



**Respondent ID: 9149 & 6193**

### **Solihull Draft Local Plan Review (SLPR)- Supplementary Consultation 2020**

This report is intended to follow on from previous responses submitted by CPRE in the previous consultations of 2017 and 2019. We have read the Supplementary Consultation (2020) with interest and wish to comment on the parts of the draft plan that are relevant to us.

#### **The SLPR is not sound**

- 1) Challenge B - Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall. It is now very apparent from the detailed analysis of the sites selected, some of which are un-sustainable, that Solihull cannot meet its housing requirement of 15,270 homes, including the 2,000 homes from the HMA over the plan period without significant adverse harm to the Green Belt and the environment. The SM is not suitable as it is based on assumption that there is no constraint to meeting full requirement. Furthermore, there is a lot of commuting in and out of the Borough which has not been taken fully account of in the SM. Therefore, as previously stated, the NPPF Para 11.b should be invoked which the Council has not done.
- 2) It is very dangerous to release too much land as stated by Government Advisor Professor Wenban-Smith in his report of 27 Jan 2016 - "Critique of West Midlands Housing Needs Assessment" paragraphs 24/25. "Over provision can never be corrected; under provision can be corrected later when needs are better defined." The proposed build rate per annum of 938 dpa is a huge step up for the construction industry to achieve in the Borough. This is higher than has been achieved in any single year since 2001 (the highest being 836 in 2005/06). The average over the last 5 years has been 706 dwellings per annum.
- 3) The proposed housing policy is not sound as it is not deliverable or achievable from past evidence. In accordance with Government's advice, development should be focused on "brownfield" sites first before taking land out of the Green Belt. Therefore, more work needs to be done on the capacity of additional dwellings being provided in the final version of the masterplan for Solihull Town Centre and the capacity at Arden Cross.
- 4) The consequences of the Covid 19 has not been fully taken into account with regards to the likelihood that there will be a small reduction in office use as more people choose to work from home or shared

offices. Therefore, there will be an increase in windfall sites as offices become redundant which will be more than enough to omit the most unsustainable site allocations from the Plan.

- 5) CPRE strongly challenges the scale of proposed development in the Blythe, Knowle and Balsall Common areas which is disproportionate and is not justified by the methodology of the Draft Local Plan; nor is it consistent with its spatial strategy and objectives. This has led to the allocation of sites which perform poorly against most measures of sustainability and will adversely affect these areas. We have explained our reasons previously but will add to this analysis following the up-dated information provided in the supporting documentation to the Plan below.
- 6) The strategy fails to adequately link housing distribution to its economic and transport policies. These emphasise growth in accessible corridors including the A45, the A34 and Solihull town center as well as the corridor linking the town center to the A45 hub. The spatial strategy also does not reflect the findings of its assessment work. This is demonstrated by the large -scale allocations in Balsall Common, Knowle and Dickens Heath which are inappropriate.
- 7) The large -scale allocations in Balsall Common, Knowle and Dickens Heath will lead to significant additional journeys by car, contrary to the spatial strategy's objectives and to Policies P7, P8 and P9 of the Draft Local Plan. The Council has, therefore, opted for a spatial strategy that places large numbers of houses in rural locations away from the main centers of employment and where car-borne travel and related congestion would be an inevitable outcome. There seems to be little or no relationship between the Council's Transport Strategy, Solihull Connected, its priorities and implied spatial strategy. The Strategy therefore fails to achieve its fundamental aim of a sustainable pattern of development.
- 8) In the Scoping Interim Sustainability Appraisal (ISA) (November 2015) large scale expansion of rural settlements was one of the worst performing options. The ISA highlighted that major adverse effects are anticipated in terms of resource efficiency. In addition, there would be moderate adverse effects with regard to reducing the need to travel and impact on the landscape. However, the findings of this initial appraisal were ignored and the Council proposed large housing allocations in rural villages, rather than more sustainable urban development (SUD).
- 9) In Para 68 of the SLPR 2020 it states, "Firstly determine where in the site hierarchy that the site falls within. This seeks to provide a balance and favors brownfield sites, accessible sites and sites which only impact on lower performing Green Belt to determine a sites potential. This approach reflects the advice in 32, paragraph 138 of the NPPF." The proposed allocation of sites, particularly on Site BL1 at Dickens Heath and BC1 Barratt's Farm and BC3 Windmill Lane do not conform to this Policy.
- 10) It is not possible to understand how some of the sites fall into the green category, "they have no or relatively low impact on relevant considerations; or that severe impacts can be mitigated," when they clearly do have high impact. Again, if an updated sustainability scoring was produced in line with recent Government Policy, the results on site selection in the first round of Sustainability Appraisal would be different. Without this, the credibility and robustness of the process is undermined.
- 11) The Solihull LPR has tried to address the requirements of the Environment Bill by stating that there needs to be a 10% increase in biodiversity on development sites, however, many local authorities are

