

- iv. Provide on-site transport infrastructure that promotes ease of access and enhances accessibility levels;
 - v. Provide, contribute to and/or enhance off-site transport infrastructure schemes (including, but not limited to, public rights of way/public footpaths and cycleways) where appropriate and viable;
 - vi. Are consistent with, and contribute to, the implementation of the 'Solihull Connected' strategy (or its replacement);
 - vii. For offices, retail and leisure development, are directed to locations in town centres, or other established locations including Birmingham Business Park, Blythe Valley Business Park, Birmingham Airport and NEC, as defined in Policies P1, P2 and P19; and national guidance.
3. Access to all development will be required to demonstrate that:
- i. It is safe, attractive and suitable for all people by all modes;
 - ii. Priority is given first to pedestrian and cycle movements;
 - iii. Opportunities for sustainable transport modes have been taken up.
 - iv. Assessed in accordance with Policy P8 'Managing Travel Demand and Reducing Congestion' and Policy P15 'Securing Design Quality' in the Local Plan and the Concept Masterplans.

Policy P8 Managing Travel Demand and Reducing Congestion

1. The Council will support development proposals which:
- i. ¹ Are located in accordance with the spatial strategy in seeking to reduce the need to travel and that essential travel can be met by forms of sustainable transport in addition to the private car;
 - ii. Promote linked trips by encouraging mixed use development where appropriate;
 - iii. ² Do not have an unacceptable impact on public highway safety;
 - iv. Takes an evidence-based approach to demonstrate appropriate car parking provision, taking account of location, trip rates and, where relevant, travel plan targets and forecast levels of car ownership;
2. The Council is unlikely to support developments:
- i. Where the impacts of increased delay to vehicles, pedestrians or cyclists, taking account of the residual cumulative transport effects of development, are severe.

This is poorly defined.

1

A developer can say that a site is accessible by bike if there is a road to it. However, ensuring that it is "safe" and "practical" to access the site by sustainable forms of transport is integral to promoting sustainable travel.

Many who do not walk or cycle may not be aware of some of the dangers and detractors that accessing properties with poor surface condition, non-segregated space, and poor lighting can pose. Too many new developments are fostering greater car dependency by failing on one or more of th...

An unacceptable impact needs quantifying.

2

Acceptance is a subjective term. There are multiple sites in the plan that will have an unacceptable impact on public highway safety, from a residents point of view. Examples of this will be in relation to BC3, with traffic onto Windmill Lane having poor visibility, whilst also increase traffic volume...

Similarly, plans for sites BL1 and 3 will push increased traffic onto Haslucks Green Road and Bills Lane. Both have serious concerns over pedestrian safety and have become accident hotspots.

possible to LCWIP corridors) to become the preferred modes of travel. Access routes that are well connected, attractive, legible and safe, as well as facilities to encourage travel by sustainable transport modes, such as provision of cycle storage, will be required where they do not exist.

274. The Council is committed to ensuring that new developments are located in locations with the highest accessibility where reliance on the private car is low and take up of sustainable modes is high, thereby not materially adding to existing highway congestion. Planning can influence road safety through its control and influence on the design of new development and consideration should be given to pedestrian and cycle links in terms of personal safety, ensuring neither a sense or fear of crime is encouraged through an isolation of the routes from other activities and street users which may discourage the use of the connecting links. Developers should consider the safety and needs of everyone in the community.

Managing Demand for Travel

275. The expected increase in travel demand arising from population growth, HS2 and UK Central will introduce transport challenges which, without application of effective land use planning, are likely to further compound congestion on the Borough's road network during peak hours. To ensure that transport does not in itself become a barrier to growth, the local plan sets a framework for promotion and facilitation of sustainable development where housing, jobs, local services and facilities are connected through a range and choice of transport modes.
276. Furthermore, increased availability and uptake of public transport, walking and cycling can complement wider accessibility and social inclusion, particularly in helping narrow income and health equality gaps between North Solihull and the remainder of the Borough. Worklessness and health inequalities can be reduced through increasing opportunities to travel via non-car modes through the increased levels of activity involved in travelling by non-car modes. Enabling people to access their local area in a variety of ways can help to provide a sense of belonging and community cohesion as people become familiar with the area and build social networks.
277. Policy P7 sets out a framework under which development will be located in the most accessible locations. It therefore provides the primary step in managing travel demands associated with development from the outset, by ensuring that realistic opportunities are available to travel by non-car modes.
278. Policy P8 seeks thereafter to ensure that the travel demands associated with new development are managed in a sustainable manner and that subsequent traffic generated does not create or exacerbate network congestion to a point of severe highway impact. To be clear, the impacts of development will be informed by robust Transport Statements and/or Assessments, which, where appropriate, model the underlying highway characteristics at the point development is expected to commence¹ as well as future points thereafter (as appropriate to the build out of the development). **Such assessments will have regard to the impact of the proposed development but should also factor in the cumulative impacts on the surrounding highway network, having regard to other known development proposals and planned infrastructure works where appropriate.** Provision of safe and secure access to new development remains paramount. Transport Assessments and Travel Plans will be required in association with particular types and scale of development to forecast the transport impacts associated with development, ensure that detrimental impacts are adequately mitigated and secure the implementation of, or contributions towards, appropriate measures to encourage and enable travel by non-car modes.
- 279.² **The Council will expect an evidence-based approach in forecasting parking demand** and servicing provision which uses established evidences bases and/or, where relevant, first principles.

This appears to be a failing in relation to the A34.

1

Significant amounts of windfall development have taken place there in recent years. Sections have over 25,000 vehicle movements, in each direction, on a daily basis. These numbers are growing and will likely increase significantly with further development.

The consideration here are not only around the impact on the network, increasing congestion and travel times, but also the impact on health, well-being and safety of the associated traffic. The volume is also a barrier to economic growth of Shirley High Street, as rather than acting as a beneficia...

Standards in this area need to be developed.

2

Very often parking surveys are done at unrepresentative times of the year, or day.

Numerous parking surveys were conducted during the pandemic and were accepted, despite the evidence being unsound. Weight should be given to the evidence of residents and interested parties, other than the applicant, to demonstrate where issues already exist and equivalent demand from...

High Speed 2 Rail

280. The HS2 Act received Royal Assent in February 2017, with the Notice to Proceed issued in April 2020 and construction works are now underway; with the line expected to be open between 2029-33.
281. The Act provides the powers and land necessary to construct and operate High Speed 2. Detailed matters relating to design and construction arrangements will be submitted to, and considered by, the Council as the approval body (termed 'Qualifying Authority') under the HS2 Planning Regime.
282. However, the Act also 'disapplies' many aspects of national, regional and local legislation and policy, replacing it with that which is more directly relevant to the design and delivery of the railway. Specific grounds are set out upon which HS2 related applications can be considered, conditioned or refused; meaning that the policies set out in this Plan cannot be applied by the Council in the usual manner when considering such applications.
283. The Council will continue to work with HS2 Ltd on measures to minimise impacts on communities and the environment as a result of the construction of the railway and associated infrastructure.
284. Other policies in the plan (most notably Policy P1 "UK Central Hub Area"), provide the policy framework for considering development proposals associated with the railway, such that no further policies are required in this chapter.

Rapid Transit

285. An efficient and accessible inter-connected rapid-transit network can play a vital role in improving the current transport system both locally and regionally whilst accommodating forecast increases in travel demand. The network can also help support wider urban regeneration and, in a more local context, go some way to reducing the transport severance between North and South Solihull.

Bypass Improvement Lines

286. The 2006 UDP sought to safeguard the lines of three longstanding potential by-passes to Balsall Common, Hockley Heath and Knowle. The 2013 SLP concluded that the need to retain safeguarding of the lines was no longer justified. In relation to Hockley Heath and Knowle, there is nothing to suggest that this conclusion needs to be revisited. However this is not the case in relation to Balsall Common.
287. The traffic associated with the HS2 Interchange site (and wider Hub area), and growth potential south of Coventry, especially when combined with traffic generated from new housing in the area, is likely to have an effect on the A452 as it passes through Balsall Common. ¹ This justifies the provision of an alternative route that could accommodate through traffic, and provide a basis for new residential developments to access the network in an appropriate manner. The Balsall Common settlement chapter gives more detail in relation to this.

Motorway Service Areas (MSA)

288. In 2001 the Secretary of State (SoS) was minded to grant permission for an on-line MSA to serve the M42 near to Catherine de Barnes. It was judged that the need for the services outweighed the harm to the Green Belt that had been identified. However, in 2005 prior to the formal decision being made, the SoS was of the view that due to material change in circumstances since the original inquiry that the inquiry ought to be re-opened.
289. The inquiry re-opened in 2008 and the MSA proposals near to Catherine de Barnes were considered alongside alternative proposals for an off line facility at junction 4. At the re-opened inquiry the Highways Agency's (as Highways England was then known) primary

New road building is incompatible with the climate commitments of the Council and Combined Authority. ¹

There are issues over induced demand with increased road building. Also, increased road building runs the risk of reducing available land for housing. This in turn places greater pressure on the Green Belt.

concern was to ensure that the safe and efficient operation of the strategic highway network would not be compromised by an MSA; and this included the operation of the Active Traffic Management (ATM) which had been bought into use after the initial inquiry.

290. In 2009 the Secretary of State dismissed the two appeals. Although the SoS concluded that there was still a significant unmet need, this need did not constitute the 'very special circumstances' that would be sufficient to clearly outweigh the substantial harm that had been identified in relation to both schemes. In relation to the Catherine de Barnes proposals, she did not consider that the proposals before her were compatible with the safe and efficient working of the ATM system.
291. Since then revised planning applications have been submitted and are currently being assessed by the Council and Highways England. Whilst the applications are under active and detailed consideration it is not considered necessary to address the issue further through this review of the development plan.

Challenges and Objectives Addressed by the Policy

- A **Mitigating and adapting to Climate Change**
- D Securing sustainable economic growth
- F Reducing inequalities in the Borough
- H Increasing accessibility and encouraging sustainable travel
- J Improving health and well being

Whilst all the Challenges and Objectives sections appear to have varying degrees of misapplication through the document, this is the most egregious one.

A policy section that includes road building cannot be described as mitigating, nor adapting to Climate Change. It can only be described as exacerbating Climate Change.

Protecting and Enhancing our Environment

Introduction

292. The national definition of sustainable development aims to enable people to meet their needs without compromising the quality of life of future generations, and includes protection and enhancement of the physical and natural environment, and efficient use of resources and energy. The NPPF states that the purpose of the planning system is to contribute to sustainable development, which includes the need to protect and enhance the natural environment, use natural resources more prudently, and to mitigate and adapt to climate change, thereby moving to a low carbon economy.
293. Since the SLP was adopted, the Council has developed a "Climate Change Prospectus" which captures how the Council is delivering a sustainable, low carbon Solihull. The prospectus sets out the Council's vision for the future, along key themes that are essential if the Borough is to become more sustainable. They are:
- Clean Growth
 - Clean Air
 - Nature Gain
 - Communication, Education & Engagement
294. Climate change is regarded as one of the greatest challenges facing humanity and the future of the planet today. There is strong scientific consensus³⁹ on both the causes of anthropogenic increases of greenhouse gases within the atmosphere, as well as the impacts.
295. The UK was the first country to introduce legally binding targets for the reduction of greenhouse gases in the Climate Act 2008. The Act also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. Following advice in the publication of 'Net Zero – The UK's contribution to stopping global warming' by the CCC, the Act was amended in June 2019 to change the target from 80% reduction of 1990 levels to net zero by 2050. A net-zero GHG target for 2050 will also deliver on the commitment that the UK made by signing the Paris Agreement to keep global warming below a temperature increase of 2°C.
296. In July 2019, the West Midlands Combined Authority declared an even more ambitious target of net zero by 2041. On the 8th October 2019 the Council took action to tackle the climate change emergency and adopted a Statement of Intent to Protect the Environment⁴⁰. To implement the statement the Council has pledged action on a number of fronts, and where these relate to land use matters they have been included in this plan. Of particular significance is the endorsement of the target of net-zero emissions by 2041, and this is a key objective of this plan.
297. Mitigation means reducing or preventing the causes of climate change, such as promoting renewable or low-carbon energy sources and reducing energy consumption. Adaptation

³⁹ <https://www.theccc.org.uk/what-is-climate-change/the-science-of-climate-change/>

https://royalsociety.org/-/media/Royal_Society_Content/policy/projects/climate-evidence-causes/climate-change-evidence-causes.pdf

⁴⁰ <https://www.solihull.gov.uk/Portals/0/Planning/Climate-Statement-Oct-2019.pdf>

Throughout this section there appears to be a missing of the drivers and impacts of Climate Change.

Whilst there is clearly positive movement in terms of recognising the importance of the natural environment on this matter, it misses many of the drivers.

There is no regard given to the carbon impact of building these homes, nor any mention of how this can and will be mitigated.

There is little detail on preventing the need for offsetting or why it is less desirable.

refers to dealing with the impacts of climate change that are occurring now and will continue to affect our people and places. Tackling both the causes and impacts of climate change are cross-cutting themes addressed in the strategy, site allocations and policies throughout this Plan.

298. Planning can help to support the transition to a low carbon economy and to provide resilience to impacts from a changing climate. The location and design of new development in the Borough will help to minimise greenhouse gas emissions, the risk of flooding, and other impacts from a changing climate, whilst policies will encourage the use of renewable and low carbon energy. The WMCA recognises the value of supporting the demand and supply chain of the environmental technologies sector for the regional economy.

299. The Borough's high quality green and blue infrastructure (GI) is one of its greatest assets. Our longest river, the River Blythe, is a designated SSSI, 14 of our parks have Green Flag awards and our suburbs are characterised by tree-lined streets. High quality, well-connected GI is our Natural Capital and has multiple benefits, which include:

- Attracting Investment
- Creating Sense of Place
- Providing opportunities for recreation and play
- Improving health and wellbeing
- Habitat for wildlife
- Flood prevention and alleviation
- Addressing Climate Change
- Urban cooling
- Filtering air and soil pollution
- Reducing noise impacts

300. GI is not just our parks and countryside, but is a network of green and blue spaces made up of street trees, gardens, ponds, rivers, canals, hedgerows, woodlands, playing pitches, public rights of way and more.

