

accommodating additional growth – in a managed fashion; and provided an appropriate balance is maintained (by ensuring a sustainable pattern of development is achieved), this would be an acceptable approach.

62. The Scope, Issues and Options consultation set out 7 broad options for accommodating growth as follows :
- Growth Option A – High Frequency Public Transport Corridors & Hubs
 - Growth Option B – Solihull Town Centre
 - Growth Option C – North Solihull/Chelmsley Wood
 - Growth Option D – Shirley Town Centre & the A34 Corridor
 - Growth Option E – The UK Central Hub Area & HS2
 - Growth Option F – Limited Expansion of Rural Villages/Settlements
 - Growth Option G – New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements

Spatial Strategy

63. Ideally, seeking to accommodate development needs close to where they arise is a sensible starting position and given that around 75% of the Borough’s population live within the urban areas, then these areas should be the initial focus for accommodating development. This approach would support potential developments that fall within options A to D described above which are within the urban area. Appropriate development opportunities under these options are therefore preferred.
64. There is extremely limited land available that could contribute towards options A to D and therefore the Council has had to look at options E, F & G (which will require land to be released from the Green Belt). In doing so it has sought strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a **balanced dispersal** approach.
65. The strategy also seeks to focus significant developments in locations that are, or can be made, accessible and sustainable. These locations will typically be on the edge of the urban area or within the rural settlements that have a greater range of services. This will be achieved by focussing development in the following locations:
- Located adjacent to the urban edge/a highly accessible settlement or;
 - Located adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school)¹⁸ or;
 - Development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available within it (including a primary school)¹⁹.
66. This approach will have the following advantages:
- Concentration could support the UK Central masterplan and HS2 growth strategy, and the investment priorities in ‘Solihull Connected’;
 - **Focussing on urban areas and sustainable urban extensions provides the best opportunity for achieving accessibility and delivering public transport improvements;**

¹⁸ This includes Balsall Common and Knowle/Dorridge/Bentley Heath

¹⁹ This includes Hampton-in-Arden, Hockley Heath and Meriden

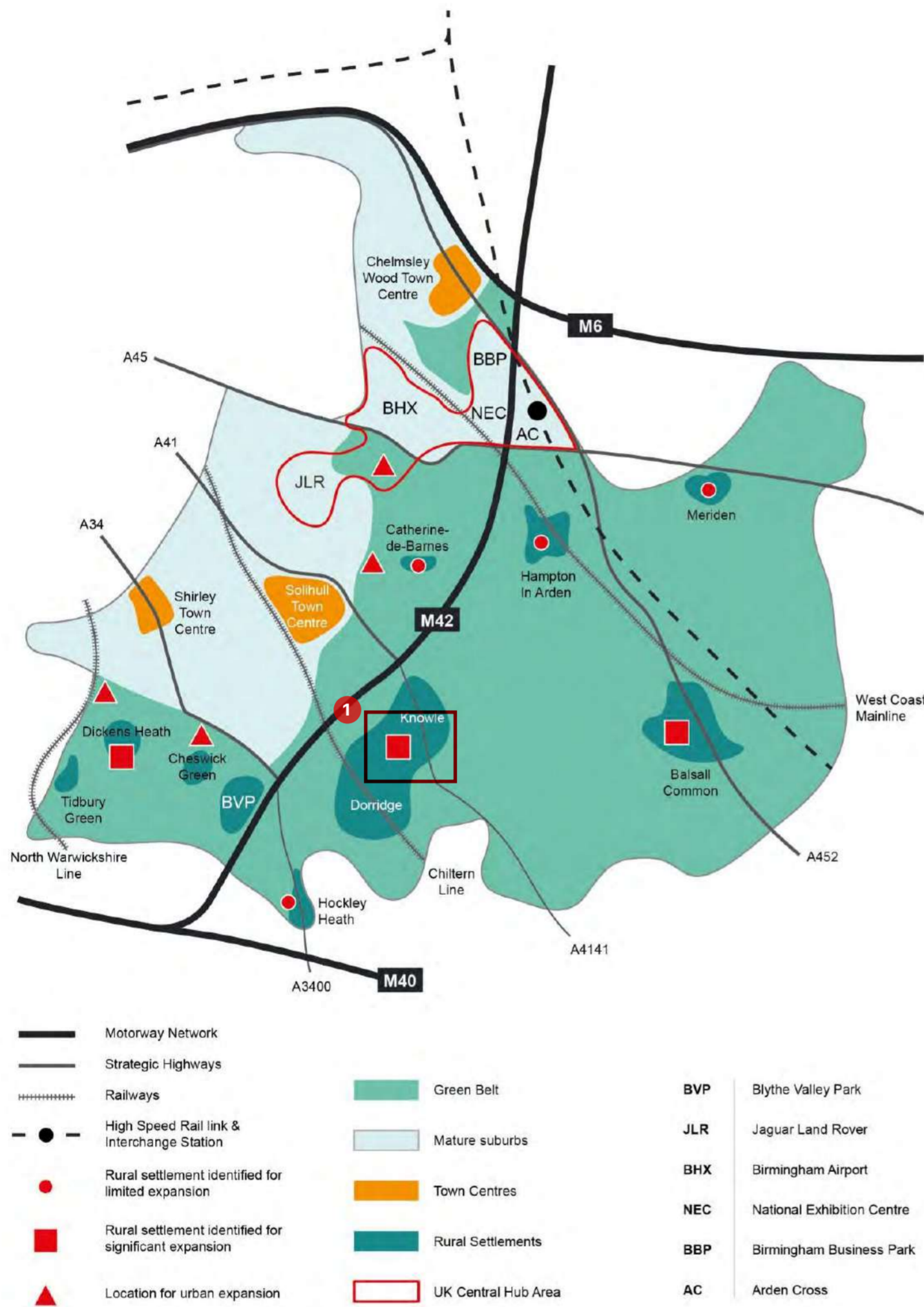
The terminology has changed from “proportionate dispersal” to “balanced dispersal”. ¹

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. ²

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.

70. The spatial strategy is illustrated in the following diagram:



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

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 th...

Sustainable Economic Growth

Introduction

71. Solihull has one of the most productive economies in the Midlands. The presence of its key economic assets combined with Solihull's central location on the national motorway and rail networks and the quality of its environment, have been key to its success in attracting investment, particularly in high value-added sectors that include automotive manufacturing, ICT, business and professional services, creative industries and construction. The attractiveness of the Borough to businesses and investors is set to take a significant leap forward with the arrival of the high speed rail link and the Interchange station that is to be accommodated in the Borough.

UK Central Solihull

72. The UK Central Solihull proposals present a unique opportunity on a nationally significant scale to bring forward major growth. This will contribute to wider strategic ambitions and in doing so make a substantial contribution to the economic growth aims of not just the Council, but also both the WMCA and the GBSLEP. The UK Central Solihull area, including The Hub, where key economic assets are located, also encompasses the proposed High Speed 2 Interchange railway station within the triangle of land bounded by the A45, A452 and the M42, known as Arden Cross.



73. The UKC Masterplan (June 2013) highlights the opportunity as follows:

“At the heart of the proposition is the notion that, by capitalising on one of the strongest economic bases in the country today, the area has the potential to underpin a national economic resurgence. By targeting investment in local infrastructure and committing to deliver an expanded Airport and proposed HS2 station, the benefits for the area and the UK are not only startlingly significant but also very exciting at a time when the country is moving out of one of the worst economic cycles in modern history.”

Unclear for readers.

1

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

2. The Hub Area, indicated on the Policies Map, embraces Birmingham Airport, the National Exhibition Centre (NEC), Birmingham Business Park and Jaguar Land Rover, each of which are key economic assets in their own right. This Plan seeks to support the future aspirations of the key economic assets in a holistic, well connected way, and to bring forward development of the area surrounding the HS2 Interchange Station at Arden Cross.
3. Development proposals within the Hub will be expected to demonstrate how they achieve the following key objectives
 - i. Contribute towards sustainable and inclusive economic growth, the continued success of the key economic assets, and Solihull’s attractiveness to investment in high value added activities, including low carbon technologies and services;
 - ii. Maximise connectivity within and beyond the site through integrated movement and transport networks (including sustainable and active modes of travel), capitalising on the infrastructure advantages of the location with its major new transport hub; Contribute to and co-ordinate transport, energy, power and digital infrastructure provision;
 - iii. Do not impede the provision of infrastructure necessary to support development elsewhere in the Hub Area, or otherwise prevent or hinder development occurring in other parts of the Hub Area;
 - iv. Encourages the use of modes of travel other than the private car;
 - v. Deliver a high quality strategic green and blue infrastructure network across the Hub area to enhance natural assets;
 - vi. Create distinct and unique places with a strong sense of identity, incorporating high quality design and innovation for development and the public realm, whilst maximising the efficient use of land;
 - vii. ¹ 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; and
 - viii. ² Encompasses sustainability principles minimising the use of natural resources and incorporating low (zero) carbon and renewable energy principles.
4. In addition to the above, the Council will also take into account the following:

Arden Cross

 - i. The Council will support and encourage the development of the Arden Cross land as an exemplary international station, with new public realm that contributes to the creation of a sense of place supporting the potential for commercial, residential and other opportunities, that will be well integrated into the surrounding environment, seamlessly linking to Birmingham Airport and the NEC in a well-coordinated way.

Whilst the inclusion of “inclusive economic growth” here is welcome, it is insufficient. 1

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. 2

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 th...

ii. 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).

iii. Land bounded by the M42, A452 and A45, as shown as Site UK1 on the Policies Map, will be released from the Green Belt to accommodate new development that will capitalise on the unique opportunity presented by the UK Central Solihull Hub Area. The exceptional circumstances justifying the removal of the land from the Green Belt are set out in the justification to this policy.

iv. It will be expected that proposals for development of the area will be promoted in a comprehensive and coordinated manner, taking account of the phasing set out in the Hub Growth and Infrastructure Plan.

National Exhibition Centre (NEC)

v. To enable the NEC to meet its future aspirations and to drive economic and employment growth, the Council will enable a broad range of developments to enhance the visitor offer, diversify facilities and increase international competitiveness.

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

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

viii. The Council will also support proposals that contribute towards wider place making objectives including commercial and residential development and other business uses. This will particularly be the case in circumstances where it can be demonstrated that more efficient use can be made of the NEC site, or where appropriate compensatory provisions can be made elsewhere (including the use of decked parking).

