction in sequestration when mature trees are lost to replacement saplings. In the event of any loss of trees, carbon sequestration should exceed previous tree stock on site, prior to any removal of trees, within 3 years. This is necessary to prevent against net loss of trees and protect against Climate Change.</div></div>	<div>124</div>
<div><div></div><div>It is unclear what the objective is here.</div></div> <div><div>optimising densities</div><div>Is it to prevent against high density, or to promote efficient land use? As a policy it is too open to interpretation, making the principle redundant. Emphasis should be give towards promoting more efficient use of land. The reason for this is to safeguard as much Green Belt as possible around the Borough.</div></div>	<div>125</div>

- This policy is not robust enough. It is too open to interpretation. 125

Developers should be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of design, layout and density, consistent with the principles of Policy P9 – Climate Change

- Whilst SuDs are included, the impact of non-permeable driveways on run off, and loss of vegetation are not sufficiently addressed. 127

In well-designed places, water features also form part of an integrated system of landscape, 399. biodiversity and drainage. Sustainable Drainage Systems can be used to enhance the surrounding environment and provide many additional benefits including attenuation, improvements to biodiversity and habitat, character, amenity and open space

More protection should be given to allow for greater amounts of rainwater to be absorbed into the ground. The growth of tarmac driveways and loss of trees and grass frontages impacts both water absorption and carbon sequestration. Design codes should be included to promote sustainability in both of these regards.

- And in their materials and construction. 127

consumption in buildings

- These are unclear and often contradictory. The sites BL1-3 are particularly so, with both the footprints and concentrations of housing hard to discern. 127

Concept Masterplans have been prepared for all residential sites allocations in the Local 404. Plan.

- This principle is contradicted by the inclusion of development around Whitlocks End Farm, Light Hall Farm and Berkswell Windmill. 129

Development will be expected to conserve heritage assets in a manner appropriate to their significance, conserve local character and distinctiveness, create or sustain a sense of place and seek and take opportunities to enhance the contribution made by the historic environment to the character of a place

- This should state that the Council will safeguard the highest performing Green Belt. 131

The Council will safeguard the “best and most versatile” agricultural land

- Number of sites is not the only metric. Urban sites like Solihull Town Centre and Chelmsley Wood have much greater capacity per hectare than Green Belt land. 133

This is reflected both in the significant number of sites in the Green Belt in the SHELAA, and the paucity of sites in the urban area.

Similarly, site UK1 is technically within the Green Belt, but is being removed. As such it should have the housing capacity maximised to realise the benefits of the HS2 station and in recognition of the housing challenges experienced in the Borough.

- The GBA shows that the developments of BL3, BL1 and BL2 rank 1st, 2nd and 5th in terms of impact on loss of Green Belt. 133

The Solihull Strategic Green Belt Assessment (GBA) assesses the contribution that the 419. Green Belt in the Borough makes towards the purposes of including land in the Green Belt. The GBA demonstrates that the Green Belt in the Meriden Gap between Solihull and Coventry makes the most significant contribution, although the Green Belt on the edge of the urban area and some settlements also contributes significantly. The findings have been used to help justify the removal of land in the UK Central Hub Area from the Green Belt and to identify suitable sites for new housing and other purposes elsewhere.

No other area has such a high impact on loss of the local Green Belt. Indeed amber sites around Dorridge were removed from the plan process, despite being on land with a much lower combined score, meaning that it makes a lesser contribution to the Green Belt. Many people are raising concerns that the selection of sites is not entirely evidence led in this regard. The 2 Elected Members who have their names most closely associated with the plan have very little development in their ward. Instead, high volumes of the Green Belt loss is concentrated next to wards of opposition group members. Where anomalies, such as this arise, it feeds speculation that this hasn’t been an evidence led approach.

- These are not possible where gaps between distinct settlements are reduced to minimal distances. 135

Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;

Such Green Belt, as with land between sites BL3 and BL1/Dickens Heath, and site BL2 and Cheswick Green are too small. There is no way to compensate for the loss of Green Belt. Part of the high score in the assessment of these sections of Green Belt was due to the function they perform in separating distinct settlement.

• See next comment		135
In accordance with paragraph 138 of the NPPF, planning permission will not be granted for development of sites removed from the Green Belt unless and until appropriate compensatory improvements to environmental quality and accessibility of remaining Green Belt is incorporated into a Section 106 agreement. Such compensatory improvements shall be proportionate to the extent of land being removed from the Green Belt and will be in accordance with the following hierarchy		
• Requirements for the size and quality of Childrens play areas is not detailed.		146
Provision of new public open space, children’s play, sports and recreational facilities		
• An increase of 1,615 houses in a town/village with fewer than 3,500 is excessive.		157
3,900 households44		
• Incompatible with climate commitments.		159
Balsall Common Relief Road		
• The site is the least sustainable of the BC sites, as it is located furthest away from the train station.		165
Policy BC3		
The station at Berkswell meets the requirements for sustainable travel in the most minimal way possible. The requirement of 3 services per hour, is only met in 1 hour of the day, where it is met by 1 minute. For all intents and purposes, this is what any reasonable interpretation would consider 2 services per hour.		
• This is not possible with the development of any portion of this site.		165
Protection of the setting of heritage assets adjacent the site		
• This chapter talks about the Blythe Villages, but ignores Shirley itself.		172
For the purposes of this chapter, the Blythe area comprises the parishes of Dickens Heath, 575. Cheswick Green and Tidbury Green, which lie to the south of Shirley and the Stratford Road; and west of the M42.		
The area in question is historically part of Shirley and the impacts of the developments will be felt most keenly within Shirley. This is especially true of Sites BL2 and BL3, which connect into Shirley South, with no access or egress from the Blythe ward by car.		
• Work needs to be done with GP practices too as they are the primary care providers in this setting.		174
Health provision – The Council is working with the Clinical Commissioning Group to 593. establish the impact of new development on local GPs and other services, and how this can be addressed.		
They have had poor consultation through this process and as such have not been able to address many of the obstacles the Plan poses. A main challenge has been with regards to the dominance of retirement living in new developments coming forward. These present unique challenges to GPs, as ageing naturally leads to greater incidence of multiple and complex health needs. This poses an infrastructure problem. The majority of the doctors surgeries that will serve the inhabitants of the new sites are located in the wards of Shirley East, West and South, and not Blythe.		
• This site is not justified based on the impact to Green Belt and Ancient Woodland.		175
Policy BL1 - West of Dickens Heath		
• The site lacks defensible boundaries and encroaches upon Cheswick Green.		177
Policy BL2 - South of Dog Kennel Lane		
The site connects onto the A34 in Shirley, but it encroaches upon the settlement of Cheswick Green. This is against policy principles that are supposed to protect distinct settlements from merging.		