301. The Government recognises the need for "more, bigger, better and joined" habitats to address fragmentation, degradation and the consequent decline in biodiversity. The ecosystem services provided by a healthy well-functioning natural environment are essential for sustainable economic growth and tackling the causes and effects of climate change. The economic and social benefits of protecting our Natural Capital far outweigh the cost of their protection, and there are significant economic opportunities available for greener goods and services.

302. The natural environment is fundamental to Solihull's attractive urban and rural environment, which helps to attract and retain investment and people. The need to address the decline in biodiversity and fragmentation of habitats locally and to enhance and restore the Borough's green infrastructure network to maximise the benefits for people and nature are recognised in the challenges and objectives, and the policies of this plan.

303. The Council values its existing GI assets and is preparing a Natural Capital Investment Strategy, which will capture the opportunities to address this challenge based on the GI Infrastructure Study (2012) and Sub-regional GI Study (2013).

304. Using natural resources more sustainably will help to protect resources for the future and contribute towards economic efficiency. This is reflected in a number of the challenges and objectives in this plan, notably those relating to water resources, waste management and

Need to recognise that Solihull only contributes 6% of land to nature's recovery. This is the lowest of Warwickshire, Coventry and Solihull.

<https://www.warwickshirewildlifetrust.org.uk/magazine> pages 4-6 of Issue 164, Summer 2020.

The paragraph as it stands is misleading. It does not give a balanced view of shortcomings of the Borough's environmental position.

minerals. More efficient use of water resources in new development will help to reduce the amount of waste water requiring treatment and discharge to the Borough's watercourses, protecting water quality, and minimising the risk of flooding. Treating waste as a resource that has value and using recycled materials will help businesses to be more efficient as well as conserving natural resources, such as the mineral resources in the Borough. The plan addresses the challenges involved in providing for more waste management facilities and to contribute to local and sub-regional needs for sand and gravel aggregates.

305. The Government recognises the importance of protecting the amenities of existing and future occupiers of land and buildings (NPPF). This plan recognises that protecting amenity whilst providing for employment, housing and other growth will be a challenge and has as an objective the need to avoid, minimise or mitigate adverse impacts.

Policy P9 Mitigating and Adapting to Climate Change

1. Proposals for development will be required to demonstrate that, dependent on their scale, use and location, measures are included that mitigate and adapt to the impacts of climate change. Full details of the proposed measures should be incorporated into a Climate Change Assessment in accordance with the Climate Change SPD.
2. At a **strategic level**, measures to reduce carbon emissions and transition to a low carbon economy will include:
 - i. Locate development where it minimises the need to travel, particularly by private vehicle, and maximises the use of sustainable forms of transport such as cycling, walking, public transport.
 - ii. Design development that enables transition to a net zero carbon economy and make efficient use of natural resources.
 - iii. Promote and attach significant weight to the installation of district, low carbon and renewable energy schemes.
 - iv. Expect major developments, particularly in Solihull Town Centre and the UKC Hub Area, to connect to or contribute towards existing or planned district energy and/or heat networks.
3. At a **site level**, development must apply the 'energy hierarchy' to reduce energy demand for heating, lighting and cooling and minimise carbon dioxide emissions as follows:
 - i. All new dwellings to achieve 30% reduction in energy demand/carbon reduction improvement over and above the requirements of Building Regulations Part L (2013) at the time of commencement up to March 2025.
 - ii. ¹ From April 2025 for all new dwellings to be net zero carbon.
 - iii. Minor non-residential development will conform to at least BREEAM Very Good and major non-residential development will conform to at least BREEAM Excellent.

This needs defining.

1

There is a diversity of applications of carbon counting in relation to housing. Some only look at the energy performance of building, covered by the EPCs (Energy Performance Certificates). This is a necessary, but insufficient measure of the environmental impact of buildings.

Whilst recognising the impact of building in unsustainable locations has on the environment, the plan doesn't seem to follow its own guidance in site selection.

Moreover, the materials and carbon that are embedded in the construction of buildings is what the policy here needs to capture. Unless the building are decarbonised in their construction phase.

<https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house>

Whilst there will be dispute over the true carbon cost of building a house, the article above states 80 tonnes of CO₂ go into the construction of a house. If this is accurate, Solihull will be producing 1.2 million tonnes of CO₂, over the course of this plan, just on the construction of the 15,000 homes.

A fully grown tree (and not a sapling) can absorb 29kg of carbon per year. To absorb the amount of carbon involved in the construction of these houses would require an additional 2.7 million fully grown trees across the course of the plan. Whilst the commitments to tree planting are welcomed,

- iv. Provide at least 15% of energy from renewable and/or low carbon sources for all major housing developments and non-residential developments of 1000sqm or more.
 - v. Supply energy efficiently and give priority to decentralised and/or district energy supply.
 - vi. For all major developments, implement a recognised quality regime that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of dwellings as specified above.
 - vii. Source low carbon and sustainably sourced building materials wherever possible, e.g. secondary aggregates, recycled products and FSC certified timber.
 - viii. For residential development of new dwellings: provide at least one charging point for electric vehicles per dwelling. For non-residential development, 1 charging point will be provided per 10 parking spaces. On development sites without allocated parking, a contribution will be made to the Council's Charging Infrastructure Fund and/or provision to be made through a commercial rapid charging point.
4. In order that development proposals are adaptive and resilient to climate change, measures will include:
- i. Flood prevention and mitigation measures, including (SUDS); and water efficiency measures as set out in Policy P11.
 - ii. Layout (including orientation) and design that enhances natural ventilation and lighting, and minimises the need for energy for heating and cooling, such as Passivhaus.
 - iii. Integrated green infrastructure, such as SUDs, green spaces and corridors, retaining and planting trees, green roofs & walls, landscaping and rain gardens.
- Renewable and low carbon energy and carbon offsetting schemes**
5. Planning permission will be granted for renewable or low carbon energy developments, **and carbon offsetting schemes**, provided that they:
- i. Do not cause demonstrable harm to residential amenity or established commercial operations;
 - ii. Avoid or minimise impacts on the historic environment;
 - iii. Can demonstrate no adverse effect on the natural environment including designated sites;
 - iv. Do not have an unacceptable visual impact which would be harmful to its setting;
 - v. Will not have a detrimental impact on highway safety.

Carbon offsetting schemes need to be heavily regulated and a last resort.

Too many schemes are not sufficiently well accredited. They can end up "greenwashing" the issue of climate impact, without addressing the problems. Any carbon offsetting schemes will only be accepted when all other alternatives have been demonstrated to be unviable. When this is...

Where located within the Green Belt, renewable or low carbon energy developments or carbon offsetting schemes that would constitute 'inappropriate development' will also need to demonstrate very special circumstances in order to be approved.

Community energy

6. The Council will support the establishment of Renewable Energy Service Companies and community-led initiatives to reduce energy use and exploit renewable energy sources within the Borough.

Climate Change Assessment

7. A Climate Change Assessment shall be submitted with relevant applicants to demonstrate how the criteria in this policy (where relevant) have been met.

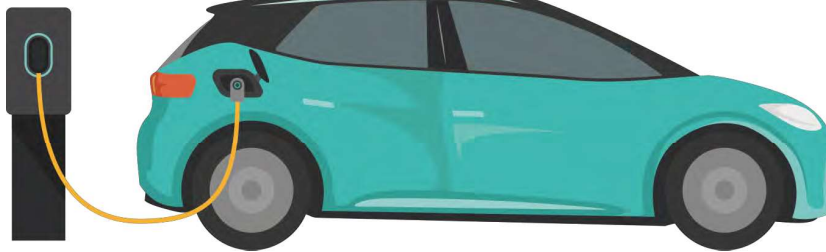
Justification

306. The NPPF is clear that planning, at both a strategic and decision-making level, should fully support the transition to a low carbon economy; secure radical reductions in greenhouse gas emissions and support the delivery of renewable and low carbon energy. The Council recognises that it has a crucial role to play in mitigating against and adapting to climate change through this plan.
307. National climate change targets aim to reduce greenhouse gas emissions to 37% of 1990 levels by 2020, 57% by 2030 and 100% by 2050. In the period 2005-2018, CO₂ emissions per person in the Borough have declined, but at a slower rate than the wider West Midlands Combined Authority area. The WMCA have set an ambitious and accelerated target to achieve net zero carbon by 2041, and this is supported by the Council. The carbon budget for Solihull during the plan period is MtCO₂. The Council will take full account of national and local targets for reducing greenhouse gas emissions, and increasing the generation of energy from renewable and low carbon sources, when considering development proposals.
308. The Council continues to implement the Home Energy Efficiency and Affordable Warmth Strategy, and working towards the Government's Fuel Poverty target: to ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy standard (Energy Performance Certificate rating) of Band 'C' by 2030.
309. 24% of the UK's carbon emissions are from the transport sector. Greenhouse gas emissions can be minimised by reducing the need to travel and ensuring that future occupiers of new developments have a choice of low carbon travel options. The Council's Transport Strategy 'Solihull Connected' states to support a low-carbon future Solihull will work in partnership with regional partners and align with the West Midlands Strategic Transport Plan 'Movement for Growth', the GBSLEP Low-carbon Transport Strategy, Birmingham Connected and Highways England; in particular to support people making low-carbon travel choices such as walking, cycling and public transport, the market for low-carbon vehicles and investment in recharging infrastructure and new technologies. The plan's spatial strategy promotes development in the most accessible locations wherever possible; in less accessible locations Policy P7 and P8 provide the parameters to increase accessibility and reduce dependence on private vehicles. The Council's Local Walking and Cycling Infrastructure Plan will provide greater opportunities for active travel and reduce reliance on the private car.

Whilst this is acceptable for older properties that are subjected to energy efficiency improvements, it is inadequate for new homes.

Whilst I'm sure the authors of this report recognise this, but it should be detailed here that this only applies to retrofitting and that new builds will be Band A or higher.

310. Reducing the impacts of climate change and improving air quality are twin objectives. The Council's Electric Charging Vehicle Strategy aims to increase the coverage of electric charging points across the Borough and future-proof technological advancement. All new development is expected to provide useable charging infrastructure directly or, where this is proven to be impractical, contribute to the Council's Charging Infrastructure Fund.



311. This policy seeks to encourage the development of low carbon and renewable energy solutions appropriate to the circumstances and scale of development. The contribution that such proposals make towards the reduction of emissions will be given significant weight.
312. Proposals to develop decentralised energy and heating networks in the Borough will be encouraged and should be based on the latest available evidence, such as the Renewable Resource Assessment (2020). Any impacts from infrastructure, including on-site low carbon and renewable energy installations, on the surrounding natural, built and historic environment, including ground and surface water quantity and quality, or on residents or businesses will be considered, with significant weight to be given to the reduction of greenhouse gas emissions to be achieved. Where adverse impacts are identified, these should be minimised, or be subject to appropriate mitigation. In locations where decentralised energy and heating networks or off-gas networks exist, or have the greatest potential, such as Solihull town centre, UKC Hub, and major business parks, developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible or viable.
313. Proposals for renewable or low carbon energy generation, such as photovoltaic arrays or windfarms, will take into account evidence provided in the forthcoming Renewable Resource Assessment and Net Zero Action Plan. Two-thirds of the Borough is designated Green Belt, and proposals which harm the openness and permanence of the Green Belt are not considered 'appropriate development'. Therefore, such proposals will need to provide Very Special Circumstances to be considered.
314. 20% of the UK's GHG emissions originate from energy use in the housing stock. The Government is committed to increasing the energy efficiency of existing and new dwellings in a way that is fair, affordable and inclusive. The energy efficiency requirement of Part L of the Building Regulations will be uplifted in 2025 as part of the Future Homes Standard. The Council are keen that the very latest Building Regulations are applied to qualifying development and not kept at the time of the first planning permission being granted. This is especially significant for large strategic allocations. Proposals for low carbon design such as Passivhaus or accelerating Building Regulations to zero carbon will be given substantial weight.
315. Efficient use of natural resources contributes to reducing our carbon and ecological footprint. Buildings and their surrounding landscape should be designed to make efficient use of natural resources during construction, operation and maintenance. Ensuring the resilience to the impacts of a changing climate at the build stage rather than retrofit is more cost-effective,

There are often good cases for using open ground for PV energy. ¹

Whilst the efficient use of land would always promote roof space usage over ground for PV cells, there are often economic cases for using open space.

The example of the Heart of England Community Energy project utilised land that was impacted by foot and mouth disease, so was unviable for agricultural usage. It allowed for a 15 megawatt array that can be returned to use as Green Belt in the future, if desired, whilst also donating £30,000 per y...

In equivalent instances, hampering the viability might reduce the social benefit that a project is able to deliver and so should be given weight in any consideration.

<https://www.hecommunityenergy.org>

Why only "given substantial weight"? ²

Surely energy performance should be required from developers, not only to prevent against fuel poverty, but also to prevent the need and associated costs of retrofitting buildings to bring them up to future standards.

inclusive and lowers fuel poverty. Sunlight and energy efficiency should be considered as an integral part of the layout through passive solar design and natural ventilation systems. Developments should also consider whole-life performance and costs. The consideration of a range of adaptation measures, including the location, design, materials, build and operation of developments, and the provision of green infrastructure, will be given substantial weight¹

316. Climate change is already happening, with rising temperatures and increase in flooding. The anticipated effects of climate change include more frequent extreme weather events; heavier rainfall and greater risk of flooding; and more and longer-lasting heat waves. The more vulnerable in society; those on low incomes, the elderly and young, those with long-term illness are also more vulnerable to the effects of climate change. This policy aims to ensure that all sections of the community are more resilient to the effects of climate change.
317. Green infrastructure delivers multiple cost-effective benefits in mitigating and adapting to climate change. Planted areas can slow water flows, decrease surface run-off, even out temperature fluctuations, trap pollution and encourage biodiversity.
318. Guidance on minimising the consumption of water resources and addressing flood risk concerns, which are likely to increase in importance in the future, is included within Policy P11. Guidance on minimising demand for energy in new developments is included within Policy P15 and protecting the most vulnerable from the impacts of climate change in Policy P18.
319. More detail on compliance with Policy P9 and the wider climate change objectives of the Local Plan are set out in the Council's Climate Change SPD². A Climate Change Assessment will be submitted with planning applications to show how different criteria of the policy have been met. The Viability Study supporting the Local Plan Review provides evidence that meeting the aims of the policy is viable, and robust evidence will need to be provided if this is not the case.

