

10635

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Kathryn Adeseye**Summary:**

The plan for bl2 does not factor in the current pressures on health services in the area. A Gp surgery should be included in the plan.

Road infrastructure on dog kennel lane is already insufficient for the volume of traffic at peak times. The increase in traffic due to plot bl2 must be considered and the road infrastructure significantly improved.

Lack of affordable housing in the borough.

Change suggested by respondent:

GP surgeries are already under increasing pressure in Shirley and it is very hard to get an appointment for the residents who already live here. If 1000 homes are built here, i think it is necessary to incorporate a new GP surgery into the plans. This is not just because of these 1000 homes at BL2 but also because of the significant development already occurring on site 11.

Improved road infrastructure on Dog Kennel Lane to reduce traffic issues. Potentially by building more roads so not all residents of bl2 are forced into using Dog Kennel Lane for access.

A development of this size needs to contain significant numbers of affordable housing. The properties for sale on the opposite site 11 are far from affordable. At least 50% of all housing built on site bl2 should be truly affordable. I.e. Social housing, part buy part rent. £350k for a three bed home is not affordable for the vast majority of young people seeking to stay in the borough. The future of the borough is dependent on its young people and if we are all forced to move out due to house prices/unaffordable rent, Solihull will suffer in the long run. Young people who have grown up here are invested in the area and want to stay near to their support networks.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments: None

10993

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Mr Ade Adeyemo**Summary:**

Re. Jaguar Land Rover (JLR) - 106: 'The exceptional circumstances to justify this approach are as follows'...

Relocation of (a) the Household Waste and Recycling Centre (HWRC) and (b) Depot to this (JLR) area was not included in previous iterations of this Local Plan, nor have local residents had the opportunity to object or comment on its last-minute inclusion in the final version of the Plan.

Furthermore, SMBC has not included other potential sites on their shortlist for a new combined HWRC & Depot in this Draft Local Plan, thereby giving the impression that this is the only agreed site.

Change suggested by respondent:

Removal of specific reference to the combined and expanded HWRC and Depot being located in the Jaguar Land Rover (JLR) Area.

This area is designated for Jaguar Land Rover (automotive) and related developments. A combined Waste Recycling Centre and Council Depot cannot be said to fall into this category.

Failing this, SMBC should indicate within the Local Plan, all of the other locations on their shortlist that are being considered for an Expanded HWRC and Depot.

Otherwise, this would be demonstrably unfair to local residents in the Damson Parkway area who have not been consulted on this late inclusion.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

11003

Object

Policy P12 Resource Management**Respondent:** Mr Ade Adeyemo**Summary:**

Re. Item 7 in this section - the Household Waste recycling Centre (HWRC):

Not Legally Compliant - By inserting this section at the last minute into the Local Plan without information or consultation, SMBC has failed in its duty to local residents.

Not Sound - No consultation with local residents. Not given the opportunity to challenge. Alternative sites considered by SMBC are not listed.

Does not comply with the Duty to Cooperate - Local residents and Councillors not informed or consulted. Not given the opportunity to comment or object during the preparation process. Other sites on SMBC shortlist not listed.

Change suggested by respondent:

For fairness and openness, ALL potential sites currently on SMBC's shortlist for relocation of the Household Waste and Recycling Facility, and their locations, should be included within the Local Plan.

Otherwise reference to the relocated Household Waste and Recycling Facility being located in this area (Land within Site UK2 Land at Damson Parkway) should be removed from the Local Plan.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14590

Object

Policy BL1 - West of Dickens Heath**Respondent:** Aishah Aftakhar**Summary:**

The site is Green Belt.

I believe the Sustainability Appraisal has not fully taken into account the issues with this site.

The site would just create further traffic / emissions and parking issues.

The playing fields in this area is seldom used due to flooding.

The secondary schools are oversubscribed.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10987

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Nick Ager**Summary:**

The plan has not taken into account the views of the vast majority of the residents of Knowle. This local authority has ignored the representations of local residents and the KBHD Local Plan. This is unnecessary development and valuable greenbelt will be lost.

Change suggested by respondent:

The proposed allocated sites should be moved to different sites closer to Dorridge and the station if they are to be more sustainable. Knowle is already over developed for its facilities and it will lose all of its character with further development.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10990

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Nick Ager**Summary:**

This is unnecessary development which will result in the loss of valuable greenbelt. It is misleading to say that Arden Academy needs a new site. Many of the buildings are modern and the older elements can be rebuilt over time. Valuable Greenbelt will be lost, which is home to a significant amount of wildlife and the area along Warwick Road provides significant visual amenity as you approach Knowle from the South. The scale of development is significantly out of proportion with the size of Knowle and will create significant issues with traffic and safety, which already struggles at the moment.

Change suggested by respondent:

This site is not appropriate for development. Sites around Dorridge would have provided better opportunities for smaller scale development providing greater sustainability being closer to the station.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

11089

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Daniel Aldersley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14430

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Daniel Aldersley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13733

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Nicolette Aldersley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11093

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Aldi Stores Ltd**Agent:** Turley**Summary:**

Generally support allocation BC5, but requires amendment to be sound. The Concept Masterplan shows land coloured red for an 'opportunity for commercial or mixed use development' which is insufficiently defined and potentially incompatible with housing. This land is brownfield and partly outside the Green Belt. The whole of the red land should be removed from the Green Belt and allocated for E Class use or residential development to enhance the entrance to the settlement, irrespective of the outcome of the adjoining housing proposal.

Change suggested by respondent:

Land coloured red on SMBC Illustrative Concept Masterplan development Principles: BC5 Trevallion Stud- "Opportunity for E-class use or residential use development".

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10710

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr James Allberry**Summary:**

More houses in an area that is not going to be able to cope with this. It will increase pollution, noise and overcrowding. The infrastructure will struggle - local amenities are not designed for this number of people, roads will be blocked up. Flooding is already an issue in this area - more houses will only make this worse. This land is meant to be green belt and the area of Cheswick Green is going to lose its natural boundaries and become part of the urban sprawl. Cheswick has already had a disproportionate number of new dwellings built.

Change suggested by respondent:

Stop building on greenfield sites. Start building on brownfield sites.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

15162

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Zoe Allen-robinson**Summary:**

Lay person cannot access soundness of plan - Poor quality plans relating to BL3 - Not enough time to analyse/digest information in the local draft plan - Site is high scoring greenbelt and should not be used - Concern over urban sprawl/ other high earning professionals will leave if setting is not preserved - Site BL3 and it's impact on local wildlife/ woodland and lack of ecological assessment - Loss of green space negative impact on health and wellbeing of local residents and climate change in general (removal of trees/ additional traffic) - Infrastructure is in place to support larger population (Public transport) - Increase in traffic pollution - Negative affect on neighbourhood amenity - object to visual impact of development - overdevelopment of site not in line with scale of existing neighbourhood

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

10946

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Hazel Allen**Summary:**

The council have never explained what the benefits are, if any to local residents.

No consultation with residents.

Possible traffic jams, which we suffer now with the Land Rover development.

It appears that all we are going to get is more pollution and traffic jams.

It is apparent that Solihull Council believe this move to be a benefit to the residents.

The council have shown no consideration to the residents who live in the immediate area and who could possibly see their properties depreciate in value. Every where in the vicinity will become an even greater bottleneck .

Change suggested by respondent:

Leave the waste disposal site where it is situated now.

Stop ruining the countryside.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14643

Object

Policy BL1 - West of Dickens Heath**Respondent:** Thomas Allen**Summary:**

Volume of traffic generated will overload an already overloaded road network - creation of a huge urban sprawl -

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14593

Object

Blythe**Respondent:** Gregory Allport**Summary:**

Cheswick Green School (CGS): Blythe Valley Park is some 2.7 miles away and without footpaths, cycle lanes or easy accessed roads to Cheswick Green, it is not right that these children should be allocated just to CGS - return journeys will be made by car/detrimental impact on traffic congestion/pollution/accidents - New school at blythe valley park/expansion of CGS needed - recommendation to accommodate all children in all three primary schools.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14595

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Gregory Allport**Summary:**

Blythe has had more than its fair share of housing development which has contributed to flooding, traffic congestion, accidents and an erosion of the semi rural environment

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11033

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Amber REI Ltd**Agent:** Pegasus Group**Summary:**

Welcome deletion of the 'Amber' sites concept and support site 104 at Blue Lake Road being a 'Red' (omission) site. The site performs an important Green Belt function in checking the unrestricted sprawl of a large built up areas and safeguarding the countryside from encroachment.

The Council's site assessment score is incorrect and should be scored a 9, which recognises the potential for the adverse impacts that would result from development of the site.

Provision of a suitable access would be difficult and compound harm to this sensitive site, impacting on the local road network and character of the area.

Change suggested by respondent:

None specified.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10862

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Dr Richard Anderson**Summary:**

Barretts Lane Development, Balsall Common.

1) Trains from Balsall Common are already over-crowded at rush hour. This MASSIVE AND TOTALLY DISPROPORTIONATE expansion of the village will have a huge negative affect on rail accessibility because of excessive over-crowding and will discourage rail travellers. They will opt for road transport, further adding to congestion.

2) Travel to Birmingham International would become even more difficult.

3) Siting a school at this end of the development where there is already a road pinch-point which is made significantly worse by the extensive on-road parking for the station, would result in periods of incredible congestion and danger.

Change suggested by respondent:

1) and 2) SUBSTANTIALLY reduce the size of the development
3) Site the school at the other end of the development.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10864

Object

Protecting and Enhancing our Environment**Respondent:** Dr Richard Anderson**Summary:**

Barretts Farm development

This will materially affect the quality of the environment:

- 1) 900 homes x average of 3 residents per home = additional 2700 (approx) people added to the existing population, just from this one development. This is massive, and will forever distort its environment, and the nature of the village
- 2) THIS IS GREEN BELT LAND - why do we keep forgetting this, why do we keep finding reasons to justify its erosion, and why do we not find every reason to successfully find alternative solutions?

Change suggested by respondent:

This development should not take place for the above reasons, and the housing should be re-allocated to areas where the environmental impact would be much less, for example, around the outskirts of Solihull.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

10866

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Dr Richard Anderson**Summary:**

Impact on Balsall Common

The objective to conserve the qualities and characteristics of rural settlements is NOT DELIVERED by this plan:

- 1) These TOTALLY DISPROPORTIONATE developments will RADICALLY alter the physical size, architecture, population, demographics, road traffic, and activity levels in the village. Just one of these would be sufficient to demonstrate that the objective has not been met, but the SIX impacts on quality and characteristics make the developments indefensible.
- 2) The developments will actually degrade the sense of place, attractiveness, and quality of life.

Change suggested by respondent:

Relocate the large developments to the outskirts of Solihull.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

10867

Object

Policy P17 Countryside and Green Belt**Respondent:** Dr Richard Anderson**Summary:**

Balsall Common Developments

The Plan's aspiration to maintain the Meriden Gap green belt is in conflict with the detail.

IT IS GREEN BELT. Therefore, development on it can only be justified if there is overwhelming evidence that ALL OTHER ALTERNATIVES have been considered and analysed in detail, and found wanting. I have not seen this evidence, do not believe the Council have it, and believe the Council has the attitude, "how can we justify building on it", rather than, "how can we avoid building on it".

Change suggested by respondent:

Avoid developing green belt land.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

14479

Object

Policy BL1 - West of Dickens Heath**Respondent:** Judith Andrews**Summary:**

Objects to Policy BL1;

Road network cannot cope with additional traffic - Strain on services/amenities - more environmentally suitable areas available?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14524

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** 53rd Coventry (Berkswell) Scouts**Summary:**

We welcome Policy P20. We are not familiar with the minimum play standards and do not know if a shortfall in Balsall Common has been identified. The Cubs have identified a lack of play equipment / facilities for children aged 7-11 years in Balsall Common.

The play provision strategy within the Balsall Common area is currently vague in the local plan. The proposed housing could generate over 300 additional children aged 7-11 and we would like to see some age appropriate play provision specified within the local plan.

Change suggested by respondent:

The local plan should ensure specific provision for age related play and informal recreation, based on the development's expected child population and an assessment of future needs within the settlement.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10953

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15199

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15200

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15202

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15203

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15204

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15205

Object

Policy BL1 - West of Dickens Heath**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15206

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15207

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15208

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15209

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15210

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15211

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15212

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15213

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15215

Object

Policy S01 - East of Solihull**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15216

Object

Policy S02 - Moat Lane Depot**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15217

Object

Policy UK1 - HS2 Interchange**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15218

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted on pg. 19 of the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

10958

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10959

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10960

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10961

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10962

Object

Policy BL1 - West of Dickens Heath**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*Warwickshire County Council, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10963

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10965

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, which includes detailed analysis of past disturbance across the site, should be undertaken. Dependent on the results of that assessment further pre-determination evaluative fieldwork may be appropriate. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10967

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

* WCC Archaeological Information and Advice, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10968

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10969

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10972

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including a detailed assessment of the past disturbance across this site, should be undertaken. Dependent on the results of that assessment, further archaeological evaluative fieldwork may be necessary to inform the assessment of the archaeological potential of the site. The policy should further advise that the results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10973

Object

Policy S01 - East of Solihull**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10976

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2018 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

*WCC Archaeological Information and Advice, 2018. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken across those parts of the site that have not been previously archaeologically examined. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

10997

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Archaeology Warwickshire**Summary:**

We are pleased to note that a policy has been included recognising the importance of the historic environment to the borough and that it highlights the need for applications to be supported by appropriately informed heritage statements. We would, however, highlight that desk-based assessment alone may not be sufficient, especially in respect of assessing archaeological potential. Would therefore recommend that this policy acknowledge that further field evaluation may also be necessary.

Change suggested by respondent:

We would recommend that part 5 of this policy have the following sentence (based on the NPPF), or similar, added after the sentence 'This should be explained in the accompanying Design and Access Statement or, for significant proposals, in a Heritage Statement'.

'Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, developers will be expected to submit an appropriate desk-based assessment and, where necessary, a field evaluation'.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10999

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Archaeology Warwickshire**Summary:**

We are pleased to note that a policy has been included recognising the importance of the historic environment to the borough and that it highlights the need for applications to be supported by appropriately informed heritage statements. We would, however, highlight that section 4 of this policy only presently references known heritage assets, without acknowledging that a proposed development site may contain as yet unknown non-designated heritage assets, such as previously unidentified buried archaeological features.

Change suggested by respondent:

This could be addressed by adding the following text, or similar, after the sentence reading '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 Asset':

Non-designated heritage assets may also include as yet unidentified heritage assets (for example previously unknown archaeological features).

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

11001

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Archaeology Warwickshire**Summary:**

As highlighted in the 2020 Archaeological Assessment undertaken by the Warwickshire County Council Archaeological Information and Advice team on behalf of SMBC*, this site has significant archaeological potential. This potential, and the need for further archaeological assessment in advance of the submission of any planning application is not referenced in this policy. As the results of the assessment may influence the final form of the development across this area, it should be.

* WCC Archaeological Information and Advice, 2020. 'Archaeological Assessment to Inform the Solihull Metropolitan Borough Council Local Plan. Additional Sites, 2020'. Warwick: WCC Archaeological Information and Advice

Change suggested by respondent:

The policy should reference the significant archaeological potential of this area and highlight that, prior to the submission of any planning application, a detailed archaeological assessment, including evaluative fieldwork, should be undertaken. It should further advise that results of the assessment should inform the development of a strategy, if appropriate, to mitigate the potential archaeological impact of the proposed development and that this strategy may include designing the development to avoid impacting any archaeological features present which are worthy of conservation.

This will help to ensure that any planning application is submitted with sufficient archaeological information to enable a reasoned and informed planning decision to be made.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

11097

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Archdiocese of Birmingham & Church of Blessed Robert Grissold, Balsall Common**Agent:** Marrons Planning**Summary:**

Support allocation BC1 in principle, but object to quantum of development which conflicts with national policy to make effective use of land. Archdiocese of Birmingham land should not be public open space as not justified by evidence and not achievable. Land previously identified for low density development in Supplementary Draft 2019 and land is suitable for specialist housing and care home bedspaces for older people. Change due to Heritage Impact Assessment, although land not part of immediate surroundings of a listed building, there is no visual connection, findings from Berkswell NDP show not valued landscape. The Concept Masterplan is unjustified, unsound and not part of Plan.

Change suggested by respondent:

The number of dwellings allocated in Policy BC1 should be amended to reflect the capacity of land at Meeting House Lane for development. The Concept Masterplan should be included in the Plan, and be amended to include the land at Meeting House Lane for specialist housing and care home bedspaces for older people in accordance with the evidence within the HIA and the requirements of Policy P4E.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14075

Object

Vision**Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

The Vision and its supporting text makes reference to UK Central and is drafted positively in accordance with paragraph 15 of the NPPF. These principles are supported however this section could be improved by making the role and purpose of UK Central and the Hub Area within it clearer as it represents such as important component of the plan. This should reflect both the continued success of key economic assets and the additional growth that can be attracted by virtue of the new allocations including Arden Cross, which will have a sub-regional role

Change suggested by respondent:

This section could be improved by making the role and purpose of UK Central and the Hub Area within it clearer as it represents such as important component of the plan. This should reflect both the continued success of key economic assets and the additional growth that can be attracted by virtue of the new allocations including Arden Cross, which will have a sub-regional role

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14079

Object

Spatial Strategy**Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

The spatial strategy plan at paragraph 70 of the Submission Draft illustrates Arden Cross intersected by HS2 within the UKC Hub Area and removed from the Green Belt. This is welcomed and strongly supported by ACL.

The spatial strategy should distinguish more clearly between economic and housing growth and how both have been accommodated. It should identify Growth Option E (UK Central Hub Area and HS2) as a core component of the spatial strategy, as this is a strategic choice to capitalise on the arrival of HS2 and to support the key economic assets in this area.

This would bring the spatial strategy more into line with paragraph 35(b) of the NPPF

Change suggested by respondent:

The spatial strategy should distinguish more clearly between economic and housing growth and how both have been accommodated. It should identify Growth Option E (UK Central Hub Area and HS2) as a core component of the spatial strategy, as this is a strategic choice to capitalise on the arrival of HS2 and to support the key economic assets in this area.

This would bring the spatial strategy more into line with paragraph 35(b) of the NPPF

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14085

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Arden Cross Ltd**Agent:** Turley

Summary:

The policy and its supporting text need updating and editing for consistency with new Policy UK1 and to provide clarity on the criteria against which proposals will be judged.

There is interchanging reference to 'UK Central Solihull' and 'UK Central Solihull Hub Area', both of which have different geographies. It is recommended that each is clearly defined in the pre-text to avoid misinterpretation of the scope of Policy P1. Reference to Blythe Valley, North Solihull and Solihull Town Centre should be contained to the opening section of this chapter as each is subject to separate planning policy.

The pre text to policy P1 is broadly supported however references to outdated documents should be removed. The policy should refer to WMCA's Recharge the West Midlands (June 2020), the updated Midlands HS2 Growth Strategy (November 2020) published since the Submission Draft was finalised, and the Council's own Economic Recovery Plan (May 2020).

A number of key development principles in the policy are drawn from a number of UGC non statutory documents. Whilst supporting the thrust of these documents, would urge consistency and clarity in how these policies will be applied in practice, in particular through a review, ideally in liaison with ACL and others, before final submission of the plan.

The following site specific elements in P1 relating to Arden Cross should be addressed: Passenger facilities no longer feature in the Birmingham Airport Masterplan 2018 and should be deleted. The phasing set out in the Hub Growth and Infrastructure Plan (January 2018) is now superceded and does not align with the current LPR plan period (2036).

The reference to the preparation of an SPD needs further clarification. It was originally envisaged there would be an update and formalisation of the Hub Framework Plan to be prepared alongside the local plan. Given the subsequent preparation of the Arden Cross Masterplan by ACL, and the more detailed combination of policies P1 and UK1, the purpose and timing of an SPD needs clarifying.

Change suggested by respondent:

The following site specific elements in P1 relating to Arden Cross should be addressed: Passenger facilities no longer feature in the Birmingham Airport Masterplan 2018 and should be deleted. The phasing set out in the Hub Growth and Infrastructure Plan (January 2018) is now superceded and does not align with the current LPR plan period (2036).

Amend or remove paragraphs 85 to 87 as the development trajectories are now out-of-date and do not align with the current LPR plan period. For example, paragraph 85 makes reference to new homes being delivered by 2033 when the plan period is to 2036.

- Remove paragraph 92 as it refers to the Garden City principles explored six years ago, which do not align with the current mixed use urban neighbourhood place-making principles in the Arden Cross Masterplan.
- The mix of land uses set out at paragraph 93 are accurate and accord with the Arden Cross Masterplan and should be reflected in Policy P1 and Policy UK1.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14087

Object

Policy UK1 - HS2 Interchange

Respondent: Arden Cross Ltd

Agent: Turley

Summary:

Supports specific policy for allocation but needs editing for consistency and to avoid overlap with P1. Following clarifications / amendments are needed:

A distinction needs to be made on the difference in purpose and effect between Policy P1 and Policy UK1.