Birmingham Airport

ix. The Council will support and encourage further development needed for operational purposes such as passenger and freight facilities, terminals, transport facilities and other development that supports operational needs, or which allows the capacity of the extended runway to be maximised.

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

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

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

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.

- xi. Where justified, development for Airport related uses beyond the Airport boundary will be permitted, providing that it accords with other policies in the Plan, including Green Belt policy. This will include opportunities within the allocated employment site (UK2).

Jaguar Land Rover (JLR)

- xii. The Council will support JLR to compete and further its success in the global vehicles industry. To achieve this, the JLR site will need to continue to evolve and where necessary expand, with the only realistic opportunity for significant expansion being to the north east.
- xiii. The Council will support and encourage the development of JLR within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of JLR as a major manufacturer of vehicles.
- xiv. Site UK2 on the Policies Map, will be released from the Green Belt to accommodate employment development, including that required for JLR operational needs or to enable JLR component suppliers, needed to directly support JLR operational needs, to be located close to the plant. The exceptional circumstances justifying the removal of the land from the Green Belt are set out in the justification to this policy.
- xv. It will be expected that proposals for the development of Site UK2 will be promoted in a comprehensive and coordinated manner that can make provision for a phased approach, if required.

Birmingham Business Park

- xvi. The Council will support and encourage the development of Birmingham Business Park within its boundary defined in this Local Plan to support its role as a prime employment location and enhance its important role as a high quality, managed business park.
- xvii. Development will be supported that includes offices, light industrial, general industrial and warehousing uses. The Council will expect development to progress in a well-planned way that will maintain the attractiveness of the business park to investors and that will protect and enhance the environment including the natural environment.

- xvii. The Council will also support a broad range of ancillary or complementary uses needed to enhance the attraction of the business park to occupiers.

1 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.

Justification

- 80. The policy reflects the Government’s commitment, as set out in the NPPF, to securing sustainable economic growth in order to create jobs and prosperity, building on the area’s strengths and meeting the challenges of global competition and a low carbon future.

It is unclear how such a scale is defined. 1

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”.

81. Solihull benefits from having a prosperous and productive economy, with its advantageous location at the hub of the national motorway and High Speed Rail networks, international connectivity via Birmingham Airport, and the presence of a number of key economic assets that contribute to employment and wealth creation for the Borough and region. The arrival of the High Speed 2 rail link within the Plan period, and the development of the Interchange Station east of the NEC present a unique opportunity for growth to be boosted through development within the UK Central Solihull Area.
82. The policy sets out the key objectives that development will be expected to contribute towards, including sustainable and inclusive economic growth. Growth that is inclusive should demonstrate that the benefits will accrue to all by building on the strengths of communities, ensuring that wealth is more evenly spread and enabling everyone to contribute and participate.

UK Central Solihull Hub Area

83. UK Central Solihull encompasses the main growth areas in the Borough; Blythe Valley Park, North Solihull, the Solihull Town Centre, and the UK Central Solihull Hub Area. This policy focusses on the UK Central Solihull Hub Area, which, as a result of the High Speed 2 rail Interchange Station, offers the greatest potential for economic growth in the Borough, and recognises the added value that co-ordinating growth aspirations can bring.
84. The establishment of the Urban Growth Company has been a key factor assisting in the delivery of the development potential of the area. The Hub Growth and Infrastructure Plan (2018) sets out a vision for the development of a globally renowned business, leisure and entertainment destination providing opportunities to live, work and play as well as a major economic driver for the Borough. The objectives in the HGIP have informed the key objectives in this policy.
85. ¹ The Hub Framework Plan (2018) shows how sustained growth will be delivered up to 2047. 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.
86. The Urban Growth Company published its Hub Growth and Infrastructure Vision (2019)²⁰ setting out the vision to create Europe's best-connected destination for business, leisure and living and a new outstanding gateway to the UK. It updates the level of residential development expected in the Hub Area as a whole to up to 5,000 new homes.
87. The Council will expect those promoting development via planning applications to demonstrate, in greater detail, how the criteria in Policy P1 have been met, and to use guidance in the Hub Framework Plan. It will also seek to pursue an SPD that will help guide development.
88. It is recognised that given the time span for development to be undertaken, and the uncertainties about what may take place in the later years, there needs to be an increased emphasis on monitoring what does come forward, and what the implications are for the plan.

²⁰ As a replacement to the 2018 Hub Growth & Infrastructure Plan.

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

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

89. For purposes relating to housing land supply it has been assumed that across the whole UKC Solihull Hub Area there will be 2,740 dwellings coming forward in the plan period. This will be 2,240 at the NEC and **500 at Arden Cross** based on the NEC masterplan (2018) and the **emerging Arden Cross masterplan (2020)**.
90. Adjacent to the Airport and the NEC is the rail interchange site that serves Birmingham International Station. The APM connecting the HS2 Interchange Station and Birmingham Airport passes through the site and will form an important connection as work continues on redesigning Birmingham International Station into a multi-modal transport exchange providing seamless connections to the new HS2 Interchange Station, Birmingham Airport and the NEC. The Council consider that the site should be protected for its important transport interchange purpose but ancillary or complementary facilities for Interchange, Airport or NEC purposes should be allowed provided they are justified and do not prejudice the use of the site for commuter parking serving the railway station as an interchange. Development of any land within the site that can be clearly demonstrated as surplus to any of these requirements will be allowed provided that it does not conflict with other policies of this local plan or policies of the National Planning Policy Framework.



Arden Cross

91. The Arden Cross proposals focus on the HS2 interchange station and the triangle of land east of the NEC bounded by the A45, A452 and M42 (some 140ha in area) and present an important and unique opportunity to maximise economic and social benefits. The High Speed 2 rail line bisects the site from north to south, and the Company's proposals for the Interchange show a Parkway-style station. As well as the station, the proposals include an Automated People Mover connecting to the NEC, Airport and mainline station, a bus station and surface car parking for 7,400 vehicles. **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.** It would fail to realise the potential of the substantial

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

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 unsustainable, once it has already been taken out of use as Green Belt (a decision that Solihull Council has no control over anyway).

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

This is not clear.

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...

economic and social benefits associated with growth around the transport hub, contrary to Government policy.

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

93. A Masterplan for the Arden Cross area has been produced (2020), which demonstrates that by utilising multi-storey car parking, the site can make a significant contribution to economic growth. The vision features a number of urban quarters, comprising a residential community with up to 3,000 new homes, an innovation district for employment and higher education, a transportation hub plaza incorporating leisure, retail and cultural attractions with office accommodation, together with a key movement corridor, a parkland area based on the Holywell Brook, based on sustainable transport principles. Providing decked car parking (rather than extensive surface level parking) to serve HS2 (and other uses) is key to this vision and will ensure efficient use of land which is being removed from the Green Belt.

94. The Arden Cross proposals require land to be taken from the Green Belt. The exceptional circumstances to justify this approach are as follows:

- The proposals are vitally important to the aim of maximising the economic growth and job creation potential of the Hub Area that is of national significance and will meet the NPPF aim to proactively promote economic growth;
- The need to capitalise on the arrival of the High Speed 2 rail link by maximising the substantial national infrastructure investment at this location;
- Stimulus to local, regional and national growth to assist with rebalancing the UK economy, accommodating growth for the wider Greater Birmingham & Solihull LEP area and the wider West Midlands;
- Significant socio-economic advantages, including additional housing to meet local and wider housing needs, the generation of high skilled jobs, increased GVA output and the agglomeration affect at the key economic assets that make up the Hub area;
- Improved access to employment from North Solihull, an area of persistently high unemployment;
- The multiple locational advantages of the area with its unrivalled transport facilities make this one of the most sustainable locations for growth in the Borough;
- The land is lower performing in the Solihull Strategic Green Belt Assessment (2016);
- The importance of maximising the efficient use of the Arden Cross land that would not have been possible if the land were not removed from the Green Belt and the base case parkway station developed instead²¹;
- The proposals are site specific in that they rely on the development of HS2 and its interchange station that will be built in the Green Belt and will address the needs of key economic assets that are of crucial significance to the local and regional economy;
- There are no similar opportunities for growth on this scale outside the Green Belt; and

²¹ The parkway station is the design in the HS2 Bill, but through a change control process, an alternative design for the rail and station infrastructure is being pursued that would allow the wider, none rail related, development to be accommodated in line with the visions and strategies set out.

No detail is given around this.

1

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.

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

95. There are therefore exceptional circumstances for releasing Site UK1 UK Central/HS2 defined in this plan from the Green Belt.

Birmingham Airport

96. The UK Aviation Policy Framework (2013) and the Future of UK Aviation: Making the best use of existing runways (2018) place a renewed emphasis on making the best use of airport runways and airport capacity. The Airport Master Plan (2018) forecasts that passenger related air transport movement will grow substantially over the plan period (2018 throughput 13m passengers/year, 2033 throughput 18m passengers/year). The Master Plan also sets out a higher growth scenario for up to 24m passengers/year, and either scenario can be delivered off a single runway, in line with Government policy. 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.

97. In order to enable the Airport to meet its aspirations a variety of operational development will be required as well as ancillary and complementary developments to serve the needs of travelling passengers. Appropriate types of development are described in Policy P1.



98. As a result of the forecast need for additional aircraft stands within the Plan period, there is likely to be a need for more land for ancillary facilities as set out in the policy beyond the Airport area. The local plan has been prepared to ensure it can respond to this if, and when, necessary. 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.