This is too weak a commitment for the reasons already mentioned.

1

Merely "giving consideration" will not address climate commitments and will jeopardise meeting them.

This document doesn't exist at present so it is impossible to see if it is sound.

2

Challenges and Objectives Addressed by the Policy

- A Mitigating and adapting to Climate Change
- B Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall.
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- D Securing sustainable economic growth
- F Reducing inequalities in the Borough
- H Increasing accessibility and encouraging sustainable travel
- I Providing sufficient waste management facilities and providing for sand and gravel aggregates
- J Improving health and well being
- K Protecting and enhancing our natural assets

Biodiversity Net Gain

8. Development will be required to demonstrate how it will secure a 'net gain' in biodiversity of at least 10% compared with the pre-development baseline.⁴¹
9. In the first instance, net gain should be provided in situ, as habitats and features to support native biodiversity, as well as conserving and enhancing existing nature conservation assets value within and around the development.
10. **In the circumstances where development, which otherwise meets the objectives of the Plan, is likely to have significant harmful effects on the natural environment, as a result of the development itself, or the cumulative impact of developments, developers must demonstrate that all possible alternatives that would result in less harm have been considered and robustly discounted.**¹
11. Where development is permitted, appropriate mitigation of the impacts and compensation will be required to deliver a net gain in biodiversity. This should be provided as:
 - i. habitat creation and/or restoration,
 - ii. increased connectivity of the ecological and green infrastructure network, and;
 - iii. responds to landscape character and local distinctiveness.
12. Enhancements should be undertaken either on the site, or in its vicinity, but where it is clearly justified that this is not possible, biodiversity offsetting, in alternative strategic locations within the Borough's ecological or green infrastructure network, may be considered as a last resort.
13. Evidence should be provided using the Warwickshire, Coventry and Solihull Biodiversity Impact Assessment calculator or Defra equivalent. Further guidance will be provided in a Green Infrastructure and Biodiversity Net Gain SPD.

Arden Landscape

14. The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create characteristic habitats such as new woodlands, copses, hedgerows and standard trees, urban trees, species-rich grassland, wood pasture, parklands, **wetlands and heathland.** To halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness.²
15. Development should take full account of national and local guidance on protecting and restoring the landscape and the areas in need of enhancement, including guidance relating to the countryside. Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible, disproportionate or unnecessary.

This is relatively weak.

1

Powers to refuse development on the grounds of negative effects on the natural environment. It is too easy to produce a report saying why a developer cannot do anything to prevent or mitigate environmental harm, especially so given the moral hazard inherent within associated in...

Errant full stop.

2

⁴¹ The Council will take seriously any attempt to minimise the biodiversity baseline value, such as the removal of trees prior to planning application.

16. Development proposals will be required to demonstrate that they:
 - i. Consider the context and setting, including local distinctiveness, natural and historic landscapes and character, and impact on tranquillity;
 - ii. Identify likely visual impacts on the local landscape (and townscape) and its immediate setting and undertake appropriate landscape design and mitigation to reduce these impacts;
 - iii. Aim to conserve, enhance and/or restore important landscape features in accordance with the latest local and national guidance, ensuring their long term management and maintenance;
 - iv. Address the importance of habitat biodiversity features, including aged and veteran trees, ancient woodland trees and hedges and their contribution to landscape character, where possible enhancing these features through means such as buffering and reconnecting fragmented areas.
17. **Sites of Special Scientific Interest:** Development likely to have an adverse effect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if, in exceptional circumstances, it can be demonstrated that the benefits of the development clearly outweigh the nature conservation value or scientific interest of the site and the national policy to safeguard such sites. Where development is permitted that may have a direct or indirect adverse effect on a Site of Special Scientific Interest, developers will be required to incorporate measures to enhance the condition of the site and contribute to its favourable status ¹
18. **Local Nature Reserve, Local Wildlife Site or Geological Site:** Development likely to have an adverse effect on a locally designated site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives. Where development would have an adverse effect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites to improve connectivity in the ecosystem network based on local evidence. Evidence of net gains to biodiversity will be required. ²
19. **Ancient woodland and Veteran trees:** Development likely to have an adverse impact on ancient woodland and/or veteran trees will not be permitted unless there are wholly exceptional circumstances. Where development may have an adverse impact on ancient woodland or veteran trees, applicants should refer to Natural England and the Forestry Commission's Standing Advice and Assessment Guide on Ancient Woodland and Veteran Trees. ³

Justification

320. The Natural Environment White Paper was published in 2011, seeking to address concerns about the decline and fragmentation of the natural environment, highlighted in the Lawton Report, through the provision of more, better, bigger and joined spaces for nature. It set out a national target to halt biodiversity loss by 2020, supported by the Biodiversity Strategy for England. The White Paper recognised the economic benefits that are obtained from natural environment resources or natural capital and makes clear that biodiversity loss has important adverse economic and social consequences, as well as environmental ones.

Development cannot be allowed to have adverse effects on SSSIs. ¹

As SSSIs are predominantly waterways in our borough, any negative impacts are liable to yield downstream consequences also.

River SSSIs are also vital as wildlife corridors, so must be given the greatest degree of protection possible.

Again, this is inadequate. ²

It is not detailed how the weighting of wildlife is counted against benefits of housing. The fear here is that in the calculations, wildlife will always lose.

Whilst there are clearly tradeoffs in all development, without clear guidelines and protections, ultimately resulting in applications for locations that will result in adverse impacts on wildlife being refused, the cumulative environmental detriment will be irreconcilable.

Again, "wholly exceptional circumstances" needs clear definition. ³

Ancient woodlands and veteran trees are by their nature irreplaceable (in the lifetime of any person).

Their importance is not only from their heritage contribution, but the unique habitats that they provide for many species.

It is considered unacceptable to have development that will have adverse impact on ancient woodland and/or veteran trees in almost every instance imaginable.

enhancement are highlighted in the Warwickshire, Coventry and Solihull Green Infrastructure Strategy and Solihull's Natural Capital Investment Plan. Developers will be expected to make use of this information in seeking to protect and enhance biodiversity through development.

328. The Council recognises and will promote the need for and benefits of joint working with a range of sectors, including public sector bodies, farming and agriculture, voluntary groups, wildlife charities, Neighbourhood Areas and private landowners to achieve landscape scale conservation and enhance the strategic green and blue infrastructure network. The Council is a partner in the Kingfisher Country Park project, with Birmingham and environmental agencies and groups, to protect and restore the landscape of the River Cole and Kingshurst Brook and their surrounds in North Solihull. The Council supports the work of the Local Nature Partnership for Warwickshire, Coventry and Solihull, such as the West Arden Living Landscape project, Tame Valley and River Cole NIA, and the Cole Valley Vision. 'Nature Conservation in Solihull' and the Council's Natural Capital Investment Plan set out the strategic objectives for biodiversity conservation in the Borough, and developers should take these and other strategies relating to the natural environment into account. The Council will work with Natural England and partners on the development and implementation of a Local Nature Recovery Strategy (LNRS) I to reverse the fragmentation of ecological networks and connect wildlife sites. Such initiatives will provide wildlife corridors and 'sinks' for species in response to the effects of climate change, as well as provide multi-functional green infrastructure to enhance ecosystem services.

329. The policy recognises the importance of designated areas such as the nationally important Sites of Special Scientific Interest, of which there are five in the Borough including the River Blythe, and locally important wildlife and geological sites and nature reserves. It also



recognises that many of these important sites are in unfavourable condition, and the potential for nearby development to help deliver improvements. The policy sets out the relative importance to be attached to designated sites when considering development proposals, including the special scrutiny afforded to Sites of Special Scientific Interest, in line with national guidance. However,

biodiversity conservation will not be achieved by protecting Sites of Special Scientific Interest alone. Locally

important wildlife and geological sites continue to be designated in the Borough and have been successfully protected through policies in development plans for many years. The LNRS will identify and further connect these 'jewels in the crown' with corridors and stepping stones for nature to thrive.

330. The policy highlights the importance of creating opportunities for wildlife in enhancing and restoring the green infrastructure network both within and around new development sites. Integrating biodiversity through green infrastructure networks and wildlife corridors will be essential to halt and reverse the fragmentation of resources identified in the Lawton Report and evidenced in the State of Nature report 2019. Developers will be expected to take proper account of the value of sites proposed for development, to deliver a net gain in biodiversity

Whilst it will not be achieved by protecting them alone, they do need protection. Insufficient protection is afforded by this plan.

Exemptions that allow for harm to be effected upon SSSIs are incompatible with environmental protection.

not be delayed by the need for additional water treatment provision. Drainage systems shall deploy surface features within the development site for water quality purposes, unless these are demonstrated to be unviable.

Water Efficiency and Disposal

2. Disposal of surface water must comply with the following hierarchy:
 - i. Recycling/reuse;
 - ii. Discharge into the ground by infiltration;
 - iii. Discharge to a surface water body or watercourse;
 - iv. Discharge to a surface water sewer, highway drain, or another drainage system;
 - v. Discharge to a combined sewer.

Recycling/reuse

3. The Council recognises the need for water efficiency in all new development. Developers must demonstrate the highest possible standards of water efficiency through the recycling of potable, grey water and rainwater, and the use of water efficient fittings and appliances, in order to minimise consumption to a maximum rate of 110 litres per person per day.

Infiltration

4. Development within areas identified as being at risk from groundwater flooding must be subject to full and careful investigation before infiltration measures are proposed, in order to minimise flood risk on the site and reduce risks elsewhere. The use of infiltration systems in areas deemed to be at risk from groundwater flooding must be agreed with the Council as Lead Local Flood Authority. On previously developed land where there is contamination known or suspected, any infiltration proposals must be agreed with the Environment Agency.

Discharge to watercourse

5. Where a developer proposes that a site discharges to a watercourse, appropriate modelling and supporting calculations must be provided to ensure sufficient receiving capacity exists. The Environment Agency must be consulted if a proposal relates to a Main River or an Area of Critical Drainage Problems.

Discharge to sewer

6. Where discharge to a public sewer is proposed discharge rates must be agreed with the Council as Lead Local Flood Authority, and confirmation obtained from the relevant infrastructure owner.

Sustainable Drainage Systems

7. All development must include the use of above ground sustainable drainage systems, in order to contribute towards wider sustainability considerations, including

If the installation of drainage systems makes a site unviable it should mean that the developer has the choice to proceed or back out.

Placing the onus on the Borough and the environment to accept environmental damage to waterways, which in turn could pose a risk to other properties from potential related flooding, is not an acceptable compromise.

Many residents will have concerns over potential miscalculation in drainage to watercourses.

The River Cole will be impacted by surface water from both sites BL1 and BL3.

Liability from this should rest with the developer, to prevent against moral hazard in report generation.

amenity, recreation, conservation of biodiversity and landscape character, as well as flood alleviation and water quality control. Developers are encouraged to secure reduction of flood risk by the provision or enhancement of green infrastructure and the inclusion of an on-site attenuation.

8. At an early stage, developers must ensure that adequate space is made for the above ground storage of surface water within the design layout of all new developments to support the full use of sustainable drainage systems (SuDS) and must demonstrate that improvements to water quality will be maximised through consideration of a range of techniques. All developments must explore opportunities to provide betterment in terms of water quality and quantity to the wider area and provide evidence as to the potential for cumulative benefits to be delivered through the implementation of a strategic approach to risk reduction.

Water Quantity

9. On all development sites, surface water discharge rates to any drain, sewer or surface water body shall be limited to the equivalent site specific greenfield run off rate. Where it is proposed to discharge runoff at rates greater than greenfield rates, developers will be required to demonstrate why it is not feasible to achieve greenfield rates and to secure agreement from the Council as Lead Local Flood Authority ahead of submission of any application.
10. In all cases, the greenfield runoff rate shall be agreed with the Council as Lead Local Flood Authority, the Environment Agency, Severn Trent Water and the Canal and River Trust, as appropriate. The greenfield runoff rate should take into account the 1 in 1 year, 1 in 30 year and 1 in 100 year rainfall events, including climate change allowances.

Flood Risk Reduction

11. Developers shall explore opportunities to contribute towards the objectives of relevant Catchment Flood Management Plans and Flood Risk Management Plans. Development must promote the reduction of flood risk by seeking to reinstate the natural floodplain, and the de-culverting and improvement of on-site watercourses. Development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary Watercourses for maintenance access. This includes existing culverted watercourses.
12. ¹ New development will not normally be permitted within areas at risk of flooding. Where it is clearly demonstrated that there are no other viable sites at lower risk of flooding, consideration will be given to development in such locations, providing that it is designed to be safe from the effects of flooding and will minimise flood risk on the site and reduce risks elsewhere. Applications for new development where there is a flood risk issue must be accompanied by a site specific flood risk assessment. Such assessments should be completed having regard to this policy and National Guidance.
13. Developers must demonstrate that the layout and design of a development, including the finished floor levels, and the drainage system take account of both fluvial and surface water flows in extreme events so as to avoid flooding of properties, both within and outside the site.

The catchment of flooding consideration areas is significant. ¹

There are risks posed to properties in Nethercote Gardens, which has the potential to be exacerbated by development of sites BL1 and BL3.

Development that risks other peoples properties, or residencies cannot be permitted, even if the site becomes unviable as a result.

There are issues of flooding data being seriously outdated already, with land with 1 in 100 year risk of flooding experiencing 5+ incidences in the last 20 years.

