

Solihull Local Plan

Draft Submission Plan (October 2020)

1. As Chairman of the Knowle Streamside Trust Management Committee (appointed by Solihull Council as Trustees of the Trust created on 15 April 1947) I am submitting the Committee's representation to the Public Stage of the Solihull Local Plan Draft Submission Plan (October 2020) and as agreed by the Management Committee of the Trust on 10/12/2020. The Management Committee reports to the Cabinet Member for Environment and Highways. The Trust property is designated as "Land at Purnell's Brook" under Charity Number 523005 and registered on 19/08/1969. The land was conveyed to the Council by a Deed of Conveyance dated 15 April 1947.

The site was also referred to as the Wychwood Avenue Local Wildlife Site and which became a designated Local Wildlife Site (LWS) in 2007. The site will be affected by Housing Allocation KN1 in the recently published Solihull Local Plan Draft Submission Plan 2020.

2. The Committee expressed its concerns in 2017 regarding the possible impact that large scale housing development in proximity to the LWS might have and would re-iterate its qualified position, that the Council must ensure that any future application for housing on this site must include all the appropriate environmental and ecological impact assessments in order to ensure that such development will not adversely impact upon the LWS. The Committee's views have not changed since its previous submission and we believe this position is reflected in the Council's own Additional Site Options Ecological Assessment document 2017 which states that: -

- 2.i HBA SMBC ECOLOGY AND GEODIVERSITY ASSESSMENT (EGA) 2016/2017 Page 82

Northern Parcel

Purnell Brook Meadows pLWS should be extended to include a section of tall ruderal vegetation beyond the existing footpath and as such be subject to a full Local Wildlife Site survey at an appropriate time of year.

The section of semi-natural broad-leaved woodland included within the development parcel and designated as part of Purnell's Brook Woodland LWS should be excluded from development. Purnell's Brook Woodland is important mixed woodland surrounded by housing and arable farmland. It acts as an important habitat corridor connecting semi-natural habitats of the Grand Union Canal and Purnell Brook Meadows plws. The potential impacts on both Purnell's Brook and its associated woodland from development are likely to include disturbance, fragmentation, invasion by non-native species and all those cumulative effects.

Encroachment activities range from waste disposal, woodland recreation, garden extension and garden plant invasion. It is essential that Purnell Brook woodland is protected and enhanced as part of mitigation and management solutions from potential development. The same should apply to Purnell Brook Meadows if it is

deemed as Local Wildlife Site standard. Therefore, the implementation of an adequate buffer is recommended for both Purnell's Brook woodland and the watercourse itself.

The Committee also draws attention to the Local Wildlife Sites Project: Citation for Purnell's Brook Woodland and Meadow of 12/01/2018 which establishes an extended LWS as documented (Appendix 1).

2.ii To this end the Committee would recommend an adequate "buffer" zone be inserted in the Concept Masterplans October 2020 document and as a minimum area of buffer and extending east beyond the minimum 8 metre boundary throughout the course of the brook. It is recommended this "buffer" zone be established as the area defined as the area of potential flood risk on page 78 of the SMBC Concept Masterplan Site Analysis and that this "Site Analysis" mapping on page 78 be extended to the northern section of the LWS. The Committee draws attention also to aforementioned evidence base document and as illustrated in Figure 2 Constraints Map on page 84 of the HBA SMBC ECOLOGY AND GEODIVERSITY ASSESSMENT (EGA) 2016/2017. The section referred to is along the land adjacent to the Purnell's Brook, as identified in the Council's Landscape Assessment (Masterplans document page 79 - land hatched yellow) the Illustrative Concept Masterplan (Masterplans document page 81, - land coloured green) and designated as Public Open Space, and the area identified as a flooding risk, set out in the Council's Masterplans – (Masterplans document - Site Analysis page 78 – land edged in blue).

The Draft Submission Plan also confirms the constraints of main concern to the Committee as expressed in 717 (page 198) and the recognition of a buffer zone for Purnell's Brook Woodland but that this protection is not stated for Purnell's Brook Meadows. However, the LWS has been redesignated and there is no differentiation as a LWS between Purnell's Brook Meadows and Purnell's Brook Woodland.

