

Mr. David Sandall

By email to psp@solihull.gov.uk

LPR Consultation Policy and Delivery
Solihull MBC
Solihull
B91 3QB

13th December 2020

Dear Sirs

Response to Solihull Local Plan- Draft Submission Plan October 2020

I wish to object to two of the elements of the Draft Solihull Metropolitan Borough Council Local Plan, as follows:

1. The nature of the potential development on Site Policy HA2 and
2. The inclusion of Site Policy SO1 (site East of Solihull) in the Plan.

I believe the Draft Plan is:

- a. unsound,
- b. inconsistent with earlier planning decisions, and
- c. partially misleading.

Policy HA2

In reference to Policy HA2 (known as Site 196 in SHLAA 2012) Page 184 Hampton in Arden I wish to comment as follows:

1. The site currently houses ten small business, providing local employment opportunities.
2. The proposed plan includes building on the Green Belt.

3. The site was subject to an earlier planning application for Retirement Homes (PL/2019/01215/PPFL), which was refused on the 10th September 2019 for the following reason:

The proposed development represents inappropriate development in the Green Belt. This causes harm by definition, harm to openness and to the purposes of including land within the Green Belt. The very special circumstances put forward by the applicant in support of the proposal clearly do not outweigh the harm by reason of inappropriateness and any other harm to the Green Belt. The proposed development is therefore contrary to Policy P17 of the Solihull Local Plan and the guidance National Planning Policy Framework 2018 (source Extract from the Full Planning Decision Notice 10th September 2019.)

4. I contend that the current proposal is unsuitable for the following:
 - a. Inappropriate development in the Green Belt,
 - b. The development is contrary to Policy P17 of the Solihull Local Plan and the National Planning Policy Framework 2018 guidance,
 - c. There are no local schools to support family housing,
 - d. There are no local General Practitioners,
 - e. There are no local pharmacies,
 - f. There are no local schools,
 - g. There are no banking facilities or local Post Office.
 - h. Public transport is limited to an hourly bus service between Solihull and Coventry, which operates Monday to Saturday from 0700 to 1900.
 - i. The main access to Catherine-de- Barnes is Hampton Lane and Lugtrout Lane. A traffic survey carried out in 2019 confirmed that the traffic flows were high for single carriageway roads (Hampton in Arden Parish News February 2020.). With the development of the HS2, M42 Junction 6 and the MSA schemes traffic flows will greatly increase. Traffic speeds on both roads were also high with around 70% of drivers exceeding the speed limit.

- j. There are no footpaths on Friday Lane and Hampton Lane in the vicinity of the site,
- k. The road infrastructure is already passed its designed capacity, with both roads acting as a rat run as motorists avoid the over congested Damson Parkway and Solihull bypass.

I object to Policy HA2 (known as Site 196 in SHLAA 2012) being included in the Solihull Local Plan Review 2020 because it is unsuitable for it is unsuitable for family housing or a care home for the reasons stated above.

Policy SO1 East of Solihull

In reference to Policy SO1 East of Solihull (Known as site 16 in the LPR2019) pages 186 and 213 I wish to comment as follows:

The plan incorrectly places the proposed site within the Borough of Solihull, namely the Town Centre and urban suburbs.

This is wholly inaccurate and misleading. The site is entirely within the Parish of Hampton-in-Arden and more specifically the Catherine-de-Barnes.

Factually, Catherine-de-Barnes is a rural village within the Metropolitan Borough of Solihull in the English county of West Midlands. It is situated approximately 2 miles east of Solihull town centre, in the civil parish of Hampton-in-Arden.

The misrepresentation detracts from the impact the proposed Plan has on Catherine-de-Barnes and the Parish of Hampton-in-Aden. Solihull Metropolitan Borough Council has failed to consider how the proposed housing development will impact on the residents of Catherine-de-Barnes.

There are around 400 residential homes in Catherine-de-Barnes. The proposal of a new build the Green Belt, of 700 dwellings is an increase of approximately 140%, which is wholly unacceptable.

The population of Catherine-de-Barnes as a whole, is older than the national average, making Catherine-de-Barnes an older person's location, who will undoubtedly feel disenfranchised by the Plan.

The proposed plan is to build 700 homes entirely in Green Belt, setting a precedent to for more new build homes within the Parish and more specifically Catherine-de-Barnes. The

erosion of the Green Belt is both unacceptable impacts on local population of a rural village and will have a dramatic change on the environment and wildlife will decline even further.

The application should not be considered in isolation but should take into account other applications within Catherine-de-Barnes, to prevent the village becoming an urban extension of Solihull.