14. At an early stage, dialogue should be held with the Lead Local Flood Authority to ensure developments do not detrimentally impact upon existing and planned flood risk management schemes including ensuring land identified for flood storage is safeguarded as well as exploring all opportunities for additional flood risk reductions and protections that can be delivered as part of the proposals working in partnership with the Lead Local Flood Authority. Developers are required to contribute towards the cost of planned flood risk management schemes through Section 106 or Community Infrastructure Levy charging schedules. All new developments that benefit from existing flood risk management schemes should contribute towards their on-going maintenance.

Justification

334. The European Water Framework Directive became part of UK law in 2003 and requires improvements to the quality of water bodies, including rivers, lakes, reservoirs, canals and aquifers. These requirements are reflected in the Environment Agency's River Basin Management Plans, with the Humber River Basin Management Plan setting out the Water Framework Directive target for each water body to achieve 'good' status. **At March 2016, one part of the River Blythe was classified 'bad', three parts 'poor' and one part 'moderate'. For the length of the River Cole within the Borough, a decline has been measured from 'moderate' status in 2009 to 'poor' status in 2015.** The Council requires well designed development in the right locations with appropriate drainage processes that can contribute towards River Basin Management Plan objectives. Where viable, surface drainage features shall be deployed in accordance with the Construction Industry Research Information Association (CIRIA) sustainable drainage systems manual, with approved proprietary engineered pollution control features used only if surface features are demonstrated not to be viable.
335. National planning guidance on water quality and flood risk requires plans to take account of infrastructure needs such as water resources. The guidance also requires new development to be directed to areas at the lowest risk of flooding using a sequential, risk-based approach to the location of new development to avoid and/or manage flood risk.
336. **The Council has undertaken an update to the Water Cycle study for the Borough, in consultation with the Environment Agency and Severn Trent Water. The study demonstrates that the level of development and the site allocations proposed in the plan are capable of being delivered without significant water and sewerage infrastructure improvements.** However, the policy requires all new development to contribute to Water Framework Directive and River Basin Management Plan objectives by protecting and improving the quality of water bodies through the provision of appropriate sewerage infrastructure and sustainable drainage techniques. Developers will be expected to demonstrate that they have thoroughly assessed the impact of their proposals on surface and ground water systems, and incorporated any necessary sewerage and drainage mitigation measures.
337. The Council recognises the need for water efficiency in all new development. The Water Cycle study recommends adoption of the optional higher standard of water efficiency as it identifies Solihull to be in moderate water stress, due to the economic benefits of reduced supply, and because of the increased sewer capacity. The policy requires developers to demonstrate the higher standard through the recycling of potable, grey water and rain water, and the use of water efficient fittings and appliances, before seeking disposal of surface water, in accordance with the hierarchy in Part H of the Building Regulations.
338. Reducing water consumption has the effect of reducing carbon emissions as water companies use energy to collect, treat and supply water and to treat waste water. Simple demand management measures, particularly those that reduce hot water use, have

The policies within the plan will allow for further deterioration to watercourses that are already below required standards.

Irrespective of what changes may happen within legislation, further deterioration of these watercourses is impermissible. For these reasons, development that will detrimentally impact watercourses must not be permitted.

The revision to the original Water Cycle Study is not provided as supporting evidence.

The original document is here: <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Water-Cycle-Study-2017.pdf>

The only equivalent updated document is this: <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Water-and-Flood-Risk.pdf>

The water and flood risk document contains no maps so the impact of new or amended sites on flood risk is not visible for those concerned by any potential risk.

343. The Council is the Lead Local Flood Authority for Solihull and has published a Local Flood Risk Management Strategy to help reduce flood risk and mitigate the impact of flooding in the Borough. Developers will be expected to review and pay due regard to the recommendations included within the Local Flood Risk Strategy produced by the Lead Local Flood Authority. The Strategy may highlight opportunities to work in partnership with the Environment Agency and the Lead Local Flood Authority to contribute to the reduction of flood risk to new development and to third party land.
344. The Level 1 Strategic Flood Risk Assessment for Solihull has identified the main flood risk areas within the Borough taking account of climate change and has been used alongside the Environment Agency's flood zone and risk of flooding from surface water maps to help guide new land allocations within the plan to areas at low risk of flooding, via a sequential test.
345. Where there may be higher risks of flooding of new land allocations because the detailed modelling of watercourses has not been undertaken or parts of a site lie within higher flood zones, a Level 2 Strategic Flood Risk Assessment has been undertaken. This applies to Sites BC1, , BL1, BL2, BL3, HA1, KN1, KN2, ME1, SO2, UK1 and UK2. This more detailed assessment defines flood zones where relevant and provides guidance on the parts of sites where development should and should not take place, as well as considering opportunities for enhancement¹. The Level 2 Strategic Flood Risk Assessment has been used to inform the concept masterplans and Site Policies in the relevant Settlement chapters.
346. For new developments at risk of flooding, a site specific flood risk assessment must be undertaken which demonstrates that the development will be safe for its lifetime, in accordance with the NPPF.
347. New development sites must be resistant and resilient to flooding, to accord with the NPPF. Drainage systems must be designed so that flooding does not occur on any part of or off the site in a 1 to 30 year rainfall event, unless an area is designated to hold or convey water as part of the design, or in any part of a building or plant susceptible to water in a 1 to 100 year rainfall event. The design of the site should ensure that flows resulting from events in excess of a 1 to 100 year rainfall event, are managed so as to minimise the risks to people and property, including flows from adjacent land where relevant. Finished floor levels must be no lower than 300mm above average surrounding ground level. Where at risk from fluvial flooding, finished floor levels must be a minimum of 600mm above the 1 to 100 year plus climate change flood level, or for minor development where detailed modelling of the latest climate change allowances has not been undertaken, no lower than 600mm above the 1 in 1000 year flood level. Where relevant, the layout of buildings should direct the most vulnerable elements of a development to the areas of lowest risk, including access routes wherever possible.
348. Where development results in the loss of flood plain storage, compensatory storage should be provided on a level for level and volume for volume basis. Mitigation measures should be provided up to the 1 in 100 (1% AEP) plus climate change fluvial flood event including the requirement for safe access and egress.
349. Across the Borough 2,000 existing properties are considered to be at risk of fluvial flooding. For surface water flooding, there are approximately 1,500 properties across the Borough considered to be within a 1 in 30 year flood outline and 4,500 properties within the 1 in 100 year flood outline. In order to increase resilience, where developments are proposed that increase the size of buildings within areas identified to be at risk from flooding then appropriate individual property level resilience measures should be incorporated in order to reduce the impact and associated costs of repair of homes and buildings along with misery and disruption caused by flooding to families and businesses.

The concentration of BL1,2 and 3 in an area with flooding risks compound effects. ¹

5. Strategically important waste management sites within the Borough, where waste management activities will be supported in principle, are identified on the Policies Map. These sites include the site of the former Arden Brickworks in Bickenhill, which contains the household waste recycling centre, and a range of other waste management operations, the materials recovery facilities at Berkswell and Meriden Quarries, the composting facilities in Berkswell, and the Moat Lane and Chapelhouse Depot waste transfer stations in the Mature Suburbs and North Solihull.
6. When investigating the suitability of sites for waste management operations in the Borough, the potential for consolidating or expanding waste management facilities at the former Arden Brickworks site, for locating waste management facilities on appropriate industrial sites or employment areas within the Borough, and for the co-location of complementary waste operations at Berkswell and Meriden quarries shall be considered. Where it is not possible or appropriate for new operations to be developed on-site or in these locations, developers shall consider the potential of sites within the Area of Search for waste management facilities identified on the Policies Map.

Household Waste and Recycling Centre

7. Land within Site UK2 Land at Damson Parkway, (which is allocated for employment purposes in Policy P1 and Policy UK2) could potentially accommodate a relocated Household Waste and Recycling Facility.

Criteria for suitability of waste management proposals

8. The Council will have regard to the following criteria in considering the suitability of sites for waste management facilities:
 - i. The contribution towards national and local waste management strategies, objectives and targets, including the Solihull Municipal Waste Management strategy 2010-2020 (or its replacement)
 - ii. The contribution towards economic development and employment in the Borough, particularly in or accessible from the North Solihull Regeneration Area
 - iii. The contribution to national and local targets to reduce greenhouse gas emissions, taking account of those resulting directly from the operations (Policy P9), and those from the transport of wastes from the source of arisings to the point of end management
 - iv. The potential for on-site management associated with development and other uses
 - v. The potential for the development of shared facilities for more than one waste planning authority where these would accord with this policy
 - vi. The potential for the co-location of complementary activities where there are no adverse cumulative impacts
 - vii. The contribution towards the restoration of former mineral workings in the Borough

This policy should have been included for prior consultation as it has been buried here.

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Many residents in neighbouring areas will no idea of the potential location of the facility, and will have strong view that will not be incorporated in the decision making process.

Justification

370. The NPPF sets out that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. Securing a good standard of amenity is an integral component of good design. Developments that affect people's visual and other amenities, such as those that create noise, odour or air pollution require careful siting to minimise impacts and appropriate measures to minimise or mitigate any impacts that location does not resolve. Equally, the siting and design of sensitive uses, such as residential development needs careful consideration to ensure that problems are not created. Significant new growth in the Borough is being promoted through this plan and the policy seeks to ensure that new development is appropriate for its location. Whilst it will be important to make effective and efficient use of land that makes provision for essential development, the Council will seek to protect people's amenity and fully consider the likely impacts on health, living conditions and the natural environment.
371. Homes in Multiple Occupation (HMOs) can provide an alternative, affordable means of accommodation but can also cause issues within local communities in terms of impact on residential amenity and loss of traditional family housing. Within the Borough there are approximately 100 HMOs. Whilst a small proportion of total households it's still an important consideration. **Proposals for new large HMOs (properties containing more than 6 unrelated individuals) will therefore be considered against this policy having regard to impact on amenity and character in particular.** Such proposals will also have regard to Policy 8 with regards parking and highway impact and P15 in terms of design. The conversion of existing properties to small HMOs are currently managed by Permitted Development rights. The Council will continue to review this position going forward and if necessary will introduce an Article 4 direction based on justifiable evidence. All proposals for new purpose built HMOs will be considered against all relevant Plan policies.
372. The NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital including trees and woodland. The policy recognises the importance of protecting and increasing trees and woodlands for amenity and other benefits. These include the enhancement or restoration of the Arden landscape, increasing green infrastructure (in both the public and private realm), conservation and enhancement of biodiversity, informal recreation, opportunities to improve air quality or mitigate impacts and addressing the impacts of climate change. Important trees, hedgerows and woodlands will include trees in conservation areas, those covered by tree preservation orders, veteran trees or those with potential to be veteran trees, features characteristic of the Arden landscape or included in national or local biodiversity action plans, and trees and hedgerows covered by regulations or best practice guidance, such as the Hedgerow Regulations and the British Standard for trees and construction. Policy on conserving the landscape and biodiversity, including the protection of ancient woodlands in the Borough, is contained in Policy P10.
373. In the context of wider national and regional air quality objectives, the policy supports the aims of the Solihull Clean Air Strategy (2019 – 2024), including the actions that will be taken to improve air quality and reduce population exposure to the pollutants known to be most harmful to human health. The integration of air quality considerations with land-use planning decisions is essential to ensure that developers fully understand the air quality impacts presented by their development. Development should therefore seek to minimise or mitigate adverse impacts on air quality, as well as enabling improvements to air quality, where appropriate. In addition to the effect of more substantial developments, consideration will be given to the potential cumulative impact of smaller developments on air quality, including their implications for vehicle emissions. As a partner in the Low Emissions Towns and Cities (LET&C) Programme and a member of the West Midlands Combined Authority, the Council will support proposals aimed at securing better air quality across the metropolitan area,

Noise from HMOs where walls are adjoining other properties must be considered.

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Where necessary, sound proofing should be fitted to mitigate against noise nuisance between such properties.

through measures such as the provision of infrastructure to encourage the use of electric vehicles for freight and public transport journeys within and beyond the Borough. A key objective of the Council Plan is to improve Solihull's air quality and implement the Electric Vehicle Strategy. Given the significant residential and commercial developments proposed across the Borough in the coming years, it is important that suitable infrastructure is in place to enable use of electric vehicles. Policy P9 sets out the Council's requirements for electric vehicle charging points associated with new development. The Council is keen to ensure that developments are future proofed and aligned with low-carbon targets as well as contributing to regional and local air quality objectives. The Planning Practice Guidance on Air Quality provides guidance for local authorities and developers and applicants are also encouraged to refer to the LET&C Programme's Good Practice Air Quality Guidance (May 2014), particularly in relation to integrating mitigation into scheme design.. Developers will be expected to ensure that development does not have a significant adverse impact on local air quality in considering the location and design of new development, and incorporate appropriate measures where necessary during construction and operation.

374. Sites coming forward for redevelopment in the Borough should be assessed to establish if there are contaminated land issues that may impact on the proposal, the surrounding area or affect other receptors or ecosystems. The policy reflects the importance of providing appropriate information on any contamination that may be present. However, it is often the case that a site that presents contamination issues may not have originally been 'suspected or known'. It is therefore important to ensure that developers consider the previous use of any land to avoid unforeseen contamination that may be identified during the development process.
375. The Council recognises the existence of significant sources of noise or potential noise within the Borough, such as Birmingham Airport, major roads and railways including HS2, mineral workings and some industrial processes, and the need to protect noise sensitive uses, including housing, education and health institutions. The policy seeks to ensure that the impacts of noise and vibration are properly investigated, assessed, quantified and mitigated to ensure adequate protection is afforded. Where this is not possible, the policy aims to prevent such development taking place. However, it is important to ensure that existing businesses and facilities, whose activities and impacts are established, do not have unreasonable restrictions placed on them as a result of new development being permitted nearby.
376. Some uses may be harmful to amenity as a result of, noise, odour or atmospheric pollution, such as mineral workings, sewage treatment works, certain types of waste management activities or certain intensive agricultural uses. The Council will protect residential, shopping, heritage assets, community and recreation areas from uses that present a significant negative impact on amenity and ensure that, where permitted, such development incorporates measures to avoid or minimise any adverse impacts.
377. 'Solihull's Countryside' identifies suburbanisation as a threat to the character and quality of the countryside. Whilst built development is controlled through Green Belt policy, light spillage and light pollution from residential, commercial and other sites and sources may need to be assessed and understood, particularly where potential harm to residential and community amenity, as well as ecosystems and biodiversity is identified. In accordance with the NPPF, the policy seeks to ensure that development is appropriate for its location and that the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation is limited.
378. Solihull's Countryside notes the loss of remoteness and a reduction in tranquillity associated with development and traffic growth and the need to maintain local distinctiveness. The Planning Practice Guidance suggests that tranquil areas are likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area.