The pre-text and explanatory text supporting the policy is too lengthy. There is merit in rationalising the policy context to avoid repetition and inconsistency

Reference to the provision of 2,500 new homes at UKC Hub over the plan period at paragraph 830 of the Submission Draft contradicts the figure of 2,740 quoted elsewhere in the plan. A thorough review of all quoted figures (including those at paragraph 828) should be undertaken to ensure accuracy and consistency with the evidence base.

The references to 'garden community' principles at paragraph 838 and 842 is misleading and confusing given the array of other development principles drawn from the UGC documents and Arden Cross masterplan. Some simplification would assist clarity when applying the policy.

There is overlap between the place-making principles and development principles at Policy UK1 (2) and (3) and these should be rationalised to accord with the Arden Cross Masterplan and Policy P1.

In general, there are far too many policy principles (23), which is overly prescriptive for decision-making purposes, particularly when accounting for the development principles in Policy P1.

The Arden Cross Masterplan, being the more recent and subject to public consultation, should take precedence as forming the guiding principles behind Policy UK1.

The previous iteration of the UKC Topic Paper should be updated to rationalise and reduce the amount of explanatory text for Policy UK1 and Policy P1.

It is not clear why reference is made to the preparation of an SPD for UKC Hub, including Arden Cross, in Policy P1 but omitted from Policy UK1. Clarification is needed on the role and purpose of an SPD at this stage.

The proposed allocation should be renamed 'Policy UK1 – Arden Cross' for the purpose of accuracy.

Change suggested by respondent:

Following clarifications / amendments are needed:

A distinction needs to be made on the difference in purpose and effect between Policy P1 and Policy UK1.

The pre-text and explanatory text supporting the policy is too lengthy. There is merit in rationalising the policy context to avoid repetition and inconsistency

Reference to the provision of 2,500 new homes at UKC Hub over the plan period at paragraph 830 of the Submission Draft contradicts the figure of 2,740 quoted elsewhere in the plan. A thorough review of all quoted figures (including those at paragraph 828) should be undertaken to ensure accuracy and consistency with the evidence base.

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It is not clear why reference is made to the preparation of an SPD for UKC Hub, including Arden Cross, in Policy P1 but omitted from Policy UK1. Clarification is needed on the role and purpose of an SPD at this stage.

The proposed allocation should be renamed 'Policy UK1 – Arden Cross' for the purpose of accuracy.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:**Attachments:****14093****Object****Policy P17A Green Belt Compensation****Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

ACL acknowledges the policy requirement for Green Belt compensation in accordance with paragraph 138 of the NPPF. The proportionality of any compensatory improvements to Green Belt should be consistent with its performance in the SGBA, the degree to which its development has already been accepted, and the provision of on-site compensation in the form of green and blue infrastructure and public accessibility. The hierarchical approach set out in Policy P17A using the 'concept masterplans' for most sites identified in the plan is supported in principle and reference should therefore be made to the Arden Cross Masterplan.

It is considered that these measures proposed in the masterplan are proportionate and will significantly contribute to the protection and enhancement of the Green Belt's environmental quality and accessibility. ACL welcomes further discussions with SMBC on the scope of compensatory improvements in line with the PPG.

It is recommended that Policy P17A(4) incorporates reference to viability given the possible tension with other costs associated with delivering physical and social infrastructure via CIL and/or Section 106 obligations, in accordance with paragraph 57 of the NPPF.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

14094

Support

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

ACL considers the evidence base to be sound, and supports the policy framework established for the Hub Area and Arden Cross site itself. To ensure that policies are clear and unambiguous, and therefore 'effective' for the purpose of the test of soundness, we will be working with SMBC to prepare a Statement of Common Ground. This will contribute towards the approach to the provision of strategic infrastructure and developer contributions in accordance with Policy21

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14095

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

The table accompanying this policy identifies Land at HS2 Interchange (Policy P1 and UK1) as providing circa 140ha. The Housing and Economic Development Needs Assessment ("HEDNA") dated October 2020 sets out the assumed employment floorspace figures derived from the UGC and Arden Cross masterplanning work. Paragraph 145 of the plan states that "evidence indicates that Site UK1 is likely to have a role to play in meeting local employment needs, especially later in the Plan period." This refers to evidence in the HEDNA regarding the upper end of the need for office accommodation which ACL considers to be realistic

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14096

Support

Policy P5 – Provision of Land for Housing**Respondent:** Arden Cross Ltd**Agent:** Turley**Summary:**

The contribution of Arden Cross to the housing supply is not specified in Policy P5 although the table after paragraph 222 includes as category 9: UK Central Hub Area by 2036 – 2,740. The 500 homes from Arden Cross is included in this figure and can be included in the trajectory from 2026.

The housing requirement assumptions in the HEDNA anticipate a positive impact from new supply on improving affordability and, as a result, the likelihood of younger households being able to access housing. It also builds in a reasonable interpretation of the latest 2018 sub-national population projections. This is welcomed by ACL as the residential component of Arden Cross is expected to appeal to and serve a demographic which sees the benefits of the location.

The development of Arden Cross will be delivered in line with the principles set out at Policy P5(6) in relation to density as ACL intends to maximise the efficient use of Arden Cross given it will be well served by public transport in line paragraph 123(a) of the NPPF. The table after paragraph 240 indicates the UKC Hub Area being developed at comparable densities to the Town Centre between 40dph and 150dph

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

13843

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Arden Multi Academy Trust**Summary:**

On behalf of over 1800 students and 225 staff at Arden Academy. We fully support the allocation as it will:

Provide modern, education facilities for primary and secondary pupils to replace outdated and inefficient buildings.

Provide better sports, leisure and learning facilities to be enjoyed by the wider community.

Improve highway safety and congestion on Station Road and promote walking and cycling.

Facilitate residential development on the most accessible part of the site.

Maximise community benefits from inevitable residential development in the settlement.

Change suggested by respondent:

We are satisfied that Policy KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a Place Based approach that we can fully support without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11265

Support

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Arden Wood Shavings Ltd**Agent:** Stansgate Planning LLP**Summary:**

Policy HA1 is considered sound subject to minor modification/clarification.

The red line boundary of HA1 on the Illustrative Concept Masterplan is unclear. The red line boundary on the Site Analysis Plan and Landscape Assessment Plan are inconsistent.

Policy HA1 criteria 3 needs some flexibility to allow for a situation where unidentified development and infrastructure costs cause the site to be not viable. This would allow an assessment at planning application stage to take account of any abnormal costs and apply infrastructure requirements accordingly.

Change suggested by respondent:

The red line boundary of allocation HA1 needs to accord with the boundary of the existing Arden Woods Shavings site.

Policy HA1 criteria 3 should be amended to read "Likely infrastructure requirements will include, subject to viability:"

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

11212

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** John Ardin**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14530

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Craig Armstrong**Summary:**

Impact on the Green Belt- Detrimentially impact on semi rural character.

Pressure on existing amenities- GPs, parking, etc.

Traffic Management- traffic congestion during peak commuting hours.

Impact on wildlife- Such a development can only adversely impact local wildlife and further erode the greenbelt.

The reality is that car use to the village centre will increase.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

11002

Object

Policy S01 - East of Solihull**Respondent:** Mrs Carol Ashby**Summary:**

The site seems to be within green belt and there are no special circumstances to remove it. The Grade II listed Field Farm may be effected, along with access problems via the sports pitches. Damson Parkway is a very busy link road from Solihull to the main A45 road, made busier by the JLR plant access. Using the same road for a major new housing development will only add to congestion.

Change suggested by respondent:

A site away from an existing large housing area, but within reach of infrastructure, perhaps a redeveloped brownfield site, may not impact so much on local traffic and would help avoid negative impacts on green belt.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

11004

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Carol Ashby**Summary:**

The idea of relocating the Council public waste site to some point on Damson Parkway seems unreasonable given that the road is a busy link road from Solihull to the A45 and the JLR plant, already carrying a steady amount of traffic which could easily be gridlocked with a high demand for the waste disposal site.

Change suggested by respondent:

An area away from an already busy road but still available from across the borough, with controllable access not impacting on local traffic in a negative manner.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

14452

Object

Introduction

Respondent: Jon Ashley

Summary:

Says there is always a choice over [with regards to use of greenspace]
Covid is not considered except in name.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14457

Object

Policy P14A Digital Infrastructure and Telecommunications

Respondent: Jon Ashley

Summary:

Council has failed to ensure that developments over recent years have been provided with adequate broadband infrastructure.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14459

Object

Sustainable Economic Growth**Respondent:** Jon Ashley**Summary:**

Impact of Brexit is not mentioned at all, especially considering likely impact on Automotive and Travel Industries

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14462

Object

Policy P17 Countryside and Green Belt**Respondent:** Jon Ashley**Summary:**

Building on Green Belt between Shirley South and West and Dickens Heath actually closes a gap! The objectives are weak and only mention the Meriden Gap not other at risk Green Belt gaps.

Plant trees on the existing green belt land.

Building on Green Belt WILL adversely affect quality of environment and attractiveness for residents.

Any open spaces within new developments must be protected against future development.

Protection must be retrospective for existing open spaces such as parks and recreation grounds, woodlands and open green spaces.

Limit economic and housing growth to the land available outside the Green Belt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14466

Object

Policy P6 – Provision of Accommodation for Gypsies and Travellers**Respondent:** Jon Ashley**Summary:**

■ questions whether there is a settled gypsy & traveller community in Solihull

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14469

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Jon Ashley**Summary:**

■ Employees of NHS and Council Services should have affordable and available housing.
 ■ The provision of social, affordable and key worker housing should be evenly spread across the borough and within reasonable distance of employment opportunities.
 ■ Key worker housing should not be eligible for right-to-buy.

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14470

Object

Policy P14 Amenity**Respondent:** Jon Ashley**Summary:**

Previous developments have failed to ensure that developers follow this requirement. Trees and hedges have been damaged or destroyed. Is this policy different from previously? What will be different.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14471

Object

Policy P17A Green Belt Compensation**Respondent:** Jon Ashley**Summary:**

No details are given of any proposed compensation (replacement, improvement etc) so this Policy is worthless. Developers have not been held to their commitments in the past in any case

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14472

Object

Policy P18 Health and Wellbeing**Respondent:** Jon Ashley**Summary:**

Solihull along with most of UK suffers from an obesity and poor diet crisis. There are already too many hot food takeaway provisions in the borough and close by in neighbouring boroughs. Further hot food takeaway provision is contrary to the purpose of this policy. There should be a presumption against new takeaway provision as a minimum.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14473

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Jon Ashley**Summary:**

Will all such open spaces, play, sport and recreations be marked on the planning map to avoid any inadvertent breaches of this policy, including public open spaces not adopted by the council but cared for by the local community directly or through a paid managed service?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14474

Object

Blythe**Respondent:** Jon Ashley**Summary:**

The plan pretends they are separate to deceive. These sites do not have good transport links and reference to improved links to Shirley Station are NOT present in the LCWIP out for consultation.

BL 3 is not well drained and is subject to bogginess and ponding.

Shirley West suffers increased traffic by design

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15177

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Jon Ashley**Summary:**

The plan pretends they are separate to deceive. These sites do not have good transport links and reference to improved links to Shirley Station are NOT present in the LCWIP out for consultation.

BL 3 is not well drained and is subject to bogginess and ponding.

Shirley West suffers increased traffic by design

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14528

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Paul Askill**Summary:**

Object to Policy BL2;

Site chosen over brownfield sites which should have been prioritised - Cheswick green cannot cope with more development/ development here disproportionate to the rest of the borough - Create further strain on local NHS -

Flooding issues/risk - Roads cannot cope/Poor public transport - Disagrees with council using new road as an artificial boundary - Cheswick Green at risks losing only remaining boundary (Dog Kennel Lane) from separating it from surrounding areas.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10834

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Roger Atkinson**Summary:**

The nature and density of the KN1 development is out of character for Knowle - it is not clear how viable the site is for the development outlined. I don't believe that the council is doing enough to promote active travel and give priority to non motor vehicle road users (although the LCWIP is a good start). I have seen very little justification for building on Green Belt land

Change suggested by respondent:

No development on Green Belt land

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:** None

14591

Object

Policy BL1 - West of Dickens Heath**Respondent:** Lesley Atter**Summary:**

I am writing to object to the council's latest plans to build yet more housing in the green belt area, destroying ancient woodland and hedgerows, adding to increased traffic and therefore air pollution.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10718

Support

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Mr Charles Ayto**Summary:**

While I wholehearted support your plan to assist the self and custom build sector there must be safe guards put in place. If self builders are being allocated plots already assigned to major house builders, then to preserve the ethos of self builders not wanting 'run of the mill' house styles and not being forced to build something 'in keeping' with the local vernacular as dictated by the big builders. By their very nature self builders are more artistic/eco friendly by nature. This individuality needs to be taken into consideration when the planning department looks at their planning application.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10638

Object

Policy S01 - East of Solihull**Respondent:** Mr John Bailey**Summary:**

The site is within the green belt and there are no very special reason to remove it. The Grade 2 listed Field Farm will be harmed. It will definitely cause access and safety problems using the existing sports pitches. Damson Parkway is a key transport corridor between the Motorway and Coventry Road that has been negatively affected by the JLR expansion. An extra 700 homes will probably add another 1400 cars creating more traffic and pollution. The access point opposite Spire Hospital/Rayner House causes a safety problem. There are no plans for additional schools/places to cope with 700 more homes.

Change suggested by respondent:

This site is Green Belt and there is now little of this left. This site already has huge traffic problems especially when JLR is changing shift, we know we get it daily. An extra 700 homes is a new traffic nightmare to contemplate on top of the JLR traffic and workers going to the NEC and Birmingham Airport, which are 24 hour operators. The impact of a 700 home expansion in this area is totally inappropriate for the area especially Catherine De Barnes Village setting This plan needs vastly scaling back and setting away from the Damson parkway corridor route.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10639

Object

Policy P12 Resource Management**Respondent:** Mr John Bailey**Summary:**

This site is not fit to house a relocated Household Waste and Recycling Facility as the area has already been heavily built on It will cause highways and safety problems adding more traffic to the to the roads in an area that has already seen the JLR expansion approved and has plans for 700 homes on Damson Parkway . The cumulative effect of this is traffic chaos on a key transport corridor in and out of Solihull, blocking access to and from the motorway. The site is not conducive to this as it is a residential area.

Change suggested by respondent:

Another location

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10651

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Adrian Baker**Summary:**

In line with Andy street and recent government changes in brownfield developments, I believe Solihull should reconsider building on many areas in the greenbelt especially the Arden Triangle - as since the changes due to Covid and working practices, the local plan may now already be outdated and no longer 'consistent with national policy'

Many more 'reasonable alternative sites' have been proposed by over 2800 residents who voted on the The KDBH Forum Residents Survey., who rejected the Arden Triangle proposal, in favour of less damaging locations for additional development in more sustainable locations.

Change suggested by respondent:

Look at alternative brownfield sites first

If developments must go ahead in parts of Knowle, make sure that any proposal has density numbers in keeping with Knowle and Dorridge

The percentage of affordable housing should not exceed 25%

the mix & size of dwellings should be in keeping with the local current mix

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10654

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Helen Baker**Summary:**

I have always felt that the secondary school need replacing which the council should be providing. Some new homes are needed but they need to fit into the area and on a much reduced scale as this is a village and already extremely congested. The plan generally doesn't take advantage of any brown fill sites or unused buildings anywhere in the area which should be considered first before valuable green areas are ruined. It doesn't make plans for any local renewable energy or future proofing transport, deliveries etc.

Change suggested by respondent:

think it is covered above

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10704

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Karen Baker**Summary:**

I support the building of a new Arden school. The longer that Arden continues to operate in their old buildings, the longer the children and staff are having to put up with the effects of working in such an outdated estate. No significant new investment or repairs can be made while the prospect of this new building remains. The new building should be approved and started without further delay.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11099

Object

Challenges**Respondent:** Central Schools Trust**Summary:**

Plan correctly identifies the need for more school places and infrastructure for the new housing developments. However, it is unsound because it fails to evidence a full range of options for school provision over the long-term so does not demonstrate that it delivers best social value, not proven that that existing schools would be willing or able to increase places until new infrastructure is built, chosen option will exacerbate structural issues with all of the current school infrastructure serving the settlement and does not meet the objective of providing "sufficient and appropriate physical, social and green infrastructure to support inclusive growth for new and existing communities"

Change suggested by respondent:

This is a once in a lifetime opportunity, to invest in schools' provision for the whole settlement, to pay back the community for the disruption from HS2 and accepting significant growth in housing in the settlement. The plan should include an exercise to evaluate a full range of infrastructure options, (using a best practice approach e.g. HMT Better Business Case approach) starting with all the relevant strategies and policies and evaluating the individual infrastructure needs for the area and developing options for how those could be best delivered overall, e.g. looking at all gaps in provision, for schools, local community centre and, sports facilities and play areas, as identified in the Solihull Infrastructure Delivery Plan published alongside the local plan. We have previously (2016) set out an option that would provide a strategic approach to infrastructure that we believe will deliver greater social value.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11009

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Balsall Parish Council**Summary:**

The proposed layout for Site BC2 fails to take account of the Balsall Parish NDP, which has passed examination although the referendum has been delayed. Policy BE.2 Local Character and Design a) and b) calls for the density of new development in immediate proximity to existing housing to reflect the density of existing housing.

The Concept Masterplan for Site BC2 shows medium density housing adjacent to low density existing housing on Balsall Street East contrary to the Balsall NDP.

Change suggested by respondent:

Policy BC2 – Frog Lane should contain the following wording:

“Where new development abuts existing development the new development’s initial density should reflect the existing density or there should be a separation through public open space.”

This development principle would be in line with that used for the Concept Masterplan Development Principles: BC5 Trevallion Stud.

“The POS provides a buffer to the south of the development between the new and existing development providing the opportunity for place-making and for the integration of the future and existing residents.”

The Concept Masterplan for BC2 Frog Lane should be amended to include the following additional wording:

“The density of housing immediately adjacent to the homes on Balsall Street East should be shown as low density. The density of housing on Frog Lane should not exceed medium density and the average density across the site should be medium.”

This wording will not change the number of homes on the site but will protect Frog Lane and ensure a gradual change in density from Balsall Street East into this new development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11010

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Balsall Parish Council**Summary:**

Concept Masterplan BC2 Frog Lane does not conform with Policy P10 requirements for greenspace improvements. Based on 110 units this development will require 0.9 hectares of public open space (POS). A doorstep space will need to be provided on site and a local play space/neighbourhood play area in the locality. The land to the east is a school playing field and not public open space. The POS required for this allocation is not shown on the Concept Masterplan. The Parish Council is concerned it may not materialise, and that POS provision in Balsall Common is below the submission plan target and the Borough average, exacerbated by inadequate provision for the SLP2013 sites. The nearest proper play provision is 2 miles away along the A452 trunk road in Lavender Hall Park.

Change suggested by respondent:

Amend Policy BC2 paragraph 2 to include the words

“Public open space amounting to 0.9 hectares must be provided on the site.”

This will ensure that the required POS is local to the new

housing and does not require children to cross main roads nor parents to use their cars to drive to Lavender Hall Park.

Policy BC2 para 4i should be deleted. There is no such place as the Holly Lane recreation ground. It is school playing field for the Heart of England school. Seeking a financial contribution is not appropriate because it is not POS.

Amend paragraph 5 of Concept Masterplan BC2 Frog Lane to “Based on 110 units this development will require 0.9 hectares of public open space on site in

a location sensitive to the amenity of existing residents, the mechanism for its delivery can be

considered at the application stage alongside other development brought forward in Balsall

Common in the adopted Local Plan.”

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11011

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Balsall Parish Council**Summary:**

Whilst the Concept Masterplan and Site Policy BC5 Trevallion Stud are generally supported, the provision of access points along its north western boundary will compromise the rural nature of Wootton Green Lane. Policy BE.2 of the Balsall Parish NDP defines the need to retain the rural character and diversity of older routes, especially retaining or replacing hedges. Traffic will be likely to use Wootton Green Lane which has no pavements and is part of the Heart of England Way, creating an inappropriate hazard.

Change suggested by respondent:

Amend Policy BC5 to include the words:

“safeguarding the rural character of Wootton Green Lane, Wootton Lane and the approach to Balsall Common on the A452. Access points to the site are kept to the eastern boundary of the site with the A452 to minimise the effect on the rural edge of the site and Wootton Green Lane.”

This protection of a rural lane is comparable to the Concept Plan policy BC4 – Pheasant Oak Farm protection of Hob Lane and the wording proposed is similar.

Amend Concept Masterplan BC5 Trevallion Stud to show the access points for the site off the A452 and none on the north western leg of Wootton Green Lane. The one on the south western leg can remain.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11012

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Balsall Parish Council**Summary:**

Para 527 Balsall Common Relief Road

The creation of this relief road should be in one phase. Rat runs are already used through the settlement to avoid the A452 and should the new road not be implemented in one go this problem will be exacerbated.

Creating the relief road in more than one phase will mean very little of the existing traffic will use it. Without the complete relief road to divert traffic from the centre of Balsall Common, the Masterplanning of the village centre will be impeded (para 528).