The application site is within the designated Green Belt. The proposed dwellings would cause harm to the openness of the Green Belt and the purposes of identifying land as Green Belt is to prevent encroachment of built developments. Consequently, the proposed development will introduce an urban landscape, causing detrimental harm to the openness of the existing Green Belt along Lugtrout Lane and would fail to assist in safeguarding the countryside from built encroachment

The objectives of the Hampton-in-Arden Neighbourhood Plan 2017 – 2028 need to be taken into account, in order to maintain and enhance the green, semi-rural nature of the Parish and safeguard the green belt, which the proposed Plan does not,.

The Proposed Plan will increase pollution.

The thrust of the Solihull Plan December 2013 is a sustainable future for the rural villages of the Borough and in doing so retain the attractiveness of those villages. In order to do so, it is necessary to retain the Green Belt.

The Natural Environment White Paper seeks to address concerns about the decline and fragmentation of the natural environment, highlighted in the Lawton Report, through the provision of more, better, bigger and joined spaces for nature. It sets out a national target to halt biodiversity loss by 2020. The proposed development would does not fall in line with the concerns raised in the White Paper. The proposed development will result in a loss of Green Land, which will not reduce the impacts of climate change but creates an urban environment along Lugtrout Lane, taking into account similar proposed development which will create an urban environment is allowed.

The Application should be rejected on the grounds of the environment impact on the Parish and the fact that the proposed application is to build on Green Land.

The Solihull Green Belt Assessment 2016 stated the following objectives:

- a. *To check the unrestricted sprawl of large built up areas.*

A new build on a green field site does not meet this objective.

- b. *To prevent neighbouring towns merging into one another.*

A new build on a green field site does not meet this objective.

- c. *To assist in safeguarding the countryside from encroachment.*

A new build on a green field site does not meet this objective.

- d. *To preserve the setting and character of historic towns.*

A new build on a green field site does not meet this objective.

During the COVID-19 pandemic, and to-date, Catherine-de-Barnes has provided a vital link to the countryside for recreation, seeing an increase in walkers and cyclists.

The proposed site acts as a buffer to protect the merger of Solihull with Catherine de Barnes and Hampton in Arden. That buffer will be lost leading to an encroachment on the Meriden Gap.

The proposed site is prime agricultural land and is farmed on a daily basis and should be protected.

I contend that the current proposal is unsuitable for the following:

- a. Inappropriate development in the Green Belt,
- b. The development is contrary to Policy P17 of the Solihull Local Plan and the National Planning Policy Framework 2018 guidance,
- c. There are no local schools to support family housing in Catherine-de-Barnes. The nearest schools are in the neighbouring urban district of Elmdon Heath which are oversubscribed.
- d. There are no local General Practitioners,
- e. There are no local pharmacies,
- f. There are no banking facilities or local Post Office.
- g. Catherine-de-Barnes has limited local facilities comprising of an independent village store, a public house, an independent restaurant and hairdresser.

- h. The nearest local facilities are in the neighbouring urban district of Eldon Heath.
- i. Public transport is limited to an hourly circular bus service to and from Solihull Interchange, which operates Monday to Saturday from 0800 to 1800.

The proposed Plan indicated two vehicle access points, firstly some 50 metres from the junction with Damson Parkway on Lugtrout Lane and secondly off Damson Parkway opposite the Shire Parkway Hospital.

Lugtrout Lane Access

- a. Lugtrout Lane is a single carriageway subject to a 30mph speed restriction.
- b. A traffic survey carried out in 2019 confirmed that the traffic flows were high for a rural single carriageway.
- c. Traffic speeds on Lugtrout Lane, between Field Lane and Damson Parkway are high with around 70% of drivers exceeding the speed limit. (Hampton in Arden Parish News February 2020.)
- d. Lugtrout Lane is a “rat run” and traffic flows are likely to increase with the development of Jaguar Land Rover, proposed waste facility, the HS2, M42 Junction 6 and the MSA schemes traffic flows will greatly increase.
- e. Increased traffic flows are already noticeable following any closure to the M42 link with the M6.
- f. The proposed Plan will add to the already increased flow of traffic and increases the risk of accidents, for the following reasons:
- g. Limited footway on Lugtrout Lane.
- h. No urban drainage along most stretches of Lugtrout Lane, which rely on soft land for road surface drainage.
- i. The development would result in a direct run-off of water onto the roadway creating surface flooding.

- j. The removal of the trees and hedges to create access will further detract from the rural aspect of the Lugtrout Lane in addition to removing soft land which acts as drainage.