On site, wherever possible.

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Desktop modelling or surveys of noise are often inadequate for analysing potential impacts. Encouragement to do on site analysis, by giving preferential weighting where this is done, is a good way of addressing potential noise pollution problems before they occur.

It may, for example, provide a sense of peace and quiet or a positive soundscape where natural sounds such as birdsong or flowing water are more prominent than background noise. Whilst much of the Borough is subject to interference from road, rail or air traffic, other noisy activities, or urban influences, there remain some quiet areas. These include canal corridors, footpaths, some conservation areas, villages and hamlets away from major roads and flight paths, and some more remote rural areas. The Council will seek to protect tranquil and locally distinctive areas by guiding development, especially that involving noisy operations or significant traffic, away from these areas..

Challenges and Objectives Addressed by the Policy

- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- E Protecting key gaps between urban areas and settlements
- J Improving health and well being
- K Protecting and enhancing our natural assets

Policy P14A Digital Infrastructure and Telecommunications

1. The Council will support proposals for the expansion of electronic communications networks including next generation mobile technology (such as 5G) telecommunications and full fibre broadband connections, whilst also seeking to keep the numbers of radio and telecommunications installations to a minimum consistent with the efficient operation of the network.
2. The Council will have regard to the needs of telecommunications operators, any technical constraints on location of telecommunications apparatus, **the potential for sharing sites** and other existing tall buildings and other structures, the impact of development on its surroundings, the sensitivity of the environment and the design and external appearance of telecommunications apparatus.
3. In considering proposals for new sites or equipment, applicants will be expected to ensure that the size of the apparatus is kept to the minimum necessary to achieve their purpose and demonstrate that there are no other technically suitable locations or design solutions that meet operational requirements and cause less environmental harm or visual impact. Applicants are strongly encouraged to consult with relevant local ward members, Parish Councils, and neighbourhood planning forums on the identification of suitable locations.
4. The Council will expect proposals for residential and business development to include provision for on-site Ultrafast broadband infrastructure to enable connectivity to wider networks. Such infrastructure should be designed and installed as an integral part of the development to ensure that properties and premises are constructed and occupied with connections readily available. Infrastructure (such as ducting for cables) should be future proofed to enable cable upgrades and minimise future disturbance during maintenance.

This should be given additional weighting to encourage cooperation and reduce amenity impact.

Justification

379. The NPPF recognises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing. It indicates that authorities should support the expansion of electronic communications networks, whilst aiming to keep the

	development is sympathetic to the surrounding natural, built and historic environment;
ii.	Ensure new developments include useable private outdoor amenity space and provide public and private open spaces where there is a choice of areas of shade, shelter and access to recreation that will benefit people, wildlife and provide flood storage and carbon management. ¹
iii.	Secure the sustainable long-term use of new development through flexible, robust and future-proofed design and layout (including through low carbon technologies); ²
iv.	Make appropriate provision for water management within development, without causing unacceptable harm to retained features, utilising innovative design solutions. Sustainable Drainage Systems should respond to and complement landscape character and urban design, in accordance with the principles of Policy P11 - Water and Flood Risk Management;
v.	Conserve, restore and enhance biodiversity, reflecting the principles of Policy P10 Natural Environment;
vi.	Respect and enhance landscape character and quality, including trees, hedgerows and other landscape features, integrating them into the development, and contribute to strategic and local green infrastructure. Proposals should relate well to local topography and landscape features and consider the protection and management of the existing tree stock on site. ³ There should not be an unacceptable loss of or damage to existing trees. Developments should incorporate new tree planting, including streets being tree-lined wherever possible;
vii.	Create attractive, inclusive, safe, active, legible and uncluttered streets and public spaces, which integrate with existing paths, streets, circulation networks and patterns of activity and have regard to the quality of the frontage public realm and the transition between the site boundary and the street.
viii.	Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours;
ix.	Contribute positively to the creation of high quality places which are accessible, interconnected and easily maintained. The design and layout of developments should promote health and wellbeing, support wildlife, encourage walking and cycling and reduce crime and the fear of crime through the adoption of Secured by Design principles.
3.	All residential development proposals shall demonstrate how they meet Building for Life 12, or its equivalent.
4.	All developments should comply with the urban design principles set out in established current design guidance, including at present; The National Design Guide (2019), Urban Design Compendium 1 and 2 (2007), Manual for Streets 1

Qualifying the amount and also quality of the space is essential. ¹

A development in Balsall Common has a 'play area' which is approximately 2 meters wide, by 3 meters long, with 3 tree stumps set into the ground. It is not functional as a play area, but would likely conform to this policy in its current form.

This is not sufficiently robust as to ensure carbon reductions in design. ²

This policy is not sufficiently robust. ³

Again, this is another area where moral hazard is rife. Truly independent assessment of tree stock is needed, as well as stronger protections to existing stock.

An additional challenge to climate commitments is the reduction in sequestration when mature trees are lost to replacement saplings. In the event of any loss of trees, carbon sequestration should exceed previous tree stock on site, prior to any removal of trees, within 3 years. This i...

- (2007) and 2 (2010), Building for Life 12 and Secured by Design principles, or their equivalents.
5. Development proposals should also comply with any local design guides and standards, including Conservation Area Appraisals, the Urban Forestry Strategy, adopted Supplementary Planning Guidance and Documents, as well as the relevant design policies of any applicable 'made' Neighbourhood Plans in the Borough.
 6. Development proposals should make efficient use of land, **optimising densities** in appropriate locations and ensuring that site characteristics, context and constraints are considered, whilst responding positively to the surrounding natural, built and historic environment.
 7. **Developers should be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of design, layout and density, consistent with the principles of Policy P9 – Climate Change.** Sunlight and energy efficiency should be considered as part of the layout through solar design and natural ventilation systems. Buildings and their surrounding landscapes should be designed to make efficient use of natural resources during construction, operation and maintenance.
 8. Applicants are encouraged to engage in pre-application discussions at an early stage in the design process and will be required to demonstrate that they have followed the robust Assessment-Involvement-Evaluation-Design process outlined in the national guidance on Design and Access Statements. Major development proposals are required to demonstrate how the local community has been consulted and engaged in the design process, in accordance with the Council's adopted Statement of Community Involvement. Significant development proposals will also be encouraged to engage with and be reviewed through the Regional Design Review process (MADE).
 9. Where a developer is promoting a phase of a wider site allocation or larger windfall development opportunity they will also need to demonstrate how they have engaged with other relevant land owners or developers with an interest in the site to ensure the proposed phase does not prevent, constrain or otherwise impact negatively upon relevant development opportunities. This should have specific regard to the importance of securing comprehensive delivery of major sites including infrastructure planning, place making, sustainable development, design and the prevention of ransom strips.

It is unclear what the objective is here.

1

Is it to prevent against high density, or to promote efficient land use? As a policy it is too open to interpretation, making the principle redundant.

Emphasis should be give towards promoting more efficient use of land. The reason for this is to safeguard as much Green Belt as possible around the Borough.

This policy is not robust enough. It is too open to interpretation.

2

Justification

393. The Government's policy on design is clear in the NPPF. 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'. The NPPF also sets out how planning policies and decisions should ensure that the key objectives of good design are secured and makes clear that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'
394. Additionally, the National Design Guide establishes ten characteristics of well-designed places. It emphasises the importance of responding positively to context, creating locally distinctive character, the value of creating strong communities and responding to issues

protection and management of existing tree stock on site should be in accordance with industry best practice, with a view to achieving a harmonious and sustainable relationship between new construction/existing structures and their surrounding trees.

399. In well-designed places, water features also form part of an integrated system of landscape, biodiversity and drainage. Sustainable Drainage Systems can be used to enhance the surrounding environment and provide many additional benefits including attenuation, improvements to biodiversity and habitat, character, amenity and open space.

400. The policy recognises that planning can help increase resilience to the impacts of climate change through the built design, layout and landscape design of development, such as promoting low carbon design approaches to reduce energy consumption in buildings. The Council is committed to ensuring developments and places are designed to deal with the challenge of adapting to and mitigating to Climate Change and would therefore encourage applicants to exceed building regulations where possible.

401. Policy P15 also requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime. Whilst adherence to Secured by Design principles is important for all new built development, it can also be relevant to smaller scale proposals such as changes of use to licensed premises and the installation of cash points, where applicants should engage with a West Midlands Crime Prevention Design Advisor at an early stage. As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to crime in the Policy also relates to creating safer buildings and places that are better protected from terrorist attack.

402. The Borough's high quality natural, built and historic environment is fundamental to its success as an attractive place to live, work and invest. As such, the policy strives to create development with the highest standards of design and sustainability, across the Borough. This should be evidenced by demonstrating compliance with Building for Life 12 or its equivalent. Development associated with the key economic assets within UK Central will be expected to be designed to the highest quality standard to ensure these areas become design exemplars for the Borough and sustainable communities. Policy P1 makes clear that to assist the growth proposals for the UK Central Growth Area, a concept framework will be prepared to ensure that a comprehensive and coordinated approach is followed.

403. However, not all parts of the Borough have a high quality environment and a key part of the strategy is to improve the built environment, particularly in some areas of North Solihull and parts of the Mature Suburbs.

404. Concept Masterplans have been prepared for all residential sites allocations in the Local Plan. The Masterplan approach is born out of the Council's ambition to accommodate growth, with place-making providing the central theme. The illustrative concept masterplans are intended to demonstrate how sites could be brought forward for development in a form which both seek to respond to the Borough's needs and safeguards the long term desirability of Solihull as a place to live and work. Each concept masterplan sets out at a broad level how the sites ought to be developed and the likely housing capacity. The Council will require the development of residential site allocations in the Plan to be in general accordance with the principles of the Concept Masterplan for the respective site allocation.

405. The appropriate density of residential development will be informed by the need to make efficient use of land together with the desirability of maintaining an area's prevailing character and setting. Where it can be demonstrated that a higher density would improve the character and quality of an area, this will be supported.

406. In more sustainable locations, which are highly accessible by public transport, as well as walking and cycling, there will be opportunities to increase densities. However, careful consideration must be given to the existing character of the local area.

Whilst SuDs are included, the impact of non-permeable driveways on run off, and loss of vegetation are not sufficiently addressed.

More protection should be given to allow for greater amounts of rainwater to be absorbed into the ground. The growth of tarmac driveways and loss of trees and grass frontages impacts both water absorption and carbon sequestration. Design codes should be included to promote sustainability in bot...

And in their materials and construction.

These are unclear and often contradictory. The sites BL1-3 are particularly so, with both the footprints and concentrations of housing hard to discern.

- iv. Parks, gardens and landscape including common, woodland, heathland and distinctive fieldscapes as defined in the Warwickshire Historic Landscape Characterisation; and
 - v. The canal and railway network, including disused railway lines and the working stations at Solihull, Olton, Dorridge and Shirley, together with associated structures.
3. Development proposals that impact upon this character and significance will be expected to demonstrate how this impact has been assessed and minimised, using a recognised process of assessment, involvement, evaluation and design.
 4. Development will be expected to conserve heritage assets in a manner appropriate to their significance, conserve local character and distinctiveness, create or sustain a sense of place and seek and take opportunities to enhance the contribution made by the historic environment to the character of a place. In Solihull, heritage assets include; Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas and also non-designated assets. The latter include buildings, monuments, archaeological sites, places, areas or landscapes positively identified in Solihull's Historic Environment Record, or during development management work as having a degree of significance meriting consideration in planning decisions, such as those identified on the Local List of Heritage Assets. The historic landscape includes ancient woodlands, hedgerows and field boundaries, and archaeological features such as earthworks.
 5. All applications that affect the historic environment will be expected to have considered and used, as a minimum the evidence in the Solihull Historic Environment Record, conservation area appraisals and management plans, to inform the design of the proposal. Development proposals affecting heritage assets should be assessed using further sources, and appropriate expertise where necessary. This should be explained in the accompanying Design and Access Statement or, for significant proposals, in a Heritage Statement.
 6. Proposals seeking to modify heritage assets for the mitigation of and adaptation to the effects of climate change will be expected to be sympathetic and conserve the special interest and significance of the heritage asset or its setting.

This principle is contradicted by the inclusion of development around Whitlocks End Farm, Light Hall Farm and Berkswell Windmill.

Justification

408. Paragraph 184 and 185 of the NPPF advise that Local Planning Authorities should set out in their Local Plan 'a positive strategy for the conservation and enjoyment of the historic environment', recognising that 'heritage assets are an irreplaceable resource' which should be conserved in a manner appropriate to their significance. The Planning (Listed Buildings and Conservation Areas) Act 1990 also places several duties on Local Planning Authorities:
 - In considering whether to grant listed building consent for any works, to pay special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses;
 - To designate and review the designation of Conservation Areas and publish proposals for their preservation and enhancement; and
 - To pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

the historic environment which have a particular value or significance. Whilst some of these studies are now a number of years old, their content remains valuable and reasonable to this date.

413. The Archaeological Assessment (2018 and 2020) provides evidence of the archaeological assets in the Borough, with general and site specific assessments and recommendations relating to the development proposals in this Plan. A Heritage Impact Assessment (2019 and 2020) has been undertaken for those development sites where potentially significant impacts on heritage assets were identified, in consultation with Historic England. These assessments have informed decisions on site selection and shaped the concept masterplans prepared for each site.
414. The Historic England Heritage at Risk registers, Solihull's Conservation Area Appraisals and Management Plans have also identified current threats to the Borough's historic environment and one of the purposes of Policy P16 and the delivery strategy is to focus on addressing such threats. The Solihull Landscape Character Assessment provides evidence of the character and local distinctiveness of the landscape, including historic landscapes.