Change suggested by respondent:

Amend paragraph 527 to commit that the relief road will be completed in a single phase and adjust policies BC3 Kenilworth Road and BC4 Pheasant Oak to require those sites to make a financial contribution to the Waste Lane to Meer End section of the relief road.

This is justified as Sites BC3 and BC4 will create traffic in Balsall Common, as recognised by the submission plan reference to the distances to the centre and the rail station, which, in the absence of a relief road, will cause further pressure on the A452 through Balsall Parish. Hence a proportionate financial contribution to mitigate the traffic demands that these sites will place on Balsall Common is appropriate.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11013

Object

Balsall Common**Respondent:** Balsall Parish Council**Summary:**

The Parish Council welcomes the commitment within paragraph 528 to create a village centre masterplan, recognising the level of expansion Balsall Common faces.

However, residents want real change on the ground and not just a plan. Without real change the centre will not cope with the increased use of cars to access it in an area where residents make 70% of their daily trips by car versus a borough average of 50%. The plan needs to make reference to funding of the improved centre.

Change suggested by respondent:

It is proposed that the similar wording is used as that for the relief road funding and the following words should be added to the end of paragraph 528.

"Delivery of the enhanced centre will be from grant funding opportunities that may be available through for instance, the WMCA and/or from a combination of SMBC and Parish Council CIL funds."

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11014

Object

Balsall Common**Respondent:** Balsall Parish Council**Summary:**

Primary School Provision

The Parish Council welcomes the commitment to a new primary school in Balsall Common to support the number of homes proposed for the settlement. However, it is concerned that any additional housing over and above the levels shown for the allocated sites and likely windfall housing will generate more primary school places than the new school can provide, and that the proposed phasing of the housing allocations in the first 5-years will exceed the current available primary school places.

A full case on this subject is made by Berkswell Parish Council.

Change suggested by respondent:

Balsall Parish Council supports the re-phasing of housing allocations proposed by Berkswell Parish Council in its submission to ensure that primary school provision keeps pace with housing development and that the plan is sustainable and sound.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11015

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Balsall Parish Council**Summary:**

Site Policy BC3 and Concept Masterplan. The area of low-density housing to be accessed from the existing housing area on Kenilworth Road extends too far into the existing wooded area defined by the Ecological Assessment: Windmill Lane and Kenilworth Road. The Assessment recommends the protection of a 30m buffer around woodland and includes this in the area of development constraint, but this is not reflected in the Concept Masterplan.

Change suggested by respondent:

The Parish Council requests that the housing area within the area of development constraint is marginally reduced to respect the constraint area shown in the Ecological Assessment. This will implement the recommendations in the Assessment and Policy P10 in the submission plan, particularly paragraphs 2, 5, 8, 9 and 11 of the policy.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

10580

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** The British Horse Society**Summary:**

See below

Change suggested by respondent:

Include equestrian activity (riding and carriage driving) as part of the plan.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10879

Support

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** The British Horse Society**Summary:**

2 i) Sustainable travel/transport should include reference to Public Rights of Way; maintaining, extending and resourcing Public Rights of Way, including equestrian access is vital to achieve sustainable transport and to provide for walkers, cyclists and equestrians to enjoy healthy, active leisure.

5 v) Multi-user routes are often interpreted as being for pedestrians and cyclists. Equestrians then become sandwiched between fast moving traffic and fast moving cyclists which creates a detrimental impact on highway safety. Equestrians should be included on multi-user/active travel routes for improved safety.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10880

Support

Policy P12 Resource Management**Respondent:** The British Horse Society**Summary:**

Broadly accept the policy.

8. Protection of and opportunities for extension of Public Rights of Way should be included within the criteria.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10881

Support

POLICY P13 Minerals**Respondent:** The British Horse Society**Summary:**

Broadly accept.

8. Please include the protection of and opportunities for expansion of Public Rights of Way within the policy.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10882

Support

Policy P15 Securing Design Quality**Respondent:** The British Horse Society**Summary:**

Broadly accept.

Protection of existing public rights of way to ensure that all users are included. Bridleways and byways are part of the PRoW network benefitting pedestrians, cyclists and horse riders/drivers. The network is fragmented therefore opportunities to extend the network for all user groups should be planned for in the design of developments. Surfaces that are safe for all users and environmentally sound should also be included in the development plans.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10883

Support

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** The British Horse Society**Summary:**

Broadly accept. The equestrian industry contributes £4.7 billion to the UK economy. Horses are also an important part of our heritage. Developments should include consideration of access for equestrians in their design.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10884

Support

Policy P18 Health and Wellbeing**Respondent:** The British Horse Society**Summary:**

Broadly accept.

2 i) The diverse population includes equestrians and physical activity includes horse riding/driving which research shows to have significant physical and mental health benefits (Sung et al, 2015).

2 iii) Active travel definition includes equestrians as they are also vulnerable road users (Jesse Norman MP, 2018)

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10885

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** The British Horse Society**Summary:**

Broadly support.

Equestrian access on public rights of way should be protected and new multi-user routes should include equestrians who are also entitled to enjoy outdoor recreation and leisure. 67% of equestrians are women and girls (Beta, 2019) and those in the over 45 years of age group are unlikely to undertake any other type of physical activity (Church 2010).

Waterways provide opportunities for multi-user routes including equestrians, of which there are successful examples in other authority areas.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10886

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** The British Horse Society**Summary:**

2 ix and x, 3viii and 4iii

Equestrians are not included in the commitment here. Routes in and around rural/semi-rural areas particularly would be essential for equestrians.

Change suggested by respondent:

Protecting and extending the existing PRow network to include equestrians in order to provide safe, off-road, connected routes.

Using opportunities such as new multi-user routes to include equestrians to improve highway safety and prevent road accidents.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10935

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** The British Horse Society**Summary:**

2 vi, 3iv,

Change suggested by respondent:

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10936

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** The British Horse Society**Summary:**

2v, 3iv and 4ii do not include equestrian access in the policy.

Change suggested by respondent:

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10937

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** The British Horse Society**Summary:**

2v and 3iv do not include equestrian access in the policy.

Change suggested by respondent:

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

10938

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** The British Horse Society**Summary:**

2vi,3iv and 4iii do not include equestrian access in the policy

Change suggested by respondent:

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

10939

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** The British Horse Society**Summary:**

4i

Change suggested by respondent:

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10940

Support

Policy BL1 - West of Dickens Heath**Respondent:** The British Horse Society**Summary:**

4i Opportunity for the Public Rights of Way referred to to include equestrian access.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10942

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** The British Horse Society**Summary:**

2iv is written in a way that suggests the bridleway will be a footpath.

3v does not include equestrian access.

Change suggested by respondent:

Equestrians are able to enjoy on average only 22% of the PRow network. Any enhancements to a bridleway should consider the needs of all users, for example using an appropriate surface materials. Please see British Horse Society guidance on surfaces <https://www.bhs.org.uk/advice-and-information/free-leaflets-and-advice>

Active travel includes equestrians as vulnerable road users (Jesse Norman MP, 2018). Improvements to the connectivity of cycle and pedestrian routes should include equestrians where it could avoid horse riders being sandwiched between fast moving motorised traffic and fast moving cyclists, to improve safety.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments: None

10680

Object

Policy BL1 - West of Dickens Heath**Respondent:** Daniel Barber**Summary:**

- site contains numerous sports fields, which will impact children and adults who use the fields
- land is high grade Green Belt. Government policy is to protect Green Belt and develop Brownfield land first.
- the site is surrounded by LWS and Ancient woodland. development will be detrimental to wildlife
- Narrow rural road network cannot take further development and is already overloaded.
- site is mostly in flood zone 1. the fields flood every winter
- Some of the mitigation measures included in the Plan are not achievable, therefore it isn't sustainable. Other sites are more sustainable.
- access to local services is being impacted (its harder to get a doctors appointment). its also difficult to leave the village by car since other housing developments have been completed. it will impact our standard of living.

Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments: None

11092

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Daryl Barnard**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

10700

Object

Hockley Heath**Respondent:** Mr Phil Barnett**Summary:**

In summary the traffic impact and the mitigation for school parking is not sufficient to support the addition of 141 properties (12% growth of the village)

Change suggested by respondent:

This site proposed is neither positively prepared or justified based on the traffic and ecological impact for the release of this site from green belt.

The site should be rejected from the local plan based on the minimal contribution to the housing needs when compared with larger developments within short distance at BVP, Dicken Heath and Cheswick Green.

The sustained disruption to the locale due to poor road flow and safety is not compensated by the addition of housing.

The proposed local plan has failed to represent the community of Hockley Heath by rejecting sites proposed in the call for land that would significantly increase housing that would make available community infrastructure levy that can make a material improvement in the community.

The selection of one 90 property site and the associated 51 properties on washed over green belt will not provide high enough levels of funding to give the village any noticeable services such as chemist, GP surgery, post office or more regular public transport.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10701

Object

Spatial Strategy**Respondent:** Mr Phil Barnett**Summary:**

Small sites chosen have little benefit to the community in return for the disruption and increase in traffic

Change suggested by respondent:

Cancel sites with less than 100 houses or look to increase the sites to provide material levy to improve the community

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15031

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Consider automatic allocation of 2013 Solihull Local Plan sites, which have been allocated for a number of years, without any justification as to their deliverability, is an incorrect approach.

Sites not come forward despite Council lacking a 5YLS, points to deliverability issues with sites.

(See also Para. 18 of Introduction).

Change suggested by respondent:

Existing 2013 Local Plan site allocations should be tested for deliverability prior to re-allocation

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15032

Object

Introduction**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Para. 21 – Council may wish to update this section to reflect NPPF Para. 30 which sets out that most recently adopted policies will take precedence, therefore LPR will take precedence over currently adopted Neighbourhood Plans.

Change suggested by respondent:

The hierarchy of neighbourhood plans should be made clear.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15033

Object

Vision**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Wording relating to meeting housing needs of HMA should be more positively worded to reflect NPPF Para. 59 'significantly boost housing supply'.
- Para. 50 should be reworded to state lower performing parcels of Green Belt could released to protect higher performing parcels whilst meeting needs.

Change suggested by respondent:

- The vision should be more positively worded in order to significantly boost the supply of housing
- The need to release lower performing green belt to meet identified needs, and preserve higher performing parcels, should be set out

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15034

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Object to inflexible market housing mix prescribed within this policy.
- Individual sites should cater for a wide range of housing types and sizes.
- Provision of such a significant proportion of only smaller (3 bed or fewer) dwellings on sites will not develop long-term sustainable communities, rather transient communities where people will not be able to form long-term neighbourhoods as homes cannot be adapted as their circumstances change.
- Council should focus on building strong healthy communities, not for short-term ownership.
- Do not consider this is good planning
- Prescribed housing mix runs counter to criterion also in policy that allows a number of factors to be taken into consideration.
- Plan has long-term lifespan, therefore should not have same market mix for whole plan period.
- Pandemic has shown how external factors can influence people's lifestyle choices.

Change suggested by respondent:

- Amendment of policy to allow for housing mix based on up to date market evidence

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15035

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Unreasonable and unjustified to require 5% SCB plots on sites of 100+ dwellings. This would equate to 761 SCB plots on draft allocations. Latest AMR shows only 374 entries on the self-build register.
- Imposition of mandatory requirement goes beyond guidance in PPG to 'encourage' SCB.
- See also extracts (attached) from Bedford's Local Plan Inspector's Report – recommended deletion of similar policy. Same principle applies here in that amount being sought is double that on register.

Change suggested by respondent:

Deletion of specific policy requirement and replacement with specific allocations or general support for self-build sites

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15036

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Housing Need evidence in 2020 HEDNA:

- PPG state that SM only minimum
- Expected growth at UKC Hub meets criteria in PPG to increase SM
- HEDNA state 13,000 jobs at UKC Hub, over 10,000 Experian baseline
- HEDNA assume only 25% of jobs occupied by Solihull residents.
- Barton Willmore carried out own analysis at 0.93 and 0.98 commuting ratios
- Demographic modelling shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario
- HEDNA identifies acute affordable housing need in Borough, BW analysis conclude HEDNA housing need should increase to meet this component of need.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15037

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

GBBCHMA Unmet Housing Need:

o Barton Willmore analysis of unmet need in wider GBCCHMA suggests that 2020 Position Statement's conclusions under-estimate the remaining unmet housing need from Birmingham up to 2031; Birmingham's deficit alone is between 11,924 – 13,101 dwellings up to 2031.

o Furthermore, if using the current standard methodology, then significant unmet need from Birmingham City and Black Country between 25,543 and 27,350 dwellings up to 2031.

o If we were to assume the increased capacity for Birmingham City (65,400 dwellings 2011-2031) set out in the 2020 Position Statement the unmet need would still be between 11,243 and 13,050 dwellings up to 2031.

- This increases significantly based on the uncapped Standard Method figure for Birmingham City which would come into effect in January 2022.

o Taking into consideration the proposed changes to Standard Method (consulted on by Government in summer 2020), this would lead to there being unmet need against emerging/existing housing requirements in all but one of the GBBCHMA authorities;

o Unmet need post 2031 should be considered, as referenced to in the 2020 Position Statement. Based on data available at the present time and the most recent Local Plan figures, Barton Willmore calculate this to be a minimum 17,700 dwellings 2031-2040.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15038

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

'Sites identified in land availability assessments'

It is unclear what is meant by 'sites identified in land availability assessments'.

Given these are sites which do not benefit from a draft allocation, then they are by definition, windfall sites which means that there is double counting from unknown sources of supply.

Change suggested by respondent:

Consider that the SMBC's supply is actually 11,496 (rounded) before any reduction in windfall or the deletion of draft allocations which are unlikely to be delivered is taken into account.

Therefore: Amend supply and spatial strategy in Plan.

Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15039

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Brownfield Land Register (BLR)

We query the separate identification of sites identified in the BLR – this BLR is subject to periodic review and thus will not be fixed as a permanent source of supply.

We consider that any sites to be delivered in this way should be considered as windfall developments.

Change suggested by respondent:

Consider that the SMBC's supply is actually 11,496 (rounded) before any reduction in windfall or the deletion of draft allocations which are unlikely to be delivered is taken into account.

Therefore: Amend supply and spatial strategy in Plan.

Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15040

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Lapse Rates

Whilst we support the use of a 10% lapse rates, it needs to be applied across the board i.e. it is equally application in relation to what is to come as to what has already gone before. If the Council accept that a 10% lapse rate is application to sites which already benefit from planning permission, then surely it should also accept that it is applicable to future planning consents which have yet to be granted.

Change suggested by respondent:

Amend housing supply and strategy

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15041

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Windfall allowance

The windfall allowance is justified by reference to past windfall rates however it fails to recognise that 'town centre sites' (a traditional source of windfall supply) are allocated in the plan through the town centre masterplan and the Council have identified other sources of supply through the brownfield register. In the absence of any assessment / analysis of this component demonstrating the projected level of future windfall provision taking these factors in account, we consider that the level of windfall should be reviewed and adjusted accordingly.

Change suggested by respondent:

Consider that the SMBC's supply is actually 11,496 (rounded) before any reduction in windfall or the deletion of draft allocations which are unlikely to be delivered is taken into account.

Therefore: Amend supply and spatial strategy in Plan.

Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15042

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

- Consider scale and delivery rates of UK Central hub proposals are unrealistic, and neither details on trajectory and delivery timescales, nor commitments from delivery partners, have not been included in consultation documentation.
- Based on LPR adoption date of 2022, we consider first likely completions to be ca. 2030. This is based on Lichfields' Report ('Start to Finish', Feb 2020) analysis that concludes the average time from outline planning app to first completion is 8.4 years.
- Given information within the August 2020 consultation {Arden Cross?}, we consider a 160dpa build out rate between 2030-2036 is reasonable, to delivery 960 dwellings. Type of supply should also be considered, as geared towards apartments. Amount of infrastructure required also needs consideration.

Change suggested by respondent:

As such 1,780 dwellings should be removed from UKC Hub assumptions.

Amend housing supply and strategy.

Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15043

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Trajectory:

- SMBC are seeking to provide a stepped trajectory as some of the larger sites will not make a significant contribution to completions until the mid-delivery phase.
- We refer you to Guildford Local Plan Inspector's report, which concludes the Liverpool method does not meet the Government's objective to boost housing supply in the shorter term.
- Consider Solihull should follow same approach as Guildford and allocate more sites.
- As with withdrawn Uttlesford Local Plan, a stepped trajectory may create a fragile 5 year land supply.
- Stepped trajectory may worsen the affordability problem as it delays delivery.

Change suggested by respondent:

Amend housing supply and strategy

Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15044

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Consider that the requirement for major residential development should be clarified to set out that there may be other ways in which sustainable access options can be implemented. The distance to a bus stop/train station should not be seen as the only measure of sustainable access.

Change suggested by respondent:

Policy should be clarified that there are other ways of ensuring sustainable transport options are available

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15045

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

NPPF Para. 109 states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within point 2(ii), SMBC are seeking to bring in a further test which would not be in accordance with the NPPF. This should therefore be deleted.

Change suggested by respondent:

- Policy P8 Point 2(ii) should be deleted

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15046

Object

Policy P11 Water and Flood Risk Management**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Policy P11 (Bullet Point 6):

- It should be made clear that planning permission can be granted prior to confirmation of discharge into a public sewer (under Section 106 of the Water Industry Act 1991) being confirmed, as it falls within a different regulatory regime.

Change suggested by respondent:

Policy P11 (Bullet Point 6):

Deletion of point relating to confirmation from relevant infrastructure owner

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15047

Object

Policy P11 Water and Flood Risk Management**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Policy P11 (Bullet Point 14):

- It should be clarified that a Section 106 Agreement is only required where it meets the tests set out in NPPF Paragraph 56.

Change suggested by respondent:

Policy P11 (Bullet Point 14):

- Clarification as to obligation requirements and the necessary tests

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15048

Object

Policy P17 Countryside and Green Belt**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Policy P17 (Bullet Point 1):

- Council seeks to safeguard best and most versatile agricultural land (BMVAL), unless there is an overriding need for development that outweighs the loss.
- BMVAL is referenced in NPPF Para. 170 (b) in relation to natural capital and ecosystem services in the countryside.
- We consider reference to BMVAL in Green Belt policy conflates separate issues of natural environment and Green Belt.
- Consider planning policies are required in NPPF to contribute to and enhance natural and local environment by recognising economic and other benefits from BMVAL, the test is not to safeguard BMVAL.
- As such point should be deleted.

Change suggested by respondent:

Policy P17 (Bullet Point 1):

Deletion of point 1

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15049

Support

Policy P17 Countryside and Green Belt**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Policy P17 (Bullet Point 4):

- Council set out a number of different factors that may be taken into account when considering very special circumstances.

Change suggested by respondent:

Policy P17 (Bullet Point 4):

- Inclusion of further factors which may create very special circumstances

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15050

Object

Policy P17 Countryside and Green Belt**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Policy P17 (Bullet Point 5):

- Sets out that development that is 'conspicuous' from the Green Belt must not harm the visual amenity of the Green Belt by reason of siting, materials or design. Given that Green Belt is a spatial designation, designed to prevent sprawl, we consider this requirement goes beyond the scope of the Green Belt, as set out in NPPF.
- As LPR contains policies to protect landscape, where necessary, as such, this point should be deleted.

Change suggested by respondent:

Policy P17 (Bullet Point 5):

- Delete Bullet Point 5 of Policy P17.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15051

Object

Policy P17A Green Belt Compensation**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Given none of the emerging masterplans show any compensatory improvements within the Green Belt, it would appear that the Policy is relying on there being additional land being available within the control of applicants (which may not be the case), or the payment of contributions.
- SMBC's viability evidence does not take this requirement into account, and no detail is provided as to how these contributions will be spent or what level of contribution is required. This therefore brings uncertainty, and the Policy should be reconsidered to ensure what is required is clear, and that it will not impact upon the viability of schemes.

Change suggested by respondent:

Reconsideration of the policy to ensure that it is evidenced based, does not impact upon viability of schemes, and is in accordance with national policy

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15052

Object

Delivery & Monitoring**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Council's viability testing does not take into account digital infrastructure within the testing and, as such, it should be evidenced that this will not render development unviable.

Change suggested by respondent:

Confirmation that digital infrastructure provision allows for viable development

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15053

Object

Balsall Common**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Note that sole justification of proposing 1,756 homes in Balsall Common is based on settlement including a primary and secondary school, and full range of retail and associated facilities.
- However no significant areas of employment, as supported by SA which states people travel outside of settlement to work.
- Expansion of settlement therefore contrary to sustainability objectives of reducing need to travel to employment areas.
- 1,756 dwellings to single rural village is not a proportional distribution strategy, but completely disproportionate.
- No discussion on how bypass, station car park, improved public transport or primary school will be funded/delivered.
- Reference to scope to enhance existing local centre and provision of a village centre masterplan, but no proposals on what these enhancements would entail or function, especially as a bypass would draw trade away from existing centre.
- No assessment of Balsall Common's ability to deliver this level of growth, for market to absorb and deliver multiple sites/outlets in such a small area.
- Furthermore, Balsall Common will be acutely affected by HS2, both in terms of physical construction of the line and disruption and uncertainty this will bring, as well as market desirability.