National Exhibition Centre

99. The role of the National Exhibition Centre has evolved since opening in 1976. The NEC is now acknowledged as a venue for major exhibitions, events, tourism and leisure and an important driver of the visitor economy. In order for the NEC to remain competitive in a market where key competitors are international it will need to respond to changing markets and expectation and provide an improved offer. The NEC aspires to maintain its competitive position in the market for hosting major events but also intends to widen its product offer to encompass a wide range of major leisure and entertainment uses. The NEC aims to fulfil its ambitions by:

Whilst this principle is correct, it is not applied to other sites in the Green Belt. Namely BL2 and BL3. 1

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. 2

Forecasts no longer say this. All bets are off in this industry. 3

Where has the Council made this assertion? 4

- Maximising commercial opportunities of current footfall through enhanced activities to increase dwell time at the NEC site;
 - Creating new footfall by introducing new facilities as an attractor to the NEC;
 - Providing a more compelling sense of arrival to the Region;
 - Increasing reputation and brand of the NEC and the Region through partnerships;
 - Providing a site that has appeal across ages, cultures and social types.
100. This will require new investment to refurbish or replace halls, create new floorspace and meet new challenges in meeting visitor expectations and on site experiences including improved visitor management, upgraded choice in its food offer and greater opportunities for relaxation and entertainment.
101. The NEC Master Plan (2018) sets out the aspiration for residential and leisure development, with the potential to accommodate up to 2,500 apartments with ancillary community uses, on land released from surface car parking. The Council will support the more efficient use of land within the NEC boundary, and the potential for a wider range of uses to complement growth at Arden Cross.
102. There is therefore a need for flexibility to enable a broad range of development that will support operational needs but also a need for ancillary and complementary supporting facilities together with provision for sustainable transport and links to employment opportunities.
103. **Developments at the NEC will play a key part in the place-making role that is expected across the Hub Area, especially given its position between the Airport and Arden Cross.**

Jaguar Land Rover (JLR)

104. The Council will continue to support the further development and modernisation of the vehicles plant in order to enable its continued success in the competitive global vehicles market. JLR is constrained in terms of its ability to expand by its location within the main urban area. To reflect this and having regard to the vital importance of JLR to the region's economy and to job creation, Policy P1 includes proposals to remove land at Damson Parkway from the Green Belt to support this aim. In addition to meeting JLR needs, this land will provide for local employment opportunities to meet the needs identified in Policy P3, as well as for potential ancillary requirements for Birmingham Airport.
105. The land indicated to be removed from the Green Belt includes land on the south eastern side of Damson Parkway/Old Damson Lane. Given its location it may be attractive to businesses and investments which support the automotive and motorsport industries. **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.**
106. The exceptional circumstances to justify this approach are as follows:
- Jaguar Land Rover is a major international business and one of the largest employers in the West Midlands, whose continued growth and success are of vital importance to the local and regional economy, and to the aspirations in the UK Central Masterplan. Failure to provide for future growth and expansion would put the Company at a competitive disadvantage with its motor manufacturing rivals and jeopardise the significant potential for new employment;
 - The Lode Lane plant is severely constrained by surrounding residential areas, Elmdon Park and local nature reserves, and the only realistic option for expansion and redevelopment is to the east on Green Belt land;

There is an important omission in the contribution that the NEC is able to make to the sustainability goals of the UKC Hub. 1

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>

This is a new component in the plan that has not been consulted upon. 2

- 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

Policy P1A Blythe Valley Business Park

1. The Council will support and encourage the development of Blythe Valley Business Park within its boundary defined in this Local Plan to support its role as a mixed use development including as a prime employment location (to enhance its important role as a high quality, managed business park) and residential community. Development that will be supported and encouraged is as follows:
2. Business development comprising of offices, industrial and warehousing. The Council will expect development to progress in a well planned way that will maintain the attractiveness of the Business Park to investors and that will protect and enhance the environment including the natural environment.
3. The Council will also support a broad range of supporting ancillary or complementary uses needed to enhance the attraction of the business park to occupiers. These could include hotels, health and fitness, leisure, childcare facilities and local facilities of a scale that does not compete with existing or planned facilities outside the business park, particularly designated town centres as appropriate.¹
4. At Blythe Valley Business Park the Council will support and encourage the delivery of additional employment floorspace by improving the attractiveness of the park to investors through an improved range of amenities, supported by well planned residential development that will create an overall sense of place and a more sustainable location.²
5. The Council will expect new facilities, including the residential element of Blythe Valley Park, to be developed within the context of a masterplan to demonstrate how integration would be achieved between existing and planned facilities and with the network of villages that lie nearby and that the business park looks outwards as well as inwards in terms of connectivity to facilities beyond the business park and how any new facilities could be provided in a way that benefits the wider area including nearby communities.

Again this policy is not enforceable as it is not defined. ¹

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.

A necessary component of the sustainability of this location is for public transport to be able to travel through. ²

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 fe...

Justification

109. Blythe Valley Business Park did not begin to be developed until the late 1990s and has a different character to Birmingham Business Park in terms of its architecture and occupiers. It has attracted large buildings for corporate occupiers though more recently has catered for smaller scale uses whilst retaining its commitment to distinctive high quality design.
110. The Business Park has an area of land of some 7ha remaining to be developed. The Business Park has aspirations to increase vitality and provide a greater sense of place by broadening the business use offer and enabling a range of supporting facilities that will help

ii. The desire to strengthen connectivity by providing improved routes for pedestrians, cyclists and public transport that are high quality, legible and safe. This includes the need to strengthen the “place” element of the transport network in Solihull town centre including those areas where the needs of pedestrians, cyclists and public transport users are to be prioritised.

iii. The need develop a multi-modal Integrated Transport Hub at the site of the current train station in Solihull. The new Integrated Hub will provide accessible, modern facilities which can accommodate **forecast** growth in passenger numbers, and enable effective integration with public transport, and investments in walking, cycling, key highways junctions and SPRINT. The new integrated transport hub should create a strong sense of arrival and place, and enable commercial, leisure and residential development in the Town Centre to come forward.

iv. The need to ensure that the provision of parking in the town centre meets the needs of retailers and businesses, whilst not acting as a constraint to development or **mode** shift.

v. The need to mark the town’s gateways through the creation of unique landmark buildings, and to create well designed **street** with **attractive active frontages which encourage vibrant and active street life and create** **characterful** and well defined spaces and routes.

vi. The value of good urban design and green infrastructure for the town centre, and the importance of **creating legible**, distinctive, flexible, attractive, safe and inclusive public realm throughout the town centre.

vii. Opportunity sites which might accommodate significant additional growth and improvements to the connectivity of the town centre.

4. Development proposals that fulfil the principles listed above will be supported.

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

6. Demand for and provision of public and private parking will be considered within the context of a parking strategy which sets out the requirements for parking provision in the town centre.

7. A range of opportunity sites will be identified under this policy.

Shirley Town Centre

8. Shirley Town Centre will be developed and sustained as a focus of commercial activity & services for the local community. It will be shaped and managed to secure its regeneration and economic success; whilst recognising the need to create an environment that will also be attractive to residential uses.

9. The extent of Shirley Town Centre is defined on the Policies Map. The boundary focuses commercial activity south of the junction between Stratford Road and Haslucks Green Road and in developments west of Stratford Road.

forecasted	1
Modal	2
Streets	3
Commas are required between the listed characteristics.	4
Creating “a” legible	5

10.	Retail activity will be focused within the town centre boundary and will be required to front onto Stratford Road or the public realm between Stratford Road and the Park. No substantial retail development will be granted planning permission elsewhere within the centre.	1
11.	All new development should be sensitive to local character and enhance the public realm.	
12.	Where appropriate, the opportunity shall be taken to promote public realm improvements, which shall be undertaken in a coordinated manner.	2
Chelmsley Wood Town Centre		
13.	Chelmsley Wood Town Centre will be developed and sustained as a focus of commercial activity, services and public transport. It will be shaped and managed to secure its regeneration and economic growth and to provide a focus for the local community and an identity of which it can be proud.	3
14.	The extent of the Town Centre is defined on the Policies Map and retail activity will be focused within it.	
15.	New development on the edge of the Town Centre will be encouraged to assist regeneration of both the Town Centre and the wider area of North Solihull to ensure its long term sustainability. New development will encourage a diverse range of uses to better meet local needs and adapt to changing retail markets. It will also be encouraged to better link the Town Centre to Meriden Park and Cole Valley; and enhance the public realm in and around the centre.	
Main Town Centre Uses Elsewhere		
16.	The Plan seeks to ensure the vitality of its town centres as the heart of their communities. Proposals for main town centre uses will be expected to locate in Solihull Town Centre and/or Shirley and Chelmsley Wood town centres. Proposals for main town centre uses elsewhere, that do not accord with the policies and proposals of this local plan, will be considered in the light of the requirements of the National Planning Policy Framework. This will have full regard to sequential assessments and impact assessments as appropriate.	4

Justification

Solihull Town Centre

113. Solihull Town Centre is strategically important in the West Midlands and the principal focus of community, civic and business activity in the Borough. It is of crucial importance to the economic and social wellbeing of Solihull and to the achievement of a sustainable pattern of development.
114. The National Planning Policy Framework promotes the vitality and viability of town centres as important locations for sustainable economic growth and in creating sustainable patterns of development that enables ease of access by a variety of transport modes, particularly public transport. It also recognises the important role that residential development has in supporting the vitality of centres.
115. The existing Land Use Plan shows how the town centre is predominantly arranged around large single use areas. Future development should deliver complementary mixed land uses,

An erroneous “f”

1

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.

Coordinated by whom?

2

There is potential for mixed residential/commercial development here.

3

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.

As important as providing for good quality housing is better integrating the town centre with the surrounding community.

This has the potential for detrimentally impacting upon Hobs Moat.

4

which can deliver multiple benefits including greater promotion of walking and cycling, enhanced vitality and development of an area's unique identity.

116. In order to strengthen the role of the centre and enhance its appearance, it is important to make appropriate planned provision for development needs over the period of the Local Plan, building on opportunities to improve access, the public realm and the range and quality of services that it offers so that it will be sustained as a place of quality and distinction.
- Residential - The introduction of new residential uses in the heart of the town centre will support existing commercial and leisure uses, whilst also providing additional activity and vibrancy outside normal shopping and working hours.
 - Retail – In order to maintain the current success of the High Street, there is a need to keep the retail circuit contained, and therefore an opportunity site should only be developed as retail, leisure, food and beverage if the site has a quality that can present something unique to the town centre and relates well to the circuit. Primary retail frontages where retailing activity will be expected to be the main street level use are largely in line with the current extent of the town centre:
 - High Street No's 1-161 and 12-134
 - Poplar Way, Mill Lane and Drury Lane 10-58 and 5-45
 - Warwick Road No 700
 - Mell Square and Touchwood.
 - 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.¹
 - Evening Economy – in order to complement and support the residential and office offer, and to ensure active usage of the town centre across the day and night, the uses that support the evening economy should be sought in particularly in the Heart of Solihull area. Uses such as arts, culture, independent cinema, pop up events, live music, and competitive socialising² (such as bowling, escape rooms, crazy golf) should be accommodated, and where appropriate these can also assist attracting visitors to the town during the day.
117. In 2016 SMBC commissioned the development of a Town Centre Masterplan which would provide a blueprint for future investment and development which maximises the opportunities for Solihull Town Centre, and capitalises on its existing assets and sets out a clear vision for Solihull as 'a thriving, premier town centre and a vibrant destination at the forefront of visionary design, sustainability and innovation.
118. The masterplan has been informed by the findings and proposals of a number of previous and concurrently run studies.
119. The evidence base that supports the masterplan has been informed by discussions and engagement with a wide range of town centre stakeholders through one on one, and group workshop sessions. The proposals of the draft masterplan were presented for public consultation during August and September 2016, and the responses helped inform the development of the final preferred masterplan.
120. The masterplan is in the process of being updated and is expected to be published by the end of the year. The update is intended to reflect a number of things: changes to proposed or actual development on a number of sites including the former Magistrates Court, Monkspath Hall Road, Touchwood II and Eastgate;³ the location of the train station; progress

These are also good locations for residential properties. ¹

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.