Challenges and Objectives Addressed by the Policy

- A Mitigating and adapting to Climate Change
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- D Securing sustainable economic growth
- E Protecting key gaps between urban areas and settlements
- K Protecting and enhancing our natural assets

Policy P17 Countryside and Green Belt

1. ¹ The Council will safeguard the "best and most versatile" agricultural land in the Borough unless there is an overriding need for development that outweighs the loss, and will seek to protect the character of the countryside.
2. Land designated as Green Belt in the Borough is identified on the Policies Map and will be kept permanently open, in accordance with national Green Belt policy.
3. Inappropriate development will not be permitted in the Solihull Green Belt, unless very special circumstances have been demonstrated in accordance with the NPPF. Paragraphs 145 and 146 of the NPPF set out forms of development that are not regarded as inappropriate. In interpreting these paragraphs the following provisions will apply:
 - i. Limited in-filling or redevelopment may take place in the following settlements without constituting an inappropriate development:
 - Chadwick End
 - Cheswick Green
 - Millison's Wood
 - Tidbury Green

This should state that the Council will safeguard the highest performing Green Belt.



416. Green Belt policy is set out in the national policy and will apply across the whole of the rural area of the Borough, other than the inset areas around settlements and other major developments. National policy makes clear that established Green Belt boundaries should be altered only in exceptional circumstances and only when a local plan is being prepared or reviewed. It also describes the circumstances when built and other development should be considered as an exception to inappropriate development.
417. The pressure on the Green Belt in Solihull has been intensified by the requirement for development emerging from housing needs (both for the Borough and wider housing market area); the lack of vacant and derelict land in the Borough; national guidance on windfall housing; and local requirements for employment land, waste management and mineral extraction. This is reflected both in the significant number of sites in the Green Belt in the SHELAA, and the paucity of sites in the urban area.¹
418. Significant adjustments to Green Belt boundaries are required in the UK Central Hub Area to provide an appropriate planning framework for the Council's ambitions for the HS2 Interchange and adjoining area, and to meet the needs of the key economic assets within the area. Further significant adjustments are required elsewhere to meet local housing and employment land needs and to address Solihull's contribution toward the shortfall in new housing land across the wider housing market area. Where land is to be deleted from the Green Belt as part of this Plan, exceptional circumstances are considered to be met to justify the change in boundaries, as required by the NPPF.
- 419.² The Solihull Strategic Green Belt Assessment (GBA) assesses the contribution that the Green Belt in the Borough makes towards the purposes of including land in the Green Belt. The GBA demonstrates that the Green Belt in the Meriden Gap between Solihull and Coventry makes the most significant contribution, although the Green Belt on the edge of the urban area and some settlements also contributes significantly. The findings have been used to help justify the removal of land in the UK Central Hub Area from the Green Belt and to identify suitable sites for new housing and other purposes elsewhere.
420. A small number of minor changes will be made to address anomalies in Green Belt boundaries across the Borough, taking into account an assessment of submissions made during the preparation of this Plan.
421. In total all of the proposed allocations relating to Green Belt sites amount to approximately 574ha⁴² out of a Borough total of approximately 11,945ha. This represents 4.8% of the total.

⁴² 140ha for the HS2 Interchange site, 94ha for the employment allocation at Damson Parkway and 340 ha for the residential allocations.

Number of sites is not the only metric. Urban sites like Solihull Town Centre and Chelmsley Wood have much greater capacity per hectare than Green Belt land.¹

Similarly, site UK1 is technically within the Green Belt, but is being removed. As such it should have the housing capacity maximised to realise the benefits of the HS2 station and in recognition of the housing challenges experienced in the Borough.

The GBA shows that the developments of BL3, BL1 and BL2 rank 1st, 2nd and 5th in terms of impact on loss of Green Belt.²

No other area has such a high impact on loss of the local Green Belt. Indeed amber sites around Dorridge were removed from the plan process, despite being on land with a much lower combined score, meaning that it makes a lesser contribution to the Green Belt.

Many people are raising concerns that the selection of sites is not entirely evidence led in this regard. The 2 Elected Members who have their names most closely associated with the plan have very little development in their ward. Instead, high volumes of the Green Belt loss is concentrated next to wa...

Challenges and Objectives Addressed by the Policy

- A Mitigating and adapting to Climate Change
- C Sustaining the attractiveness of the Borough for people who live, work and invest in Solihull
- E Protecting key gaps between urban areas and settlements
- I Providing sufficient waste management facilities and providing for sand and gravel aggregates
- L Improving water quality and flood risk
- K Protecting and enhancing our natural assets

Policy P17A Green Belt Compensation

1. In accordance with paragraph 138 of the NPPF, planning permission will not be granted for development of sites removed from the Green Belt unless and until appropriate compensatory improvements to environmental quality and accessibility of remaining Green Belt is incorporated into a Section 106 agreement. Such compensatory improvements shall be proportionate to the extent of land being removed from the Green Belt and will be in accordance with the following hierarchy: ¹
2. Where compensatory improvements have been identified as part of the concept masterplans included as part of the Local Plan, that such improvements are included in the development proposals.
3. Where compensatory improvements have not been identified as part of the concept masterplans included as part of the Local Plan that the compensatory improvements are provided in accordance with the following hierarchy:
 - i. ² Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the development site;
 - ii. Compensatory improvements to remaining Green Belt land adjacent to, or in close proximity to the settlement or area accommodating the development;
 - iii. Compensatory improvements to remaining Green Belt land in an area identified for environmental improvements as part of the Council's Green Infrastructure Opportunity Mapping.
4. In the event that it is robustly demonstrated that none of the above options can be satisfied (eg as land is not available) then the Council will accept a commuted sum that it will use to undertake compensatory improvements.

See next comment

1

These are not possible where gaps between distinct settlements are reduced to minimal distances.

2

Such Green Belt, as with land between sites BL3 and BL1/Dickens Heath, and site BL2 and Cheswick Green are too small. There is no way to compensate for the loss of Green Belt. Part of the high score in the assessment of these sections of Green Belt was due to the function they perform in se...

Justification

431. Land designated as Green Belt in the Borough will be kept permanently open, in accordance with national Green Belt policy. This Plan has had to make significant incursions into Green Belt in order to meet housing and other needs for the Borough and the wider area. Where Green Belt has been allocated, exceptional circumstances for housing or other development have been fully demonstrated in accordance with paragraph 136 of the NPPF.
432. Paragraph 138 of the NPPF requires that plans should set out ways in which the impact of removing land from the Green belt can be offset through compensatory improvements to the

- a garden. In some cases, the continued protection of the land as open, natural garden land and type of enclosure may be regulated by conditions;
- iv. the proposed development provides equivalent or better replacement open space, sport, or recreation facilities in size, quality and accessibility within an accessible location for existing and potential new users; or
 - v. the development results in a substantial community, recreational, play or sports benefit that clearly outweighs the harm resulting from the loss of the existing open space/facilities.
4. Where existing provision is not being protected then the Council will require appropriate compensatory measures. The alternative provision should be at least the equivalent in terms of size, quality, accessibility, use, visual amenity, natural capital value, and supported by a management plan to ensure ongoing viability of provision. The creation of new and/or Enhancement of open space or buildings shall be in accordance with Policy P15 – Securing Design Quality and Policy P10 – Natural Environment.
 5. The Council supports the principle of designating land as Local Green Space, including designation within Neighbourhood Plans. Where designation would be appropriate, necessary and where the open space meets the criteria outlined in national guidance.
 6. In this plan the following sites (as shown on the policies plan) are designated as Local Green Spaces:
 - i. Land between Old Waste lane and Waste Lane, Balsall Common
 - ii. Land south of Shirley
- 1 Provision of new public open space, children's play, sports and recreational facilities:**
7. New housing developments will be required to provide or contribute towards new open spaces or the improvement of existing provision in the area, in line with the minimum standard of 3.57ha per 1,000 population..
 8. The Council will seek to secure well-designed new and improved open space and their maintenance as an integral part of new residential (including care homes), commercial (over 1ha or 1,000 sqm) or mixed use development.
 9. New housing developments will be required to provide or contribute towards new open spaces or the improvement of existing provision in the area, unless financial unviability is clearly demonstrated.
 10. In areas where an existing local open space provision shortfall is identified, new or improved provision to accommodate the needs of the new and existing population should accord with the local standards and priorities for action outlined in the adopted Green Spaces Strategy (reviewed 2014) and future revisions, the Indoor Sports Facilities Strategy and Playing Pitch Strategy (including the Playing Pitch Mitigation Strategy) and any future revisions thereof.

Requirements for the size and quality of Childrens play areas is not detailed.

Balsall Common

The Settlement Now

515. Balsall Common is largely a post-war suburban village bisected by the A452 which links east Birmingham, the NEC and Birmingham airport with Kenilworth and beyond to the south east. It is located in the 'Meriden Gap' just 2km from the boundary with Coventry⁴³.
516. The settlement straddles the parish boundary between Balsall & Berkswell parishes, with most of the settlement being located within Balsall parish. Beyond the main settlement are the smaller villages of Berkswell and Temple Balsall; both of which have primary schools but otherwise only a very limited range of facilities. The combined population of the parishes is around 9,700 in some 3,900 households⁴⁴ – the majority of which are located within Balsall Common itself.
517. The settlement is characterised by popular, low density residential areas with an open plan, cul-de-sac style layout. The village has a small but thriving local centre astride the A452 with a range of shops, facilities and services, although there are some opportunities to improve the Centre. A recently constructed medical centre is located on the north east side of the village.
518. The Heart of England secondary school (which accommodates over 1,200 pupils) is located in the settlement, as is Balsall Common Primary School which has three forms of entry. Its restricted location together with its size does result in congestion around school drop off/pick up times.
519. Berkswell railway station to the north-east of the village provides access to London, Birmingham and Coventry via the West Coast mainline. It has a small car park which fills up rapidly in the morning with commuter parking resulting in overspill parking in roads nearby.



520. The Berkswell Neighbourhood Plan was formally 'made' by the Council in September 2019. The Balsall Neighbourhood Plan was independently examined toward the end of 2019 and will now go to referendum when the current covid-19 related restrictions preventing referendums are lifted..

⁴³ And it is noted that there have been and will be further developments in Coventry on its western outskirts close to the Borough boundary.

⁴⁴ Unless otherwise stated, the population and number of households in the settlement chapters relate to figures from the 2011 census.

An increase of 1,615 houses in a town/village with fewer than 3,500 is excessive.

527. **Balsall Common Relief Road** – Evidence shows that there is a need for a bypass to serve Balsall Common currently, and that the additional growth proposed in this Plan will make its early delivery necessary to facilitate development and HS2 activity. It also indicates that continuing the line of Hall Meadow Road around the eastern side of the village, crossing Waste Lane to the west of Little Beanit Farm and joining up with the A452 around the Meer End Road junction is the preferred route. The design of the road would be single carriageway with few direct access points thus being attractive to through traffic as an alternative to using Kenilworth Road through the centre. However, the road would be expected to provide the main vehicular access into the Barratt's Farm development, and will need to be phased early in the development and as such it could also provide construction access for HS2 traffic. Delivery of the road will comprise of direct on site delivery, coupled with potential CIL funding and grant funding opportunities that may be available through, for instance, the WMCA.
528. **An Enhanced Centre** – Although the centre provides for a range of retail services, it is rather limited in scope and given the level of growth proposed it provides an opportunity for additional residents to support new facilities. Furthermore, the environmental improvements along Kenilworth Road made possible through the provision of a by-pass will also provide a catalyst for enhancements to the centre. Most of the centre is located within Balsall parish, but areas in Berkswell may also be included. The Council will work with both parishes to agree an appropriate way forward, e.g. through a village centre masterplan.
529. **Station Parking** – The northern part of the Barratt's Farm development can be used to provide parking facilities for station users. This would be a short walk from the station and would seek to address the issue over commuter parking.
530. **Improved Public Transport** – A higher population gives greater potential for improved public transport services to be viable, e.g. better frequency of bus services and as HS2 starts to operate the existing main line has the potential to provide for greater local commuter services.
531. **New Primary School** – Based on the sites allocated for development, a new two form entry primary school is to be accommodated on the Barratt's Farm development. Funding for the school will be expected via developers contributions associated with the development of the allocated sites.
532. **Secondary School** – Heart of England School is located in Balsall Common but serves a far wider area, including a significant number of pupils living outside of Solihull. The School will be able to cater for pupils from the proposed developments from within its existing capacity, however this will need to be kept under review as more detail on housing numbers becomes clear. If expansion is required at the School this should be funded through developers contributions.
533. **Community Infrastructure Levy** – Presently Balsall Parish Council will directly receive 15% of the levy collected in the area, although this will increase to 25% once its Neighbourhood Plan is made. Berkswell Parish Council already has a made Neighbourhood Plan and will receive the higher amount. This will provide a significant source of funding that can be used to take forward appropriate projects that the community have identified as priorities. This can include simple relatively low cost actions (e.g. further traffic regulation orders) through to more substantial projects. It will be for the parish council to decide how this 'local' element of the CIL receipts is to be spent and there is potential for partnership working to maximise the use of monies from this source.
534. **Concept Master Plans** – Concept masterplans have been prepared for each of the site allocations proposed in the settlement. These identify the key existing features of the site that may need to be retained, and show at a high level where development is envisaged within the wider site. This is to ensure that when development proposals move to the

Incompatible with climate commitments.

1

principles outlined for Site BC2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.

Justification

551. This site includes the land at the rear of the dwellings fronting Balsall Street East and up to the boundary with Frog Lane. The site to be allocated for development will exclude the playing fields/allotments at the eastern end of the site. The new Green Belt boundary will use Frog Lane and Holly Lane as strong defensible and well defined boundaries.
552. The site lies in a lower performing parcel in the Green Belt Assessment, 2016 with low capacity to accommodate change in the Landscape Character Assessment, 2016. It is well located with regard to the existing primary school, but less so for other facilities, with overall medium accessibility.
553. The Sustainability Appraisal offers mixed outcomes, with significant positive effects for access to primary school and leisure facilities, but significant negative effect due to the distance to the key economic assets.
554. Compensatory improvements will be required for the loss of Green Belt as set out in the policy.