Change suggested by respondent:

Review distribution of growth in Balsall Common.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15054

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Barratts Farm multiple ownership is described as 'complex' in Para. 541.
- Is single largest site and one proposed to delivery by-pass.
- Previous draft of Local Plan stated site will only be brought forward if landowners/promoters could demonstrate collaborative and comprehensive approach. Seems from text this is not the case.
- Serious doubt Barratts Farm can be delivered within anticipated timeframe, which affects Plan's housing land supply.

Relief road issues:

- Policy advises relief road required early in the plan period.
- Road will be provisionally funded by CIL payments and grant funding that may come from WMCA.
- CIL funding can only be secured through future sites, which can only be delivered until Local Plan Review is adopted (as they are in the Green Belt) and subsequent CIL schedule is adopted.
- No grant funding proposal in place to fund the road.
- Therefore, road is not deliverable.

Change suggested by respondent:

- Review site allocations in Balsall Common and suitability of Site BC1

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15055

Object

Policy BL1 - West of Dickens Heath**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Consider sports re-provision should be considered now, otherwise pitches will be lost with no alternative in place, and no guarantee of re-provision. Any proposals within Green Belt need to be considered against Green Belt tests, inc. floodlighting.
- Note unable to re-provide on site because of LWS.
- Significant local concern, particularly with no proposals for replacement.
- Council have had ample time to secure alternative sports provision. Lack thereof suggest no alternatives are currently available, and questions delivery of site.
- Therefore, consider Site BL1 should be deleted from Plan.

Change suggested by respondent:

- Re-provision of the sports pitches should be secured prior to allocation.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15056

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

- Text pre-judges a planning application by stating that very special circumstances will likely exist to support re-provision of sports pitches with the Green Belt to the north of the allocation, for which no detail is known, and therefore cannot be relied upon.
- Therefore, housing that would be included on the existing sports pitches should not be counted until the re-provision of the sports pitches is secured.

Change suggested by respondent:

- Re-provision of the sports pitches should be secured prior to allocation.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15057

Object

Blythe**Respondent:** Barratt David Wilson - Arden Green**Agent:** Barton Willmore Planning**Summary:**

Proposed Alternative Site, CFS 545:

- o Should qualify as Priority 5 in Step 1 (yellow) as in accessible location (see Atkins 2016 Accessibility score) within a lower performing Green Belt area (4).
- o Should therefore advance past Step 1
- o N.B. Accessibility of Site 545 is same as Sites 126, 176, 122 and 130 (components of Site 4/BL1), which have been taken forward to Step 2.
- o Site selection process is therefore flawed.
- o Factors in favour of Step 2:
 - ☒ Site would be part of Growth Option G; given Council are proposing developments in the Tidbury Green/Whitlocks End area.
 - ☒ Hard constraints do not prevent development, as TPO trees will be unaffected.
 - ☒ Site has existing defensible Green Belt boundaries to the north, west and east, and would be defined by strong boundaries; a railway and flood zone to the west, buildings to the north, and road to the east.
 - ☒ Site can deliver a significant area of amenity open space to the south (over and above that required by policy), which can be retained in perpetuity to ensure a long-term maintenance of a gap between Whitlocks End and Tidbury Green.
 - ☒ Site also close to amenities in Wythall (Bromsgrove DC)
 - ☒ Can be demonstrated that historic landfill can be dealt with and does not adversely affect site's suitability – would increase SHELAA score
 - ☒ No development proposed within Flood Zone 3 of wider site boundary – would increase SHELAA score
 - ☒ Site within Landscape Character Area '2', but other sites are already proposed within this landscape area. LCA (p.25) confirms it is not possible to establish a baseline sensitivity to change without details of proposed development (see Appendix 2 – Landscape and Visual Appraisal for Site).
 - ☒ SA does not identify any significant harmful impacts.
 - ☒ Accessibility overall score is medium/high, with lower scores for GP and food store. These are within 1.8km along a formal route, and is considered a reasonable distance to walk or cycle. See enclosed DTA assessment, which demonstrates accessibility to site.

Change suggested by respondent:

Given the identified significant shortfall in supply, and on basis that we consider certain sites (BC1, BL1, KN1) are not deliverable, we propose an alternative site, Land at Arden Green (Site 545)

Site should be re-assessed as 'green' in accordance with Site Selection Methodology and should be consulted upon to meet part of housing need.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13856

Object

Introduction**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Paragraph 18 states that the site allocations from the Solihull Local Plan, 2013 will be brought forward. The automatic allocation of these sites which have been allocated for a number of years, without any justification as to their deliverability, is an incorrect approach.

Paragraph 21 refers to neighbourhood plans and the importance SMBC places on these. Paragraph 30 of the NPPF states the most recently adopted policies will take precedence. SMBC may wish to make it clear that the LPR will take precedence upon adoption over any currently adopted Neighbourhood Plans.

Change suggested by respondent:

Existing allocations should be tested for deliverability prior to re-allocation

The hierarchy of neighbourhood plans should be made clear in paragraph 21

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13857

Object

Vision**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Given that paragraph 59 of the NPPF states that the Government's objective is to significantly boost the supply of housing, the wording relating to meeting the needs of the housing market area should be more positively worded.

Paragraph 50 sets out that SMBC are seeking to protect the integrity of the Green Belt. Wording should be included setting out that lower performing parcels could be released to protect higher performing parcels while meeting identified and evidenced needs.

Change suggested by respondent:

The vision should be more positively worded in order to significantly boost the supply of housing

The need to release lower performing green belt to meet identified needs, and preserve higher performing parcels, should be set out in paragraph 50

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13859

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Object to the inflexible market housing mix prescribed within Policy P4C. The NPPF encourages balanced and mixed communities catering for a wide range of the population. Individual sites should cater for a wide range of housing types and sizes. Provision of such a significant proportion of only smaller (3 bed or fewer) dwellings on sites will not develop long term sustainable communities. It will result in a transient community where people cannot form long term neighbourhoods as they will need to move on as their circumstances change if there are insufficient homes of the right size on a site to accommodate them.

Including a prescribed housing mix runs counter to the criterion elsewhere within the policy which allow a number of factors to be taken into consideration. This plan has a significant lifespan and to prescribe a housing market mix which is to remain in place for the whole of plan period does not provide sufficient flexibility for adaptation to current housing need and demand. We have seen with the current pandemic the way external factors can influence people's choice of lifestyle.

Change suggested by respondent:

Amendment of policy to allow for housing mix based on up to date market evidence

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13868

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Object to P4D. Requiring all sites of over 100 houses to provide 5% of open market dwellings in the form of self-build plots is unreasonable and unjustified. Given provision for 7,605 houses through allocations above 100 houses/ UK Central Hub area, this would equate to the 761 self and custom build plots to be provided from the draft allocations, against 374 entries on register. PPG advises Councils to engage and encourage provision. Alternatively, Plan could identify custom build sites. Similar policy elsewhere has been deleted at examination

Change suggested by respondent:

Deletion of specific policy requirement and replacement with specific allocations or general support for self-build sites

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13869

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

The requirement in Policy P7 for major residential development should be clarified to indicate that there may be other ways in which accessible options can be implemented. The distance to a bus stop/train station should not be seen as the only measure of sustainable access.

Change suggested by respondent:

Policy P7 should be clarified that there are other ways of ensuring sustainable transport options are available

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13870

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within Policy P8 2(ii), SMBC are seeking to bring in a further test which would not be in accordance with the NPPF. This should therefore be deleted.

Change suggested by respondent:

Policy P8 2(ii) should be deleted

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13871

Object

Policy P11 Water and Flood Risk Management**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Policy P11 point 6, the confirmation of discharge into a public sewer falls under Section 106 of the Water Industry Act 1991. As such, it should be made clear that planning permission can be granted prior to this being confirmed, as it falls within a different regulatory regime.

In Policy P11 point 14, it should be clarified that contribution through a Section 106 Agreement is only required where it meets the tests set out in NPPF Paragraph 56.

Change suggested by respondent:

Deletion of Policy P11 point relating to confirmation from relevant infrastructure owner

Clarification as to obligation requirements and the necessary tests in point 14

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13872

Object

Policy P17 Countryside and Green Belt**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Policy P17 conflates two separate issues by inclusion of best and most versatile farmland, and goes beyond NPPF, which includes BMV land as one of a number of criteria, but does not require safeguarding. P17 point 4 does not include all factors to be taken into account when considering very special circumstances. Policy P17 point 5 goes beyond scope of Green Belt as set out in NPPF and duplicates guidance on protecting landscape

Change suggested by respondent:

Deletion of Policy P17 point 1, inclusion of further factors which may create very special circumstances in point 4, and deletion of point 5

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13876

Object

Policy P17A Green Belt Compensation**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

None of the emerging concept masterplans show any compensatory improvements within the Green Belt. It would appear that Policy P17A is relying on additional land being available within the control of applicants (which may not be the case), or the payment of contributions.

SMBC's viability evidence does not take this requirement into account, and no detail is provided as to how these contributions will be spent or what level of contribution is required. This creates uncertainty, and Policy P17A should be reconsidered to ensure what is required is clear, and that it will not impact upon the viability of schemes.

Change suggested by respondent:

Reconsideration of the policy to ensure that it is evidenced based, does not impact upon viability of schemes, and is in accordance with national policy

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13877

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Policy P21 expects major development to provide or contribute towards the provision of measures to directly mitigate its impact and physical, social, green and digital infrastructure.

SMBC's viability testing does not take into account digital infrastructure within the testing and, as such, it should be evidenced that this will not render development unviable.

Change suggested by respondent:

Confirmation that digital infrastructure provision allows for viable development

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13882

Object

Balsall Common**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Provision of 1,756 new homes in Balsall Common, a rural settlement with no significant employment is disproportionate. No assessment has been undertaken to demonstrate the ability of the settlement to deliver this level of growth. Expansion of Balsall Common is not supported by the Sustainability Appraisal due to the limited employment opportunities and the likelihood it will encourage commuting

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13883

Object

Blythe**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

There are serious doubts about the delivery of Site BC1 as no evidence of necessary collaborative working by multiple landowners and significant infrastructure requirements mean it is not deliverable within the stated time frame or the Plan period

Change suggested by respondent:

Alternative site 544 Broad Lane proposed to meet part of need proposed at Balsall Common

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13884

Object

Balsall Common**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

There is no explanation how the infrastructure requirements for Balsall Common would be funded or the land for the enhancement of the local centre delivered. The Relief Road is not deliverable as required early in the Plan period as this will be before CIL receipts are available

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13885

Object

Policy BL1 - West of Dickens Heath**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

The Council has had ample time to identify and secure alternative sports provision for the loss of playing pitches at Site BL1 and the fact that this is not identified within the plan suggests that there are currently no alternative sites. This calls into question the delivery of this site and with no evidence and no proposals in place, we consider that proposal BL1 should be deleted from the plan.

Change suggested by respondent:

Reprovision of the sports pitches should be secured prior to allocation and Policy BL1 should be deleted from the plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13886

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Draft allocation KN1 requires the re-provision of sports pitches. In this instance, the re-provided pitches are currently shown within the Green Belt to the north of the allocation. Paragraphs 713-715 state that it's likely that very special circumstances will exist to support development in this location and, as such, the re-provision will likely be acceptable. However, this pre-judges any application, for which the detail is not known, and as such cannot be relied upon. Therefore the housing that would be provided on the sports pitches should not be included until the re-provision of the sports pitches is secured.

Change suggested by respondent:

Reprovision of the sports pitches should be secured prior to allocation

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13887

Object

Blythe**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Omission site – Land at Hawkshurst, Broad Lane (Site 544) should be allocated to meet part of housing need not deliverable at Balsall Common or UK1. Site has been inappropriately assessed as should be 5Y, not 9R in step 1, as accessible on edge/extension of Coventry. Step 2 should have been undertaken. Accords with Spatial Strategy, no hard constraints, does not breach defensible Green Belt boundary, potential for burial space to meet needs. Accessibility study flawed as does not assess facilities within 1,200m of site outside Borough and makes no allowance for cycling. Similar landscape character rating has not precluded allocations elsewhere and inappropriate to use LCA to discount sites. SA identifies 2 harmful effects; agricultural land which is mostly grade 3, so may not be best & most versatile and has not precluded allocations elsewhere, and distance to jobs which is incorrect as accessible to Warwick University and Coventry City Centre

Change suggested by respondent:

Site 544 Broad Lane should be allocated for housing as is appropriate using site assessment criteria and deliverable

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15069

Object

Policy P5 – Provision of Land for Housing

Respondent: Barratt David Wilson Homes - Land south of Broad Lane

Agent: Barton Willmore Planning

Summary:

Housing Need evidence in 2020 HEDNA:

- PPG state that SM only minimum
- Expected growth at UKC Hub meets criteria in PPG to increase SM
- HEDNA state 13,000 jobs at UKC Hub, over 10,000 Experian baseline
- HEDNA assume only 25% of jobs occupied by Solihull residents.
- Barton Willmore carried out own analysis at 0.93 and 0.98 commuting ratios
- Demographic modelling shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario
- HEDNA identifies acute affordable housing need in Borough, BW analysis conclude HEDNA housing need should increase to meet this component of need.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15070

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

GBBCHMA Unmet Housing Need:

o Barton Willmore analysis of unmet need in wider GBCCHMA suggests that 2020 Position Statement's conclusions under-estimate the remaining unmet housing need from Birmingham up to 2031; Birmingham's deficit alone is between 11,924 – 13,101 dwellings up to 2031.

o Furthermore, if using the current standard methodology, then significant unmet need from Birmingham City and Black Country between 25,543 and 27,350 dwellings up to 2031.

o If we were to assume the increased capacity for Birmingham City (65,400 dwellings 2011-2031) set out in the 2020 Position Statement the unmet need would still be between 11,243 and 13,050 dwellings up to 2031.

- This increases significantly based on the uncapped Standard Method figure for Birmingham City which would come into effect in January 2022.

o Taking into consideration the proposed changes to Standard Method (consulted on by Government in summer 2020), this would lead to there being unmet need against emerging/existing housing requirements in all but one of the GBBCHMA authorities;

o Unmet need post 2031 should be considered, as referenced to in the 2020 Position Statement. Based on data available at the present time and the most recent Local Plan figures, Barton Willmore calculate this to be a minimum 17,700 dwellings 2031-2040.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15071

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

'Sites identified in land availability assessments'

It is unclear what is meant by 'sites identified in land availability assessments'.

Given these are sites which do not benefit from a draft allocation, then they are by definition, windfall sites which means that there is double counting from unknown sources of supply.

Change suggested by respondent:

- Amend supply and spatial strategy in Plan.

- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15072

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Consider automatic allocation of 2013 Solihull Local Plan sites, which have been allocated for a number of years, without any justification as to their deliverability, is an incorrect approach.

Sites not come forward despite Council lacking a 5YLS, points to deliverability issues with sites.

Change suggested by respondent:

Existing 2013 Local Plan site allocations should be tested for deliverability prior to re-allocation

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15073

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Brownfield Land Register (BLR)

We query the separate identification of sites identified in the BLR – this BLR is subject to periodic review and thus will not be fixed as a permanent source of supply.

We consider that any sites to be delivered in this way should be considered as windfall developments.

Change suggested by respondent:

- Amend supply and spatial strategy in Plan.

- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15074

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Windfall allowance

The windfall allowance is justified by reference to past windfall rates however it fails to recognise that 'town centre sites' (a traditional source of windfall supply) are allocated in the plan through the town centre masterplan and the Council have identified other sources of supply through the brownfield register. In the absence of any assessment / analysis of this component demonstrating the projected level of future windfall provision taking these factors in account, we consider that the level of windfall should be reviewed and adjusted accordingly.

Change suggested by respondent:

- Amend supply and spatial strategy in Plan.

- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15075

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

- Consider scale and delivery rates of UK Central hub proposals are unrealistic, and neither details on trajectory and delivery timescales, nor commitments from delivery partners, have not been included in consultation documentation.
- Based on LPR adoption date of 2022, we consider first likely completions to be ca. 2030. This is based on Lichfields' Report ('Start to Finish', Feb 2020) analysis that concludes the average time from outline planning app to first completion is 8.4 years.
- Given information within the August 2020 consultation {Arden Cross?}, we consider a 160dpa build out rate between 2030-2036 is reasonable, to delivery 960 dwellings. Type of supply should also be considered, as geared towards apartments. Amount of infrastructure required also needs consideration.

Change suggested by respondent:

- As such 1,780 dwellings should be removed from UKC Hub assumptions.
- Amend housing supply and strategy.
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15076

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Trajectory:

- SMBC are seeking to provide a stepped trajectory as some of the larger sites will not make a significant contribution to completions until the mid-delivery phase.
- We refer you to Guildford Local Plan Inspector's report, which concludes the Liverpool method does not meet the Government's objective to boost housing supply in the shorter term.
- Consider Solihull should follow same approach as Guildford and allocate more sites.
- As with withdrawn Uttlesford Local Plan, a stepped trajectory may create a fragile 5 year land supply.
- Stepped trajectory may worsen the affordability problem as it delays delivery.

Change suggested by respondent:

- Amend housing supply and strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15077

Object

Policy P5 – Provision of Land for Housing**Respondent:** Barratt David Wilson Homes - Land south of Broad Lane**Agent:** Barton Willmore Planning**Summary:**

Note that the 10% lapse rate applied does not take into account windfall, the UK Central Hub Area or allocated sites. We consider that a 10% lapse rate is suitable, but that it should be applied to future development as well.

Change suggested by respondent:

- 10% lapse rate should be applied to future development as well.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14563

Object

Policy BL1 - West of Dickens Heath

Respondent: Sarah Barrett

Summary:

The road network is already overloaded and cannot take more traffic.

The plans involve building on green belt land and on playing fields used by local residents.

Increase flooding.

Development threatens boundaries of the village

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10577

Object

Hockley Heath**Respondent:** Mrs Heidi Bartlett**Summary:**

Use of Green Belt land.
 School road not wide enough.
 Pressure on surrounding country lanes.
 More risk of flooding we already suffer from flooding in the village.
 Pressure on electricity and gas supply we already suffer from power cuts.
 Pressure on our sewage system.
 Noise and car pollution.
 Lack of pavement past the School.
 Safety of Children going to and from School.
 Entrance to School road from the Stratford road is not wide enough.
 Lose of wildlife habitat.
 Damage to the Canal.
 Lack of public Transport to Secondary Schools.

 Local school not able to cope with lots of new Children.

Change suggested by respondent:

Too many houses.
 There are better locations in other areas outside of the main village.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

15198

Object

Policy P14A Digital Infrastructure and Telecommunications**Respondent:** Barton Willmore Planning**Agent:** Barton Willmore Planning**Summary:**

Council's viability testing does not take into account digital infrastructure within the testing and, as such, it should be evidenced that this will not render development unviable.

Change suggested by respondent:

Confirmation that digital infrastructure provision allows for viable development

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13692

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

Support allocation of Site BC4, which is primarily brownfield land for housing. Site can deliver 270 dwellings making more effective use of land whilst still according with environmental and design requirements, see Barwood masterplan. Concept masterplan contains errors, Relief Road corridor incorrectly shown. Reference to bypass providing Green Belt boundary is incorrect and contradicts paragraph 560 of Plan, which refers to eastern boundary of site. Object to BC4.2.iv reference to public open space east of site to Relief Road as shown on Concept Masterplan as unreasonable and undeliverable as outside promoter's control. BC4.2.vi should be removed as unnecessary and insufficient evidence. BC4.3 requirements should be subject to meeting CIL tests. Object to BC4.4.i and paragraph 560 requirement for open space between site and Relief Road. BC4.4.ii requirement should be within site. Should reference potential Green Belt enhancements to be agreed at planning application stage.

Change suggested by respondent:

Increase capacity to 270 dwellings.

Delete criteria 2vi and 4i. Amend criteria 2iv to remove 'and to Relief Road', 4ii to within site, and paragraph 560 to delete 'and land to the east between the site and the Relief Road'.

Amend Concept Masterplan to show accurate alignment of Relief Road, exclude public open space on land between site and Relief Road and to correct wording of second paragraph to confirm Green Belt boundary along eastern boundary of site.

Infrastructure requirements should be subject to meeting CIL tests. Green Belt enhancements should be potential to be agreed at planning application stage.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

13693

Object

Policy P17A Green Belt Compensation**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

Insufficient evidence to justify the compensatory improvements required by Policy P17A. Green Belt enhancements should be reasonable and proportionate to avoid jeopardising viability. Requirements outside the control of land promoters are undeliverable. Hierarchy in criterion 3 lacks robust evidence, and Green Infrastructure Opportunity Mapping not in evidence base. Policy should be based on robust evidence identifying deliverable land for enhancement, managed through S106 procedure.

Change suggested by respondent:

Amend policy to delete hierarchy and reference robust evidence identifying deliverable land for enhancement, managed through S106 procedure.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13711

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

P4A. The Council should take into account any updated and wider definition of affordable housing which may emerge as national policy evolves, as well as ensuring that the implications of any policy on viability are fully tested. In this regard, we are pleased to note that Policy P4A confirms that a Meeting Housing Needs Supplementary Planning Document (SPD) will be produced and periodically updated to ensure that the local affordable policy remains up to date and can respond effectively to changing circumstances.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13713

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

P4A. Whilst we recognise that criteria 7 and 8 of Policy P4A set out expectations in terms of what “should be provided” in terms of social rented and shared ownership housing, we are pleased to note that both criteria state that the specific tenure mix “will take into account site circumstances”. We consider that such flexibility is critical to ensure that the Policy can be found sound as ultimately affordable housing needs will vary between different areas of the borough and may change over the plan period. It is important that any provision of affordable housing takes account of evidence of local needs and market demand defining tenure mix.