Leisure and entertainment ²

This is no longer incorporated in the new Solihull Town Centre masterplan. ³

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.

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 consult...

on the Climate Change Prospectus; transport and movement strategy and plans; and current market advice and economic performance of the town centre.

121. The Masterplan has helped shape the proposals of the town centre policy. The centre is contained within clearly defined boundaries, the Chiltern railway and Prince's Way to the south-west, Blossomfield Road, Lode Lane to the north-west, Warwick Road to the north, New Road and Churchill Road to the east.
122. Near the centre, to the west, is Solihull railway station and to the south and east Tudor Grange and Malvern Parks respectively. The High street is an important principal pedestrian route through the centre providing pedestrian links to the modern Touchwood shopping mall on the south side and to the older Mell Square precinct to the North. It also links the Poplar Road bus interchange area in the direction of the railway station with St Alphege Church and the attractive historic core along the High Street.
123. The Town Centre is an appropriate location for a broad range of town centre uses including retail, leisure and entertainment facilities, appropriate sport and recreation uses, offices, arts, culture and tourism and residential. It is important that opportunities for development improve the centre, adding to vitality and vibrancy and to diversify the centre beyond traditional retail uses, whilst retaining or enhancing important characteristics.
124. High quality urban design will therefore be expected to ensure that development will protect the character of the Centre's historic heritage, improve public realm and improve pedestrian movement around the centre, for example, to improve links to the Centre's parks and provide improved articulation between Touchwood and nearby open spaces and improve the pedestrian link between Mell Square and the Warwick Road Morrison's store which has poor public realm. Design principles that developers will be expected to follow are identified in the policy.
125. The timing of development will maintain a balance of activity throughout the centre over the Plan period and to ensure continued success either side of the High Street and to fit with provision of new infrastructure, including public transport improvements and traffic management measures. The area to the south of the High Street has been the focus of activity in more recent times, with the development of Touchwood, Waitrose store and the recently opened Aldi store. However parts of the Centre are becoming outdated in appearance and would benefit from new development to modernise it and increase its attraction as a destination.
126. The Illustrative Town Centre Masterplan highlights a number of opportunity sites where development has the potential to come forward within the period of the local plan and beyond. The sites represent the opportunity to improve the attractiveness of the Centre as a place of quality and distinction reflecting strong urban design principles.
127. The 2016 Masterplan was used to inform the Draft Local Plan (2016) which indicated that new development in the town centre could deliver:
- Up to 11,700 sq m of commercial and leisure development
 - Up to 74,620 sq m of new office development
 - 1,400 new homes in the town centre, with potential for over 100 additional homes on land near the train station.
128. ¹ The Draft Local Plan then went on to identify which of the 1,500 new homes could 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,
129. The emerging masterplan revision is expected to include a schedule of updated opportunity sites which will be informed by a market review carried out in 2016 by Cushman and

The revised and updated masterplan now shows 1,178 new homes in the Town Centre. It is unclear how many of these are deliverable within the plan period. As the numbers of:

<http://eservices.solihull.gov.uk/mginternet/documents/s85375/Appendix%20A.pdf>

- 1,178 new homes

- 50,000sqm.officefloorspace

- 40,000 sqm of retail, leisure and active ground floor space

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.

Wakefield, and by subsequent economic appraisal and market analysis undertaken in 2020 by Amion. This is indicating:

- There is latent demand for office space in the town centre, especially for 'headquarter style' offices characterised by large floorplates which efficiently serve the operational requirements of the occupier
- There is continued market interest in apartment buildings with well-located apartments comfortably achieving values which would make the provision of one floor of basement parking viable, which has the potential to impact on achievable development densities.
- The retail function of the town centre should be strengthened through the introduction and addition of complementary town centre uses in appropriate places with new office and residential development playing an important role in increasing visits and use of the town centre as a whole.

130. The emerging work is indicating that the level of residential development that can be accommodated in the town centre is expected to at least match that assumed in the Draft Local Plan, if not exceed it. For the purposes of the land supply in this plan, the same figure used in 2016 will be used. When the revised masterplan has been approved, the opportunity will be taken to update the land supply at that time.

131. The level and type of development that will be identified for each site will be developed as an urban design response in the first instance, and then tested through an iterative review which considered the capacity, deliverability and viability of each site. The emerging evidence base for the revised masterplan is indicating that in broad terms the sites being considered could support the level of residential development indicated in mixed and standalone developments, and that there would be capacity for the retail and office development.



132. A diverse evening economy can help shape the attraction of the Town Centre as a place that is vibrant and inclusive. The Council will encourage, through the development management process, a broad age spectrum of residents into the centre to enjoy a wide variety of leisure and entertainment facilities.

133. The scale of the changes envisaged for Solihull Town Centre will

inevitably take some time to realise and will be realised gradually throughout the life of the plan, and beyond. The timescales within which the opportunity sites are delivered will be influenced by a range of factors, including land ownership, predicted longevity of existing uses and market conditions. Sites already in public ownership or currently being considered for development are likely to come forward in the short term, and will need to be supported by upgrades to the public realm and connectivity. This will help to create a setting for investment in large scale developments in the medium to long term, on sites outside public ownership or with more complex land assembly requirements. There is also the opportunity to bring forward developments in support of Policy P9 (Mitigating and Adapting to Climate Change), particularly through district energy and/or heat networks.

It has not exceeded it. It has fallen short. 1

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.

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. 2

Shirley Town Centre

134. Shirley Town Centre is the Borough's second largest shopping centre and an important centre for commercial activity and services to a broad local catchment. The Centre faces competition from nearby out of centre retailing in the A34 corridor and from increased offer in Solihull Town Centre. It is a long, linear centre arranged either side of the A34, with a number of foodstores anchoring mini-clusters. It has a variety of convenience and comparison goods retailers and continues to maintain its vitality and viability.
135. The Centre lacked a substantial retail core that will help to provide a 'heart' for the Centre that could strengthen its competitive position. To remedy this weakness a mixed use scheme (known as Parkgate) anchored by a food-based superstore, and including a variety of comparison retail units designed to meet modern retailer requirements and residential accommodation, was developed and is now trading. The scheme also improves links to Shirley Park as an important local amenity that improves the attractiveness of the Centre to shoppers.
136. Nationally, the traditional high street faces numerous strategic challenges, including the growth of on-line retailing in particular and post COVID home working. Consequently, there is a need for town centres to reinvent themselves as places to visit, with attractive public realm, open spaces and core retail offer supported by a mix of civic and leisure facilities.. An Economic Plan for Shirley is being refreshed, supported by the Greater Birmingham and Solihull Local Enterprise Partnership to support the economic development and recovery of the centre. . This includes considerations of future investment in Shirley,, and plans to maximise the centre as a 'destination' to support a buoyant day and night time economy.
137. Additionally, a project to address improvements to connectivity, accessibility and congestion is being undertaken as part of the UK Central development programme, assessing the A34 corridor as a key transport route.
138. The A34 Stratford Road is a strategic and busy radial route linking the M42 via Shirley to Birmingham with access points to Solihull town centre and Blythe Valley Business Park. The route is included in the West Midlands Key Route Network (KRN) and DfT's Major Road Network (MRN). **It currently experiences significant congestion at some locations which is likely to be exacerbated as a result of future development.**
139. The key objectives for the project are:
- **2 Improve journey reliability through improved public transport and active travel infrastructure and smarter choices engagement.**
 - Addressing safety for all users including improved facilities for pedestrians and cyclists and addressing accident hotspots.
 - Improve conditions for pedestrians including tackling severance and improving the public realm through community engagement.
 - Support economic recovery by improving the efficiency of the highway network through a range of interventions and technology improvements.

Chelmsley Wood Town Centre

140. Chelmsley Wood Town Centre is the main centre for North Solihull and is an important centre of commercial activity and services and for its public transport accessibility. The main part is a purpose built precinct that opened in 1971 to serve the Birmingham overspill estates that are now part of North Solihull. The performance of the Centre deteriorated between 1998 and 2006 but then improved following increased investment in and management of the Centre. The Centre is anchored by a recently constructed food-based superstore that is part of other improvements that have included a new library, housing/social services offices, bus

Not only is it an issue with regards to significant congestion, it has the highest concentration of road traffic accidents in the Borough.

<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.

This is insufficiently explained.

interchange and public realm improvements. Further limited comparison retail development is also included. New development can bring opportunities to strengthen the role of the Centre in serving the community by improving links to North Solihull and to nearby open spaces; and emerging work indicates opportunity for the town centre to accommodate residential development and **an assumption is made that at least 100 dwellings will be delivered in the plan period.**¹

Challenges and Objectives Addressed by the Policy

- 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 wide shortfall.
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- D Securing sustainable economic growth
- F Reducing inequalities in the Borough
- H Increasing accessibility and encouraging sustainable travel
- J Improving health and well being

Policy P3 Provision of Land for General Business and Premises

1. To encourage sustainable economic growth and provide a broad range of employment opportunities the Council will plan for a continuing supply of employment land. **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.**²
2. The Council will support the allocated sites for purposes set out in the table. Small-scale supporting facilities may be allowed where needed to specifically enhance or complement business use in the particular business locality and are compatible with sustainable development principles.
3. To ensure that an adequate supply of land remains available for employment purposes, sites will be protected for their allocated purposes. **Non-allocated employment sites will also be protected for employment use (offices, industrial and warehousing) and, where appropriate, waste management).**³ Alternative uses may be allowed where the following criteria are met:
 - i. The site is relatively isolated from other business premises or is out of place in the context of other neighbouring uses, such as residential; or
 - ii. It is clearly demonstrated that there is no longer a need to retain the site for its intended business class purpose; or
 - iii. In the case of vacant premises, there is no longer a reasonable prospect of attracting business development in market terms;
 - iv. The alternative use will support sustainable development principles and will directly support employment locally;

A masterplan is needed to ascertain the viability of this. There is opportunity for a higher concentration of housing here.¹

This table constitutes unnecessary loss of Green Belt due to the amount of land made available for office space.²

<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 foreseea...

