

Consultation cannot be considered to have been effective (therefore not legal) because:

No Written notification has been received by residents, nor was any written notification received about any earlier consultations on this plan, therefore content as well as process is open to comment and challenge.

Up to 4<sup>th</sup> December, council website section on Current Consultations did not show this consultation, thereby shortening the consultation period

Policies Plan Map and Maps used to show sites are very out of date and do not show existing developments from as early as 2015, therefore giving false impression of context of proposed development sites.

The Plan is not considered sound because:

### **Foreword**

Para 2 False statement – says no choice over loss of Greenbelt Land. Patently incorrect. Choices always exist. Has loss of Green Belt land been taken into account when evaluating net zero carbon future as loss of green space will have effect of increasing net emissions?

Para 3. What evidence is presented to support claim that most recognise new growth is needed?

### **Introduction**

Para 8 What evidence that plan reflects the vision and aspiration of local communities?

Para 13 Covid is not considered except in name. The impact on future economy, travel and demographics is not considered in determining number and pattern of future housing and employment needs nor of Airport and Rail Traffic.

Para 18 This implies there are site allocations, yet to be developed which are not identified in this plan? In which case it is deceptive of context.

### **Challenges**

Para 38

A – economic and housing development will increase net carbon emissions contrary to objective, especially by building on greenbelt land with low density housing without green energy infrastructure. Therefore any new development must be demonstrated to be carbon negative and include the necessary green energy infrastructure.

B – what is the justification for assisting accommodation the Housing Market Area wide shortfall when Solihull is already a highly economically active area. Surely development should be elsewhere under a Policy of Levelling Up.

Building on Green Belt WILL adversely affect quality of environment and attractiveness for residents

There has been a massive amount of building for older people in recent years – not shown on maps. What evidence (including effects of Covid) are presented to support this stated future need.

How many entries are there on the councils register of those interested in serviced plots for self or custom house building. Has this number grown in the recent two years to suggest that there is inadequate availability now?

How does the council assess that new developments are meeting local needs rather than attracting additional demand from outside the borough?

C How does building on green belt conserve the qualities and characteristics of the borough?

Council has failed to ensure that developments over recent years have been provided with adequate broadband infrastructure. How can we be sure that this objective will now be met?

D How does building on green belt provide a natural landscape which is attractive for relocation of businesses?

Restructuring post Covid is mentioned but not the impact on demand for housing. Impact of Brexit is not mentioned at all, especially considering likely impact on Automotive and Travel Industries.

E Protecting Gaps. Building on Green Belt between Shirley South and West and Dickens Heath actually closes a gap! The objectives are weak and only mention the Meriden Gap not other at risk Green Belt gaps.

F How will proposals close inequalities between wards?

H How will building on Green Belt comply with objective to develop more in areas with good public transport access?

J Does not address objectives to DISCOURAGE unhealthy lifestyles and air and ground pollution such as presumption against fast food outlets and take-aways and actively pursuing individuals and business which contribute to litter and fly tipping. Prevalence of private hire vehicles (often old and poorly maintained) compared to public transport and sustainable transport options.

K Why not plant trees on the existing green belt land, rather than build on it and plant trees elsewhere?

L River Cole is not regularly maintained and is also subject to fly tipping in some locations. Flood water enters the borough from other local authorities which do not ensure maintenance and control of surface water. Water exists borough to Birmingham which also does not maintain watercourse to minimise flooding upstream.

Vision

47 Vision includes protection of Green Belt – which cannot be achieved by building on it.

[REDACTED]

50 The wording is now different – it is only the integrity of the Green Belt that is to be protected. How small does a Green Belt gap have to become before its integrity is lost?

Any open spaces within new developments must be protected against future development. Protection must be retrospective for existing open spaces such as parks and recreation grounds, woodlands and open green spaces – for example the Orchard, Canalside and Riverside POS on the Berry Maud Lane development.

51 The council should not spend money allocated to the borough or paid in Council Tax and Business Rates for Environmental Offsets or other investments outside the borough in order to achieve Net Zero Emissions, which do not yield direct benefit to the residents and businesses of the Borough (except certified Zero Carbon PPAs for energy use within the Borough).

Does Net Zero apply to the operation and flights from Birmingham Airport?

### **Spatial Strategy**

59 Release of significant tracts of the Green Belt to enable economic growth is not consistent with previous statements on protecting the Green Belt. Furthermore, it is a decision which should be brought to the electorate either as a main policy area in an Election or as a Single topic Referendum. Contrary to the statement – there is an alternative. Limit economic and housing growth to the land available outside the Green Belt.

67 Discourage development isolated from settlement, disproportionate addition to settlement or in relatively less accessible locations – eg Shirley South and Dickens Heath Whitlocks End Farm. Note that some of these identified areas virtually join up and destroy the integrity of the Green Belt. Putting them in different categories is a deception.