For it to be sound, a more flexible approach is needed to the wording of Policy P4A, which enables local and site specific circumstances to be reflected when defining the affordable housing mix and for this to be considered and assessed at the decision-making stage.

Change suggested by respondent:

We propose that criteria 7 and 8 of Policy P4A are either deleted or reworded as follows: “The precise mix of social rented and shared ownership properties should take into account local requirements and take account of site-specific circumstances

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13715

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

P4C. The mix of market housing at any given site must take account of evidence of local needs and market demand. Whilst criterion 1 of Policy P4C suggests that there is some flexibility for housing mix depending on site specific circumstances, criterion 3 seeks to fix a very specific housing mix, using the terminology “shall be provided”.

Ultimately, housing needs vary between areas of the borough and may change over the plan period. Matters in relation to the most appropriate market housing mix for a site can be considered and assessed by the LPA at the decision-making stage once a planning application for development has been submitted.

Change suggested by respondent:

To provide flexibility and enable the mix of market housing to reflect local needs and market signals, and therefore for the policy to be sound, criterion 3 should be removed or reworded as follows: “The precise mix of market dwellings should take into account local requirements and take account of site-specific circumstances”.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13717

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

P4D. We accept that the Council is justified in making provision for self and custom build housing in order to comply with the Self and Custom Housebuilding Act, the Housing and Planning Act, Planning Policy Guidance and the needs identified on the self-build register.

However, having considered the justification for Policy P4D and the Council's 'Meeting Housing Needs Topic Paper', we disagree that the Council has sufficiently evidenced its proposed requirement for 5% of open market dwellings on residential sites of 100 units or more to comprise self and custom build plots.

Such a policy needs to be justified with robust evidence of need in order to be found sound. Currently, there are limited details provided as to how the 5% requirement has been derived and how this figure relates to local need and demand for self and custom build plots across the borough.

This prescriptive, borough-wide requirement to provide 5% threatens the Council's ability to meet its local housing need requirement if there is no localised need or demand for such plots and so they remain vacant, as opposed to being built out and offered to the market as part of a more traditional developer build offering.

If self or custom build plots are not built out and remain vacant for a long period, this has adverse implications for viability and other Local Plan objectives and is also harmful to the visual and residential amenity of those living in close proximity to them.

Change suggested by respondent:

We propose that an additional criterion is added to the policy, to allow flexibility and to ensure that there is evidence of local demand before this is required as part of a planning application proposal. We also propose an additional criterion whereby if there is no firm interest in self and custom build plots on a site within 6 months of the marketing of those plots, they could then be developed for open market housing instead.

This approach will enable the provision of self and custom housebuilding if local demand exists, but also ensure that homes are delivered to the market if such demand does not materialise in practice. This will maximise the ability of the Council to deliver its overall local housing need requirement.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

13720

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

Whilst we support the principle of Policy P4E and its objective to provide a variety of homes to meet the needs of different groups in the community, we are concerned that it does not consider the particular locational requirements of older people and those with disabilities and special needs.

Policy P4E does not consider the location or which operators will be providing specialist care provision.

Given their land requirements, developments of 300 dwellings and more will typically be on the edge of existing settlements, rather than in more central, urban locations which are typically in closer proximity to local services and facilities. Older persons and specialised living accommodation usually needs to be in the most sustainable and accessible locations, in close proximity to a good range of services, facilities and transport links, given that residents tend to be less mobile and more reliant on public transport. Furthermore, the larger, mainstream housebuilders which typically build developments of 300 dwellings or more also tend to have less experience or expertise in operating specialist housing or care accommodation.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13721

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

The Council has provided insufficient evidence to justify policy P4E.

Change suggested by respondent:

Criterion 4 should be removed and the draft Plan should instead identify site allocations across the borough which are most appropriate for such accommodation (typically in more urban areas of the borough) and include appropriate wording in the relevant policies for those sites.

Alternatively, criterion 4 could be reworded as follows: "All developments of 300 dwellings or more should include provision of specialist housing or care bedspaces if supported by evidence within an up to date Council statement of need for older person's accommodation."

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14784

Support

Policy P15 Securing Design Quality**Respondent:** Barwood Development Securities Ltd**Agent:** stantec**Summary:**

Support the general thrust of Policy P15. However, the numerous design principles set out are too prescriptive and risk local distinctiveness being overlooked in favour of achieving generic design objectives which may not be appropriate to local context.

Design principles should reflect only what is necessary to ensure the creation of high quality spaces within individual development sites and their local context, as opposed to generic principles which may not necessarily lead to the development of well-designed places.

In criterion 9 it is important to state that any infrastructure or planning obligation requirements to ensure the comprehensive delivery of sites should meet the statutory tests in Regulation 122(2) of the Community Infrastructure Levy.

Change suggested by respondent:

Propose that Policy P15 is reworded so that it sets out the Council's design "aspirations", as opposed to "expectations". This would allow for proposals submitted as part of planning applications to be appropriately assessed on their design, based on local context at the decision-making stage.

A reference to the need for compliance with the CIL Regulations should be added to criterion 9.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15157

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Charlotte Bateman**Summary:**

Objects to Policy BL2;

Road infrastructure cannot cope - increased risk of flooding - traffic congestion - negative impact on healthcare provision

- not enough places at primary/secondary schools - concerns over air pollution/destruction of greenbelt

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

10893

Object

UK Central Hub**Respondent:** Roundtable Consultancy Ltd**Summary:**

The proposal to move the waste and recycling plant will cause massive issues in terms of traffic, particularly following the council's previous decision to allow JLR to build a new logistics centre in the same area. The loss to date of our natural landscape is a disgrace and this will bring yet more congestion and added pollution to the area

Change suggested by respondent:

Alternative land should be found for the waste and recycling plant, away from this already congested area of Solihull. I can only assume that none of the councillors have to suffer trying to reach the Coventry Road junction when JLR are changing shifts - the route is already at breaking point and we have yet to see the impact of the logistics centre. It's always been a case of 'what JLR want, JLR get' and now we are being asked to suffer even more

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11067

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carole Beattie**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11191

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Heidi Becker**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13718

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Matthew Becker**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14446

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Oliver Begley**Summary:**

Object to the HWRC moving to Damson Parkway.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14445

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Sarah Begley**Summary:**

Object to the HWRC moving to Damson Parkway.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10581

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Mr David Bell**Summary:**

My objections at the start of the process remain that sites 2 and 3 were so far from the centre of the village and the station and that as agreed by most residents and the parish council the boundary of the green belt should be Balsall St East. With site 2 should it proceed the new houses should be set back from the rear gardens of houses to the main road. Access is recognised as a concern but no information is forthcoming as to the required second access.

Change suggested by respondent:

That the green belt boundary should be Balsall St and Balsall st east

Legally compliant: Yes**Sound:** Yes**Comply with duty:** Yes**Attachments:** None

15196

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr David Bell**Summary:**

My objections at the start of the process remain that sites 2 and 3 were so far from the centre of the village and the station and that as agreed by most residents and the parish council the boundary of the green belt should be Balsall St East. With site 2 should it proceed the new houses should be set back from the rear gardens of houses to the main road. Access is recognised as a concern but no information is forthcoming as to the required second access.

Change suggested by respondent:

That the green belt boundary should be Balsall St and Balsall st east

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

15091

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr David Bell**Summary:**

It is on the very outskirts of the village and therefore not convenient for many of the amenities and therefore not sustainable.

Proximity to the windmill and the habitat for many species of wildlife.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

15095

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Andrew Bennett**Summary:**

Road infrastructure can't cope with additional traffic - Impact on protected ancient hedgerows - impact on local wildlife and impact on ecological balance of the area - Brownfields sites in wider Birmingham area not prioritised enough - increased risk of flooding - increased pressure on utility infrastructure (Gas, electricity, Sewerage) - Increased car usage/poor public transport - impact on healthcare provision.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14506

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Andy & Rachel Bennett**Summary:**

Object to Policy BL3;
BL3/Area 26 confuse the public - Shirley is carrying largest percentage of development throughout the borough - road infrastructure not cope with increased level of traffic with little opportunity/scope to widen roads - Increased traffic=risk of accidents - Destruction of local habitat and ecological balance of the area - Birmingham needs to utilise Brownfield sites first/ Why is Solihull absorbing there housing needs - Increased flood risk building on greenbelt sites - Shirley is car dependent, cannot cope with additional traffic created - utility infrastructure such as gas, water, electricity and sewage cannot cope - Puts healthcare facilities at risk/ will not be able to cope with the increased population.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10837

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Louise Bennett**Summary:**

This site is not fit to house a relocated Household Waste and Recycling facility as the area has already been heavily built on. It will add more traffic to an area already busy from existing houses and JLR traffic and which will only get busier if the plan for 700 new homes is approved. The site is a residential area and not suitable for waste facility.

Change suggested by respondent:

That the household waste facility, if it needs to be relocated, should move to a more suitable brownfield site on the edge of Solihull, not in a central part of it near to houses.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13961

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided to demonstrate Site KN2 is deliverable or developable, contrary to the requirements set out in the National Planning Policy Framework. It is unclear whether there is an agreement by all landowners to the site being brought forward. There appears to be a lack of a comprehensive agreed approach with the Concept Masterplan document including three concept plans produced by different companies.

There are also unresolved issues relating to the loss of playing pitches. A fully developed masterplan strategy with appropriate playing pitch replacement strategy is required.

There are significant concerns about the feasibility of delivering the necessary infrastructure to facilitate development within 5 to 10 years.

Change suggested by respondent:

Paragraphs 225 and 226 should be amended to remove the estimated contribution of KN2 from Delivery Phases I and II.

Policy KN2 should be amended in light of the findings of additional evidence gathering, negotiations with landowners and masterplan work

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

13962

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

There is insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School. There is no mention of any need for expansion at secondary school level in Knowle/Dorridge in the 'Infrastructure Delivery Plan', dated October 2020.

The financial and carbon cost of the school proposals may be significantly more than upgrading and extending existing facilities. Arden Academy has had recent upgrades and extensions, which undermines any need and cost justification.

There would be potentially larger financial contributions available towards other essential infrastructure needs if the contributions required towards the schools proposal were minimised.

Change suggested by respondent:

Robust evidence is required to demonstrate Arden Academy proposals are the most appropriate strategy having regard to reasonable alternatives.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13963

Object

Policy BL1 - West of Dickens Heath**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided on the relocation of the existing sports provision south of Tythe Barn Lane. There are multiple complex land assembly issues to be overcome. This is contrary to the deliverability and developability requirements set out in National Planning Policy Framework.

The 'Developer Site Proposal' plan included in the Concept Masterplan Document shows the re-placement playing pitches on a 'Local Wildlife Site'. This would be contrary to Policy BL1 criteria v and draft Policy P10.

There are significant time implications for the outstanding work necessary relating to the replacement playing pitches. BL1 is undeliverable and potentially unviable in the short to medium term.

There are suitable alternative options to BL1 including allocating more small and medium sized sites; allocating brownfield land; additional small-scale development to larger village boundaries; and ensuring development densities make the most efficient use of land.

Change suggested by respondent:

If issues of soundness cannot be overcome- paragraphs 225 and 226 should be amended to remove BL1 from Delivery Phases I and II.

Policy BL1 should be amended in light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13977

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided on cross-boundary collaboration in respect of the housing land supply shortfall. A Statement of Common Ground has not been published, contrary to Paragraph 27 of the National Planning Policy Framework.

It is unsound for the council to make no policy provision to address the expected need arising from outside the administrative area within the current plan period.

Change suggested by respondent:

A Statement of Common Ground should be published which addresses the cross- boundary land supply shortfall. Housing delivery target number should be modified if/as appropriate.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13979

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The plan does not sufficiently take into account anticipated growth over the plan period and beyond to avoid the need for an early review. The standard method for assessing housing need would increase the housing requirement to 1011 dwellings per annum.

It is unsound to propose phasing delivery of the housing requirement. If the requirement is not delivered effectively/timely, house prices could escalate reducing affordability.

It is unsound that there are no 'safeguarded' sites proposed which is inconsistent with national policy. This would speed up the Local Plan review process and ensure a deliverable supply of housing land.

Change suggested by respondent:

Small and medium sized sites for residential development should be allocated.

The phased housing delivery target table at paragraph 224 should be removed.

Policy P5 should be modified to state '1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Two new paragraphs beneath paragraph 4 of Policy P5 should be included-

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances: • To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area; • To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.'

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13986

Object

Policy P5 – Provision of Land for Housing

Respondent: Messrs Benton & Neary

Agent: Tyler Parkes Partnership Ltd

Summary:

Insufficient 'deliverable' sites, 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or accommodate the scale of growth projected up to 2036. There are significant doubts over the deliverability and suitability of several proposed site allocations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13987

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The number of new dwellings proposed in Solihull Town Centre is not achievable. The Council are relying on outdated historic figures from the 2016 draft Solihull Town Centre Masterplan.

The 'Areas of Change' set out in the 2020 Solihull Town Centre Masterplan covers a physically smaller area than the 2016 draft. However the proposed housing numbers are largely maintained.

The Plan only sets out the total number of dwellings to be delivered within the town centre as a whole. Policy P5 should identify specific sites.

No detailed work on concept masterplans for the proposed development sites in Solihull Town Centre has been undertaken, implying it does not have the same level of confidence as the 'Allocated Sites'.

No accurate capacity testing has been undertaken with inconsistencies to the 2019 Brownfield Land Register.

The proposed provision of largely apartments in Solihull Town Centre would seem unrealistic, in light of the clear need for family housing in the Borough.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13988

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

There have been/are issues that are preventing deliverability of dwellings in Solihull Town Centre, with only 10 dwellings approved in the last 7 years. There are current infrastructure requirements on which new development is dependent.

There are multiple landowners and multiple existing land uses on the proposed housing redevelopment sites. Land assembly may also be required to ensure sites can be developed comprehensively. 'Deliverability' and 'developability' has not been demonstrated with evidence.

There is a reliance on larger site redevelopments in Solihull Town Centre, contrary to the NPPF paragraph 68.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13989

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The capacity of Solihull Town Centre's redevelopment sites has been overestimated, due to heritage considerations, the need for family housing and compliance with spacing standards. The absence of detailed Concept Masterplan work has failed to justify the densities of development.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13990

Object

UK Central Hub**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided on the deliverability of 2,740 dwellings from the UK Central Hub within the Plan period.

The definition of the 'UK Central Hub Area' is imprecise and inconsistently applied within the Plan and supporting evidence. Some definitions include land at Blythe Valley Park, North Solihull, Solihull Town Centre which are areas not included within the UK Central Solihull Hub documents provided as evidence. It is unclear as to where the proposed 2,740 dwellings are being provided.

The housing contribution from the 'UK Central Hub Area' is not clearly defined and there is a reliance on documents provided in evidence (but not to be adopted) which are subject to change.

The quantum of dwellings and delivery timeframe is inconsistent within the Plan and supporting evidence.

Change suggested by respondent:

The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.

A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.

The quantum of dwellings and timeframe for delivery as quoted within the Plan and supporting evidence should be consistent.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13991

Object

UK Central Hub**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Delivery of The UK Central Hub requires co-ordination of several landowners and implementation of necessary social, transport, utilities and flood risk management infrastructure. Without a clear Policy and/or Concept Masterplan there is uncertainty on delivery within the Plan period. There is no evidence of a legally binding Memorandum of Understanding/agreement amongst landowners.

Change suggested by respondent:

The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13992

Object

UK Central Hub**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Development of Arden Cross requires the removal of land from the Green Belt with no compensatory measures being identified which is in conflict with national and local planning policy. There is no local plan policy requirement, Concept Masterplan or supporting evidence setting out any Green Belt compensatory measures

Change suggested by respondent:

The development of Arden Cross requires Green Belt compensation.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13993

Object

UK Central Hub**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

In respect of the proposals at the NEC, there is no site-specific policy, no Concept Masterplan and no allocation within the Policies Map to identify the location or quantum of housing contribution. There is uncertainty as to the evidence demonstrating that the site is suitable or deliverable as it does not appear to have been appraised. It appears that the NEC housing area was not subject to a Sustainability Appraisal, and it would likely have scored low against objectives SA1, S14 and SA17.

The NEC proposals will be delivered as apartments in a relatively small residential community, with no opportunity for future growth and limited housing types likely to appeal to a narrow demographic. Locating residential development amongst "... an unrivalled 24-hour entertainment and leisure destination" would be contrary to Policy P14.

Change suggested by respondent:

The NEC site should be fully assessed for its suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13994

Object

UK Central Hub**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

In respect of Arden Cross there is no site-specific policy, no Concept Masterplan and no allocation within the Policies Map to identify the location or quantum of housing contribution.

The site scored badly within the Sustainability Appraisal, matters on social infrastructure and achieving a satisfactory solution with regards heritage need to be considered.

The Green Belt Assessment identifies a refined area (reference RP13). If the site had been considered as part of the wider area, its performance against the purposes of the Green Belt would have been assessed differently.

The Archaeological Assessment states that the proposals will likely have a significant negative archaeological impact. There does not appear to have been an ecological assessment.

Delivering the necessary infrastructure will be a challenge. There are major constraints to development, including managing the construction land-take and impacts of construction works.

There are issues with provision of social infrastructure such as schools and health care facilities which would place residents at a disadvantage if occupation precedes infrastructure delivery.

Change suggested by respondent:

The Arden Cross site should be fully assessed for its suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13995

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Concern that the housing capacity of some of the proposed allocations will be reduced to fully meet the minimum public open space requirement set out in Policy P20. The POS requirement in the Policy and concept masterplan document is incorrect (for sites BL1, BL3, HA1 HH1) when compared to the actual requirement set out in the Open Space Topic Paper dated October 2020.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13996

Object

Policy P5 – Provision of Land for Housing**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The table at paragraph 225 'Maintaining Housing Land Supply' is unsound as there is a lack of robust evidence to demonstrate there has been no double counting across the sources or to demonstrate the deliverability of the capacity numbers.

There is no evidence to demonstrate Brownfield Land Register sites will come forward for development. Stage 2 has not been undertaken and none of the sites have permission in principle. There is no evidence on how the windfall allowance has been calculated to demonstrate that historic rates excluded sites identified in the SHELAA and Brownfield Land Register (ensuring no double counting).

There are concerns in relation to the developability of SHELAA site 245 Former Rugby Club, Sharmans Cross Road. There is no mechanism for replacement of the sports pitches which would be lost as a result of residential development as required by Policy P20.

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, Brownfield Land Register and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all Brownfield Land Register sites, SHELAA sites, and proposed housing allocations.

If justification cannot be provided, those site allocations, SHELAA sites, Brownfield Land Register sites and planning permissions should be deleted from the Plan and housing land supply information.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14004

Object

Blythe**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The significant need for housing and the housing land supply shortage outside the Green Belt has satisfied the 'exceptional circumstances' test as detailed in the National Planning Policy Framework.

The proposed Green Belt boundaries for the Blythe area fail to exclude 'land to the west of Tilehouse Lane' from the Green Belt and therefore are unsound. The Council have failed to effectively use previously developed or 'brownfield' land 'as much as possible', contrary to paragraph 137 of the National Planning Policy Framework.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14005

Object

Blythe**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The Council have failed to identify a sufficient supply of deliverable and developable housing sites, therefore there is immediate need to identify additional and/or alternative sites.

'Land to the west of Tilehouse Lane' scores 4 out of 12, when assessed against the purposes of including land within the Green Belt, in the 2016 Green Belt Assessment. The score is lower than many of the areas selected for removal from the Green Belt. The site is partially brownfield previously developed land, has strong defensible boundaries, and is within close proximity to public transport.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14006

Object

Blythe**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Contrary to paragraph 139 e) of the National Planning Policy Framework, Insufficient policy weight has been given to encouraging the development of all suitable land for housing, to avoid the need to adjust Green Belt boundaries beyond the plan period. The Council should critically examine all areas washed over by Green Belt, where there are areas of 'ribbon' development and lower performing areas of Green Belt in highly accessibility locations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14008

Object

Blythe**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The Topic Paper dated October 2020 recognises the area as being suitable for significant growth and high levels of accessibility. A small-scale extension of the settlement boundary to the west would represent a limited and proportionate expansion to the proposals for Dickens Heath.

The context of justifying the proposed housing site allocation at HH1 applies equally to 'land to the west of Tilehouse Lane'. The wider quadrant represents an area of existing ribbon development beyond the existing settlement boundary, largely continuous without significant gaps and does not make a significant contribution towards the Green Belt.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14009

Object

Blythe**Respondent:** Messrs Benton & Neary**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Land to the west of Tilehouse Lane (ref 116) has been attributed a priority score of 8, in the Site Selection Step 1 Site Hierarchy Criteria of the 'Site Assessments' document dated October 2020, which is disputed. This does not accurately reflect the characteristics of the site or location. The site is more accurately classified as a Priority 3 and 5 site. The site satisfies all the stated factors in favour of the site being brought forward for allocation in Step 2 of the site selection methodology.