- It is problematic that under these arrangements no local contribution will go any of the Shirley Wards that will be impacted by these sites.

Community Infrastructure Levy

Site BL1 will impact Shirley West and Shirley South via traffic flows on Haslucks Green Road and Bills Lane.
Site BL2 will impact Shirley South via traffic flows on Blackford Road, Tanworth Lane and down Dog Kennel Lane and the A34.
Site BL3 will impact residents of Bills Lane and the surrounding roads most pertinently. The site has its only access and egress points solely onto Bills Lane. This is against best design principles, but will also impeded safe walking routes in this area. Given that the road has seen pedestrian fatalities, and that there are no protected crossing points in the entirety of the road, this is problematic.
In addition to this, the only sustainable travel points require crossing of this road for many vulnerable people in the surrounding area. The demographics of the adjacent LSOAs are significantly older than both the national and even the Borough’s average.
The sites are situated in such a manner that CIL should accrue to the neighbourhood most impacted, which in the instances of BL3 is Shirley South. BL2 is of detriment to both Shirley South and Cheswick Green and so this should be recognised in CIL allocations, in the even that site BL3 is not removed.

- This site should be removed as alternative provision can be found from vacant office provisions in the Solihull Town Centre.

Policy BL3 - Whitlock’s End Farm

The site has the highest Green Belt combined score of any of the allocated sites within the plan. The mean score of all the sites in the plan is between 4 and 5. This site comes out at 8. The site is primarily covered in pine trees, meaning that the net loss of trees is irreplaceable. The environmental impact of removing this site, in addition to the impact of the setting of the listed Whitlock End Farm site, mean that it can not be kept in the plan.
The plan also suffered from a lack of defensible boundaries on the most problematic facade, to the south, heading towards Dickens Heath. This is particularly problematic as Dickens Heath uses the canal as the defensible boundary. This site would have no defensible boundary before reaching the canal. This would lead to a merging of 2 distinct settlements with unique characteristics, and would so be against planning policy.

- This section should be called “Knowle” as the entirety of provision is located in Knowle.

Knowle, Dorridge & Bentley Heath

This is problematic as Dorridge is the more sustainable location, as the train station is located there. The further development is located from there, the worse it is for promoting sustainable travel and fostering car dependency.

- As the Council potentially has some ownership stake in this development, it should be prioritised for provision of social and affordable housing.

Policy KN2 : South of Knowle (Arden Triangle)

- All

Many

- This plan was published after another application for over 200 dwellings on the former Morrisons site was made visible.

Development Opportunities in 795.
Shirley Town Centre – Following completion of the Parkgate development and redevelopment of the Powergen site there are limited opportunities for further large scale developments, and therefore any further residential dwellings are likely to arise from windfall developments.

It would appear that developers are in talks with Solihull Council’s Planning Department, so the absence of acknowledging this here is problematic. This is for more retirement living and a care home.
Composition is 115 apartments and 90 bed care home.
<https://www.birminghammail.co.uk/news/midlands-news/towering-plan-old-morrisons-supermarket-19247659>

- Too few homes are planned on this allocation in total and within the plan period.

Policy UK1 - HS2 Interchange

There is commercial capacity on Birmingham Business Park and in the North of the Borough.
As there is anticipated uplift in the number of houses due to HS2 arriving in Solihull (in part because of speculation over properties, with many being bought by owners in the South East of the country), it is not just strategically right to focus additional housing here, it is also one of the most sustainable locations.
Conservative estimates put the capacity at 1,000 homes higher than has been estimated for the purposes of this plan.

Our Borough



Area **17,828** ha of which **67%** is Countryside & Green Belt

Median House Prices:

Solihull	£277,500
West Midlands	£194,995
England & Wales	£235,000



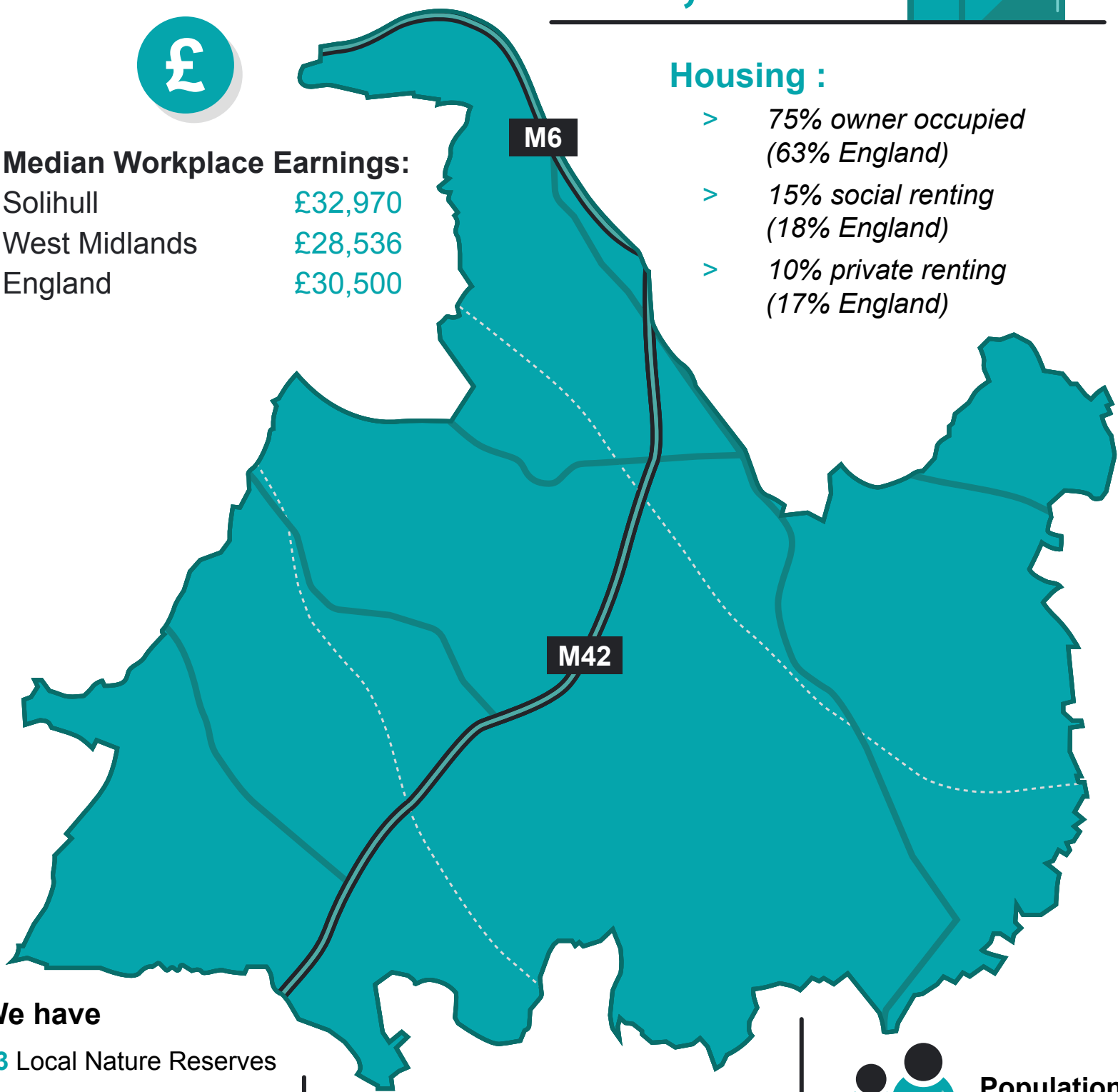
Median Workplace Earnings:

Solihull	£32,970
West Midlands	£28,536
England	£30,500

Households
91,050

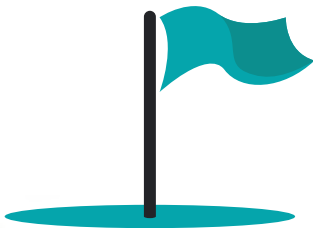


- Housing :**
- > 75% owner occupied (63% England)
 - > 15% social renting (18% England)
 - > 10% private renting (17% England)



We have

- 23 Local Nature Reserves
- 16 Green Flag Parks
- 20 Conservation Areas
- 380 Listed Buildings



Average number of cars/vans owned per household:



Solihull	1.34
East Solihull	1.68
West Solihull	1.42
North Solihull	0.98
England	1.16



Population
214,910

around **75%** of which live in the urban area of the Borough

Over **65s** make up **21%** of the population (England 18% & West Midlands 19%)

No Sources or dates are stated for the data in the infographic.

Foreword

1. Welcome to the Council’s Local Plan. This is one of the most important strategies that the Council produces. It influences so many aspects of our lives – where we live, where we work, how we get there; and of course how we ensure that Solihull remains the special place that it is.
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.
4. But it is not just about the numbers, we need quality and diverse housing that can be assimilated into, and support, our existing communities. We are using concept masterplans for the major allocations which set out from the start where we want to see development coming forward, and where the opportunities are for ‘green and blue infrastructure’ which provide the green lungs and open spaces that are vitally important. The plans also show where significant new tree planting can take place and identify where important infrastructure is to be provided as part of the development.
5. Opportunity has been taken to ensure the plan captures our aspirations around the climate change agenda. It is an opportunity to incorporate our Climate Change declaration into a statutory plan. Climate Change is crosscutting across so many areas; this has shaped our thinking about a whole range of issues, from where development takes place; to how biodiversity can be protected and enhanced; and how to make progress towards our ambitions to be zero carbon by 2041.
6. The arrival of HS2 in the Borough, with the first station outside of London being only 38 minutes away from the capital, represents a unique opportunity for us, and we must ensure a proper planning framework is in place so we can maximise on its benefits.
7. What we have now is what we would describe as a plan for people and places; where wellbeing and the environment matter.

Councillor Ian Courts, Leader of the Council
Councillor Andy Mackiewicz, Cabinet Member Climate Change, Planning & Housing

The plan doesn’t make decisions. It is incorrect to phrase it in such a way. The decisions are made by the elected members on the Council, with only one group supporting this plan.

This plan does not significantly boost the supply of homes for “all our communities”. It does so for some, disproportionately, and not for others.

This plan is incompatible with the Climate Emergency and the pledges that the Council has made in that respect.

This is patently not true. There are options that involve greater or lesser loss of Green Belt land in Solihull. These are options, but some of the alternatives suggested have either not been included, or discarded.

There are no policy requirements on the climate impact of housing, which will mean that the Planning Department and Committee will be unable to refuse applications that cause considerable harm to the environment.

This is largely due to the materials and construction methods accounting, disproportionately, for CO2 emissions of housing over the first 50 years of their use. If Climate commitments are to be met, and the principles of sustainability achieved, these need to be resolved within the document.

This is the West Midlands Combined Authority targets, not the target passed, unanimously, by Solihull Council on 8th October 2019. This motion stated 2030 for Solihull Council to be “net carbon zero” by.

Land at Arden Cross is not being maximised for housing, meaning that some benefits will not only not be realised, it will foster greater car dependency to travel to the HS2 interchange.

Introduction

8. At the heart of planning is the need to plan positively for sustainable development¹. One of the principal ways this is achieved is by having a local plan to guide the development of an area. Having a local plan is key to delivering sustainable development that reflects the vision and aspirations of local communities. The aim is that local authorities should positively seek opportunities, through their local plan, to meet the development needs of their area. The Council’s local plan addresses the spatial implications of economic, social and environmental change that is happening to the Borough, both now and in the future.
9. The current local plan, the “Solihull Local Plan” (SLP), was adopted in December 2013 and covers the period 2011 to 2028. Although it is a recently adopted plan, and is up-to-date in many respects, there are three reasons that have triggered the need for an early review of it. The first is to deal with the legal challenge to the 2013 plan²; secondly to accommodate Solihull’s own housing needs, as well as helping to address the housing shortfall occurring in the wider Housing Market Area (HMA); and finally to provide a proper planning framework that recognises the arrival of HS2 in the Borough³ – in particular the first station outside of London which is to be constructed on land opposite the NEC.
10. The latter is particularly important as it provides a unique opportunity for the Borough to capitalise on maximising⁴ the potential HS2 has, and recognising the part it has in contributing towards creating one of the most connected places in the country. A place where international air travel, high speed rail, and conventional rail all come together at a location well served by the national motorway network and local connections⁵.
11. Two thirds of the Borough is located in the Green Belt, and this includes the strategically important Meriden Gap that separates Solihull and the Birmingham conurbation from the city of Coventry. This plan seeks to protect this important feature that makes Solihull special whilst accommodating, in a managed way, the growth that is needed.



“Sustainable development” is defined by 1987 Bruntland Commission Report for the United Nations as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.¹

This Plan does not deliver on the purpose of Sustainable Development, as it will compromise future generations ability to meet their needs, due to the environmental impact of this plan.