Brackets are incomplete, or include an errant close bracket.³

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 overl...

- v. There is no conflict with other policies of the Local Plan or National Planning Policy.
- 4. The Council will encourage the retention of small and medium sized enterprises, and the creation of new ones, both in urban and rural areas as a key economic driver and to help facilitate growth in a broad variety of locations, including North Solihull as a priority, subject to the following criteria:
 - i. Form, use and scale are appropriate to the character of the particular location.
 - ii. There is no significant harm to the local environment, including landscape quality and character.
 - iii. **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.**
 - iv. The land or premises are not in the Green Belt or are compliant with Green Belt policy.
 - v. In the case of development in rural areas, it is consistent with the Council's countryside policies and those in any made Neighbourhood Plan, and does not undermine the quality and character of the natural environment.
- 5. The Council will expect development proposals on business sites to include the necessary infrastructure to accommodate high capacity digital communication.
- 6. In order to encourage sustainable access to business developments and reduce the need to travel, applicants for planning permission for business use will be expected to demonstrate the anticipated level of employment that will be generated and how this will be of benefit to meet local employment needs.
- 7. Employment development will not be allowed where it:
 - i. sterilises natural resources or key sites needed to secure sustainable development, particularly in regard to provision for distributed heat and energy networks, or
 - ii. Where it would have an unacceptable impact on the amenity of neighbouring uses by way of noise, odour, vibration or significant visual intrusion.

If a location is viable for housing, it is compatible with home-working. This policy section makes no sense.

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.

Justification

141. The Borough is home to a number of business sites of more local significance of varying age and quality. These are important for local employment opportunities to provide a broad range of business accommodation in terms of type and size and a number of them have land that remains to be developed. Other older, non-allocated sites, such as Cranmore Industrial Estate, Boulton Road and Elmdon Trading Estate, provide some further opportunities through redevelopment of older outmoded premises.
142. Evidence in the Housing and Economic Development Needs Assessment 2020 indicates that there is a need for around 147,000 sq m of employment floorspace to meet local needs for the Plan period to 2036. For offices existing supply including vacancies balances the need, but for industrial use and warehousing there is a shortfall of around 26,300 square metres (thus requiring between 5.2 ha – 6.6 ha of land²³).
143. The table below includes existing allocations to be carried forward from the SLP and New allocation. Although these new allocations have already been identified under Policy P1, they are included here for completeness.

Site	Available Allocated Area (ha ²⁴)	Readily Available Allocated Area (ha)	Preferred Use Classes ²⁵
Existing Allocations			
Blythe Valley Park	Between 59,000 and 99,000 sq m ²⁶	2.0	B1, B2 & B8
Fore, Stratford Road (adj M42)	2.0	2.0	B1
Chep/Higginson, Bickenhill Lane, Bickenhill	4.0	0	B1, B2, B8
Land north of Clock Interchange, Coventry Road	2.0	1.0	B1
Birmingham Business Park	2.4	2.4	B1, B2 & B8
New Allocations			
Land at HS2 Interchange (UK1)	c140		See Policy P1 & UK1
Land at Damson Parkway (UK2)	C94		See Policy P1 & UK2

144. Allocated provision comprises land remaining to be developed on existing employment sites. The evidence base supports the approach of using existing allocations with a broad

²³ Using a floorspace to land ratio of 0.4 to 0.5.

²⁴ Unless indicated otherwise

²⁵ As set out in the Solihull Local Plan which predated the changes to the Use Classes Order

²⁶ From current planning permission as part of the mixed use scheme.

There are issues with the size of development and the preferred use classes.

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 offi...

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.

range of employment uses where possible so that there is less reliance on the B1 use class. This is supported by market trends that show a preference for town centres as office locations.

145. The above table also includes two allocations (Sites UK1 and UK2) which will necessitate land to be removed from the Green Belt. The justification for Policy P1 provides the exceptional circumstances for this approach. Whilst Site UK2 is partly intended to provide for JLR needs, much of this has already been committed in the form of the despatch area and logistics operations centre, approved under very special circumstances. The emerging concept masterplan shows a number of phases remaining for development, which can meet wider local employment needs, **the need for a replacement Household Waste and Recycling Centre and Depot**, as well as providing for any remaining JLR or Airport needs. This will provide flexibility in the provision of land to meet employment needs, avoid the necessity to allocate further Green Belt for development, and will be subject to the plan-monitor-manage approach. Evidence indicates that Site UK1 is likely to have a role to play in meeting local employment needs, especially later in the Plan period.



146. In addition to the allocated employment sites, Solihull has a number of employment sites where opportunities to recycle employment land may come forward. For example, substantial recycling of land has already occurred in older premises at Cranmore Industrial Estate, Shirley to create new offices and modern industrial/warehouse units and similar opportunities may come forward elsewhere, such as within Elmdon Trading Estate (near the Airport).

147. **For the purposes of the Local Plan employment uses are business class uses and appropriate waste management facilities.** Planning applications for waste management facilities will be considered in the context of effects on local environment and amenity both

The usage of UK2 for a Waste and Recycling Centre is problematic.

1

Not only is this not a good location, it does not perform best of the potential sites included in the supporting evidence.

It is not defined whether the potential waste processing facility would be B1, B2, B8 or sui generis use.

2

In the absence of this, many people testing the plan for soundness could be concerned that, if the opposition to plans to relocate

within the employment site and its broader surroundings and the nature of waste management operation, for example, the extent that it takes place within the confines of a building, the amenity and traffic or transport effects on the road network and effects on pollution.

148. Solihull does not have substantial amounts of previously developed land that would be suitable or available for employment purposes. It is therefore important to protect the limited supply of employment land and premises from alternative uses, including types of economic development that would be more appropriate in a town centre environment.
149. The policy sets out the particular circumstances when alternative development may be accepted. These include, for example, small isolated premises in predominantly residential surroundings that render the premises out of context and better able to support sustainable development principles in an alternative use.
150. Mixed business uses may be enabled on employment sites where this will help to support sustainable development principles. Business class uses should predominate. Other uses of an ancillary nature may be enabled provided they are small scale in the context of the mixed use development and justified in terms of supporting the business function of the mixed use development and do not conflict with National Planning Policy, particularly in regard to its aims of supporting sustainable economic development and growth and supporting town centres.
151. Small and medium sized enterprises will be encouraged in all areas of the Borough, including rural areas, North Solihull and within established business sites, through redevelopment and creation of other opportunities for the development of small business space, provided they meet the criteria in the Policy that seek to protect the environment, local amenity and the Green Belt.
152. Digital connectivity and high capacity communication networks are key to commercial success in the 21st Century. Solihull is committed to increasing digital capacity across the Borough to help in remaining competitive, attracting inward investment, reducing inequalities and remaining a leading centre of enterprise.

Challenges and Objectives Addressed by the Policy

- A Mitigating and adapting to Climate Change
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- D Securing sustainable economic growth
- F Reducing inequalities in the Borough
- H Increasing accessibility and encouraging sustainable travel
- J Improving health and well being

Policy does not prevent inappropriate development of land for car dealerships, as was experienced on the A34.

There are no protections against land, that would be better used for residential development, being developed for business purposes. This has happened on the A34, adjacent to TRW, known as The Green. A high concentration of car dealerships have amalgamated along the corridor, which is...

Health is omitted from this list. Housing is a key determinant in both good physical but especially The population projections are over the latest projections by 3,367 persons by 2036, using the latest ONS figures. 1 2

The projections here are 3,517 households higher than the most recent statistical projection by the ONS. 3

A growth in a demographic does not necessarily correlate with an equal increase in a specific housing need. 4

A primary example is in the older demographics. A higher proportion of people aged over 65 own the property they live in than those under 35. Similarly, many people who have lived in a property for many years will want to stay in their property, rather than move into retirement properties.

Another factor at play is the value retained in their property. Some people, even though

The figure quoted is from September 2018. The most recent figure is £282,754, nearly 3% higher. 5

<https://www.ons.gov.uk/>

The affordability ratio has increased to 11.54, a 37% increase. Such a substantial change must be acknowledged in the plan. 6

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.

This policy is not only misguided, it has the potential to significantly worsen the issue of affordability in the borough. 7

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 c...

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

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. 8

Providing Homes for All

Introduction

153. **Good housing is essential for social, environmental and economic wellbeing.** A broad range of housing of different types, sizes, values and tenures are required to meet needs and create and maintain mixed and balanced communities. A well-functioning housing market is essential for Solihull to meet its full potential as an area which is a good place to live and for its future economic success.
154. Solihull provides some of the best housing in the West Midlands, with values consistently above the regional average. It is a strong attractor of households, given its location, connectivity, local environment, excellent schools and the strength of the local economy and employment opportunities.
155. More housing is needed because of population and household growth. **Population is projected to increase by around 23,369 from 217,047 in 2020 to 240,417 in 2036, an increase of 10.8%. The number of households is projected to increase by 13.8% over the period 2020 to 2036 from 91,059 to 103,595.**
156. Meeting housing need does not just mean building additional housing. It is important that the right type of housing is delivered.
157. **65% of household growth in the period to 2036 is projected to be households aged 65 and over and single households. It is projected that by 2036 46% of all households will be single people or couples aged 65 and over.**
158. Affordable housing need is exceptionally high as Solihull has one of the most severe affordability problems in the West Midlands Region. Mean and median house prices in Solihull are significantly higher in comparison to regional and national figures. **Solihull's median price of £275,000 is £85,000 higher than the West Midlands region. Median house prices in Solihull stand at 8.42 times the median earnings of those working in the Borough.** The shortage of affordable housing is particularly acute in the Mature Suburbs and Rural areas of the Borough.
159. There is therefore a need for more market and affordable housing, and also for more specialist and supported housing. **There is a need for more housing that can provide opportunities for households to 'downsize', thereby releasing family housing for resale and re-letting.**
160. There is a Borough wide shortage of homes which are affordable. The local Borough need is for both smaller and family-sized affordable rented housing and intermediate tenure homes. There is also a need for more smaller and lower cost market housing. It is important that housing of the right type is delivered to meet these needs and the Council will seek to achieve this through use of a range of approaches, including advice to developers through the 'Meeting Housing Needs' Supplementary Planning Document and how it brings forward and disposes of its own land.
161. The provision of new homes must therefore address the needs of all types of household, including families, single people, older and disabled people and those who want to build their own home. **New homes should be affordable** by those who are seeking a first home and those who wish to move home. There must be increased provision of affordable housing both for rent and intermediate tenure to meet the growing needs of households which cannot afford market housing.
162. The Council aims to ensure that everyone has the opportunity of access to a decent and safe home within a quality living environment, by:

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 r..