Tidbury Green, Dickens Heath, Whitlocks Farm, Cheswick Green, BVP, Illshaw Heath is effectively a huge block of development wiping out a swathe of Green Belt between Shirley and the M42 when developments since the last plan but not on the map are taken into account. Could be even worse if neighbouring Worcestershire decides on same policy.

### **Site Selection**

68 What does “highly performing” mean in respect of Green Belt areas – it is note stated

What is the distribution of social housing across the wards of Solihull Borough as a percentage of housing units in each ward? Does the draft local plan significantly make the distribution more even?

## **Policy Chapters**

### **Policy P1A – BVP**

BVP is in the process of becoming a residential neighbourhood in addition to massive growth in non-office based business. The impact of this change is yet to be seen. It is too soon to take further steps in enlarging the business and residential aspects.

### **Providing Homes for All**

155 What is driving forecast population increase? Is it indigenous or attracted by increased economic activity? In the case of the latter there is a choice to limit economic growth and restrict housing growth. Has this been considered?

157 It would seem that the type of growth envisaged may not retain a character attractive to an ageing population. Why provide housing for this group, often in areas without existing communities and activities, rather than encourage them to move elsewhere?

158 Affordability issues suggest that employment available to many residents is not well enough paid. This suggests that much of the economic growth is not sustainable. Organisations (including the council) are profiting from paying lower rates than needed for staff and contractors to live close to their work. This suggests that businesses and government organisations should be levied more to support affordable/social housing or should limit their activity to that which can support living levels of pay.

### **Policy P4A**

1 No mention is made of key worker homes, such as for Health and Social Care, Municipal Services and Teachers. Employees of NHS and Council Services should have affordable and available housing.

171 The provision of social, affordable and key worker housing should be evenly spread across the borough and within reasonable distance of employment opportunities, ideally reachable by walking, cycling or public transport. For key worker housing, this should be reserved and prioritised for allocation based on distance to workplace. This supports overall affordability and Climate Change. Key worker housing should not be eligible for right-to-buy.

222 Do the figures in the table take account of developments completed and occupied in the period between the last plan and now?

### **Policy P7**

1. Some of the greenfield and green belt sites patently do not fulfil this criterion of most accessible locations. Eg Whitlocks Farm

### **Policy P14 Amenity**

1 Clearly many of the proposed developments are in breach of this. Views, open areas for walking and which support local wildlife are lost. Air quality, noise and light pollution will all be worse.

Previous developments have failed to ensure that developers follow this requirement. Trees and hedges have been damaged or destroyed. Is this policy different from previously? What will be different.

#### P14 A Digital Infrastructure

Don't make me laugh. Reference Acorns/Mounts Chase development off Aqueduct Road, Shirley. Developer was allowed to install old technology, beyond acceptable distance and with poor installation quality. Result – 1MB/s intermittent service. Residents having to fund fibre connection without support from developer or council.

#### P17 Countryside and Green Belt

You mean Green Belt Land, not sacrificed by this plan (340 ha) will be kept open... until the next plan.

#### P17 A Green Belt Compensation

No details are given of any proposed compensation (replacement, improvement etc) so this Policy is worthless. Developers have not been held to their commitments in the past in any case.

#### P18 Health and Wellbeing

##### Hot Food Takeaways

3 Solihull along with most of UK suffers from an obesity and poor diet crisis. There are already too many hot food takeaway provisions in the borough and close by in neighbouring boroughs. Further hot food takeaway provision is contrary to the purpose of this policy. There should be a presumption against new takeaway provision as a minimum.

#### P20

Will all such open spaces, play, sport and recreations be marked on the planning map to avoid any inadvertent breaches of this policy, including public open spaces not adopted by the council but cared for by the local community directly or through a paid managed service? Will the council conduct a survey to identify all such areas and write to residents asking for such areas to be identified for protection?

8 Please state that this will be at the cost of residents, as it has been on recent developments.

Para 496 CIL should be ringfenced to be spent within the ward containing the development and the use of such monies should be subject to ward level consultation.

BL3 and BL1 are effective contiguous and fill the buffer between Dickens Heath, Majors Green and Shirley. The plan pretends they are separate to deceive. These sites do not have good transport links and reference to improved links to Shirley Station are NOT present in the LCWIP out for consultation. Para 613 is incorrect.

Current recreational and natural spaces will be destroyed. Wildlife will be disturbed/displaced (notably water fowl). Character of Stratford Upon Avon canal will be significantly reduced. Ancient hedges will be destroyed.

BL 3 is not well drained and is subject to bogginess and ponding. Flood risk assessment has not taken place

Para 616 – previous said that highly performing Green Belt would not be prioritised for development.

Para 621 – Shirley West suffers increased traffic by design.

BL2 is effectively contiguous with current new development on old Lucas site north of Dog Kennel Lane.

Flood Risk Assessment has not taken place.

#### Policies Plan Map

Existing Open spaces are not highlighted. Are they subject to protection to prevent future development? Including parks and other POS.