The administration have repeatedly been warned that this iteration of the plan, in part due to the process the Council has followed, is also open to legal challenge.²

It is unclear in what way this plan achieves this end. Plans have already been approved by Solihull Council for the HS2 Interchange site. However, this plan does not accommodate the necessary level of housing on the site.³

This is a tautology.⁴

This implies it is well served by public transport, which it is not.⁵

Climate Change

12. Although the reasons noted above triggered the need to review the plan, it is also clear that a new plan provides an ideal opportunity to ensure the Council's approach to planning matches its ambitions in responding to the climate change challenge. In recognition of the gravity of the climate change emergency the Council adopted a 'Climate Change Declaration' in October 2019. Action on many fronts is needed to address this challenge and through this plan the Council will set, in a statutory framework, those aspects of the declaration's actions that can be addressed through the planning system. As the declaration states "there needs to be a just transition for our residents and for business, taking them with us, so as to protect employment and avoid adverse effects on our people, our economy and our communities."

The phrasing of this statement implies that ALL aspects that can be addressed are. This is not true. 1

Covid-19

13. This introduction would not be complete without reference to the Covid-19 crisis of 2020. Its effects have been devastating and the long term effects of it are still not clear. But what is clear is that the Borough must create the right conditions for the recovery and having an adopted plan in place will play a key part in this.

Whilst the authors of the plan are fully aware of the current pandemic, no adaptation to the consultation period has been made to account for this. 2

How Could it Affect Me?

14. The local plan as a whole sets out the future spatial strategy for the Borough and includes the allocation of sites to promote development. It also identifies land where development would be inappropriate because of its impact on, for instance, environmental or historic assets; and it also incorporates a strategy for enhancing the natural, built and historic environment.

More pertinently, the manner in which the administration has acted has jeopardised the successful adoption of the plan. Documents have been uploaded or changed, without publicising this, after the consultation started. Many residents have explained difficulties with the Council's website and process of s...

What will happen if we don't identify enough land for new development?

15. National planning policy is that the supply of land for housing should be significantly boosted, and without an adequate supply of land for new dwellings, access to the homes that we all need becomes ever more difficult. Equally, land for commercial needs has to be managed to ensure that both existing businesses can flourish whilst also providing an opportunity to attract new business into the Borough. Of course, we also need to recognise the special place that Solihull is, and this plan seeks to ensure that the right balance is achieved between providing land for new development and protecting what makes Solihull special.
16. If the Council does not have an appropriate plan in place, it will be unable to demonstrate a '5 year land supply' and this could mean that policies in the 2013 plan would be considered out-of-date and lead to less influence over the impact, including through inappropriate design, that some developments may have. This increases the Borough's vulnerability to speculative development proposals, and would lead to development and growth taking place in an unplanned manner, placing additional pressure on infrastructure without guaranteeing or planning positively for measures that can mitigate the impacts. In addition, the Secretary of State could intervene in the Council's plan making powers thus taking away local choice about where development should be accommodated.

A seismic shift is taking place, where homes are becoming commercial locations, with more people working from home than at any point in history. This plan does not account for that. 3

Background

17. This plan has been developed through a series of stages which started with a scope, issues and options consultation in November 2015; and further consultations on draft versions of a plan in November 2016 and January 2019. These earlier stages, and the evidence base

prepared to support this plan, can be found on the Council’s website at www.solihull.gov.uk/lpr.

Relationship to Other Plans

- 18. This plan largely replaces the Solihull Local Plan (Dec 2013), and most of its policies will no longer carry any weight. The only exceptions are the site allocations from the 2013 plan which remain to be brought forward. These are referenced in the policy/settlement chapters.
- 19. The Gypsy and Traveller Site Allocations Development Plan Document (DPD) was adopted in December 2014 and co-existed with the SLP. Alongside Policy P6, this DPD will continue to be used to provide a framework for determining relevant applications under this plan.
- 20. There are now three neighbourhood development plans that have been ‘made’, and they formed part of the development plan for the Borough before this plan was adopted. Others that come forward will need to reflect the strategic policies of this plan.
- 21. The Council places great importance on neighbourhood plans and recognises the substantial efforts that communities have made in bringing forward plans. In the context that this plan provides a number of policies that include Borough wide standards or expectations, there may be occasions when existing neighbourhood plans (particularly if they are up to date and reflect current evidence) provide a more appropriate local expression of a standard or expectation that should be taken into account and given due weight.
- 22. The local authority will continue to work with neighbourhood groups and parish councils to support the ongoing delivery of new neighbourhood plans and the update of existing plans as appropriate and in accordance with national guidance.

Should state “brought”. 1

Our Borough

Overview of the Borough

- 23. Solihull Metropolitan Borough is located on the southern edge of the West Midlands conurbation, between Birmingham and the Black Country to the west and Coventry to the east. It is bound to the north by the rural area of North Warwickshire and to the south, by rural Bromsgrove, Stratford and Warwick. The Borough is renowned for its key economic assets and strategic transport infrastructure both of regional and national significance; its attractive environment and quality of life; **aspirational housing** and excellent schools. All of which mean that Solihull is a desirable place in which to live, work and invest. Together, these elements combine to establish Solihull’s character of ‘town in country’ living up to the Borough’s motto: “Urbs in Rure”.
- 24. Solihull is part of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP), a partnership led by key businesses and local authorities to drive sustainable growth and job creation. Solihull is also a constituent member of the West Midlands Combined Authority (WMCA). The Combined Authority has a Strategic Economic Plan (SEP) which sets out how devolved powers and resources will be used to deliver a stronger West Midlands with a focus on skills, innovation, transport and inward investment. Development at Birmingham Airport and the arrival of HS2, will help make Solihull and the West Midlands region a world class business location.
- 25. Solihull is at the heart of the national rail and motorway network with direct rail services to London, Birmingham and the north along the West Coast and Chiltern Mainlines and has excellent access to other regions in the UK through the M42, which links the Borough to the M6 at the northern boundary of the Borough and the M40 to the south. This strategic transport infrastructure, together with Birmingham Airport, has ensured the Borough is the principal national and international gateway to the GBSLEP area and the wider West Midlands area.

Historical Development

- 26. The development of Solihull was highly influenced by the arrival of the railway stations and the 20th Century expansion of Birmingham south-eastwards. The area now known as Solihull Borough was predominantly rural with small historic towns and villages of medieval origin or earlier at Solihull, Meriden, Berkswell, Barston, Hampton-in-Arden, Knowle and Bickenhill until the end of the 19th Century, when Birmingham began to expand into rural Olton, with houses overlooking Olton Mere. Shirley originally developed from a scattered heathland settlement serving the road from Birmingham to Winchester via Oxford. Development of the Grand Union and Stratford-Upon-Avon canals and the railways also occurred during the Georgian and early Victorian periods, respectively.
- 27. The Rural Area once formed part of a huge area of wood pasture and ancient farm lands known as Arden and evidence of previous woodland, commons and heaths are often shown in local place names. There were also a number of manor houses and halls associated with large parks situated within the Rural Area, for example, parkland associated with Berkswell Hall was once part of a medieval deer park. Much of the woodland has now been cleared and the landscape character is predominantly agricultural, characterised by a variety of fieldscapes from older, irregular piecemeal enclosure to larger planned enclosure and very large post-war fields.
- 28. Large settlement expansion from Birmingham into Solihull occurred between 1900 and 1955, particularly during the inter-war period. This resulted in the development of semi-detached housing estates at Lyndon, Olton, Elmdon and Shirley stretching towards Solihull and, to a

It is unclear what is meant by the term “aspirational housing”. It is potentially problematic given the context of the affordability ratio between house prices and earnings.