There is over provision of this type of housing in the borough. 1

- identifying deliverable housing land supply for fifteen years from the date the Plan will be adopted and ensuring that at least a five-year supply of housing land is available for development;
- prioritising locations for development that will best contribute to building well connected sustainable and balanced communities;
- ensuring the provision of an appropriate mix, type and tenure of housing on sites in a range of locations which meet the needs of all Solihull's residents, particularly needs for social rented housing, affordable home ownership, and **housing for older and disabled people**, on a Borough wide basis;
- promoting opportunities for self and custom build.

Policy P4 – Meeting Housing Needs

163. This policy is set out in 5 parts:

- P4A – Affordable Housing
- P4B – Rural Exceptions
- P4C – Market Housing
- P4D – Self Build and Custom Housing
- P4E – Housing for Older and Disabled People

Policy P4A Meeting Housing Needs – Affordable Housing

1. The Council will require developers of allocated and windfall sites to make a contribution to affordable housing on residential sites of major development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more to meet the housing needs of the Borough. Affordable housing includes social rented, affordable rented, intermediate tenure and Starter Homes, which is available at below market price or rent and which is affordable to households whose needs are not met by the market.
2. The Borough definition of 'affordable' will be informed by work with the WMCA and build upon the definitions in national guidance. It will be set out in a Meeting Housing Needs Supplementary Planning Document (SPD) which will be updated periodically to ensure it remains up to date and can respond to the introduction of new tenures quickly and effectively if required.
3. **2** 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:
 - i. Site size;
 - ii. Accessibility to local services and facilities and access to public transport;
 - iii. **3** The economics of provision, including particular costs that may threaten the viability of the site;
 - iv. **4** 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;

The Council has had this target for some time and has never met it. 2

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.

The viability assessments documents details that developers have substantial costs, which means that affordable housing provision is jeopardised. 3

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.

These need to be detailed exhaustively so as to prevent misapplication of the principle. 4

- v. **The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and** ¹
- vi. Vacant Building Credit
- 4. Where on-site provision is not feasible or viable there will be a financial contribution towards the provision of affordable housing that would not otherwise be provided, elsewhere within the Borough. The approach to calculating commuted sums is set out in the 'Meeting Housing Needs' Supplementary Planning Document.
- 5. The extent of affordable housing that should be provided in relation to developments that either re-use existing buildings or include the demolition of existing buildings will be assessed according to the 'vacant building credit'. The approach to calculating the vacant building credit is set out in the 'Meeting Housing Needs' Supplementary Planning Document.
- 6. On-site provision and off site contributions should be calculated based on a tenure split of **65% social rent with 35% provided as shared ownership.** ²
- 7. The social rented should be provided as follows, but will take into account site circumstances:
 - i. 30% one bedroom maisonettes/apartments (2 person home)
 - ii. 35% two bedroom houses (4 person home)
 - iii. 25% three bedroom houses (5 person home)
 - iv. 10% four bedroom houses (6 person home)
- 8. The shared ownership should be provided as follows, but will take into account site circumstances:
 - i. 15% one bedroom maisonettes/apartments
 - ii. 40% two bedroom houses/apartments
 - iii. 40% three bedroom houses
 - iv. 5% four bedroom houses
- 9. Specific sites circumstances are defined as town centre development, which may result in a different mix of type and size being delivered.
- 10. The availability of a rented home at time of need and that meets a household's size mean that social rent is most needed to meet homeless and housing needs in a timely way. Affordable rent will only be supported if the rent is provided at target rent.
- 11. Where the economics of provision of affordable housing, including particular costs that may threaten the viability of the site, the applicant is required to submit a viability assessment at the time of planning application submission. The Council will instruct a qualified valuer to examine the submitted viability assessment. The cost of the Council's qualified valuer will be met by the applicant.

This is ambiguous, but appears to make reference to retirement properties that have been addressed in previous comments. ¹

If so, as a policy it needs to be removed, or a more detailed explanation given, to prevent the misapplication of this policy.

Further diversification is required in provision, with greater flexibility to adjust. ²

It is possible that this is better managed via a Supplementary Planning Document to update this component.

12. The mechanisms and criteria for the delivery of Policy P4A will be set out in the Meeting Housing Needs Supplementary Planning Document.
13. Further detail and guidance for delivery of Policy P4A will be set out in the Meeting Housing Needs Supplementary Planning Document

Justification

164. The requirement for the provision of affordable housing is justified on the basis that Solihull has a high level of unmet housing need, as evidenced in the Housing and Economic Development Needs Assessment (HEDNA). This is supported by official data produced by MHCLG and local Borough wide data on housing need.
165. The HEDNA identified a need for 578²⁷ affordable homes per annum. The scale of need means that the Council is justified in seeking to secure as much affordable housing as viability allows.
166. The consequences of unmet housing need are significant. These can include homelessness, households in temporary or unsuitable accommodation for longer periods of time and overcrowding. Insufficient affordable housing will also act as an impediment to economic growth where companies experience problems in workforce recruitment and retention.
167. The level of need for affordable housing is therefore high in relation to the level of new provision. Provision of affordable homes is however limited by the proportion of development that takes place, and will continue to take place, on sites below the national affordable housing threshold. The site size threshold below which there is no requirement to provide affordable housing will result in many sites which could reasonably have provided affordable homes being fully developed only with market housing.
168. The affordable housing threshold adopted in the 2013 Solihull Local Plan was 0.2 hectares or 3 or more net dwellings. This threshold did not discourage development of small sites or the replacement of individual homes at the end of their lifespan, and the Council considered that it was appropriate to Solihull's local circumstances
169. The new threshold is dictated by changes to National Planning Policy Guidance and is consistent with this. Setting the threshold of major development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more to meet the housing needs of the Borough, is justified on the basis that housing developments at and above this level should contribute to meeting the need for affordable housing.
170. Since the adoption of a 40% affordable housing target (Policy H4 in the Solihull UDP, February 2006 and Policy P4 in the Solihull Local Plan, December 2013), a wide range of privately led residential developments have made provision at this level. The implementation of the policy has had due regard to the suitability of each site and its capacity to provide affordable homes. The Authority Monitoring Report highlights the delivery and contribution this policy makes towards meeting the borough's affordable housing need. It is therefore considered appropriate to the Borough's local circumstances.
171. Policy 4A is set on a Borough wide basis. This reflects the fact that needs cannot always be met where they arise, so use has to be made of the development opportunities that become available. Therefore any development may need to provide for needs arising in another part of the Borough. The only exception to this may be on rural 'exceptions' sites where housing may be reserved for those with a local connection.

²⁷ This reduces to 224 if households already in accommodation are excluded.

This is significantly in excess of the 40% target given in this plan. 1

There are issues in terms of worsening inequality from this policy approach. 2

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 developme...

- iv. Accessibility to local services and facilities and access to public transport in accordance with policy P7;
 - v. **The economics of provision, including particular costs that may threaten the viability of the site;**
 - vi. The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities.
2. Where the Council issues a concept masterplan for a site this will include details of the likely profile of household types requiring market housing, e.g. multi-person, including families and children, single persons and couples, as identified by the latest HEDNA.
 3. Market dwellings shall be provided in accordance with the following mix:
 - i. 1 or 2 bedrooms – 30%
 - ii. 3 bedrooms – 50%
 - iii. 4 or more bedrooms – 20%
 4. Further detail and guidance for delivery of Policy P4C will be set out in the Meeting Housing Needs Supplementary Planning Document.

The particular costs will need to be defined. 1

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.

Justification

186. The Council is justified in requiring that the mix of market housing reflects the latest evidence on need for household types and sizes, so that market provision reflects local Borough demand and promotes and sustains mixed and balanced communities.
187. The recommended market mix is derived from the outputs of the 2020 HEDNA, which is a Borough-wide assessment. A similar mix of housing in all areas is expected but this will be applied flexibly according to specific local characteristics. In applying the mix to individual development sites, regard will be given to the size and nature of the site and character of the area; any relevant policies in Neighbourhood Plans; up-to-date evidence of need; and the existing mix and turnover of properties at the local level.
188. Specific sites, such as town centre development, may result in a different mix of housing being delivered.
189. Based on the evidence, it is expected that the focus of new market housing provision will be on 2- and 3-bed properties; which will also assist affordability. Continued demand for family housing can be expected from newly forming households. Some demand for smaller to medium-sized properties (2- and 3-beds) can be expected to increase opportunities for older households to downsize and allow turnover of existing larger family homes.
190. The Council will monitor what is being built to ensure that a reasonable mix of market housing is provided across the Borough.
191. In applying this policy, any room designated as a bedroom should comply with the criteria set out in the national space standards, in accordance with Policy P5.

does illustrate a level of demand which has been considered through the development self-build and custom housebuilding policy.

195. The Council has approved Local Connection Criteria and Assessment of Financial Resources and fees for the Solihull Self-Build and Custom Housebuilding Register. As at 30 October 2019 there were 370 individual entries on the Register along with 4 groups containing a total of 18 individuals.

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

1. New housing developments will be expected to provide a mix of dwelling size and type to meet the identified needs of older people and those with disabilities and special needs in accordance with current assessments of housing need and evidence:
2. All new build housing on major development sites must be built to Category M4(2) (Accessible and Adaptable dwellings) of approved Building Regulations Document M; Volume 1, unless it is built in to M4(3);
3. At least 5% of housing on major development sites must be wheelchair user dwellings to M4(3) of the Building Regulations;
4. All developments of 300 dwellings or more must provide specialist housing or care bedspaces in accordance with the Council's most up to date statement of need on older person's accommodation.
5. This policy will be applied flexibly taking into account:
 - i. Site specific factors which may make step-free access unviable;
 - ii. The economics of provision, including particular costs that may threaten the viability of the site;
 - iii. Whether the provision of housing at these standards would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;
 - iv. The need to achieve a successful housing development.
6. ¹ Applications for specialist housing for older people and younger adults with disabilities will be supported where:
 - i. The site is accessible to shops, amenities and public transport;
 - ii. It can be demonstrated that satisfactory Primary Health Care services will be accessible to serve the residents of the development;
 - iii. The development makes a positive contribution towards meeting identified needs set out in the Council's most up to date statement of accommodation need;

Further considerations need adding: 1

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 tim...

