

LPR Consultation
Policy and Delivery
Solihull MBC
Solihull
B91 3QB

Councillor Tim Hodgson
Shirley West Ward

C/o Solihull MBC Manor Square
Solihull B91 3QB

13 December 2020

Dear Solihull MBC

Re: Solihull Local Plan Publication Stage Representation

I wish to raise serious concerns about the soundness of the Solihull Local Plan for the following key reasons:

- The spread of housing is not distributed fairly across the borough, with 31% in Balsall Common and 39% in Shirley/Blythe (B90 postcode), including the site at The Green Shirley (site 11) currently being built out.
- Many areas of the borough, such as Dorridge, will not meet their housing needs in the plan, while Balsall Common/Berkswell and the Shirley/Blythe area are disproportionately over-contributing to the local housing need. This is unfair and is an imbalance that needs to be addressed through modification to the plan.
- The loss of Green Belt is too great considering that brownfield sites at Solihull Town Centre and Arden Cross (HS2 Interchange) are being under-utilised for housing and masterplans for both locations are not included in the plan.
- There is a lack of supporting evidence to demonstrate that sites BL1, BL2 and BL3 do not pose a significant flood risk, particularly in view of the fact that they feed into the River Blythe and Cole catchments which have flooded more than once in excess of 1 in 100 year levels in the past 15 years. For example, homes in my ward downstream of sites BL1 and BL3, in Corley Close, Aqueduct Road, Colebrook Road and Nethercote Gardens, flooded in excess of these levels in both 2007 and 2018. These events are happening more frequently as a result of Climate Change, and the risk of building 1,600 more homes in the area cannot be underestimated.
- The cumulative effect of the quantity of housing being allocated to the Shirley/Blythe area will result in the gap between Shirley and Dickens Heath/Cheswick Green being narrowed too much, putting in jeopardy the remaining Green Belt buffer. The prospect of a new road forming a new Green Belt boundary at site BL2 is of considerable concern. Dog Kennel Lane provides a well-established and distinct separation between the built-up area of Shirley and the Green Belt, and this should be maintained. There is significant community concern that over time, the narrow gap in Green Belt that is left behind will be filled in and will result in a continuous urban sprawl.
- There is a lack of any detail in the plan on how it will cater for the increased demand for primary healthcare services, like GP surgeries in the Shirley area. With the

housing numbers we already have, and proliferation of care homes and housing for older people, current facilities are struggling to cope and the system has fallen over during the Covid-19 pandemic. This is not sustainable and whilst the plan identifies sites for new primary schools, there are no sites identified for primary care.

- The plan has been rushed through with an inadequate timescale for public consultation, especially in view of the Covid-19 pandemic, with traditional outreach methods, like public meetings, not being possible. Requests to extend the consultation period have been denied by the Council. Opposition Councillors have unanimously backed extensions to the consultation, through an amendment to the decision on the plan at the 6 October 2020 Full Council meeting, and subsequently via a Motion to the 8 December 2020 Full Council meeting. Both of these attempts were blocked by the ruling Conservative Councillors.
- Residents have reported to me numerous difficulties in accessing the forms online to respond to the consultation, and many, particularly people who are digitally excluded, have told me they knew nothing about the consultation and did not therefore have an opportunity to respond or did not know how to.
- Documents in support of the plan were uploaded by the Council after the consultation opened on 30 October 2020, with some alterations made as late as the final week of the consultation. Despite this, no extensions were granted to allow people the chance to review their representations in view of the amendments made.
- A disproportionate amount of supporting evidence was uploaded in October (around a third of the total in page numbers) when the consultation went live. This gave a very limited window of opportunity for respondents to go through all the documents.

Like all Opposition Councillors, I voted against this plan when it came to the Full Council meeting on 6 October 2020. The plan should not be submitted for public examination until it is modified, as it would result in thousands of acres of Solihull Green Belt being lost unnecessarily, while the housing needs of many parts of the borough will not be met.

The vast majority of the land allocated in this plan is currently in the Green Belt, and contributes greatly to openness and recreation, improving mental health and wellbeing for our communities. Using Green Belt to the extent the plan does is flawed because it is the least sustainable from a transport perspective, resulting in high car dependency due to poor public transport and active travel links. Traffic congestion and air pollution are already major problems in the Shirley/Blythe area, and with the quantity of new development proposed in the plan, this will only worsen and the Council has not provided sufficient evidence to justify the inclusion of these sites.

Green Belt land is also essential for CO2 sequestration. Priority in the plan should have been given to verticalisation in urban areas rather than urban extension to maximise land efficiency for housing.

The National Planning Policy Framework (NPPF) is clear in section 11 that “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

Further to this, section 8 of the Council’s Draft Submission Plan FAQs states that “Developments will be located in accessible locations for sustainable transport, or improve the existing provision as well as being well-connected for cyclists and pedestrians.” The plan relying so heavily on Green Belt sites, which have poor access to sustainable transport options, does not achieve this. Additionally, policies P7 and P8 of the plan

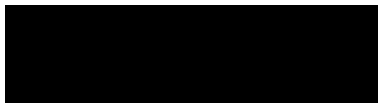
advocate ease of travel, reducing the need to travel and easing congestion. Relying on allocating so many Green Belt sites will not accord with those policies.

In spite of the clear concerns I have highlighted in this letter, I completely recognise that Solihull, along with the rest of the country, faces a housing crisis. I am very troubled by the position of our young people, who face great difficulty finding affordable homes. Solihull Council has in recent years encouraged and allowed the construction of housing for the over 55s to the point of having a surplus for this age group in Shirley while younger people continue to struggle to be housed. I would like to see much stronger policy in the plan on addressing affordable homes for our younger residents.

On balance, my conclusion is that the Local Plan does not meet the needs of the whole borough, sacrificing our Green Belt when this could be avoided with a sound and fair plan. The Shirley/Blythe area and Balsall Common in particular are targeted with too high a number of new homes without the infrastructure to sustain this, whereas other parts of the borough are not taking a fair share of our housing need. Objections raised by residents, Opposition Councillors, Parish Councils and other third parties have been ignored and dismissed by the Council and the consultation has not been sufficiently inclusive.

I am happy to participate in the public examination sessions to explain how I think the plan should be modified to meet the soundness test.

Yours sincerely

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Councillor Tim Hodgson

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