Challenges

37. To help shape the policies in the local plan it is helpful to identify the challenges the Borough faces and what the objectives should be in addressing these challenges. This helps to ensure that the plans policies are justified and that they will play a part in meeting these objectives.
38. Whilst the challenges identified in the Issues and Options consultation were based on the 2013 SLP, the subsequent consultations have enabled these challenges to be shaped and updated through this process to ensure they are up-to-date and appropriate. The challenges are not set out in any priority order.
- A. Mitigating and adapting to Climate Change
- B. Meeting housing needs across the Borough, including the Borough’s own needs and, where possible, assisting with accommodating the HMA (Housing Market Area) wide shortfall.
- C. Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- D. Securing sustainable economic growth
- E. Protecting key gaps between urban areas and settlements
- F. Reducing inequalities in the Borough
- G. To maintain a supply of Gypsy and Traveller sites and pitches.
- H. Increasing accessibility and encouraging sustainable travel
- I. Providing sufficient waste management facilities and providing for sand and gravel aggregates
- J. Improving health and well being
- K. Protecting and enhancing our natural assets
- L. Improving water quality and flood risk
- M. Maximising the economic and social benefits of the High Speed 2 rail link and Interchange
- N. Mitigating the impacts of High Speed 2 and the growth associated with the Interchange area
- O. Providing infrastructure and securing developer contributions.

Challenge A – Mitigating and adapting to Climate Change

- To reduce the higher than average greenhouse gas emissions.
- Low potential for wind and biomass.
- To reduce the high level of emissions from transport.
- Traffic growth generated from new housing and employment growth across the Borough
- Rise in emissions from increased flights and passenger travel to and from Birmingham Airport

Clearly there is not equal regard given to the gaps between Shirley and the Blythe villages as others. These are the most at risk of convergence with the contiguous Birmingham/Solihull conurbation.

- Risk to health of older people and those in fuel poverty in poorly insulated homes.
- Risk of increased surface water flooding in urban areas.
- Urban heating and adverse impact on air quality.
- Retrofitting of existing buildings.
- Increased risk of disease
- Impact on biodiversity conservation and landscape character.

Objectives

- To address the Council's Climate Change declaration of October 2019
- 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.
- Provision of low carbon infrastructure (Green Gas, local Power networks, EV charging)
- Promote decentralised energy and heating networks within the Mature Suburbs and North Solihull area, and the generation of energy from on-site renewable sources.
- Support the implementation of 'Solihull Connected' and increase mode shift to public transport and active travel by ensuring that new development is located in areas of high accessibility or potential high accessibility.
- Implement measures, such as integrated green infrastructure, to improve resilience of existing and new developments to the impacts of climate change.
- Implement measures to improve the alternatives to car travel.
- Promote public transport access to Birmingham International station and low carbon surface movement strategy to the Airport

Challenge B - Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall

- Meeting the Borough's housing needs without adversely affecting the quality of its environment and its attractiveness for businesses and residents.
- Accommodating some of the HMA wide housing shortfall without adversely affecting the quality of its environment and its attractiveness for businesses and residents
- Ensuring a supply of housing is available throughout the plan period, especially in the early period.
- A shortage of affordable housing, particularly for rent and first time buyers, in all areas of the Borough but especially the Mature Suburbs and the Rural Areas of the Borough.
- A need to widen the housing offer to ensure the provision of an appropriate range of market housing and encourage affordable routes to home ownership.
- ¹ A need for a range of affordable housing for older people and for people with learning, physical and sensory disabilities and mental health needs.

The current situation is over provision of unaffordable housing for older people. This has been concentrated in Shirley, which this plan doesn't address.

Objectives

- Ensure high quality design and development which integrates with its surroundings and creates safer, inclusive, adaptable and sustainable places which make a positive contribution to the Borough’s sense of place, attractiveness and to people’s quality of life.
- Conserve and enhance the qualities of the built, natural and historic environment that contribute to character and local distinctiveness and the attractiveness of the mature residential suburbs and the rural area.
- Ensure development does not have an adverse impact on residential and other amenities, and where that impact is unavoidable, to incorporate satisfactory mitigation.
- Promote the sustainability of the rural areas through infrastructure investment, including broadband.
- Widen the range of options for older people and those with disabilities through provision of accommodation which is designed to meet these diverse needs.
- Provide cycle ways and wildlife to provide sustainable connectivity between communities, transport hubs and public open spaces.
- Enhance the Borough’s cultural & visitor attractions.
- ¹ **Maximise the potential of the 2022 Commonwealth Games** to encourage visitors to Solihull



Challenge D - Securing sustainable and inclusive economic growth

Key Economic Assets

- Maintaining Solihull’s important regional and sub-regional role.
- Meeting aspirations of key businesses to enable them to maintain competitiveness (Birmingham Airport, National Exhibition Centre, Birmingham Business Park, Blythe Valley Park, Jaguar Land Rover) whilst contributing to sustainable development.
- Retaining and developing a high skilled workforce.
- Provide a range of housing to attract inward investment

This is the only reference to the “Commonwealth games” in the document. Not only is no idea given as to how this will be achieved, there is little that can be done in the timescale necessary to contribute towards this goal.

- Provide a natural landscape that is attractive for relocation of business
- Impact of congestion on motorways, the strategic highway network and rail from additional growth/housing.
- **Impact of pressure for development** on the quality of the environment.
- Need to provide opportunities around workplaces for healthy and active lifestyles.
- Need for high speed digital connectivity to enhance competitiveness.
- Need to ensure that the “urbs in rure” is preserved in Solihull to drive inward investment into the West Midlands.