now stating that there should be 20% enhancement. We believe that SMBC should also have a policy to provide a 20% enhancement of ecological value on new developments.

- 12) Mott Macdonald on page 8 of their transport report recognise that the Prism used is a strategic network tool and has limited validity on what they consider to be low flow minor roads; this we believe brings into question the results for many of the sites within the local plan, as these could be considered to be served by an inadequate minor road network. The report focuses on 11 key routes which are all on the strategic network.
- 13) Site **BC1** should not be allocated for the reasons previously given in our 2019 response and is in the Meriden Gap. The development of this site is dependent upon the eastern distributor road being completed; we understand that funding for this road has not been provided as yet. This would further contribute to the traffic congestion at peak times in this area.
- 14) Site **BC3** should not be allocated for the reasons previously given and is not sustainable using the Council's own criteria. The allocation of site BC3 has not been justified and should be deleted from the Plan. There are omission sites both within Balsall Common and in the wider borough which either should have been allocated, based on merit, or for which the omission has not been justified. It is also important to note that Site BC3 is in the Meriden Gap, which is of national strategic ecological importance. Residents of Balsall Common have proposed a Managed Open Space as a significant tourist attraction, with the internationally acclaimed and fully operational Grade II\* Listed Berkswell Windmill at its heart, which would be a positive use of this site for future generations. The ecologically diverse nature of this country park would be a considerable asset in continuing to support the essential north-south ecological corridor whilst contributing to the shortfall in green space in Balsall Common. CPRE Warwickshire fully support this proposal.
- 15) Part of Site **BL1**, the land west of Dickens Heath should be deleted from the Plan as it unsustainable. The proof that this Site is unsustainable is borne out by the fact that the Council is proposing such a significant amount of mitigation, some of which are unachievable, in an attempt to make the Site sustainable. No other proposed site in the Draft Local Plan has so many adverse effects, particularly to the natural environment, as it is surrounded by 9 Local Wildlife Sites and ancient woodland, particularly when one takes into account that there are alternative sites readily available which are more sustainable such as the Tidbury Green Golf Course (named Arden Green which could also accommodate 250 dwellings), which does not flood on the proposed housing areas, has a lower Green Belt scoring (4) and is not surrounded by LWS but is equally accessible to the Whitlocks End station. In addition, a green and blue corridor with public footpaths and cycleways would link the new development with Lowbrook Farm to the station and be a positive asset to the existing and future communities and could provide a green lung between Bromsgrove DC area and Solihull. Although the housing figures have been halved for site BL1, if removed from the Green Belt, further development is likely in the future on the undeveloped green spaces. Other reasons have been set out previously.
- 16) Site **SO1** Hampton Lane. We support the Council in recognising and safeguarding part of the areas of high ecological value in their evaluation but object to the low -density development rear of Hampton Lane on loss of biodiversity grounds.

**17) Site KN1** The Arden Triangle. We object to this allocation for the reasons previously given and this site allocation should be reduced.

**18) Site KN2.** We also object to this allocation for the reasons previously set out.

CPRE wish the Council to take the response above into consideration before sending onto the Inspectorate.

**CPRE Warwickshire Branch wish to speak in support of their statements at the EIP**

