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13th December 2020

Policy and Spatial Planning Team
Solihull Metropolitan Borough Council
The Council House
Manor Square,
Solihull B91 3QB

Dear Sir/Madam,

Objection to Site BC3 - Fails 3 out 4 Tests of Soundness

I wish to formally object to Site BC3 Windmill Lane/Kenilworth Road and ask that it is *removed* from the Solihull Draft Submission Local Plan and Final Local Plan.

The Draft Submission Local Plan is not sound, in proposing the allocation of Site BC3 for housing, as it fails to comply with 3 of the 4 tests of Soundness:

1) Positively Prepared:

The plan has not been positively prepared in that it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units on Green Belt Land (greenfield) and 1195 in the Meriden Gap is not required in order to comply with planning policy. Moreover, it is demonstrated that Site BC3 specifically is not sustainable using the Council's own criteria.

2) Justified:

The allocation of site BC3 has not been justified. 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. Moreover, the findings from the final version of the masterplan for Solihull Town Centre are not incorporated and cannot be reconciled with the Draft Local Plan.

3) Consistent with National Policy:

There are inconsistencies with the NPPF. Specifically paragraphs 11; 94; 108; 109; 122; 138; 185 and 194 are not complied with. As such, the enabling of sustainable development will not be delivered should Site BC3 remain in the Draft Local Plan.

I wish to protect the biodiverse rich habitat that is Site BC3 and I also wish to protect the setting and character of the Grade II * Listed Berkswell Windmill.

Yours faithfully,

Richard Clare