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common

1. The site is allocated for 120 dwellings
2. Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following:
 - i. **Protection of the setting of heritage assets adjacent the site;**
 - ii. Provision of low density housing, and where relevant single storey housing to protect the setting and functionality of Berkswell Windmill;
 - iii. Conserving important ecological habitats and the great crested newt corridors;
 - iv. Provision of above ground SuDS features;
 - v. Facilitating easy access by walking and cycling to the rail station and other facilities.
 - vi. 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D
3. Likely infrastructure requirements will include:
 - i. Financial contribution to education provision as required by the Local Education Authority;
 - ii. Developer contributions to primary care health services in the vicinity and appropriate UHB secondary care services in the wider CCG;

The site is the least sustainable of the BC sites, as it is located furthest away from the train station.

The station at Berkswell meets the requirements for sustainable travel in the most minimal way possible. The requirement of 3 services per hour, is only met in 1 hour of the day, where it is met by 1 minute. For all intents and purposes, this is what any reasonable interpretation would consider 2...

This is not possible with the development of any portion of this site.

Blythe

The Area Now

575. For the purposes of this chapter, the Blythe area comprises the parishes of Dickens Heath, Cheswick Green and Tidbury Green, which lie to the south of Shirley and the Stratford Road; and west of the M42.
576. This area consists of distinct villages set within, and separated by, attractive countryside and Green Belt, which gives each village a sense of remoteness. The landscape is characterised by smaller hedged fields and numerous hedgerow trees of Arden pasture with the River Cole to the west and River Blythe SSSI from the south. Small ponds and pockets of ancient woodland punctuate the landscape. There are no Conservation Areas, but several farmhouses are Grade II listed buildings within a farmland setting.
577. Tidbury Green comprises predominantly inter-war linear development along key roads. New residential developments at Tidbury Green Farm and Lowbrook Farm are providing a greater mix of housing types and much needed affordable housing to the area. Tidbury Green primary school has been expanded to provide additional capacity for the pupils arising from these new developments. Wythall train station, which has services to Birmingham and Stratford upon Avon, is within walking distance from the centre of the village, but bus services are poor. The south of the Parish borders the popular Earlswood Lakes and Clowes Wood SSSI. There is a train station with limited services at Earlswood, but few amenities. Tidbury Green parish contains 1,130 residents in 432 households.



578. Cheswick Green is predominantly a planned new village from the 1970s and consists almost entirely of post-war development characterised by cul-de-sac, open plan layouts. There are a number of key local facilities, including a one-form entry primary school, GP surgery, village hall, pub and local shops. Public transport is via the bus service which runs to Shirley and Solihull. It is proposed that the school will be enlarged to two-form entry to accommodate pupils from new housing development at Blythe Valley Park and Mount Dairy Farm, subject to normal statutory processes. The hamlet of Illshaw Heath lies to the south. Cheswick Green has a population of 2,197 residents in 891 households.

This chapter talks about the Blythe Villages, but ignores Shirley itself.

1

The area in question is historically part of Shirley and the impacts of the developments will be felt most keenly within Shirley. This is especially true of Sites BL2 and BL3, which connect into Shirley South, with no access or egress from the Blythe ward by car.

589. **Pedestrian and Cycling Connectivity** – Cycling and walking links to Whitlock’s End station, village centres, local services and Shirley town centre will be improved to facilitate active travel and reduce car dependency, especially for short journeys.
590. **Highway improvements** – It is likely that highway improvements will be required at various locations in the settlement, as well as capitalising on highway improvement initiatives along the Stratford Road. These could include speed reduction measures, access and junction improvements around development sites, highway capacity improvements or adjustments to traffic priority arrangements.
591. **Parking Improvements** – The provision of appropriate additional off-street parking may be considered in Dickens Heath.
592. **New Primary School** – Pupils arising from Site 4 will be accommodated at the recently expanded Tidbury Green Primary school. A new two-form entry primary school, however, will be required to serve Sites 11, 12 and 265. The draft concept masterplans show the school situated on Site 12. Funding for the school will be expected via section 106 agreements associated with the development of the allocated sites.
593. **Health provision** – The Council is working with the Clinical Commissioning Group to establish the impact of new development on local GPs and other services, and how this can be addressed.
594. **Sports and Recreation** - Replacement of any lost recreation / sports provision as a result of development will be required to an equivalent or better standard, including access and use by the wider community where appropriate. Several sites have been shortlisted in the vicinity of the existing clubs West of Dickens Heath, and an enabling policy for replacement pitches and facilities is incorporated within Policy P20.
595. **Play and Open Space** - Provision of play and areas of open space within potential development sites will be required. There is also a need to ensure that best use is made of existing green and blue infrastructure assets within development sites, together with provision for linkages to the surrounding area.
596. **Concept Master Plans** – Concept masterplans have been prepared for each of the site allocations proposed in this area, in accordance with planning policy and best practice guidance. The plans that accompany this consultation, for the principal sites, include a draft concept masterplan. They seek to identify the key existing features of a site that may need to be retained, and show at a high level where development is envisaged within the wider site. This is to ensure that when development proposals move to the planning application stage, there is certainty about the important elements of the development, e.g. appropriate green infrastructure and other requirements. Whilst this may result in a lower gross to net developable area, this will demonstrate that a quality development can be provided which makes efficient use of land and respects local character.
597. **Green Belt Enhancements** – The revised NPPF makes provision for environmental and/or access improvements to be undertaken to land that is to remain in the Green Belt to compensate for land that is taken up for development. This provides an opportunity for additional accessible open space and green infrastructure, wider access to the countryside, as well as maximising biodiversity net gain. These enhancements will be situated particularly in the area south of the existing urban edge and between the new urban extensions and the rural settlements (Dickens Heath & Cheswick Green).
598. **Community Infrastructure Levy** – Presently the parish councils will directly receive 15% of the levy collected in the area. This will increase to 25% once any Neighbourhood Plans are adopted. This will provide a significant source of funding that can be used to take forward appropriate projects that the community have identified as priorities. This can include simple relatively low cost actions (e.g. further traffic regulation orders) through to more substantial

Work needs to be done with GP practices too as they are the primary care providers in this setting.

They have had poor consultation through this process and as such have not been able to address many of the obstacles the Plan poses.

A main challenge has been with regards to the dominance of retirement living in new developments coming forward. These present unique challenges to GPs, as ageing naturally leads to greater incidence of multiple and complex health needs. This poses an infrastructure problem.

The majority of the doctors surgeries that will serve the inhabitants of the new sites are located in the wards of Shirley East, West and South, and not Blythe.

It is problematic that under these arrangements no local contribution will go any of the Shirley Wards that will be impacted by these sites.

Site BL1 will impact Shirley West and Shirley South via traffic flows on Haslucks Green Road and Bills Lane.

Site BL2 will impact Shirley South via traffic flows on Blackford Road, Tanworth Lane and down Dog Kennel Lane and the A34.

Site BL3 will impact residents of Bills Lane and the surrounding roads most pertinently. The site has its only access and egress points solely onto Bills Lane. This is against best design principles, but will also impeded safe walking routes in this area. Given that the road has seen pedestrian fatalities, an...

In addition to this, the only sustainable travel points require crossing of this road for many vulnerable people in the surrounding area. The demographics of the adjacent LSOAs are significantly older than both the national and even the Borough's average.

The sites are situated in such a manner that CIL should accrue to the neighbourhood most impacted, which in the instances of BL3 is Shirley South. BL2 is of detriment to both Shirley South and Cheswick Green and so this should be recognised in CIL allocations, in the even that site BL3 is not r...

projects. It will be for the parish councils to decide how this 'local' element of the CIL receipts is to be spent and there is potential for partnership working to maximise the use of monies from this source.

599. **Affordable Housing** – Affordable housing will be required on development sites in accordance with adopted planning policy.

Proposed Approach

600. Given that the opportunities to develop on previously developed land in Blythe are extremely limited, Green Belt release will be required and a redefined Green Belt boundary will need to be established. In accordance with national planning policy, such boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. Sites that are close to the existing settlement or are / can be well-served by public transport will be preferable, subject to their performance against the purposes of including land Green Belt as supported in the Green Belt assessment and any other evidence base and constraints.
601. A mix of market and affordable housing, as well as smaller market homes for young people wishing to remain in the area and specialist housing to meet the needs of older people will be provided in the area. This will seek to align the types and sizes of homes to be made available and the needs of the community. However, there will need to be a careful balance struck between making the most efficient use of land and respecting the character of the local area.
602. It is important that sites are considered in a comprehensive manner to avoid piecemeal developments occurring. This needn't necessarily preclude a phased approach where one parcel of land or part of a site may be available for development in advance of another, but this should be in accordance with an approach agreed by the Council.

Proposed Allocations

¹ Policy BL1 - West of Dickens Heath

1. The site is allocated for 350 dwellings.
2. Development of the site should be broadly consistent with the principles as shown in the concept masterplan below, which include:
 - i. A pedestrian link north of the hedgerow along Tythe Barn Lane is proposed in order to provide a safe route to Whitlocks End Station. Likewise opportunities to connect to the public footpath over the Stratford Canal are promoted.
 - ii. Connection to proposed Dickens Heath to Solihull town centre cycle route.
 - iii. Provision of 2.3ha of public open space, including children's play.
 - iv. Relocation of the existing sports provision south of Tythe Barn Lane to a suitable site in the vicinity;
 - v. Retention of Local Wildlife Sites, with potential for enhancement and appropriate buffer to Tythe Barn Coppice ancient woodland.
 - vi. Retention of trees and hedgerows within the site and along Tythe Barn Lane to conserve the character of this approach into Dickens Heath;

This site is not justified based on the impact to Green Belt and Ancient Woodland. ¹

canal to the north, and hedgerow to the west. The larger site is bounded by Tilehouse Lane to the west, Tythe Barn Lane to the north and Birchy Leasowes Lane to the south.

604. The smaller northern site is an existing arable field with few constraints. Views onto and access to the Stratford-upon-Avon canal will be enhanced, whilst retaining its important function as a wildlife corridor and key piece of green infrastructure.
605. The larger site is currently occupied by Highgate United FC, Leafield FC and Old Yardleians Rugby Football Club, and re-provision will be required for these sports pitches. Tythe Barn Meadows Local Wildlife Site (LWS) to the west will be retained, as will the integrity of Little Tyburn Coppice, a remnant ancient woodland. Tyburn Farm pastures have been confirmed as a LWS as part of the Local Plan Review process, it is the area north of Tythe Lane running up to the canal. The LWSs are expected to impact upon the ability to re-provide the playing fields within the site and therefore alternative options for their re-provision is being pursued. Development proposals could include options that sees the retention of the existing garden centre, or it could be redeveloped to provide residential accommodation.
606. The sites are opportunely located in very close proximity to Whitlock's End Station, which has 3 train services per hour to the centre of Birmingham with a short journey time of 20 minutes. Furthermore, local services and shops in Dickens Heath village centre will be easily accessible by foot or bicycle, and it is important that convenient links are provided.
607. The Landscape Assessment (2016) states that the Blythe area has medium landscape value but high overall sensitivity to new development. As such, the concept masterplan proposes to retain historic landscape features, such as hedgerows and standard trees, and the meadows and woodland designated as Local Wildlife Sites.
608. Highway improvements will be required to the surrounding roads, and a pedestrian/cycling link north of the hedgerow along Tythe Barn Lane is proposed to provide a safe route to Whitlocks End Station.

1 Policy BL2 - South of Dog Kennel Lane

1. The site is allocated for 1,000 dwellings
2. Development of the site should be broadly consistent with the principles as shown in the concept masterplan below, which include:
 - i. Respecting the setting of the Grade II Listed Light Hall Farm. Development should be set back from the immediate locality to avoid harm. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in reducing harm;
 - ii. Provision of 8.2ha of public open space and a range of play areas for children and young people.
 - iii. Multi-modal access routes from Dog Kennel Lane that respond to those already established at the development at the Green.
 - iv. Enhancement of bridleway access from Cheswick Green through the site as a pedestrian route and key green infrastructure link.
 - v. Trees and hedgerows along Dog Kennel Lane should be retained to protect the character of the highway.
 - vi. On site accommodation for older people in accordance with Policy P4E

The site lacks defensible boundaries and encroaches upon Cheswick Green. 1

The site connects onto the A34 in Shirley, but it encroaches upon the settlement of Cheswick Green. This is against policy principles that are supposed to protect distinct settlements from merging.

Policy BL3 - Whitlock's End Farm¹

1. The site is allocated for 300 dwellings
2. Development of the site should be broadly consistent with the principles as shown in the concept masterplan below, which include:
 - i. Respecting the setting of the Grade II Whitlocks End Farm.
 - ii. Provision of 2.3 ha of public open space and a range of play areas for children and young people.
 - iii. Enhancement of public rights of way through the site as a pedestrian route and key green infrastructure link.
 - iv. Trees and hedgerows along bridleway and public rights of way to be retained.
 - v. On site accommodation for older people in accordance with Policy P4E.
 - vi. 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D.
3. Likely infrastructure requirements will include:
 - i. Developer contributions to new 2-form primary school and early years provision at Site BL2;
 - ii. Developer contributions to primary care health services in the vicinity and appropriate UHB secondary care services in the wider CCG catchment.
 - iii. Provision of above ground SuDS features
 - iv. Avoidance of flood risk areas to north –west of site and potential for flood alleviation measures to benefit the wider area;
 - v. Highway improvements as required including access improvements on Bills Lane.
 - vi. Appropriate measures to promote and enhance sustainable modes of transport including improvement of bus services and pedestrian and cycle connectivity towards Shirley railway station, the Stratford Road and Shirley Town Centre in accordance with the Council's LCWIP.
4. Green Belt enhancements will include:
 - i. Public open space in the wider site and accessibility and green infrastructure connections to the Local Green Space located to east as designated under Policy P20.
5. The Concept Masterplans document should be read alongside this policy. Whilst the concept masterplan may be subject to change in light of further work that may need to be carried out at the planning application stage, any significant departure from the principles outlined for Site 26 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.