Solihull Town Centre

- Widening the range of uses and activities to maintain and enhance attractiveness whilst providing for a greater range of needs.
- Impact of congestion.
- Maintaining the attractiveness of the Town Centre’s historic core and parkland setting.
- Allow for restructuring post COVID and the new economic landscape

Shirley Town Centre

- Pressure from out of centre retail development.
- Poor quality shopping environment.
- Impact of high level of through traffic and congestion.
- Allow for restructure post COVID

Chelmsley Wood Town Centre

- Dated in appearance and in need of environmental improvements.
- Broader diversity of uses needed to improve attraction to shoppers.
- Maintain its local importance.
- Allow for restructure post COVID

Objectives

- **Maximise the capacity and benefits of the recently extended runway at Birmingham airport**, including through enhancing the passenger experience.
- Support the continued success of other key economic and employment assets such as National Exhibition Centre, Birmingham and Blythe Valley Business Parks and Jaguar Land Rover whilst maintaining the quality of the environment and managing congestion.
- Support smaller businesses and employers in the Borough.
- Support the continued success of Solihull Town Centre whilst maintaining the quality of its environment and managing congestion.
- Encourage investment into Shirley and Chelmsley Wood Town Centres to improve competitiveness and the shopping environment and support long term sustainability.
- Revitalising town and local centres to meet the emerging challenges of Post COVID Britain, including their role as destinations for retail and leisure.

This is the impact of pressure “from” development.

1

Maximising capacity of the airport is inconsistent with not only the Climate Emergency measures and objectives of Solihull Council, and the West Midlands Combined Authority, but also the Paris Agreement of 2016.

2

Additionally, the aviation industry has experieinced a significant contraction during the global pandemic. It is unclear to what extent the sector will grow in response to this. The current viewpoint of the External Auditors for Solihull Council is that airports cannot be valued at present for these reas...

- The need to maintain an appropriate level of supply of authorised Gypsy and Traveller sites and pitches in Solihull.
- Avoiding the establishment of unauthorised developments and encampments.

Objective

- To ensure adequate provision of authorised pitches to meet the identified accommodation needs of Gypsies and Travellers in the Borough.
- Reduce the number of unauthorised developments and encampments and enable Gypsies and Travellers to access the services and facilities to meet their needs, whilst respecting the interests of the settled community.

Challenge H - Increasing accessibility and encouraging sustainable travel

- Difficulties of access to services, facilities and employment leading to social exclusion, in the North Solihull area and for young and elderly in rural areas.
- High car use in the Mature Suburbs and often this is the only form of available transport in rural parts of the Borough.
- Ensuring that expected levels of population growth as well as delivery of HS2 and UK Central do not compound existing levels of peak hour congestion on the principal road network
- Public transport journey times and poor reliability can discourage modal-shift.
- Poor pedestrian and cycle connectivity between communities and retail and employment centres.
- Physical, behavioural and perceptual barriers to more sustainable forms of transport, most notably cycling and bus.
- Poor north-south public transport links.
- Poor cross-Borough transport links to key destinations such as Birmingham Airport and lack of direct public transport link to University of Warwick
- Managing transport demand and access to Solihull Town Centre
- High number of journeys to school and college by private car
- A new approach is needed to access to Solihull central business district.
- More journeys to school and college taken by sustainable modes of travel.
- More developments in areas with good public transport access and of sufficient density to support the long term viability of public transport provision.

Objective

- Improve accessibility and ease of movement for all users to services, facilities, jobs and green infrastructure, including the rural area.
- Reduce the need to travel.
- Manage transport demand and reduce car reliance.
- Enable and increase the modal share of all forms of sustainable transport, including the ability to use different modes (eg train & cycle) for one journey.

Car use is the only form of available transport for parts of the Mature Suburbs that are more remote from major thoroughfares.

Urban extension as a policy further compounds this problem, as very often the issues are not only demand focussed (concentrations of available transport users), but also due to connecting infrastructure. Bus companies would prefer to avoid routes with speed bumps. Also some parts of the r...

A minimal approach to densities will also yield a minimal modal shift to sustainable travel.

This is incompatible with both climate and transport objectives of this document.

- De-couple economic growth and increase in car use.
- Concentrate development in areas with high existing, or potential for improved public transport access, and of critical mass to support the long term viability of public transport provision.
- **Increase the amount of EV charging points**

Challenge I - Providing sufficient waste management facilities and providing for sand and gravel aggregates

- Providing sufficient waste management facilities to meet an equivalent tonnage to the waste arising in the Borough.
- To encourage developers to have a waste strategy and the construction to minimise the carbon impact
- Providing for sand and gravel production to meet national and local targets, in the context of limited resources elsewhere in the sub-region.

Objectives

- To promote the management of waste arising in the Borough further up the waste hierarchy and its treatment as a resource to be used wherever possible.
- To address the identified needs for waste management in the Borough.
- To provide for primary sand and gravel resources within the Borough to meet Solihull's contribution to the requirement identified in the West Midlands Metropolitan Area Local Aggregates Assessment, including the maintenance of a minimum 7 year landbank, whilst ensuring that provision is made to encourage the use of secondary and recycled aggregates, that sand and gravel resources are safeguarded from possible sterilisation by non-mineral development, and that environmental, restoration and aftercare criteria are met.

Challenge J - Improving health and wellbeing for everyone

- Significant health inequalities in the Borough, particularly between North Solihull and the rest of the Borough.
- **Incidence of unhealthy lifestyles and behaviours**, particularly in young people; an ageing older population, and the need to improve the physical and mental health and wellbeing of those who visit, work and live in Solihull, in accordance with the Health and Wellbeing Strategy.

Objective

- Promote development that contributes to a healthy and safe population by providing for opportunities to enable people to pursue an active lifestyle, increase participation in physical activity including play, sport and recreation and make healthier choices.
- Meet local housing and employment needs whilst facilitating the provision of appropriate health care services to create healthier safer communities.
- Ensure development promotes positive outcomes for physical and mental health and wellbeing through its location, layout and design, inclusion of appropriate levels of

Whilst Electric Vehicles are preferable to Internal Combustion Engine vehicles, they place the same infrastructure demands on the highway.

The wording of this is not only problematic, but misleading. The implication is that health is primarily driven by “lifestyle choices”, rather than other factors. Income and employment are more significant indicators in this respect, so should have t

<https://www.jrf.org.uk/report/falling-short-experiences-families-below-minimum-income-standard>

open space, sporting facilities, safe cycling routes and the protection and improvement of air quality.

Challenge K - Protecting and enhancing our natural assets

- Decline in the quantity, quality and connectivity of biodiversity and ecological networks across the Borough, including sites of national importance such as the River Blythe, loss of sites of local importance, and fragmentation of habitats.
- Degrading of the historic Arden landscape character in parts of the Borough.
- Managing the growth agenda so that ecosystem services provided by natural assets are not harmed and thus undermine the Borough’s capacity for growth.
- Facilitating the planting of 250,000 trees by 2030¹

Objectives

- Increase and enhance Solihull’s natural environment
- Promote an ecosystem approach to biodiversity conservation aimed at:
- Halting and reversing decline and loss by conserving, enhancing and increasing the cover and connectivity of biodiversity and habitats of value. Contributing to local and sub-regional initiatives to improve the natural environment, such as Nature Recovery Networks and the Natural Capital Investment Strategy
- Integrate green infrastructure and biodiversity net gain within development and avert fragmentation with the wider ecological network
- Reviewing and updating biodiversity information and the network of local wildlife and geological sites.
- Addressing gaps in the strategic ecological network to support wildlife and green infrastructure.
- Promote a landscape scale approach to protecting and restoring the landscape of the Borough and its characteristic features.