The site and wider quadrant would score higher currently than BL1 and BL2 in accessibility terms with regard to proximity with an existing pedestrian footpath to the Whitlock's End Railway Station. Unlike BL1 the site does not have uncertainties around the relocation of sports facilities.

There are no physical or legal constraints restricting development at the site. Various landowners covering a large proportion of the quadrant have put forward their respective properties sufficiently demonstrating the availability of this area to come forward for development.

Change suggested by respondent:

A new site allocation at 'land to the west of Tilehouse Lane' for residential development.

Or inset a new paragraph below paragraph 601 in the Plan as follows:

'In addition to the proposed site allocations in the Blythe area, BL1, BL2 and BL3 that would fall within the settlement boundary, if the Green Belt boundary is amended as proposed, there is also land west of Tilehouse Lane (as shown on Enclosure 2), that would then be considered appropriate for development as they would then also be within the settlement boundary. This area has been promoted for development by landowners and if the Green Belt boundary is changed the area would no longer be subject to Green Belt policy. Following the proposed amendments as defined on the Policies Plan Map, proposals in this location will be considered appropriate for residential development subject to development proposals satisfying local and national planning policy requirements.'

The Policies Plan Map should be amended to either exclude 'land to the west of Tilehouse Lane' from the Green Belt or exclude the site plus the quadrant, with a SHELAA capacity of 48-51 and a capacity based SHELAA numbers plus indicative layout of 81-84 dwellings.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14173

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Object to the use of Green Belt land for housing in Balsall Common but qualified support for the concept masterplans for the sites which reflect most of the appropriate policies in the Berkswell NDP. Support the location of open space between existing and new housing, preservation of areas of ecological interest with commitment to enhance the natural environment, vehicular access only from the new relief road and Waste Lane (BC1) and expectation of landowner collaboration. Support green corridor along Waste Lane with open space/Local Green Space. The layout and design of new developments and effective integration into the current built environment provided by the concept plans, as currently written, will ensure the community has a better chance of remaining a good place

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14181

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Policy BC1 and masterplan. Object to lack of interconnectivity between public open spaces and with the countryside, contrary to guidance/policy in paragraph 301, P9 4iii and P10. The 3 open spaces should be connected to facilitate movement of wildlife with a minimum 6.5m wide corridor to be planted and enhanced. By utilising the public open space buffer and/or 30m gap as required in the Berkswell NDP, this need not affect the development capacity

Change suggested by respondent:

Policy BC1 paragraph 2v is modified with additional wording 'including the linking of the 3 ecologically important areas with a wildlife corridor of at least 6.5 metres in width'

The supporting Illustrative Concept Master Plan BC1: Barratt's Farm is modified to show the position of that wildlife corridor

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14182

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Object to the lack of mitigation for environmental noise from HS2 which will impact around half of Site BC1, contrary to guidance in the NPPF/Noise Policy for England.

Change suggested by respondent:

Policy BC1 – Barratt’s Farm should be modified as follows

'Homes built on this site in areas which are affected by environmental noise as defined by British Standard 8233:2014 (Guidance on sound insulation and noise reduction for buildings) or its successor standard should be constructed to meet the requirements of that standard or its successors.'

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14183

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Supports the inclusion of Site BC6, Object to the lack of mitigation for environmental noise from HS2/West Coast mainline railways which will impact on Site BC6, contrary to guidance in the NPPF/Noise Policy for England.

Change suggested by respondent:

Policy BC6 – Lavender Hall Farm should be modified as follows

'Homes built on this site in areas which are affected by environmental noise as defined by British Standard 8233:2014 (Guidance on sound insulation and noise reduction for buildings) or its successor standard should be constructed to meet the requirements of that standard or its successors.'

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14184

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Whilst Site BC6 is supported in principle, object to the lack of provision for a footway/cycleway link to the nearest school, Berkswell C of E primary, contrary to the cycling/walking strategy and Policies P7/P8

Change suggested by respondent:

Policy paragraph 3 should be modified by the inclusion of the following wording as 3vi:
 "Financial contribution to the creation of a pavement/cycleway to Berkswell School."

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14186

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Object to the omission of Site 43 Old Lodge Farm, Kenilworth Road from the table of site allocations, as it is above the threshold of small sites and should be allocated as its removal from the Green Belt enables its development.
 Allocation will need to address issues relating to access to play area and school, and environmental noise

Change suggested by respondent:

The table of allocated sites in paragraph 226 should be modified to include Site 43 Old Lodge Farm with a site area of 1.4 hectares and a capacity of 40 homes. The windfall housing supply should be reduced accordingly in table in paragraph 225

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14187

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Site 43 Old Lodge Farm, Kenilworth Road should be allocated for housing with a new policy. Mitigation for environmental noise from the A452, Relief Road and West Coast mainline will be required to accord with guidance in the NPPF/Noise Policy for England. Provision should be made for a play area, as the nearest existing sites are the other side of the Relief Road, as well as enhancement of Lavender Hall Park. Enhancement of the public right of way network is required, including a new walking/cycling route to the wider network and Berkswell C of E school

Change suggested by respondent:

A new policy "BC7 – Old Lodge Farm", should be created with the following wording

1. The site is allocated for 40 dwellings
2. Homes built on this site in areas which are affected by environmental noise as defined by British Standard 8233:2014 (Guidance on sound insulation and noise reduction for buildings) or its successor standard should be constructed to meet the requirements of that standard or its successors.
3. Likely infrastructure requirements will include
 - 3.1. Provision of public open space, including a doorstep play area, with a contribution to Lavender Hall Park
 - 3.2. Enhancement of the public right of way network, including new walking and cycling route connecting to the wider network and Berkswell School

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14189

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Object to the proposed Green Belt boundary as set out in Paragraph 537 which excludes land from the Green Belt that is proposed to be retained as open space/Local Green Space. Whilst the proposed open/green space is supported, the public open space south of Waste Lane and the Local Green Space bounded by Waste Lane/Old Waste Lane should be retained in the Green Belt

Change suggested by respondent:

The proposed Green Belt boundary south of BC1 and north of BC4 around Waste Lane should retain the proposed public open space and Local Green Space in the Green Belt

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14190

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

The curtilage of Site BC4 should be amended to retain the public open space along the Waste Lane corridor within the Green Belt, which will minimise the reduction in Green Belt gap between Balsall Common and Burton Green/Coventry

Change suggested by respondent:

The curtilage of Site BC4 should be amended to retain the public open space along the Waste Lane corridor within the Green Belt

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14191

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Object to the wording to paragraph 539, which should highlight the importance of retaining the open space at the entrance to Balsall Common from the east and the Green Belt gap to Burton Green/Coventry

Change suggested by respondent:

The following wording should be added to paragraph 539.

“This area of land is critical to maintaining the apparent width of the Meriden Gap and maintaining the rural nature of the approach to Balsall Common from the Coventry/Burton Green direction”

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14192

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Paragraph 527. Object to the lack of certainty of the delivery of the whole length of the Balsall Common Relief Road in one. A phased approach with the Station Road to Waste Lane section completed first will lead to rat running along Hob Lane/Waste Lane/Windmill Lane and compromise highway safety.

Change suggested by respondent:

The Balsall Common Relief Road is critical to the soundness and deliverability of the plan in a way that meets the requirements of the NPPF.

The wording of paragraph 527 should be amended by addition of the following sentence.

"It is planned that the Relief Road will be delivered as a single entity within the same time frame to connect Meer End with Station Road. In that way a continuous relief road will be completed in a single event without compromising local lanes"

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14193

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Welcomes the proposal to build a new primary school in Balsall Common as part of the Plan. However, the phasing of primary school educational places is not consistent with the housing phasing. The educational policy does not make sufficient provision, as required by the NPPF, for primary school provision during phase 1 of the housing allocation.

Change suggested by respondent:

1. The Trevallion stud site (BC5) should not be allocated to phase 1 of the plan in paragraph 226 but allocated to phase 2.
2. The commitment to a new primary school in paragraph 531 and policy BC1 should provide that construction of the new primary school should commence early in phase 1 of the plan

These actions will leave a theoretical shortage of 30 places during phase 1 of the plan but that is probably within the margin of prediction error.

As an alternative sites BC2 and BC3 could be re-scheduled into the second allocation phasing leaving only site BC5 to be developed in phase 1. That will eliminate the fully projected shortage of primary school places during the first phase of the housing plan by reducing house building in that phase to 200 homes down from a maximum of 565 to 200

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14194

Object

Balsall Common**Respondent:** Berkswell Parish Council**Summary:**

Welcomes the commitment in paragraph 528 to create a village centre master plan. However, residents need more than a plan with a 60% increase in the population of Balsall Common. The centre needs to be actually improved to cope with the increased population. A minority of the centre falls within Berkswell Parish with the majority with our sister parish Balsall. Rather than repeat the case made by Balsall PC, it is requested that the Examiner notes Berkswell PCs support for the case made by Balsall PC and their proposed wording change to paragraph 528.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11113

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

Allocation of BC1 Barratt's Farm is contrary to the vision in the Plan to protect the Meriden Gap and evidence in the Strategic Growth Study (SGS) highlighting it's Principle Contribution to Green Belt Purposes. Justifying it's release on the basis of the Green Belt Assessment and SHELAA is inappropriate. The former is not fit for purpose, requires more detailed assessment and does not determine whether land should be released. The latter assessment is suspect, partly due to changes since 2016, as proposal requires a relief road, land is in use for agriculture, a high pressure oil pipeline is present, and adjoining rail and relief road constitute bad neighbour uses. Alternative options not involving land making a Principle Contribution have not been investigated including SGS South of Birmingham. Contrary to the spatial strategy focusing development where needs arise and reliance on private car is low. Contrary to national guidance emphasising the use of brownfield land and protection of Green Belt. No obvious suggestion of required Green Belt compensation. Fails to take account of development proposed in Meriden Gap within Coventry

Change suggested by respondent:

Policy BC1 and its associated Concept Masterplan should be removed. Alternatively, timing of the delivery period in paragraph 226 should be delayed to phase iii, and the land safeguarded as per NPPF paragraph 139c and d, to allow the full impact on the Green Belt land in the Meriden Gap to be understood before it is destroyed forever. If future events reduce the housing demand the site will be returned to full Green Belt protection.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

11116

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

There is a serious discrepancy in the definition of the Green Belt boundary south of Waste Lane. Specifically, paragraph 537 says "The boundary will be drawn close to the eastern edge of site BC4 before following the line of Windmill Lane to the southern point of site BC3 where it then cuts across to Kenilworth Road".

Concept Masterplan BC4 states "The alignment of the bypass will provide the new green belt boundary to the east of the site" which could then release significant areas of land south of Hob Lane down to the A452 at Mere End. The Concept Master Plan BC4 should be corrected.

Change suggested by respondent:

Concept Master Plan BC4 2nd paragraph to be amended to read "The boundary will be drawn from the eastern edge of site BC1 along Old Waste Lane to the junction with Waste Lane and then close to the eastern edge of site BC4 before following the line of Windmill Lane to the southern point of site BC3 where it then cuts across to Kenilworth Road".

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11119

Object

Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

The Statement of Common Ground should be published to allow public scrutiny before the plan goes to the Secretary of State. Changing the Green Belt boundaries is contrary to NPPF in the absence of a SOCG showing that SMBC has discussed the potential for some of its need to be accommodated outside the Green Belt elsewhere. The Plan fails to take account of housing and industrial land proposals in Coventry close to the boundary with Solihull. The need for the Balsall Common Relief Road should be reassessed in context of the A46 A45 link road in Coventry.

Change suggested by respondent:

Reference Solihull MBC Local Plan – publication stage. Guidance Note to Accompany Model Representation Form – Legal Compliance and Duty to Cooperate – paragraph 2.3.

“Non-compliance with the duty to cooperate cannot be rectified after the submission of the plan”.

The plan should not be submitted to the Secretary of State until the SoCG has been negotiated, published and the public have had an opportunity to scrutinize it with a 6 week consultation period.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11123

Object

Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

Balsall Common suffers a severe lack of public open space equating to 2.5ha/1000 compared to a Borough average of 5ha/1000. The Plan presents an opportunity to address this deficiency, but the additional 13ha for 4,000 population will worsen it contrary to Policy P20. Despite a commitment to acquire land for sports hubs across the Borough, there is no specific allocation for Balsall Common. The Plan fails to comply with the Berkswell NDP Policy B1 requiring pos between existing and new housing for allocation BC1. The BFNAG proposal for a Central Park is not incorporated at the southern end.

Change suggested by respondent:

Policy BC1 2 ix to read:

Provision of sufficient public open space around water courses, heritage assets and ecologically sensitive areas to bring the average POS ha/1000 head of population for the site up to the average for the rest of Solihull Borough.

Policy BC1 3 ix to read:

Provision of new playing pitches and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy and SMBC Cabinet meeting 13/08/2020 agenda item 3.5 and 3.6; and resolution 5. Land acquisition on Site BC1 to be funded according to Cabinet meeting 13/08/2020 resolution 5 i, ii, iii.

Concept Master Plan Principles for BC1 to include the sentence:

POS to provide a buffer to the south of the development between the new and existing properties providing an opportunity for a public park and for the integration of the future and existing residents.

The Concept Master Plan for site BC1 should be amended so that the 4 areas designated as low density housing between the footpath running SE from Barratt's Lane and the houses on Meeting House Lane/Kelsey Lane are designated as POS.

The medium density housing area immediately to the NE of Old Waste Lane should be shortened so that there is POS to the rear of the existing properties (see attachment).

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11124

Object

Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

Development at Balsall Common will have a huge impact and demands a total rethink of the infrastructure of the village. Paragraph 528 of the plan pays lip-service to this for the Balsall Common village centre and does not comply with Policy P21. The LPR has been underway for 4 years and residents have a right to something more substantial. Balsall Common medical centre services are being reduced and centralised in places difficult to access by public transport, despite the significant increase in population proposed and contrary to Policy P18. The new primary school proposed for Barratt's Farm needs to be provided earlier in the Plan period.

Change suggested by respondent:

Policy BC1 3 to read

"Infrastructure requirements will include:" (to remove "Likely")

- i. Provision of a new 2 form primary school and nursery before any major house building takes place.
- iii. A thorough evaluation of the impact and sustainability of the development on all health care services carried out by SMBC and the CCG. Developer and Solihull MBC contributions to.....CCG.
- x. A detailed master plan for the enhanced village centre, published and funded, and agreed by the Borough Council, Balsall and Berkswell Parish Councils, Village resident's association and local action groups; before any development is begun.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11125

Object

Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

The Plan proposes a Balsall Common Relief Road although the evidence concentrates on the section from Waste Lane to Meer End, ignoring the effect on Hall Meadow Road and the existing estates and medical centre or through BC1 which is unsound. There is no evidence that pollution, congestion and safety assessments have been undertaken. Whilst phased early to provide for HS2 traffic, Barratt's Farm will be phased later or after HS2 which will invalidate proposal. There is considerable uncertainty over the funding of the waste Lane to Meer End section. Reasonable alternative routes west of Balsall Common have not been investigated.

Change suggested by respondent:

If the transport survey proves that the full bypass from Mere End to the Hall Meadow Road junction with the A452 will not cause serious congestion, pollution and safety problems, then:

Policy BC1 3 vi to read

"Provision of the Balsall Common bypass between Station Road and Mere End as the first phase of the development."

If the transport survey raises congestion, pollution and safety issues, then Policy BC1 3 vi to read

"The Site BC1 estate feeder Road between Station Road and Waste Lane to be designed to ensure it is not possible to use it as a "rat run" to bypass the village centre.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

11175

Object

Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

The timetable for HS2 works in paragraph 525 is inconsistent with paragraph 280 and needs correcting. Given the later opening date of 2020-33, how practical is delivery of Site BC1 within the Plan period? Need assurance that no significant development on Barratt's Farm will take place until all HS2 construction throughout Balsall Common is complete. HS2 construction will also impact sites BC4, BC5, and BC6 and their phasing should allow for this.

Change suggested by respondent:

Paragraph 525 to read ".....with the main works due for completion during the period 2029-2033 ready for the line to open at some later date still to be confirmed."

Policy BC1 2 vi changed from "Housing shall be phased to avoid coinciding with construction of the HS2 rail line in this vicinity" to "No housing development to be started in site BC1 until all construction work on the HS2 rail line affecting this location is completed".

Policies BC4, BC5, and BC6 should have similar amendments

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11192

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

Policy BC1 fails to address the climate emergency or Challenge A, the huge loss of fields is not compensated for and it is not clear how the requirement for biodiversity net gain can be met. The policy should include public open space between new and existing housing and a wildlife corridor along the western edge to link Lavender Hall Park and open countryside to the south-east. It should also address the WMCA requirement to plant one tree per resident, or 11,500 trees for Balsall Common requiring 10ha of land, Barratt's Farm provides the best opportunity and planting could screen HS2.

Change suggested by respondent:

The following to be added to Policy BC1 4 i:-

after.... woodland copse planting. "This to provide a minimum 10% net gain in biodiversity and habitat creation; and space for tree planting to meet the requirements of paragraph 38 challenge K; and replacement of trees and habitat lost to HS2."

"A wildlife corridor at least 6.5m wide to be created to run all the way along the western edge of the Barratt's Farm site to connect and act as a "stepping stone" between Lavender hall Park in the north and what remains of the open countryside to the south and east."

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14790

Object

Policy P15 Securing Design Quality**Respondent:** BFNAG**Petition:** 120 petitioners**Summary:**

Carefully controlled phasing of the construction on large allocations is essential to ensure that the concepts of the masterplan are not lost and haphazard piecemeal uncoordinated construction is avoided.

Concept Master Plans are for most residents the most important section in the plan. It is vital that once the plan is made, the concept master plans are adhered to and not amended to suit developer convenience or profit opportunity. No change to concept master plans should be allowed without specific agreement from the borough council, relevant parish council or neighbourhood forum, and established neighbourhood action groups.

A policy should be inserted in the plan to explicitly enforce this.

Change suggested by respondent:

Policy P15: New point 10

"Concept Master Plans as included in Local Development Plan must be adhered to in spirit and in detail throughout development unless changes are specifically agreed by the borough council, relevant parish council/neighbourhood forum, residents' associations and established neighbourhood action groups."

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

10865

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr jasbir bilen**Summary:**

The parking congestion and safety issues in a already every narrow and unsafe road. The inappropriateness of a school right next to the station , a relief road, and HS2 which is already a bottle neck. School is marked in a conversation area for wildlife - there are foxes, owls, newts, frogs, bees polecats etc

The speeding traffic and unsafe environment

Change suggested by respondent:

Keep the school at the same time. No further dwellings required use brown sites

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

15159

Object

Solihull Town Centre & Mature Suburbs

Respondent: Mark Billson

Summary:

Impact on school's, shops bus routes doctors, hospitals - road infrastructure lacking.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15160

Object

Policy BL2 - South of Dog Kennel Lane

Respondent: Mark Billson

Summary:

Impact on school's, shops bus routes doctors, hospitals - road infrastructure lacking.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15161

Object

Policy BL3 - Whitlock's End Farm

Respondent: Mark Billson

Summary:

Impact on school's, shops bus routes doctors, hospitals - road infrastructure lacking.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10679

Object

Policy BL1 - West of Dickens Heath

Respondent: Birchy Close Residents Association

Summary:

Site BL1 Dickens Heath

I would like to register my objections to the inclusion of part of the above site in the Local Plan, the larger of the two which proposes up to 350 dwellings

My reasons are;

- Increase traffic problems.

The population of Dickens Heath has grown from the original award-winning design of 850 dwellings to 1,757 units today. The proposed new housing would increase this to around 2,100 dwellings. However, the roads and infrastructure have not been designed or improved to accommodate this increase. The vast number of dwellings proposed in the Local Plan Review for the Blythe area, together with the large housing estates given planning permission in the general area in the last few years has caused considerable congestion at peak times. Given the parking problems in the Village centre, the narrow rural roads and historic hedgerows, it will be difficult if not impossible to make all the required road improvements to take any more traffic.

- Accessibility

One of the main design concepts of Dickens Heath was to limit the need for private car use. This meant that all housing was to be within easy walking distance (800 metres) of the centre. The majority of the proposed Site BL1 exceeds this walking distance. The new residents would therefore generally use their own vehicles to reach the retail, educational and social facilities of the existing village where car parking is already a major problem. New footpath links would be necessary to make the development sustainable in terms of walking distances to the Village Centre. Earlier drafts of the plan showed a new footpath through Birchy Close. This will not be deliverable as it is a private road owned by approximately 50 separate freeholders. Also, the plans do not show the junction of Birchy Leasowes/ Dickens Heath Road which lies within the shortest alternative route from the proposed development to the Village. This cannot be improved as ancient woodland and LWS adjoin the narrow highway where there are no footpaths. In addition, as the distance from the proposed site is not within an accepted walking distance, a bus route is proposed by the Council along Birchy Leasowes Lane but buses cannot turn on to Dickens Heath Road safely. Neither can a bus travel to the Village Centre along Tythe Barn Lane, as the access on to Dickens Heath Road is also restricted.

