Objection to Site BC3

The Draft Local Plan Team Solihull Metropolitan Borough Council The Council House Manor Square, Solihull B91 3QB



10<sup>th</sup> December 2020

Dear Madam/Sir,

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

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

The Draft 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 have not been included. This is due for publication by the year end.

## 3) Consistent with National Policy:

Inconsistencies with the NPPF are demonstrated throughout this report. 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.

I look forward to hearing from you.

Yours faithfully,

Silvia McMenamin SPAB Mills Section Administrator