Challenge L – Improving water quality and flood risk

- Poor or moderate quality of the Borough’s main water bodies, the Rivers Blythe and Cole and their tributaries, and increasing risk of flooding associated with new development.

Objectives

- To contribute towards improving the quality of the water environment by ensuring that the Plan’s policies and land allocations help to protect and improve the quality of the main water bodies in the Borough.
- ² To minimise the risk of flooding by avoiding development in high risk areas wherever possible, by applying the flood risk sequential test reducing flows to rivers by restricting surface water discharge rates during periods of high intensity rainfall, and ensuring that new development is designed so as to minimise surface water flooding risks.

The planting of trees will have no impact on CO2, if there is no commitment to a net-gain of trees. ¹

This is particularly pertinent to site BL3, where significant numbers of trees will be lost to build housing.

The concentration of development in the Blythe/Shirley area will increase surface water discharge into rivers. ²

A primary example of this is recent flooding in Nethercote Gardens. Development at sites BL1, 2 & 3 will undoubtedly have a detrimental impact on this.

Challenge N - Mitigating the impacts of High Speed 2 and the growth associated with the UKC Hub area

- Impact of construction works on the HS2 rail link and interchange station on the environment, communities and transport network, and subsequently during the operational phase.
- Significant infrastructure requirements associated with the rail link and interchange.
- Impact of the associated economic and housing growth on the Borough's transport network, communities, environment and its Green Belt.

Objectives

- To maximise the opportunities of HS2
- Develop a strategy to mitigate the impacts of increased road traffic to/from Birmingham Interchange including public transport provision, junction schemes and environmental measures required.
- To make efficient use of land at the Interchange site by utilising decked car park options in lieu of extensive surface level parking.

Challenge O – Providing infrastructure and securing developer contributions

- Providing sufficient and appropriate physical, social and green infrastructure to support inclusive growth for new and existing communities

Objectives

- Set out strategic and local infrastructure needs in the Infrastructure Delivery Plan.
- ¹ Work with stakeholders and partners in infrastructure delivery, including Transport for West Midlands, the CCG and NHS Estates, utility providers, statutory bodies and neighbouring authorities.
- Allocate funding from developer contributions in the annual Infrastructure Funding Statement to enable timely delivery of infrastructure to support development and growth objectives.

The Council has been made aware of deficiencies in this regard. ¹

Managers of GP practices have given deputations to the Council to explain that since the restructuring of the local CCG, communications on these sort of matters has deteriorated. In light of this, the objectives should state working with “primary care providers” to ensure there is no worsening...

Vision

Council Plan (2020 to 2025)

39. The Council Plan (July 2020) sets out the Council’s direction in the five year period to 2025. It is a basis for engagement with Solihull residents and businesses and is therefore a good starting point to develop a vision that can be used to shape the local plan. The Council Plan vision is one:

‘Where everyone has an equal chance to be healthier, happier, safer and more prosperous through growth that creates opportunities for all’.

40. The Plan has been developed in the context of the Solihull Health and Wellbeing Strategy and the Covid-19 Economic Recovery Plan.

41. The basis of the Plan is that economic development, environmental sustainability and health and wellbeing must move forward together so that sustainable inclusive economic growth and opportunity for all can be realised.

42. The Plan identifies five building blocks of inclusive economic growth:

- Building a vibrant economy (including social economy),
- Promoting and delivering social value
- Enabling communities to thrive
- Actioning the Council’s climate change declaration
- Improving skills and access to good work.

43. Everything that the Council does aims to contribute to one or more of these. The Council Plan identifies a number of priorities and component activities to be done by 2025. The local plan makes a contribution (at least in part) to the following priorities.

Economy

- Revitalising our towns and local centres
- UK Central (UKC) and maximising the opportunities of HS2
- Increase the supply of housing, especially affordable and social housing

44. The outcomes from this will be that town and local centres have stable or growing economies, people, business and the environment benefit from UKC and HS2, including increased access to good work, and there is more affordable and environmentally sustainable housing.

Environment

- Enhance Solihull’s natural environment
- Improve Solihull’s air quality
- Reduce Solihull’s net carbon emissions

45. The outcomes from these activities will include an enhanced, well connected natural environment, more people walking, cycling and using public transport, improvement in air quality with clear progress toward achieving net zero carbon – the Council by 2030 and the Borough by 2041.

People and Communities

These are inconsistent with the OECD Framework for Inclusive Growth

https://read.oecd-ilibrary.org/economics/opportunities-for-all_9789264301665-en#page1

Health is a key aspect of inclusive growth. In the Plan it does not recognise the importance of health for inclusive growth.

This paragraph makes no grammatical sense and so the soundness of the assertion cannot be established.

- Take action to improve life chances in our most disadvantaged communities
 - Enable communities to thrive
 - Sustainable, quality, affordable provision for adults & children with complex needs.
46. Achieving this priority will see increases in residents with significant disadvantages moving into employment, education or training, and stronger, more connected, resourceful communities finding solutions to local problems.
47. The Local Plan is one major tool that can be used to enable the Council Plan vision to be achieved, in doing so the vision for the local plan should complement and build upon (in a land use planning context) the Council Plan vision. This is what is described in the following paragraphs.

Borough Vision - Overview

By 2036, Solihull will have built on its distinct reputation as an attractive and aspirational place to live, learn, invest, work and play.

It will have taken advantage of the unique opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area; reflecting the Borough’s location at the heart of the national rail and motorway network. In particular the opportunity will have been taken to ensure that the HS2 Interchange is well integrated to the Borough’s green infrastructure and key economic assets, including Birmingham Airport, the NEC and JLR to ensure they, and others, can capitalise on this potential.

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.

The Borough will retain its sense of identity, both in its urban and rural area (including protection of the Green Belt which contains the strategically important Meriden Gap); and the quality of the environment that make it a special place.

This vision will be underpinned by ensuring all relevant activities are underpinned and fully integrated with measures to tackle the Climate Change emergency; recognising that this has a cross cutting dimension that extends across economic, social and environmental objectives.

Achieving this vision will contribute towards the ability for everyone to have an equal chance to be healthier, happier, safer and prosperous, through growth that creates opportunities for all.