Furthermore, this site is not "highly accessible" as stated in the Sustainability Appraisal. While it would be close to Whitlocks End railway station, the overloaded rail service at that station gives access to Central Birmingham and to Stratford-upon-Avon. It does not provide a service to Solihull Town Centre or employment locations which are further than 15 minutes distance, for which here is only a slow and indirect bus service, and there would be no public transport to the 'UK Central' location east of the M42 Junction 6. There would be no direct access from Site BL1 to the services and facilities in Dickens Heath village itself, as there would be no direct road or cycleway to the village centre. Cycle and pedestrian access to the village centre was a core principle of the design for Dickens Heath.

- Impact on natural environment

This is a high performing Green Belt site. There are more Local Wildlife Sites surrounding it than any other of the proposed allocations with protected species, ancient woodlands and hedgerows. Also, the land is liable to flooding as the sub-soil is deep boulder clay that does not allow adequate percolation.

- Local 'overload'

The Plan proposes to locate approximately 39% of all proposed new housing in the Borough to South Shirley/Blythe Ward. This is an inordinate amount compared with other communities so does not contribute to geographical distribution. I think that this will place an excessive burden on such a small area given the nature of the roads, traffic levels, the flood risks and the rural environment

Change suggested by respondent:

Site BL1 Dickens Heath

I would like to register my objections to the inclusion of part of the above site in the Local Plan, the larger of the two which proposes up to 350 dwellings

My reasons are;

- Increase traffic problems.

The population of Dickens Heath has grown from the original award-winning design of 850 dwellings to 1,757 units today. The proposed new housing would increase this to around 2,100 dwellings. However, the roads and infrastructure have not been designed or improved to accommodate this increase. The vast number of dwellings proposed in the Local Plan Review for the Blythe area, together with the large housing estates given planning permission in the general area in the last few years has caused considerable congestion at peak times. Given the parking problems in the Village centre, the narrow rural roads and historic hedgerows, it will be difficult if not impossible to make all the required road improvements to take any more traffic.

- Accessibility

One of the main design concepts of Dickens Heath was to limit the need for private car use. This meant that all housing was to be within easy walking distance (800 metres) of the centre. The majority of the proposed Site BL1 exceeds this walking distance. The new residents would therefore generally use their own vehicles to reach the retail, educational and social facilities of the existing village where car parking is already a major problem. New footpath links would be necessary to make the development sustainable in terms of walking distances to the Village Centre. Earlier drafts of the plan showed a new footpath through Birchy Close. This will not be deliverable as it is a private road owned by approximately 50 separate freeholders. Also, the plans do not show the junction of Birchy Leasowes/ Dickens Heath Road which lies within the shortest alternative route from the proposed development to the Village. This cannot be improved as ancient woodland and LWS adjoin the narrow highway where there are no footpaths. In addition, as the distance from the proposed site is not within an accepted walking distance, a bus route is proposed by the Council along Birchy Leasowes Lane but buses cannot turn on to Dickens Heath Road safely. Neither can a bus travel to the Village Centre along Tythe Barn Lane, as the access on to Dickens Heath Road is also restricted.

Furthermore, this site is not "highly accessible" as stated in the Sustainability Appraisal. While it would be close to Whitlocks End railway station, the overloaded rail service at that station gives access to Central Birmingham and to Stratford-upon-Avon. It does not provide a service to Solihull Town Centre or employment locations which are further than 15 minutes distance, for which here is only a slow and indirect bus service, and there would be no public transport to the 'UK Central' location east of the M42 Junction 6. There would be no direct access from Site BL1 to the services and facilities in Dickens Heath village itself, as there would be no direct road or cycleway to the village centre. Cycle and pedestrian access to the village centre was a core principle of the design for Dickens Heath.

- Impact on natural environment

This is a high performing Green Belt site. There are more Local Wildlife Sites surrounding it than any other of the proposed allocations with protected species, ancient woodlands and hedgerows. Also, the land is liable to flooding as the sub-soil is deep boulder clay that does not allow adequate percolation.

- Local 'overload'

The Plan proposes to locate approximately 39% of all proposed new housing in the Borough to South Shirley/Blythe Ward. This is an inordinate amount compared with other communities so does not contribute to geographical distribution. I think that this will place an excessive burden on such a small area given the nature of the roads, traffic levels, the flood risks and the rural environment

P Brandum

17 Birchy Close

B90 1QL

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

13771

Object

Policy P1 UK Central Solihull Hub Area

Respondent: Birmingham Airport Ltd

Summary:

Birmingham Airport are supportive of the Local Plan and concur with the exceptional circumstances outlined in Policy P1 for releasing land from the Green Belt. However it is considered that minor amendments should be made to the wording of planning policies P1 and UK2 to help deliver a sound Local Plan.

Policy P1 should be amended to include reference to development for Airport related uses proposed by Birmingham Airport only and the development of urban mobility. This ensures that the future of a key economic asset is safeguarded.

Reference should also be made to West Car Park, which may be required to provide additional capacity for Airport related development beyond the 15-year horizon outlined within the Airport Master Plan. The Local Plan is currently silent on its intentions for this site.

Change suggested by respondent:

Policy P1 should be amended to include reference to development for Airport related uses proposed by Birmingham Airport only and the development of urban mobility. This ensures that the future of a key economic asset is safeguarded.

Reference should also be made to West Car Park, which may be required to provide additional capacity for Airport related development beyond the 15-year horizon outlined within the Airport Master Plan. The Local Plan is currently silent on its intentions for this site.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments:

13773

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Birmingham Airport Ltd**Summary:**

In line with the Local Plan soundness criteria, in order to ensure that the Local Plan is fully justified the policy should provide more clarity on how the Masterplan will be developed. This includes guidance on significant stakeholder and landowner engagement and how such engagement will be recorded and addressed.

This should be included in new clauses to the policy and in the justification.

It is recommended that the following clauses should be added to Policy UK2:

“6. The concept Masterplan document should be submitted alongside evidence of meaningful engagement with key stakeholders, landowners and interested parties.

7. The concept Masterplan should not prejudice Birmingham Airport’s ability to achieve it’s sustainable growth aspirations and serve the region as a key economic asset.”

Change suggested by respondent:

It is recommended that the following clauses should be added to Policy UK2:

“6. The concept Masterplan document should be submitted alongside evidence of meaningful engagement with key stakeholders, landowners and interested parties.

7. The concept Masterplan should not prejudice Birmingham Airport’s ability to achieve it’s sustainable growth aspirations and serve the region as a key economic asset.”

Further justification should be included in the policy to provide more clarity on how the Masterplan will be developed. This includes guidance on significant stakeholder and landowner engagement and how such engagement will be recorded and addressed.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13774

Object

Sustainable Economic Growth

Respondent: Birmingham Airport Ltd

Summary:

As a statutory consultee Birmingham Airport is consulted on applications close to the airport boundary which may impact on aerodrome safeguarding. However, the process is often time consuming and the applicant often has very little knowledge of the safeguarding process, what it might entail and crucially, how it might impact on timescales for determination of planning applications

It is recommended that a new policy is added to the Local Plan, which deals specifically with Aerodrome Safeguarding and encourages pre consultation with Birmingham Airport. Prior consultation will benefit SMBC in meeting it's statutory determination periods for planning applications. This will provide applicants with knowledge of the safeguarding process.

This should take account of all elements of the safeguarding assessment which is undertaken to identify potential hazards to the Airport operation such as the impact of construction, communication navigation and surveillance, wildlife, lighting, drones, and 5G technology. Specifically in relation to 5G planning applications should include an assessment to demonstrate how there would be no harmful impact on Birmingham Airport's protected Radar system, as a result of any proposed development involving 5G technology

Change suggested by respondent:

It is recommended that a new policy is added to the Local Plan, which deals specifically with Aerodrome Safeguarding and encourages pre consultation with Birmingham Airport. Prior consultation will benefit SMBC in meeting it's statutory determination periods for planning applications. This will provide applicants with knowledge of the safeguarding process.

This should take account of all elements of the safeguarding assessment which is undertaken to identify potential hazards to the Airport operation such as the impact of construction, communication navigation and surveillance, wildlife, lighting, drones, and 5G technology. Specifically in relation to 5G planning applications should include an assessment to demonstrate how there would be no harmful impact on Birmingham Airport's protected Radar system, as a result of any proposed development involving 5G technology

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14635

Object

Policy P5 – Provision of Land for Housing**Respondent:** Birmingham City Council**Summary:**

Paragraph 228

BDP establishes BCC's unmet need of 37,900. Latest HMA position statement indicates unmet need to 2031 is 2,597.

Situation beyond 2031 is currently emerging, but envisaged shortfalls will continue beyond 2031, with the BC evidencing a shortfall of 29,260 dwellings between 2019 and 2038 through its 2019 Urban Capacity Review.

Welcomes contribution of 2,105, but unclear why only this level. Reference is made to the SA that doesn't identify any further significant effects of accommodating 3k compared with 2k (above LHN).

They believe that there is scope to maximise contribution without compromising sustainability, but potential to clearly justify why not more remains.

Given other emerging contributions from elsewhere in the HMA, Solihull's figure is disappointing, especially given the location close to where the need arises thus being more sustainable.

SMBC needs to commit to an early review, possibly triggered by adoption of the BC plan or progress in reviewing the Birmingham plan - to the point where any housing shortfalls are fully identified and established.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14640

Support

Policy P5 – Provision of Land for Housing**Respondent:** Birmingham City Council**Summary:**

Paragraph 241

The Submission Plan helpfully provides indicative masterplans for all of the proposed development allocations to indicate the levels of housing growth for each one. These show that, although gross density levels appear low, net density levels are in line with those recommended in the West Midlands Strategic Housing Study to promote additional growth. However, given that the masterplans provided are indicative, the Submission Plan should specify that the housing figures indicated for each site are therefore minima.

Change suggested by respondent:

The Submission Plan should specify that the housing figures indicated for each site are therefore minima.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14641

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Birmingham City Council**Summary:**

The City Council welcomes the proposed approach taken within the Draft Submission Plan with regard to the UK Central Solihull Hub. As a key stakeholder in the development of the Hub and its strategic national importance, the City Council support the approach being taken particularly in relation to land at Arden Cross and at the NEC and the promotion of the site for high quality, high density mixed use development

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14516

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Wendy Blackburn**Summary:**

AGAINST the proposed move of the current HWRC and Moat Lane Depo to site 12

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14117

Object

Policy P5 – Provision of Land for Housing**Respondent:** John Blackhall**Summary:**

Suggests and sets out that housing densities are not aligned with those stated in the KDBH Neighbourhood Plan.

Change suggested by respondent:

Align housing densities in concepts document to approved KDBH NP.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10633

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Gemma Blanco**Summary:**

Allocating 31% of housing to Balsall Common will erode the rural fringe and encroach on the Meriden Gap. 1,100 of the 1,600 houses are on greenfield land contrary to Government advice, which is non renewable unlike brownfield land

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10634

Object

Balsall Common**Respondent:** Gemma Blanco**Summary:**

Site BC2 should be removed as it a small development on vital Green Belt land making an insignificant contribution to housing, which contradicts the aim of the NPPF as there are no exceptional circumstances. It would set a precedent encouraging further urban sprawl, will erode natural flood plain causing flooding on surrounding fields, access is unsuitable as Balsall Street East is a heavily congested road with a school which additional traffic would exacerbate especially at peak times, is poorly located for public transport and village centre and would have a significant impact on carbon footprint

Change suggested by respondent:

Delete Site BC2

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14848

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs J Bliss**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11017

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Hampton-in-Arden Society**Summary:**

See representation made by Hampton in Arden Parish Council in respect of site HA2 and SO1.

HA2 - Object to the allocation for 95 dwellings on the grounds that Solihull MBC previously determined that the site was NOT suitable for family housing. There has been no improvements to the local infrastructure or facilities. However, we would support a care facility. We recognise that a self-contained facility, such as a care home/village, could be accommodated without significantly impacting on local facilities.

Change suggested by respondent:

1. Allocate HA2 for a care facility development

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

11018

Object

Policy SO1 - East of Solihull**Respondent:** Hampton-in-Arden Society**Summary:**

SO1 - Object to site being included in the Solihull Local Plan for the following reasons:-

- 1) The proposal cannot be reconciled with SMBC's previously determined position that the site (or components of the site) would impact on the openness of the green belt and would threaten coalescence between settlements.
- 2) The development fails to meet the objective referred to in Challenge E of the Local Plan – 'Protecting key gaps between urban areas and settlements'
- 3) The current infrastructure does not support a development of this size, and current development plans for land on Damson Parkway in particular, will result in significant traffic issues which have not been truly taken into account.
- 4) No evidence of a Traffic Impact Assessment for the period of the Plan and specifically for the allocated site SO1.
- 5) Para 430 of the Plan states 'The settlements of Catherine de Barnes, Hampton in Arden, Hockley Heath and Meriden are inset from the Green Belt. Whilst Green Belt policies do not apply within these settlements, the Council will take into account their rural setting and special character in considering development proposal.'

We feel that the SO1 proposal directly contradicts this policy.

Change suggested by respondent:

Remove site SO1 from the Plan.

In the event that our request for withdrawal of site SO1 from the Local Plan does not succeed, we suggest that any development within the extended boundary area north of Lugtrout Lane should be ribbon-type development and the quantity of 700 dwellings allocated to the overall site be substantially reduced to minimise the impact of the development of the local environment, and the rural character of Lugtrout Lane and Field Lane.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10758

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mrs Sarah Bloomer**Summary:**

All government/independent studies agree that an allocation of new housing is justified and warranted within this area. It is also clear that:

- (1) recent new housing have contributed little in terms of improvement to local facilities; and
- (2) the long-term viability of quality learning in Arden Academy is unsustainable on the current site, it being long-overdue for re-development but having no means by which to undertake this work. The school currently far too small for the students.

The proposals outlined in the Concept Masterplan therefore represent a balanced, justified, legally compliant and sound basis on which to meet these needs.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14538

Object

Policy BL1 - West of Dickens Heath**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Until the relocation of the sports pitches that enable deliverability of site BL1 it cannot be justified in policy terms. There are significant delays associated with resolving this issue; firstly suitable alternative locations have to be found for the pitches to be relocated to; and secondly, those sports pitches have to be laid out which often takes 2/3 years to set them up because of the need for specialist grass, proper drainage and sub soil preparation for grass laying.

Given the deliverability issues, the site should only be safeguarded for future development, and an alternative site such as Site 192 allocated

Change suggested by respondent:**Either:**

Confirm the relocation of the sports pitches required to make BL1 deliverable

Consider whether a larger area of land around Tidbury Green such as land east of Tilehouse Lane (which is lower performing in Green Belt terms) could be part of the comprehensive strategy to deliver the housing as it does not require the relocation of sports pitches, and safeguard Site BL1 for longer term development

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14539

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Plan has not demonstrated that housing proposed at UKC Hub Area is deliverable within the Plan period, considering likely delays in delivering the HS2 station. There is no evidence of applications for residential development at the NEC, so level of delivery is overambitious. Significant infrastructure requirements including the link to the M42 could involve a significant delay.

Further information on planned trajectory and stages of delivery of housing is not available, so it is unclear how much of the housing will have to be delivered before HS2 is completed.

Challenge the assumed delivery rate proposed by the Council in this location and the provision of circa 20% of the overall dwelling provision in a single location in a high density format which does not accord with the Borough's housing requirement for predominantly family housing.

Change suggested by respondent:

Further information on the planned delivery of the housing and infrastructure related to the site is required to ensure that delivery of the HS2 station does not prejudice the delivery of the 2,740 homes to be delivered up to 2036.

The proposals for circa 20% of the housing target in a single location should be reviewed.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14540

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Policy P4A is ineffective as it does not provide developers with flexibility and the mix of housing should be considered at the application stage in accordance with the ranges in the HEDNA 2020.

The proposed tenure requirement is not supported by the HEDNA which advises that a rigid mix should be avoided.

Shared ownership is a narrow offer of affordable

housing that is not social rented. Intermediate housing is considered to be a more appropriate definition to use.

Affordable Rent is also encouraged by Homes England and should be included in the Policy's list of tenures.

Change suggested by respondent:

Each application for residential development

should be considered on its merits and the type and mix of affordable housing should be discussed with the Council's housing and planning departments at the pre-application stage.

Policy P4A 6 should be amended to include reference to a requirement for social and affordable rent rather than purely social rent. The policy should also be amended to replace "shared ownership" with "intermediate housing" which includes

Shared Ownership, Shared Equity, Discounted Market Housing for Sale etc

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14543

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Policy P4C is ineffective as it does not provide developers with flexibility and the mix of housing should be considered at application stage in accordance with the HEDNA.

The housing mix proposed in the HEDNA provides a range for each dwelling type which reflects the 'latest' evidence. However, many sites are different in character and surroundings and therefore a blanket approach to the unit mix is not considered appropriate or sound.

This 'latest' evidence may not be representative of need when planning applications are submitted in the future. Policy should not provide a fixed dwelling mix and a blanket approach to the size and mix should be avoided.

Policy fails to recognise that housing mix policies may be included in Neighbourhood Plans

Change suggested by respondent:

Remove reference to mix (point 3) from Policy P4C and refer to indicative housing mix ranges in accordance with the HEDNA within the explanatory text. Developers should be 'encouraged' and not 'required' to accord with the mixes.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14544

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Object to requirement for self and custom build plots on each of the development sites over 100 dwellings as threshold and proportion not justified, and goes beyond advice in PPG. Policy has no regard to the potential for negative impacts. The register may provide an indication of the level of interest, but this needs to be analysed further to uncover the specific requirements of respondents and test whether people have the means to acquire the land/ construct their own property or location on a large housing development is suitable.

There are practical issues to consider in providing self and custom building such as the day to day operation of such sites, consideration of potential health and safety issues of having multiple individual construction sites within one development and the subject of a design code.

Change suggested by respondent:

The requirement for allocated sites of 100 units or more to provide 5% of open market dwellings in the form of self or custom build plots should be removed.

Provision of self or custom build plots should be the subject of discussion with those expressing an interest, and once the Council has an understanding of the type and range of sites that are sought allocations (for example in the form of clusters) should be identified and allocated.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14547

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Policy P4E goes beyond PPG without necessary evidence, will result in larger dwellings and lower densities contrary to requirement for efficient use of land. Plan should make most efficient use of Green Belt land as Borough has limited brownfield land and there is a shortfall of housing land across the housing market area.

Policy fails to consider suitability criteria such as vulnerability to flooding, site topography or local demographic requirements.

Requirement for specialist housing or care bed spaces is unconnected to housing strategy and the health and well-being of communities with differing specialist and health requirements. No evidence is provided to justify 0.5ha provision, and care villages will require larger sites.

Change suggested by respondent:

The requirement for all dwellings to be built to Category M4(2) standards should be removed unless evidence can be provided to justify blanket approach. Alternatively, a percentage requirement included that is evidenced based on need to ensure that developments can still make the most efficient use of land.

The criteria listed under Point 5 of Policy P4E should be amended to state "Site specific factors which may make step-free access unsuitable or unviable".

The requirement for sites of 300+ dwellings to deliver specialist housing or care beds paces should be removed and specific sites for specialist and senior living allocated to deliver this specialist provision.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14551

Object

Policy P5 – Provision of Land for Housing**Respondent:** Bloor Homes**Agent:** Savills

Summary:

The proposed number of homes allocated has decreased from the 2019 Draft, whilst 600 dwellings have been added to the windfall category, which does not meet test of a Plan-led approach. Object to reduction in the number of allocated sites and in site capacity for seven of the proposed allocations, which fails to make most efficient use of Green Belt land. Object to 18% of housing provision in one location and all potentially high density living of a type which doesn't meet the needs of most families. Do not consider that 2,740 dwellings will be delivered at the NEC/Arden Cross by 2036, so this figure should be reduced and evidenced. Evidence shows different capacities and timescales, no applications to date for NEC and HS2 likely to delay delivery.

Do not consider that 200 dwellings per annum of windfall dwellings is realistic or an effective way to plan for the future. There is no compelling evidence for a higher rate given Borough's constraints. Rather than relying on windfall provision, the Plan should have identified additional sites.

Proposed contribution to housing market area shortfall is insufficient compared with North Warwickshire's and there is no evidence to justify figure. Does not take account of needs for 2031-36. There should be an agreement between the HMA Authorities and a Statement of Common Ground.

Local housing need should be kept under review given Government White Paper and revised standard methodology.

Should plan for this growth using 2 scenarios and identify additional housing allocations for higher figure if required.

Support flexibility in density policy but the criteria listed under Policy P5 6 should be the same criteria as NPPF paragraph 122. Proposed density at Arden Cross is significant increase on current achieved densities and Plan will need to ensure that the impact of these densities is reflected and considered.

Change suggested by respondent:

UK Central Hub area will not deliver 2,740 dwellings in this plan period, an additional contribution should be made towards the HMA shortfall and the revised standard methodology requirement should be taken into consideration by the Council before submitting the Local Plan for Examination.

Reduction in capacities of some sites and increase in windfall allowance should be reviewed.