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 demogra...

- iv. All specialist housing must meet the Category 2, Category 3(2a) or Category 3(2b) requirements of the Building Regulations, Approved Document M, Volume 1.
- 5. Applications for care homes (Use Class C2) for older people and younger adults with disabilities will be supported where:
 - i. The site is in close proximity to shops, amenities and public transport;
 - ii. It is appropriate to the needs of the intended occupiers, staff and visitors;
 - iii. There are satisfactory Primary Health Care services to serve the residents of the development within reasonable proximity;
 - iv. The design meets or exceeds the most up to date standards set by the Care Quality Commission (or successor bodies) regarding the safety and suitability of premises;
 - v. The proposal will facilitate an improvement in the quality of care provided in particular including the provision of nursing care.
- 6. A planning condition will define the percentages of M4(2) and M4(3) required for each planning approval.
- 7. Where references to the Building Regulations in the policy change, the requirement shall be taken to refer to the most up-to-date standard.
- 8. Further detail and guidance for delivery of Policy P4E will be set out in the Meeting Housing Needs Supplementary Planning Document.

Comments made in relation to specialist care for older people are equally applicable here. The same exception should be included here. 1

Justification

196. National planning policy requires local planning authorities to plan for the needs of different groups in the community, including older people and younger adults with learning disabilities, autistic spectrum conditions, mental health and physical disabilities and sensory impairments.



197. Planning policy must therefore understand the housing needs of particular groups and this is an important part of the Council's duties under the Equality Act 2010, including the Public Sector Equality Duty.
198. The proportion of older people in the population is forecast to increase. The number of people aged 75 and over is projected to increase by 7,147 between 2020 and 2036 to comprise 12% of the population.
199. It is also projected that there will be a 35% increase in the number of people aged 65 and over with dementia and a 31% increase in those aged 65+ with mobility problems.
200. A number of Neighbourhood Plans identify the requirements to provide a range of housing for older people, and Local Plan policy P4E supports this. **Consultation responses to the 2016 Draft Local Plan also supported provision for older people and those with disabilities.**¹
201. It is important that all older people have good and affordable housing choices. Not all older people need specialist accommodation; many will prefer to remain in their own homes. There is therefore a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specialist housing.
202. An important part of meeting need for older people will be through general purpose new homes built to accessible standards and which are suitable and attractive for 'downsizing'. This will include 'age-restricted general market housing'² designed for people aged 55 and over and the active elderly which may include some shared amenities such as communal gardens but does not include support or care services.
203. **Policy P4E supports the Council's adult social care approach. Suitable general needs 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.**³
204. Government has consolidated a wide range of new housing standards. This is based on minimum Building Regulations requirements with the ability for local planning authorities to apply the optional national standards over and above these. One of the optional standards covers accessibility.
205. Optional standards can only apply where a policy is included in a Local Plan. Policy P4E therefore applies the optional accessibility standards in Solihull.
206. Conditions will be applied to relevant planning permissions to ensure compliance with Policy P4E. Where references to the Building Regulations in the policy change, the requirement shall be taken to refer to the most up-to-date standard.
207. The two optional Building Regulation standards for accessibility and adaptability are M4(2) and M4(3). M4(2) promotes the ability of people to remain in their homes as their circumstances change as it covers design measures that can allow homes to be adapted. M4(3) relates specifically to wheelchair user housing and distinguishes between 'wheelchair adaptable' (M4(3 2a)) and 'wheelchair accessible' dwellings (M4(3 2b)). Policy P4E requires 'wheelchair adaptable' as 'wheelchair accessible' only applies where the Council is responsible for allocating or nominating an individual.
208. The HEDNA demonstrated a need for homes which are suitable for older people and those with disabilities (physical, sensory and learning). This is also evidenced by local Borough wide data and Council assessments and plans.

The consultation question amalgamated the 2 distinct groups. This was pointed out in consultation responses.¹

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.

<https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf>

Again, these should have geographical governors applied to prevent concentrations in locales.²

Whilst this paragraph is true, it is misleading.³

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 car...

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.

209. The HEDNA also demonstrated the need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. The evidence supported a policy requirement that:
- All dwellings (in all tenures) meet the M4(2) standards
 - A need for around 700 dwellings to be for wheelchair users (M4(3)) in the period to 2036, met by a requirement that 5% of new homes are built to M4(3 2a).
210. Policy P4E therefore sets a requirement for M4(2) and M4(3) dwellings to be provided on all major development. Conditions will be applied to relevant planning permissions to ensure compliance with Policy P4E.
211. Where application of the 5% requirement for M4(3) results in a fraction of a wheelchair user dwelling, provision will be rounded to the nearest whole dwelling.
212. In addition to enabling people to remain in their own homes, there is also a need for policy to support specialist provision.
213. Specialist provision can take the form of specialist housing and care homes. P4E will make provision for housing with care dwellings, which are part of the overall housing need identified in Policy P5, and additional care bedspaces for elderly people.
214. Specialist housing will provide fully self-contained homes to people who may need care at the time that they take up occupation, or may develop a need for care over a period. People will have tenancies or leases which give them security of tenure and the right to control who enters their home. Schemes will have communal spaces and facilities, access to personal care and support 24 hours a day through an agency registered with the Care Quality Commission, community alarms and other assistive technologies and an office for use by staff serving the scheme.
215. Care Homes will provide individual rooms ('care bedspaces') on a licence within a residential building. They will provide a high level of care meeting all activities of daily living. Personal care and accommodation will be provided together as a package with no clear separation between the two. This type of provision includes residential, nursing and dementia care. Care homes will be Care Quality Commission regulated for the purpose of 'accommodation for persons who require nursing or personal care'.
216. Specialist housing and care homes must be in accessible locations, consistent with policy P7.
217. The Council is also justified in requiring the provision of homes which are designed to meet specific needs of older and/or disabled people (including people with learning and/or physical or sensory disabilities) because of the outstanding need for such accommodation and the relatively high cost of provision.
218. ¹ The population growth among adults aged 18-64 with disabilities is less pronounced than 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.
219. Applicants for planning permission should seek pre-application advice to establish whether their proposal will be classified as use class C2 or C3.

Challenges and Objectives Addressed by the Policy

- B Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall.
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull

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

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.

- F Reducing inequalities in the Borough
- J Improving health and well being

Policy P5 – Provision of Land for Housing

1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036. The allocations will be part of the overall housing land supply detailed in the table below.
2. The average annual housing land provision target is 938 net additional homes per year (2020-2036). A trajectory showing how this target will be delivered from all sources of housing land supply is shown below. It will be subject to annual review through the **AMR**.
3. New housing will be supported on windfall sites in accessible locations where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness. Unless there are exceptional circumstances, new housing will not be permitted in locations where accessibility to employment, centres and a range of services and facilities is poor.
4. Housing will be provided as a mix of small and larger sites that will ensure a continuous supply of housing provision throughout the Plan period, and a continuous supply of affordable housing. Indicative delivery periods are included in the table below.

National Space Standards

5. In order to ensure that new residential development delivers appropriate levels of amenity and a sustainable living environment, new homes should comply with the nationally described space standards set out by Government.

Density

6. The appropriate density of new housing will be based on a number of factors, and measured on the developable area of a site. This will include site plots and estate roads, **but exclude land for other development requirements such as open space, SuDS and strategic highway infrastructure**. Density will be informed by the following:
 - i. The need to maximise the efficient use of land;
 - ii. The appropriate mix of housing in accordance with Policy P4;
 - iii. **Responding to local character and distinctiveness**, including landscape and townscape features, green infrastructure and heritage assets;
 - iv. Scale, type and location of development, in particular with regard to accessibility of services by sustainable transport modes;

This is not defined.

1

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

2

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

3

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 efficie...

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

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

2020 - 91,050
 2030 - 96,602
 10 year difference in household numbers - 5,552
 Average increase in the number of households - 555

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

Median house price - £282,754
 Median workplace earnings - £24,493
 Affordability ratio - 11.54

The calculation should therefore be as follows:

$$(11.54 - 4) / 4 \times 0.25 + 1 = 47.1\%$$

Corrected figure is as follows:

$$555 \times 1.471 = 816.4$$

Rounded up to 817

Corrected figure is as follows:

$$817 \times 16 = 13,072$$

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.

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.

Justification

Local Housing Need

220. Since the revised National Planning Policy Framework (NPPF) was published in July 2018, councils have been required to calculate their local housing need (LHN) using the Government's standard methodology. For the base year 1st April 2020, the LHN is 807 dwellings per annum, which over the plan period would result in a need for 12,912 dwellings.

Data source	Number
Households at 2020	90,937
Households at 2030	97,259
10 year difference in number of households	6,322
Annual average increase in no. of households	6.32%
Median house price	£277,500
Median workplace earnings	£32,970
Affordability ratio	8.42
Affordability increase ²⁸	27.6%
Adjusted household projections annual average increase (ie the LHN)	807
Plan period	2020-36
No. of years in plan period	16
No. of dwellings required during plan period – Minimum LHN	12,912

221. National planning practice guidance is clear that the LHN provides a minimum starting point in determining the number of homes needed in an area and it explains when it might be appropriate to plan for a higher housing need figure that the standard methodology indicates. This has been addressed in the HEDNA which has considered whether the UK Central Hub proposals represent a deliverable growth strategy that is likely to exceed past trends. The HEDNA concludes it is and has therefore looked to see what additional workforce may be required. On the basis that the standard methodology provides for higher jobs growth than baseline predictions indicate are necessary; and if commuter patterns for employment in the 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.**

222. This housing growth can be delivered through sites with planning permission, suitable deliverable sites identified within the Strategic Housing and Economic Land Availability Assessment, locations proposed for allocation by this policy and unidentified windfall sites,

²⁸ The formula in the standard methodology converts the ratio into a percentage increase to be applied to the household projections.

predominantly within South Solihull. The following table provides an overview of housing land supply.