Borough Vision in Detail

48. It will be a Borough that continues to be economically successful and a driver for sustainable growth within the West Midlands; where the potential for sustainable inclusive economic growth within the UK Central area is unlocked and the ambitions for the economic assets contained within it are fully realised, without undermining the qualities that make the Borough attractive to people and investment. Essential infrastructure will be delivered to facilitate and underpin sustainable economic growth and the Borough will be a more accessible and integrated place where walking, cycling and public transport are more attractive and convenient alternatives to travel than by car.

It is unclear what is meant by this. 1

Integrating a site, which is surrounded by major roads, or motorway, on all sides into green infrastructure is unclear. Does this mean that the site will have the benefits of green infrastructure brought in, or the dis-benefits of their loss take off-site?

The growth in homes for older people is raised as a concern in this regard. 2

Many residents have raised concerns with the overdevelopment of retirement living and care homes in Shirley. This is impacting the sense of identity of the area, with net increases in the number of older demographic groups. These are not only a threat to the character and identity of the ar...

There is a risk of the M42 corridor ‘overheating’ in terms of economic growth. 3

There are arguments to suggest that the Black Country is a good candidate for redevelopment and targeted growth policies. It is also in concordance with the current governments “levelling up” agenda. The rhetoric of this section is reminiscent of “trickle down economics”, which has been t...

It is unclear what is meant by this. 4

In what way would the the qualities that make the Borough attractive to people and investment be undermined? One way is by losing significant amounts of Green Belt, which this plan does. It is therefore internally inconsistent.

49. Solihull will be a fairer and more equal Borough where all existing and future generations live healthier lifestyles, make healthier choices and have equal opportunities to a better range of high quality and affordable housing, education, jobs and an attractive, safe environment. We will have responded to and reduced the Borough's local housing need through the provision of a greater range and type of affordable and market housing; and Solihull's Gypsy and Traveller community will have been provided for. All local communities will have greater involvement in shaping their areas and neighbourhoods, helping to sustain the longevity of rural settlements through the Neighbourhood Plan process.



50. The Borough will continue to be 'Urbs in Rure', realising its ambitions for sustainable economic growth without compromising the quality of its environment, protecting the integrity of the Green Belt and retaining the strategic Meriden Gap between the Birmingham Conurbation and Coventry. The Borough's high quality Mature Suburbs, distinctive rural settlements, villages and wider Rural Area, its historic and natural environment and green infrastructure network will be protected and enhanced. The quality of the housing, public realm and green space will have been maintained and improved across the Borough. New development shall have taken the opportunity to provide additional open space that links into the Borough's green infrastructure to ensure the Borough's 'Urbs in Rure' character is maintained and enhanced.
51. The Council recognises the gravity of the climate change emergency and in October 2019 made a Declaration of Intent to collaborate with, and support the WMCA in delivering the West Midlands target of net-zero emissions by 2041. The Council has also set a target to become a net carbon zero Council by 2030.
52. In tackling climate change, the Borough will have significantly reduced its carbon emissions, realised its potential to deliver renewable and low carbon energy schemes and created development which has minimised, and is resilient to the future, impacts of climate change.
53. Solihull will have reduced the amount of waste produced in the Borough through increased recycling and re-use, eliminated the gap between the amount of waste arising and the capacity of its facilities and continued to provide an adequate supply of sand and gravel to help meet local development needs.
54. This Borough wide vision will have local area perspectives as explained in the settlement chapters.

This sentence is grammatically incorrect and has an erroneous use of "make healthier choices".

Also the use of "will" as opposed to "aims to be" would be a

Are pitches as opposed to sites sufficient?

The process that this Plan's consultation has followed does not lead to any degree of faith in this statement.

Retaining the gap is frequently referenced, but not explicitly explained, as building within this area is included within the plan.

Spatial Strategy

Introduction

55. Solihull has an enviable record of promoting and delivering growth in a way which enhances the Borough whilst at the same time not undermining the characteristics that make it special and attractive to investment. The spatial strategy will continue to manage growth and protect these characteristics.
56. The 2013 Local Plan incorporated a spatial strategy that was based on a housing target that reflected the emerging requirements from the revisions to the Regional Spatial Strategy. This was a target that was 'constrained' and wasn't meeting the Borough's own needs. Furthermore, it didn't accommodate any of the shortfall that was beginning to occur across the housing market area. This plan seeks to do so by not only accommodating the Borough's own needs, but also in making a meaningful contribution towards accommodating some of the shortfall from the housing market area.
57. At the time the 2013 plan was being prepared, the plans for HS2 had not reached an advanced stage. That plan acknowledged that the high speed rail link could play a key role in the future growth of the Borough, but at the time it would have been wrong to assume its development. Since then the HS2 Act has received consent, and following the issuing of the 'Notice to Proceed' in April 2020, construction has now started on the project.
58. The arrival of the high speed link will have a profound effect on the Borough and this local plan review must address how its benefits can be maximised. This is in the context of the unique opportunity that is available to do so; with the interchange being located at the heart of the Boroughs key economic assets and transport infrastructure.
59. 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. Solihull is not alone in having to accommodate development within the Green Belt - there are examples within the same housing market area where this has already occurred, and others are expected to follow. Nevertheless Solihull puts great value in the Green Belt and only sacrifices Green Belt if there is no other option.
60. The Strategy seeks to develop the potential of each part of the Borough to contribute to the growth agenda through a place making approach aimed at enhancing Solihull as a place where people aspire to live, learn, invest, work and play; whilst recognising and protecting character and local distinctiveness. This includes realising the potential of the UK Central Area to drive growth and recognising the needs and growth potential of all communities in the Borough. Opportunities for development to meet these needs will be balanced with the importance of protecting the Mature Suburbs and the open countryside within the Solihull Green Belt.

Developing the Spatial Strategy

61. The Scope, Issues and Options consultation indicated that whilst many elements of the spatial strategy in the Local Plan 2013 remained relevant, the Review is being undertaken in a different strategic context and needs to accommodate a substantial increase in the level of growth to be accommodated. A significant number of representations considered that the 2013 spatial strategy was no longer appropriate, as it needed to be amended to reflect the increased emphasis on economic and housing growth. Whilst this is accepted, it would not be right to suggest that accommodating growth at all costs is an appropriate response. Rather the balance between these potentially competing demands needs a shift towards

Again this is not detailed or explained. 1

Land at HS2 will have to be released from the Green Belt, but the extent to which other land is required is unclear. 2

Had the Arden Cross site been maximised for housing, alongside the Solihull Town Centre Masterplan and a new Chelmsley Wood Town Centre Masterplan, much of the Green Belt would not have needed to be released.

This is not true, as detailed in the previous comment. 3