2. iii The Committee therefore recommends that the Local Plan Draft Submission 2020 document be amended in section 2. iv. in respect to the reference to the "buffer zone" for Policy KN1 (page 195) by correctly defining this area as the Purnell's Brook Woodland and Meadows LWS SP17Y3 and extending protection to the area defined above (see 2.i and 2.ii)

2. iv The Committee is opposed to any development within this identified buffer area, as in the opinion of the Committee, as supported by the HBA SMBC ECOLOGY AND GEODIVERSITY ASSESSMENT (EGA) 2016/2017, it is asserted that this would inevitably create an increase in both the volume of water and levels of pollutants within the run-off that will be generated from an increase in hard surfacing and would therefore pose a risk to the ecology of the Purnell's Brook, which is a major tributary of the River Blythe SSSI.

3. With regard to the remainder of the site, any attenuation measures, e.g. Sustainable Drainage Systems (SuDS) must be adequate to prevent any risk to the Purnell's Brook (Ref. Draft infrastructure Plan Section 5.1 page 101, Natural and Semi-Natural Green spaces). Management programmes must also ensure that SuDS continue to function as designed, in future years.

4. Any increase in local residents will also result in increased visitor numbers to the Wychwood LWS with a potentially negative impact upon the woodlands and grassland of the area. The site is already fragile and the existing circular footpath struggles to cope with current usage. It is likely that with increased usage, people will develop new additional footpaths through the site in order to avoid the muddy areas, which would have a negative impact particularly on the woodland field layer.

5. It is difficult to identify mitigation measures in order to minimise the impact of increased visitor numbers onto the LWS. However, an alternative path on the south eastern side of the brook, through the newly established area of Public Open Space, might be laid out to provide an alternative route for visitors, which could ultimately connect with the footbridge over the Grand Union canal. Given the boggy nature of this area, it is possible such a path might need to be board-walked across some areas. However, such a path could perhaps divert people away from the more fragile circular path within the LWS.

6. Wildlife corridors to connect the LWS with Hampton Road and onto the land south of Hampton Road is considered an imperative and the retention and improvement to existing ancient hedgerows is strongly recommended. This is also supported by the Council's strategy for wildlife ways throughout the Borough. The Committee recommends the Local Plan Draft Submission 2020 document is amended by extending this protection within Policy KN1 2. iii (page 195).

The Committee requests the SMBC Illustrative Masterplan KN1 (page 81) to include the following: -

1. A reference to the LWS
2. A buffer zone as set out above
3. Permanent protection and enhancement to all hedgerows on the site KN1 as wildlife corridors

The Committee notes the Local Plan acknowledges that 'made' Neighbourhood Plans "provide a more appropriate local expression of a standard of expectation that should be taken into account and given due weight". It also notes the Site Allocations in the Concept Masterplans have been tested for the capacity to deliver housing and also how the site should be developed and so understands the Concept Masterplans document October 2020 is integral to the Solihull Local Plan Draft Submission Plan. However, it is recommended that Draft Submission Plan is appropriately reinforced to confer the weight given to the Site Analysis statements in the Masterplans within the Draft Submission Plan for absolute certainty on reliance for all Planning applications in the future.

JUSTIFICATION OF RECOMMENDATIONS OF THE COMMITTEE

The Committee refers to the evidence base used by Council and the minimum suggested constraints as recited on page 84 of the HBA SMBC ECOLOGY AND GEODIVERSITY ASSESSMENT (EGA) 2016/2017

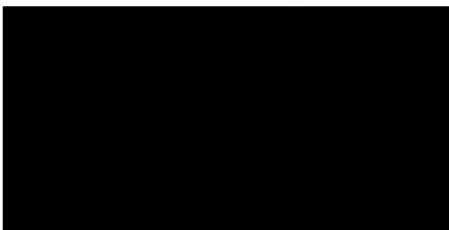
Figure 2 Constraints Map

The areas marked in green and blue on the above constraints map indicate where development should be avoided and ecological enhancement encouraged. They include:

- 30m buffer around woodland
- 8m buffer either side of adjacent to watercourses
- 8m buffers around ponds
- 5m buffer either side of intact hedgerows
- Areas of medium to high distinctiveness grassland (Values 4, 5 & 6)

The Committee is supported by advice from officers of the Council on the management of the site.

Evidence of surface water accumulations in seasonal rainfall on land east of Purnell's Brook and within the zone referred to above as the "buffer zone" recorded November/December 2020 (Appendix 2).



Councillor Alan Rebeiro, Knowle Ward

Chairman

Knowle Streamside Trust Management Committee

Date: 10/12/2020

Appendix 2



(Below) Fence boundary line approximately 60 meters from Purnells Brook