This site should be removed as alternative provision can be found from vacant office provisions in the Solihull Town Centre.¹

The site has the highest Green Belt combined score of any of the allocated sites within the plan. The mean score of all the sites in the plan is between 4 and 5. This site comes out at 8. The site is primarily covered in pine trees, meaning that the net loss of trees is irreplaceable. The environmental im...

The plan also suffered from a lack of defensible boundaries on the most problematic facade, to the south, heading towards Dickens Heath. This is particularly problematic as Dickens Heath uses the canal as the defensible boundary. This site would have no defensible boundary before...

Knowle, Dorridge & Bentley Heath

The Settlement Now

675. Lying around 3 miles south east of Solihull Town Centre, Knowle, Dorridge and Bentley Heath (KDBH) is the Borough's largest rural settlement with a combined population of around 19,800 in some 8,000 households. It is inset in the Green Belt which separates it from the main urban area of Solihull and the surrounding rural villages.
676. Whilst Knowle, Dorridge and Bentley Heath are essentially three villages, the significant post-war development in the area means that they are now physically and functionally linked such that they form one built up area. It is not obvious where one village ends and another one begins and there are strong links between each community as they share many local services and facilities. However, each village has its own shopping provision, park, primary school, community/village hall and churches which help to underpin the sense of individual village identity.
677. The historic medieval core of Knowle is centred on the High Street and the church of St. John the Baptist, St. Lawrence and St. Anne, at the junction of two historic routes. This area is protected by Conservation Area designation and includes 53 statutory listed buildings and a number of locally listed assets. Knowle has a thriving and well used local centre with an extensive range of shops, facilities and services.
678. Similarly, development from the later Victorian and Edwardian periods around and near to Dorridge railway station (Station Approach and Granville Road) also benefit from Conservation Area status. The dated shopping parade in Dorridge has been redeveloped to provide up-dated modern facilities and a new public realm that enhances the centre as a whole. It includes food and drink outlets, small business, shops and services.
679. Bentley Heath has a smaller range of shops and services providing more for the day to day convenience needs of residents.
680. Overall, the settlement benefits from an attractive residential environment with leafy green streets, access to a number of parks, open spaces and green spaces within the area, and links to the countryside beyond. Green and blue infrastructure is a valuable attribute, with local wildlife sites and local nature reserves, as well as the canal which provides an important environmental and recreational feature.
681. KDBH is served by four primary schools (including a Catholic primary school) and the Arden Academy and Sixth Form Centre secondary school which has a current capacity of around 1,850 pupils. However, the recent housing developments in the area along with a fluctuating birth rate, is creating pressure on primary school places.



This section should be called "Knowle" as the entirety of provision is located in Knowle.

This is problematic as Dorridge is the more sustainable location, as the train station is located there. The further development is located from there, the worse it is for promoting sustainable travel and fostering car dependency.

Masterplan) between the former hedge lines (now removed) and Purnell's Brook. The areas between Hampton Road and limits of any new development should be landscaped as amenity areas to enhance the setting of the Hall. In making the recommendations, the guiding principle is to ensure that development cannot be seen from within the grounds of Grimshaw Hall and the concept masterplan for site 8 seeks to reflect this.

717. The site is subject to some further constraints including Purnells Brook Woodland and Purnells Brook Meadows Local Wildlife Sites, (although the former runs along the extreme north western edge of the site) as well as a number of significant trees. These will need to be carefully considered in the design of any future scheme. No development will be permitted on the Purnells Brook Meadow LWS and an appropriate buffer should be provided to the Purnells Brook Woodland LWS. The Level 2 Strategic Flood Risk Assessment has identified significant fluvial and surface water flood risk along Purnell's Brook. Development should therefore be limited to those parts of the site that are located outside the higher flood zones.
718. . The site performs very well in overall accessibility terms and there is good access to all key facilities in Knowle. Development on both the northern and southern parts of the site will be expected to build on this and ensure that walking and cycling connectivity is provided both within and beyond the site boundary, linking in with the existing and proposed cycle and walking networks identified in the Council's Cycling and Walking Strategy. Measures to promote and enhance sustainable modes of transport such as the provision of pedestrian and cycle connectivity towards Knowle village centre and the Grand Union Canal towpath will be expected.
719. The allocation as a whole is in an area with medium landscape character sensitivity and low visual sensitivity. The landscape value of the area is medium with an overall low landscape capacity to accommodate new development. Development of Site 8 at Hampton Road is consistent with Option G of the Spatial Strategy for the significant expansion of rural villages.

1 Policy KN2 : South of Knowle (Arden Triangle)

1. The site is allocated for 600 dwellings together with the redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school.
2. Development of the site should be consistent with the principles as shown in the concept masterplan, which include:
 - i. Retention of important landscape features and the setting of heritage assets;
 - ii. A site layout designed to give priority to pedestrians and cyclists, providing safe and direct routes throughout the development linking to existing and proposed footway/footpath/cycleway networks;
 - iii. Provision of suitable SuDS and flood risk management. Careful design consideration should be given to the opportunities to reduce flood risk within the site boundary. Deculverting the watercourse passing through the site will be required to provide flood alleviation and environmental benefits;
 - iv. Provision of 4.9ha of open space. Doorstep, Local and Neighbourhood Play areas will be required. Public open space should provide a green link to the neighbouring Middlefield Development;

As the Council potentially has some ownership stake in this development, it should be prioritised for provision of social and affordable housing.

Solihull Town Centre & Mature Suburbs

The Area Now

782. Solihull Town Centre is a strong, vibrant and regionally important Centre containing a wide variety of shops, businesses and civic services. The 'mature suburbs' area that forms part of the urban area includes the largely residential suburbs of Elmdon, Hillfield, Lyndon, Monkspath, Olton, Shirley and Solihull. These areas benefit from good schools and strong local centres.
783. The Mature Suburbs adjoin Birmingham to the west and north, with countryside that is part of the Meriden Gap and the M42 to the east, and Green Belt to the south. The combined population of the Mature Suburbs is just under 100,000 in some 41,000 households.
784. The Mature Suburbs are characterised by Victorian and Edwardian development, the Grand Union canal and railway network, a tighter urban grain, extensive gardens and parks. There are also substantial recreational facilities, such as Olton, Robin Hood and Widney Manor golf clubs and Olton Mere. More modern housing estates are characterised by an open plan, cul-de-sac layout with on-plot parking and a predominance of detached and semi-detached properties. Shirley Town Centre provides for much of the needs of the west of the area, and has benefitted from significant investment at its heart, whilst there are district centres at Hobs Moat, Hatchford Brook, Shelly Farm and Olton. This area is home to a variety of employment opportunities located in the Solihull and Fore Business Parks and JLR, as well as in the established Cranmore and Monkspath area.
785. Solihull Town Centre is enriched by its attractive historic core of St. Alphege church, the Square and the High Street, and contains retail, commercial and cultural facilities. To the north and south of the Town Centre, the more modern retail developments of the 1960s precinct style Mell Square and the early 21st Century Touchwood development broaden its offer. To the south and east lie Malvern and Brueton Parks, which provide extensive areas of land for informal recreation within walking distance of the Town Centre. Tudor Grange Park to the south-west provides opportunities for more formal sport and recreation.
786. Both the 2006 UDP and 2013 SLP identified large scale development opportunities for Shirley town centre that made provision for significant new residential development to be provided. The Parkgate scheme opened in 2014 and redevelopment of the Powergen site is now complete.
787. There is an extensive educational campus to the south-west of Solihull Town Centre containing Alderbrook, St Peter's and Tudor Grange secondary schools, together with Solihull College. Immediately to the north of the Town Centre is Solihull School. On the edge of the Mature Suburbs to the south of the Town Centre is the Sixth Form College. These establishments are located within walking distance of Solihull Town Centre. The north of the area is catered for by Lode Heath and Lyndon schools, whilst Langley and Light Hall schools provide secondary education in the west and south. Many of the schools suffer from traffic congestion at opening and closing times.
788. Solihull has a transport interchange at the Western edge of the town centre which has a bus interchange and rail services to Birmingham, Leamington Spa and London, together with the Borough's main bus interchange. This rail line also serves Olton and Hillfield/Monkspath at Widney Manor. There is also a rail station west of Shirley with services to Birmingham and Stratford.

The Area in the Future

789. The Mature Suburbs are substantially developed with few opportunities for significant growth. Being mainly residential, there are relatively few brownfield land opportunities. The Town Centre, which has grown significantly for a generation, is likely to experience some restructuring with opportunities for a wider range of uses including residential in the future.
790. Both Solihull rail station and the Town Centre road system are already congested at peak times and are likely to experience increased passenger numbers/vehicle movements in the future. The improvements to Junction 6 of the M42, involving a new 2.5km long dual carriageway to the west of the motorway that will relieve the pressure on junction 6. However this may increase pressures for growth on the green belt land to the east of the Mature Suburbs. It is too early to robustly review the impact of this infrastructure or any potential safeguarding opportunities it may create however and this will need to be examined further as part of later Local Plan reviews.

What is Required for the Area in the Future?

791. There are limited opportunities for growth in the Mature Suburbs reflecting the built up nature of the area and the importance of maintaining the attractive open spaces that are so important to the Borough's character and wellbeing.
792. **Restructuring of Solihull Town Centre** – A refreshed master plan for Solihull Town Centre will highlight opportunities for alternative uses whilst ensuring that sufficient land is retained for retail and commercial uses. The masterplan highlights the potential for the identified opportunity sites to accommodate significant levels of residential development, and there are likely to be other windfall sites that come forward as the town centre evolves.
793. **Redevelopment of Solihull Rail Station** - Solihull rail station will be redeveloped to provide more modern facilities capable of handling the predicted increase in passengers in future years, following the decision not to pursue its relocation to the south-east. Improvements to the pedestrian route to and from the Town Centre, some of which have already been implemented, will make the redeveloped station more accessible to commuters, students and visitors. This will be managed further through the new Town Centre Masterplan.
794. **Improving accessibility to and around Solihull Town Centre** - A key challenge will be to manage the anticipated increase in traffic in the area, especially around Solihull Town Centre and the major road corridors. The Council is undertaking studies looking at key junctions within and close to the Town Centre. However, encouraging more people to use public transport, cycling and walking, rather than the private car for journeys to the Town Centre will be essential. Improving routes to/from the Town Centre and links to the adjacent parks for cyclists and pedestrians would help to make these alternative modes of travel more attractive.

795. **Development Opportunities in Shirley Town Centre** – Following completion of the Parkgate development and redevelopment of the Powergen site there are limited opportunities for further large scale developments, and therefore any further residential dwellings are likely to arise from windfall developments.



This plan was published after another application for over 200 dwellings on the former Morrisons site was made visible.

It would appear that developers are in talks with Solihull Council's Planning Department, so the absence of acknowledging this here is problematic. This is for more retirement living and a care home.

Composition is 115 apartments and 90 bed care home.

<https://www.birminghammail.co.uk/news/midlands-news/towering-plan-old-morrisons-supermarket-19247659>

achieved via the creation of five components: the Global exhibition centre (NEC), an Entertainment Zone, Lakeside, the Commercial gateway, and through creation of a Rapid transit loop all underpinned by the development principles of connectivity, activity and design. The delivery of the masterplan, as with the wider UK Central Solihull Hub Area, is reliant on a coordinated approach to the delivery of infrastructure and the development of the site through a phased approach. A key element of the strategy is to release surface car parking land for development and re-provide this capacity in on site multi storey car parks. A phased replacement plan is being developed to enable the release of land. NEC City has been conceived to fit in with the wider aspirations for the UK Central Solihull Hub Area and reflect the overall vision for the area.

850. **Jaguar Land Rover expansion** – Land at Damson Parkway is being allocated to accommodate employment development, including future expansion at JLR. Whilst it is unclear at this stage the exact nature of future proposals, the site will be a key element of the UK Central Solihull Hub Area proposals.
851. **Birmingham Business Park** – The Park already occupies an important role as a prime employment location. It is important that the wider proposals for The Hub builds upon this.
852. **Birmingham Airport Masterplan (2018)**– The masterplan (published pre Covid-19) for the airport predicts growth in passenger numbers per year from 13 million in 2018 to 18 million in 2033, and considers the potential for and implications of higher growth levels to 24 million. It is framed in the context of the national policy to make best use of the existing extended runway. It sets out plans for £500 million of new investment to expand the terminal building, increase the number of aircraft stands, extend ancillary facilities and interconnect with HS2. It highlights a need for more land for ancillary facilities beyond the existing Airport area and identifies land near Elmdon and JLR, which includes land allocated for employment development at Damson Parkway. This is in the context of maximising the benefits of HS2 and the wider proposals for UK Central Solihull.

Proposed Allocations

1 Policy UK1 - HS2 Interchange

1. This site is allocated for mixed use development including the HS2 Interchange station and ancillary infrastructure, commercial, residential and associated retail, leisure and cultural uses.
2. Development of this site should be consistent with the place making principles set out in the Hub Framework Plan, and the Arden Cross Masterplan, which encompass the following:
 - i. Improve accessibility;
 - ii. Establish a high quality green and blue network;
 - iii. Create sustainable, high quality communities;
 - iv. Generate a clear sense of place.
3. Development should accord with the following Development Principles, as set out in the Arden Cross Masterplan:
 - i. A high density activity intensive strategy providing a mix of cultural, commercial, leisure and retail activity around the main transport hub;

Too few homes are planned on this allocation in total and within the plan period.

There is commercial capacity on Birmingham Business Park and in the North of the Borough.

As there is anticipated uplift in the number of houses due to HS2 arriving in Solihull (in part because of speculation over properties, with many being bought by owners in the South East of the country), it is not just strategically right to focus additional housing here, it is also one of the most sustainable...

Conservative estimates put the capacity at 1,000 homes higher than has been estimated for the purposes of this plan.