Damson Parkway Access

- a. Damson Parkway is a single carriageway subject to a 40mph speed restriction.
- b. The site exiting on to Damson Parkway is approx. 250 metres from an already heavily trafficked junction with Warwick Road.
- c. There is no footway along the site boundary with Damson Parkway.
- d. Damson Parkway already experiences severe heavy traffic flows during peak times, school runs and shift changes at Jaguar Land Rover plant.
- e. Damson Parkway provides the main thoroughfare for traffic from the southern and western parts of Solihull to Birmingham Airport, Resort World, Birmingham International Railway Station, NEC, National Motorcycle Centre and Chelmsley Wood which form part of Solihull Metropolitan Borough..
- f. Damson Parkway will be subject to further traffic should following developments transpire:
 - i. HS2 Interchange
 - ii. Brexit Lorry Park
 - iii. Arden Cross comprising of Arden Cross mixed use commercial and residential housing community adjacent the HS2 Interchange Station.
- g. Increased traffic flows are already noticeable following any closure to the M42 link with the M6.

Damson Parkway is the designated route for the SPRINT rapid bus- strategy. SPRINT will be the first bus priority corridor of its kind anywhere in the country creating a cross-city route between the A45 and the A34. The proposal will require the reallocation of road space to enable SPRINT and existing bus services to avoid the inevitable long delays as a result of traffic congestion arising from the Arden Cross that will integrate the HS2 Station, NEC and Birmingham Airport.

The road infrastructure surrounding the proposed Plan will not be able to cope with the current traffic flows let alone future developments.

The Proposed Plan will increase pollution.

Climate Change

The Intergovernmental Panel on Climate Change has warned that global temperatures need to be kept from rising by more than 1.5°C.

The United Kingdom has pledged to be carbon neutral by 2050, but how can Solihull approach its ambitions.

Solihull Local Plan- Draft Submission Plan October 2020:

The Plan will provides an ideal opportunity to ensure the Council's approach to planning matches its ambitions in responding to the climate change challenge. In recognition of the gravity of the climate change emergency the Council adopted a 'Climate Change Declaration' in October 2019.

Policy SO1 East of Solihull (known as site 16 in the LPR2019) is in opposition to Solihull Metropolitan Borough Councils' 'Climate Change Declaration' in October 2019 for the following:.

- a. A new build on the Green Belt will destroy an existing farming concern.
- b. Will cause the felling of mature trees and hedgerows.
- c. Mature trees are the most powerful weapon in the fight against climate change: trees.
- d. Mature trees have been quietly offsetting carbon emissions for centuries, converting carbon dioxide into the oxygen we need for life. Mature trees store more carbon , more quickly than younger trees. As we lose trees, the problems worsen.
- e. Mature trees absorb about 31 lbs. of carbon dioxide each year, new trees will take 100 years to reach the same benefit. Old trees store more carbon, more quickly, than younger trees
- f. Hedgerows bustle with activity. The kind of animals that live and utilise hedgerows include everything from
 - i. The harvest mouse,
 - ii. Foraging bats, and

- iii. Roosting birds.
- g. Hedgerows are filled with all manner of plant life too, whether it's with elderflower, or the thorny bramble, with its autumnal berries and abundant nectar.
- h. Beyond the benefits they bring to wildlife, it's important to maintain hedgerows to preventing soil erosion.
- i. Another important aspect of hedgerows is that they create a natural barrier that prevents water run-off from fields, so the ground is less likely to dry out.
- j. The diverse range of plant life in hedges can even help combat climate change by storing carbon in its vegetation.

The Plan will include new build on either side of Lugtrout Lane, between Field Lane and Damson Parkway.

This aspect of Lugtrout Lane is a narrow lane, less than 500 meters in length comprising 21 residential homes (of which there are ten paired Edwardian period cottages) forming a community green space. The residents are mainly elderly and vulnerable constituents who will be deprived of the existing right of a quiet life.

Street lighting is limited to one street light. There is no road drainage. There is one footpath from Damson Parkway alongside the farm land for 160 meters ending in front of house number 136.

The Plan will destroy the rural aspect for the community and increase the already existing traffic flow.

The ten paired cottages are understood to have been built in 1910 at the end of the Edwardian period, and heavily influenced by The Arts and Crafts Movement, which promoted simple design.

The cottages are of brick construction. The method of construction for the period was to build shallow footings for the foundations. Whilst there is no evidence of ground movement, the building of homes either side of the properties, will result in the loss of soft ground, which currently absorbs the surface water. The resulting hard land will create an increase in groundwater which will create instability and ground movement causing subsidence and heave to the cottages.

I object to Policy SO1 East of Solihull (known as site 16 in the LPR2019) being included in the Solihull Local Plan Review 2020 because it is unsuitable for housing and commercial development for the reasons stated above.

I object to Policies HA2 (known as Site 196 in SHLAA 2012) and SO1 East of Solihull (known as site 16 in the LPR2019) for the following reasons stated above.

Yours faithfully

Mr. D. Sandall