Solihull Housing Land Supply 2020-2036 (as of 1st April 2020)

Source	Capacity
1 Sites with planning permission (started)	1,663
2 Sites with planning permission (not started)	1,119
3 Sites identified in land availability assessments	320
4 Sites identified in the brownfield land register (BLR)	77
5 Town Centre Sites ²⁹	961
6 Solihull Local Plan (2013) allocations without planning permission at 1 st April 2020	350
7 Less a 10% to sites with planning permission (not started), sites identified in land availability assessments, BLR and SLP sites	-283
8 Windfall housing land supply (2022-2036)	2,800
9 UK Central Hub Area to 2036	2,740
10 Allocated Sites to 2036	5,270
Total Estimated Capacity (rows 1-10)	15,017

Windfall Housing Supply

223. Windfall housing sites are sites that will become available for residential development during the Plan period that cannot be identified now. There is compelling evidence that windfall sites consistently become available in Solihull. The windfall assumption in the adopted Solihull Local Plan was 150 dpa. The average windfall supply since 1992 has increased to 209 dpa and in the last decade is 231 dpa. The 5YLS position adopted at Cabinet in July 2019 set out a revised windfall rate of 200 dpa to reflect his position. To prevent double-counting with existing permissions, the windfall completions are counted from the third year of supply, therefore from 2022 onwards.

Housing Trajectory

224. To ensure that an adequate supply of housing will be available throughout the plan period consideration has been given to the likely delivery rates of both existing commitments and the proposed allocations over the plan period. A number of small-medium sites will gain permission and commence development within the first five years of adoption of the plan from 2021. However, some of the larger sites will not make a significant contribution to completions until the mid-delivery phase. For this reason, and to ensure a robust five year housing land supply for the duration of the plan, the housing requirement is stepped:

²⁹ Solihull Town Centre (861) & Chelmsley Wood Town Centre (100)

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. 1

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 equivalence... 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. 2

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

Source	Capacity
1 Sites with planning permission (started)	1,663
2 Sites with planning permission (not started)	889
3 Sites identified in land availability assessments	200
4 Sites identified in the brownfield land register (BLR)	77
5 Solihull Local Plan (2013) allocations without planning permission at 1 st April 2020	350
6 Less a 10% to sites with planning permission (not started), sites identified in land availability assessments, BLR and SLP sites	-152
7 Allocated sites	1,170
8 Windfall housing land supply (2022-2025)	600
Total Estimated Capacity (rows 1-8)	4,797
Annualised requirement	851
Annualised requirement + 5%	894
5 year requirement	4,468
5 year supply/requirement	5.37 years supply

Allocated Sites

226. Summary Table of Residential Allocations

Area ³¹	Ref.	Site Name	G B ³²	P D L ³³	Site Area (ha)	Capacity	Delivery Period ³⁴
Balsall Common	BC1	Barratt's Farm	Y	N	91	875	II and III
	BC2	Frog Lane	Y	N	6	110	I
	1 BC3	Windmill Lane/Kenilworth Road	Y	N	7	120	I

³¹ The area or settlement the allocation is adjacent to (not necessarily the ward or parish it falls within).

³² Does the allocation relate to releasing a site from the Green Belt.

³³ Is the site previously developed land, or at least a substantial part of it is.

³⁴ Indicative delivery period: I = years 0-5, II = years 5-10 & III = years 10 -16

This site is not deliverable based on multiple grounds:

1. Heritage impact on the Berkswell Windmill
2. Unsustainable location, due to distance from Berkswell train Station.
3. 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. 1

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. 2

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.

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.

Site BL3 was the last site to be included in the plan and is not sustainable. 3

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.

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.

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...

Alternatives to provision of this site in particular have already been cited.

Area ³¹	Ref.	Site Name	G B ³²	P D L ³³	Site Area (ha)	Capacity	Delivery Period ³⁴
	BC4	Pheasant Oak Farm	Y	Y	14	200	II
	BC5	Trevallion Stud	Y	Y	12	230	I and II
	BC6	Lavender Hall Farm	Y	Y	4	80	III
Blythe	BL1	West of Dickens Heath	Y	N	23	350	I and II
	BL2	South of Dog Kennel Lane	Y	N	47	1000	I, II and III
	BL3	Whitlocks End Farm	Y	N	14	300	I and II
Hampton in Arden ³⁵	HA1	Meriden Road, Hampton in Arden	Y	Y	5	100	I
	HA2	Oak Farm, Catherine-de-Barnes	Y	Y	3	95	I
Hockley Heath	HH1	School Road	Y	N	6	90	I
Knowle	KN1	Hampton Road	Y	N	11	180	I and II
	KN2	South of Knowle	Y	N	49	600	I and II
Meriden	ME1	West of Meriden	Y	N	4	100	I
North of the Borough	NS1	Kingshurst Village Centre	N	Y	4	50	I
Solihull	SO1	East of Solihull ³⁶	Y	N	43	700	I and II
	SO2	Moat Lane Depot	N	Y	3	90	III
<i>Non Green Belt Sites (2)</i>					7	140	
<i>Green Belt Sites (16)</i>					340	5,130	
Total					347	5,270	

³⁵ Site SO1 is also located within Hampton in Arden parish

³⁶ Although the site is located within Hampton in Arden parish, it functions as an extension of the urban area and so has been included in the Solihull settlement chapter.

be expected that evidence can be provided of a joint and coordinated approach so that one phase of development does not prejudice a future phase, nor place undue viability pressures on a later phase to complete necessary infrastructure to serve the whole development.

Challenges and Objectives Addressed by the Policy

- B Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall.
- E Protecting key gaps between urban areas and settlements
- F Reducing inequalities in the Borough
- H Increasing accessibility and encouraging sustainable travel
- J Improving health and well being
- K Protecting and enhancing our natural assets
- L Water quality and flood risk

Policy P6 – Provision of Accommodation for Gypsies and Travellers

1. An updated Gypsy and Traveller Accommodation Assessment (GTAA) is currently being undertaken and is in the process of being completed. The Council will seek to meet the need for any permanent residential pitches to 2036 that is identified in the updated GTAA. This will include meeting the needs arising from Gypsies and Travellers who meet the Planning Policy for Traveller Sites (PPTS) planning definition of a Traveller, as well as those who have ceased to travel permanently. It will also include an allowance for 'undetermined' households where it was not possible to complete an interview during the completion of the GTAA, where required.

Gypsies and Travellers who meet the PPTS planning definition.

2. The accommodation needs of Gypsies and Travellers who meet the PPTS planning definition of a Traveller will be met through a combination of the remaining site allocations in the Council's adopted Gypsy and Traveller Site Allocations Plan (2014) that have not yet come forward; work to identify whether need can be met through other unimplemented planning consents and vacant pitches on sites; and through work on a pitch deliverability assessment to identify whether identified need can be met through the intensification of existing authorised Gypsy and Traveller sites.
3. The remaining pitch allocations are:
 - i. The Haven – 6 pitches
 - ii. Old Damson Lane – 2 pitches
4. ¹ 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.
5. The following criteria will be used in the allocation of future sites and subject to compliance with other policies in the plan, applications which perform well against the criteria and which contribute to meeting any identified unmet need, will be considered favourably.

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.

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_state_release

258. Both 'Movement for Growth' and Solihull Connected set out a vision of an inter-connected network of rapid-transit for the region, comprising Metro (light rapid transit) and SPRINT (bus rapid transit). In addition, Midlands Connect, of which Solihull is a partner, will, through its strategic transport strategy, identify the key road and rail infrastructure with the greatest economic impact across the whole (East & West) Midlands region.

Cycling and Walking Strategy

259. To support Solihull's Transport Strategy 'Solihull Connected' the Council is currently developing a Cycling and Walking Strategy for the Borough.

260. Cycling and walking are recognised as important components to reduce congestion, improve air quality and support better physical and mental health. Cycling and walking have the real potential to enhance the vibrancy and special character of our Borough.

261. The Cycling and Walking Strategy presents the Council's overall approach to active travel in the Borough. The strategy will set out our vision for how we will deliver cycling and walking infrastructure, how we will improve the capability and confidence of our residents to cycle and walk more often and how we will ensure new developments cater for cycling and walking.

262. The Cycling and Walking Strategy is a key step in our approach to accommodate growth in travel demand on our network while maintaining Solihull's special character.

263. Purpose of the Cycling and Walking Strategy:

- set the overall vision for cycling and walking in Solihull
- set a clear standard for cycling and walking infrastructure
- ensure major developments consider active travel - more sustainable approach to transport
- embed cycling and walking initiatives into local policy

264. As part of the strategy, we will also be producing a Local Cycling and Walking Infrastructure Plan (LCWIP). LCWIPs are a new Government approach to identify cycling and walking improvements required at a local level.

265. The Solihull LCWIP will enable a long-term approach to develop a local cycling and walking network within the Borough. The overall aim of the Solihull LCWIP will be to improve cycling and walking infrastructure across the Borough over the next 10 years.

Policy P7 Accessibility and Ease of Access

1. All new development should be focussed in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access.
2. The Council will expect development proposals to fulfil the following:
 - i. Demonstrate how access to the site will be achieved in a sustainable manner by a range and choice of transport modes.
 - ii. ¹ 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;
 - iii. For all other development, provide access to a bus service offering at least a 30 minute daytime frequency within 400m of the site;

Site BL3 does not accord with these policies. 1

- iv. Provide on-site transport infrastructure that promotes ease of access and enhances accessibility levels;
 - v. Provide, contribute to and/or enhance off-site transport infrastructure schemes (including, but not limited to, public rights of way/public footpaths and cycleways) where appropriate and viable;
 - vi. Are consistent with, and contribute to, the implementation of the ‘Solihull Connected’ strategy (or its replacement);
 - vii. For offices, retail and leisure development, are directed to locations in town centres, or other established locations including Birmingham Business Park, Blythe Valley Business Park, Birmingham Airport and NEC, as defined in Policies P1, P2 and P19; and national guidance.
3. Access to all development will be required to demonstrate that:
- i. It is safe, attractive and suitable for all people by all modes;
 - ii. Priority is given first to pedestrian and cycle movements;
 - iii. Opportunities for sustainable transport modes have been taken up.
 - iv. Assessed in accordance with Policy P8 ‘Managing Travel Demand and Reducing Congestion’ and Policy P15 ‘Securing Design Quality’ in the Local Plan and the Concept Masterplans.

Policy P8 Managing Travel Demand and Reducing Congestion

1. The Council will support development proposals which:
- i. ¹ 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;
 - ii. Promote linked trips by encouraging mixed use development where appropriate;
 - iii. ² Do not have an unacceptable impact on public highway safety;
 - iv. Takes an evidence-based approach to demonstrate appropriate car parking provision, taking account of location, trip rates and, where relevant, travel plan targets and forecast levels of car ownership;
2. The Council is unlikely to support developments:
- i. Where the impacts of increased delay to vehicles, pedestrians or cyclists, taking account of the residual cumulative transport effects of development, are severe.

This is poorly defined. 1

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 th...

An unacceptable impact needs quantifying. 2

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 volume... 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.