Allocate additional housing sites which have performed well against the evidence base criteria and are in sustainable locations.

Amend Point 6 of Policy P5 to accord with the criteria listed in NPPF Paragraph 122 and amend the indicative densities table on page 76 to set out more realistic densities for the UK Central Hub area

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14556

Object

Blythe**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Site 192 Tilehouse Lane Tidbury Green should be allocated for c300 dwellings to meet the increased housing need requirements. Site is in an area identified for and capable of further expansion given its accessibility and sustainability.

In the Council's evidence base site 192:

☒ is located within a lower performing Green Belt parcel;

☒ is located within a Medium / Low landscape parcel;

☒ has 'Medium / High' accessibility;

☒ is a Category 1 site in the Site Assessment Paper as it performs well against the suitability, availability and achievability assessments.

Change suggested by respondent:

Site 192 should be considered as an additional allocation being a high performing site adjacent to the proposed allocation (BL1) land west of Dickens Heath.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14557

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

The requirement for a 30% uplift etc in Policy P9 is over and above the PPG, which limits standards to the equivalent of Level 4 of the Code for Sustainable Homes, and insufficiently justified.

Consideration should be given to the capital cost and land take involved to achieve the 15% of energy from renewables requirement, which is not demonstrated. Sourcing energy from the National Grid can in some cases be more sustainable than small scale renewable energy production as each year they are sourcing more of their energy from renewable sources.

£6,000 is a significant amount of money per dwelling just to meet energy requirements without any of the other requirements being sought in the plan.

Change suggested by respondent:

Amend Policy P9 to 'encourage' development to apply the energy hierarchy to reduce energy demand and minimise carbon dioxide emissions. The policy should state that this will be subject to viability and suitability considerations at the application stage. The requirement to reduce energy demand to over and above Building Regulations Part L should be removed as this does not comply with the PPG.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14560

Object

Policy P10 Natural Environment**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Do not consider that the Council is justified in bringing the "net gain" in biodiversity of at least

10% requirement forward ahead of the Bill being progressed through parliament, and secondary legislation coming into effect.

Support reference to Natural England standing advice in relation to ancient woodland and veteran trees as the most appropriate guidance.

Policy P10 16i references tranquility but does not explain what is meant by "tranquility", and how the impact on tranquility can be effectively measured so is not justified or effective

Change suggested by respondent:

The requirement for a biodiversity net gain of 10% should be removed from this policy and any requirements left to SPD once the Environment Bill is passed and secondary legislation has been brought in.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14561

Object

Policy P15 Securing Design Quality**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Policy P15. Climate change considerations should be a 'fabric first' approach to build i.e. building in such efficiencies to new homes that reduce the call on energy demand in the first place and avoids 'retro fits'.

Generally support the approach to this policy but suggest that amendments are required to 2iv and 7 to make the policy more effective.

Change suggested by respondent:

Point 2 iv of this policy should be amended as follows: "Where possible, make appropriate provision for water management within development, without causing unacceptable harm to retained features, utilising innovative design solutions." The reason for adding "where possible" is to ensure that allowance can be made for site specific constraints such as ground conditions that may be present preventing delivery of SuDS.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14565

Object

Policy P5 – Provision of Land for Housing**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Plan should identify areas of safeguarded land in order to meet longer term development needs beyond the plan period, which should be released from Green Belt now. This is encouraged by the NPPF and would recognise that Green Belt release would otherwise be required to meet housing need in future reviews. This is particularly important given proposed changes to the standard method and the shortfall in the housing market area, especially between 2031-36. Sites should be in lower performing Green Belt parcels, adjacent to sustainable settlements, accessible and be suitable, achievable and deliverable, including Site 192 land east of Tilehouse Lane

Change suggested by respondent:

Plan should identify areas of land that could be released from the Green Belt now and safeguarded for future development should the Council not be able to meet its housing needs or the housing needs of the HMA during the next plan period.

Additional allocations and/or safeguarded ;and should be identified including Site 192 (land east of Tilehouse Lane, Tidbury Green)

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14568

Object

Policy P17A Green Belt Compensation**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Policy P17A should set out Green Belt compensation projects which can be paid for through CIL as the NPPF does not specifically state that Green Belt compensation has to be sought through S106 contributions. This could enable local communities to identify projects that they would like compensation to fund.

Where Green Belt compensation cannot be provided effectively on site or could significantly reduce the net developable area of the proposed allocation, the Council should have an effective strategy in place that enables off site contributions to be made to Green Belt mitigation in other locations.

A formula or calculation should be provided to determine the level of contribution that may be provided to allow developers to plan for this on top of other contributions / requirements.

Change suggested by respondent:

Policy P17A should be amended to refer to the use of CIL as well as S106 agreements to secure Green Belt compensation. Confirmation is sought as to the level of compensation that will be requested for sites removed from the Green Belt.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14570

Object

Policy P18 Health and Wellbeing**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Object to the requirement at Policy P18 2vii for all new development to deliver new and improved health services. This is not justified or effective due to requirement being placed on all development sites without site specific consideration.

New health facilities should not be a blanket requirement on all new developments and should be considered on a site by site

basis. Where improvements are needed in health services or facilities, but a new building or facility is not required, then financial contributions could be sought to improve existing facilities.

Change suggested by respondent:

Policy P18 should be amended to allow for financial contributions where improvements are identified as the necessary mitigation to make development acceptable in planning terms.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14572

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Bloor Homes**Agent:** Savills**Summary:**

Object to the requirement in Policy P20 point 10 that new development should look to accommodate the needs of existing population. Although it is likely that the existing population will use any open space provided, it should be recognised that any contribution or enhancement to be agreed through a section 106 agreement should be directly related to the development and take account of the tests of Regulation 122 of The Community Infrastructure Levy Regulations (2010) and NPPF paragraph 54 and 56. In essence new development should only seek to mitigate the impacts arising from the development and not resolve existing deficiencies.

Change suggested by respondent:

Point 10 of Policy P20 should be amended to remove the reference to providing for the open space needs of the existing population.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10823

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Gary Blyth**Summary:**

My representation is for the BL2 and BL3 sites proposed in the plan.

The average sale price for these houses will exceed the average salary in Solihull makes the purchase of these houses will be out of reach of most local people, meaning more "second homes" being owned.

The proposed sites of BL2 & BL3 will mean around 3,000 extra cars being on the already severely clogged road system around these sites.

There are also no proposals in the plan to improve any existing infrastructure (Roads/Schools/Healthcare) to support the influx of more people in the Shirley area.

Change suggested by respondent:

The consultation period for this plan is only 6 weeks and is far less than other consultation in the West Midlands. More time should be allowed to properly scrutinize the plan particularly as most of the updates to the plan have been in the last 5-6 weeks. By only allowing 6 weeks is suggesting its being rushed through before the public have a chance to digest what is happening to the borough and green belt is built on.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

15188

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Gary Blyth**Summary:**

My representation is for the BL2 and BL3 sites proposed in the plan.

The average sale price for these houses will exceed the average salary in Solihull makes the purchase of these houses will be out of reach of most local people, meaning more "second homes" being owned.

The proposed sites of BL2 & BL3 will mean around 3,000 extra cars being on the already severely clogged road system around these sites.

There are also no proposals in the plan to improve any existing infrastructure (Roads/Schools/Healthcare) to support the influx of more people in the Shirley area.

Change suggested by respondent:

The consultation period for this plan is only 6 weeks and is far less than other consultation in the West Midlands. More time should be allowed to properly scrutinize the plan particularly as most of the updates to the plan have been in the last 5-6 weeks. By only allowing 6 weeks is suggesting its being rushed through before the public have a chance to digest what is happening to the borough and green belt is built on.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10824

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Gary Blyth**Summary:**

The proposed sites of BL2 and BL3 will not provide "affordable Housing" given that the average salary in Solihull is approximately £30,000 and the house price for these developments is £277,000. Therefore, these houses are 9 times the amount of the average salary for the borough meaning the vast majority of local people will not be able to get mortgages to purchase one thus denying them the chance to get on the housing ladder. This inevitably leads to more affluent people buying these as second homes and renting them out.

Change suggested by respondent:

Ensure these houses cannot be purchased as a second home and priority is given to first-time buyers.

Provide a larger percentage of these houses to be available for rent at a council regulated, rental value that takes into consideration the local average salary.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

15189

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Gary Blyth**Summary:**

The proposed sites of BL2 and BL3 will not provide "affordable Housing" given that the average salary in Solihull is approximately £30,000 and the house price for these developments is £277,000. Therefore, these houses are 9 times the amount of the average salary for the borough meaning the vast majority of local people will not be able to get mortgages to purchase one thus denying them the chance to get on the housing ladder. This inevitably leads to more affluent people buying these as second homes and renting them out.

Change suggested by respondent:

Ensure these houses cannot be purchased as a second home and priority is given to first-time buyers.
Provide a larger percentage of these houses to be available for rent at a council regulated, rental value that takes into consideration the local average salary.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

14581

Support

Blythe**Respondent:** Helen Blyth**Summary:**

Dickens Heath and Cheswick Green developments have already caused major stresses on our existing infrastructure with the roads unable to cope with capacity.
NHS services available have been reduced and these sites would cause more pressure.
Once the fields have been built on there is no going back.

Change suggested by respondent:

High Street will have a significant number of empty units as a result of many companies going into administration- these must be potential housing development opportunities.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10713

Support

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr B Bohanna**Summary:**

Good idea but needs , housing to dense

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10714

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr B Bohanna**Summary:**

Great plan we need a school that is safe and a new school (Arden) with greater space to protect the pupils and staff are better protected from possible future virus epidemics .

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

11051

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Anne Bond**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14123

Object

Balsall Common**Respondent:** Ken Bone**Summary:**

Missing an opportunity to develop the area based around the windmill to make it a focal point.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14125

Object

Balsall Common**Respondent:** Ken Bone**Summary:**

Needs more emphasis on developing brownfield sites, not green belt.

Suggests more housing should be located at Bickenhill where the new rail interchange will be.

Thinks the by-pass is now just associated with housing rather than its original purpose.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14613

Support

Policy P1A Blythe Valley Business Park**Respondent:** Mrs Diane Booth**Summary:**

Supports Policy P1A but seeks modifications

Change suggested by respondent:

Public transport improvements needed to get as many people to and from with least amount of pollution generated -

New developments designed with off grid energy networks - utilisation of the government green grant - investment in low energy carbon solutions - need for significant retrofitting.

Legally compliant: Yes**Sound:** Yes**Comply with duty:** Yes**Attachments:**

14599

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs linda bosworth**Summary:**

Objects to site BL2;

Doubling the intake size of the school/loss of playing field will lead to a substandard school experience - New developments should have there own junior/infant schooling facilities - Children from Blyth Valley walking/taking bus to school is unreasonable - Worsen flooding in the area - Impact on hospital/doctor appointments - Road network can't cope with increased traffic - poor aesthetic appeal of newer developments.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14597

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jayne Bott**Summary:**

The local road infrastructure cannot handle any further increase in cars users.

Further building detrimental to the Local wildlife sites and woodland.

Losing green areas and sports fields will be detrimental to the children and adults that use these facilities.

Area floods every year.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13854

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** John Boucher**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill. Concerns required net biodiversity gain of 10% can be achieved.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

10703

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Miss Elizabeth Brace**Summary:**

There are some anomalies between the masterplans with regard to access onto Grove Road, Knowle, Site KN2

Change suggested by respondent:

1. With reference to the Site Analysis Plan, Barn End, which is a Grade 2 listed building, is not indicated as such. In addition, major oak and ash trees alongside the development on the Grove Road boundary are not indicated.
2. The Landscape Assessment plan indicates a link between habitats, i.e Local Wildlife Sites. Originally Grove Road was going to be permanently closed to achieve this, but this does not now appear to be indicated.
3. The SMBC Concept Plan indicates two access points on Grove Road, yet the description mentions two. The BDS Concept Plan also indicates two access points, and the southern most access points don't take into consideration lack of visibility, existing trees and height differences between road and development site.
4. The Plans should indicate the retention of the rural character of Grove Road, it's screening from the development, and the treatment of it's junction with the A4141

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

14385

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Katy Brat**Petition:** 2 petitioners**Summary:**

- > Land forms boundary between the built up west midlands and open farmland. Development BL2 comes within 100m of Cheswick Green creating an 'impossibly narrow gap'.
 - > Loss of Viable farmland/pastures
 - > Loss of open rural paths
 - > Increased risk of flooding as a result of development
 - > Creation of noise/light pollution
 - > Destruction of natural habitat
 - > concerns over increased traffic
 - > No need for new school when council are consulting on doubling size of old school to meet the needs of development.
- "Create a city of housing estates in place of fields"

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14442

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Richard Bridge**Summary:**

Wishes for site BC3 to be removed.

The plan has not been positively prepared in that it is not practical to deliver the unmet need of the HMA (2105 units)

The allocation of site BC3 has not been justified.

There are inconsistencies with the NPPF.

Change suggested by respondent:

Remove site BC3

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:** None

10767

Object

Blythe**Respondent:** Mrs Sarah Bridge**Summary:**

The area is completely overdeveloped. I moved with my family to Cheswick Green six years ago as living in a quiet village on the edge of countryside really appealed. My husband and I both commute to Birmingham and Coventry. Since we moved here, Cheswick place and Blythe valley have been built, along with many many other developments in shirley. During all of this time NO improvements have been made to local public transport. The roads have got busier and air pollution has worsened. I'm worried about more flooding in the area.

Change suggested by respondent:

I object to building on green belt land first and foremost. But if any more building is to take place, the council must address infrastructure issues FIRST. Eg GP, hospital and public transport offerings.

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:** None

11061

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Chris Brittain**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14673

Object

Policy BL1 - West of Dickens Heath**Respondent:** Bromsgrove and Redditch District Council**Summary:**

Bromsgrove District Council has concerns about the implications of development sites adjacent to the Councils boundaries in the Blythe Valley area. The particular concern is, the accessibility of Whitlock end station for pedestrians accessing it from these new sites, and the overall capacity and safety of the road junctions in this broad location particularly along Tilehouse lane. Whilst the plan does have policies in place to manage these issues it was felt by BDC for the plan to be sound, that they needed to be strengthened, to that end we have worked with officers at Solihull MBC and Worcestershire CC to agree a set of changes which will allay our concerns.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14821

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs H Brookes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14777

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Dr P and Mrs D Brotherton

Summary:

We are against the proposal: --

1. To build here would strip the lane and many people of the beauty and tranquility the lane affords.
2. Wildlife
3. flooding.
4. It is a narrow, country lane, not built for a massive housing estate. Already, increased traffic comes via Barston from Solihull and along beautiful but narrow and bendy Wootton Lane. This is already a problem now that Park Lane is closed and the A452 crossed blocked. It would be dangerous.
5. There are two sharp bends in Wootton Green Lane, one is a right-angle bend, we have seen collisions here, and it has become ever more dangerous with cars using the lane as a short-cut.
6. The other sharp bend is by our house, and it is sometimes quite dangerous reversing - heaven knows what it would be like with a few more cars, let alone hundreds.

A452 Dual carriage way is one way. This road has previously seen very serious accidents.

7. Access to the proposed site would be very dangerous, the lane is not suitable being a country lane and access from the Kenilworth Road would be treacherous. For years during rush hour there are long queues through Balsall Common, where the bypass made little difference, because many are accessing the huge number of housing estates we already have. Another road plus a supermarket traffic would be utterly chaotic.

8. Lack of amenities in the area to support the uptake in housing here, no shops, commercial, industry to sustain the housing. Lack of public space to support housing.

We hope you will take the time to consider these views.

Yours sincerely,

Dr P and Mrs D Brotherton

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14870

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Dr P and Mrs D Brotherton**Petition:** 2 petitioners**Summary:**

Objects to BC5;
strip the lane of tranquillity and beauty it provides - Impact on Wildlife - Worse impacts of flooding - Lane cannot provide for significant uptake in vehicles - access to the proposed site would be dangerous - lack of amenities to support housing.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10817

Object

Hockley Heath**Respondent:** Mr Phil Brown**Summary:**

The facts related to the Current village and links are not all still true, and have not been reflected in such a way that informs future decision making. The future plans are not detailed to consider the impacts of other developments on this one, such as traffic down School Road as a result of BVP or the impact on Dorridge Station Car Parking. There is no traffic/transport specific detail/plans that will support the development plans, other than high level meaningless words.

Change suggested by respondent:

658 - There is no bus service that links to Birmingham. The Railway station at Dorridge, does link with Birmingham and London, however the Car Park is already full before the morning peak is complete currently, meaning additional future capacity would need to be found, if additional houses are provided locally. this is also true for other developments proposed in the plan. There is no commentary of this need in the plan, and therefore where the funding for it would come from.

661 - The School is already full, how by increasing the size of the village by 17.7% (141 homes) does this not overwhelm it?

663 - The Concept Plan and the Local plan quote different numbers 100 in the concept and 90 in the local plan, in addition the concept plan makes no reference to the additional 51 houses that the local plan seems to "design in" by needlessly removing the Green Belt from the north side of School Road. There is no need to do this, if the intention is not to allow the extra building. Indeed by removing the green belt from that part of the road, this will lead to additional infill building on that side - further eroding the character and attractiveness of the the village, as it become just another terrace of houses without the supporting infrastructure that is required. (existing plans for No 122 School Road are examples of infill building)

664 - The concept plan shows no evidence that there is any consideration for resolving the School Parking problem, indeed it will actually make the problem worse, particularly from a safety aspect as the access road to the new development is virtually opposite the School, and where most of the existing School parking occurs. There seems no control to mandate that the developer builds in the School parking relief capacity, other than local planning applications which at best are ineffective. In addition if the building alongside 84 and behind 84/86&90 is allowed this will further put pressure on the road and the ability to park for Schoolchildren. The impact of children coming from BVP (as it is a

popular & successful school) will also increase the vehicle count at the peak School hours.

665 - This will do nothing. Will the Local Parish council be able to put traffic lights at the junction of School Road/Stratford Road to assist with the flow of vehicle out of School Road?

666 - School Road is already a busy road for Cyclists, which is to be supported. however the road is not suitable for the volume. Beyond Saddlerwell Lane , the road becomes a narrow unlit country lane, and given the speed and volume of traffic now using the road it is only a matter of time before there is a serious accident. There is nothing to describe what enhancements are considered, and how these might be funded, as only road widening would provide safety, but would destroy the character of the road, and be prohibitively expensive. In terms of Walking to the Village Centre, The current pavement is unlit, and currently in a state of disrepair in a number of locations (as the result of the additional building on Ashtons Nursery land). Despite complaints at the time the council have not resolved the issues. It is unclear if the plan would provide a safe walking environment from Saddlerswell Lane to the Village, and who would be expected to fund it.

667 - There are many contradictions in this compensation to loss of Green belt offer. Greenbelt is not just a piece of land that is not built on, it is the home for nature. The continuous hedgerow along School Road, and Saddlerswell Lane provides a route for both birds and Mammals to survive. There is a good population of Hedgehogs living in this area of the road, a Nationally endangered species, that need this style of habitat. Breaking it and replacing it with footpaths, and worse roads is not conducive to the ongoing survival in the area. Equally accessible Open land, be it new parkland or woodland planting, does not support the wild private habitat that the existing wildlife needs. By providing play areas along the route of the canal, will again be disruptive to the water based wildlife. This section of the canal is currently home to a nesting family of Kingfishers, which again are declining and need the seclusion to continue to successfully breed.

668 - I am not convinced that increasing the size of the village by 17.7% on home count is either limited or proportionate.

670 - Again seems to be confusing needs placed on the requirement. market and affordable, and smaller homes for young people and specialist housing for elderly. It is not one thing or the other. The needs are very different and the impact equally very different. With the exception of the latter, all will need to have the capability to have a car for each member of the household, as the limited public transport available is not geared to this sector, who would need to be commuting elsewhere for work (as there is non existing or proposed in the village) There is no mention I have seen of any traffic studies, or traffic plans that is monitoring the use of School Road, to see the impact of this and existing developments around. There has already been and increase ad a result of the Tutnel Road development, the additional houses at Ashtons Nursery, and the increasing use of the road as a result of both the Mount Dairy Farm and BVP development. It is a convenient "Rat Run" route either from these areas to access the A3400, or from Hockley Heath as the shortest route to Shirley, and the larger shops and retail parks. As already stated it is a narrow, unlit country lane. Indeed given the nature of the edges to the road it is often necessary to stop if an oncoming car is approaching in the opposite direction at night to avoid damage to the car from the many pot holes at the edge of the road.

Is a town planning department capable of making the careful balance decisions, with the pressure from developers to build?

671 - Why? - where is the rationale for this other than convenience and the ability to accommodate more building as described as No 49 and No 328, to start. Once it is approved, how many more infilled opportunities will arise, and be legitimised (Example 122 School Road) If the plan for the proposed allocation is to be agreed, then this should be removed to safeguard the remainder of the road for ongoing development.

672 - Not clear what the real number of the allocation is a here it is 90, but the Master Concept plan is 100, so either scope creep is already planned or the documents are wrong. Either way how does this document control the size? The plan does nothing to explain how the highway mitigation will be delivered, or if it will be mandated. If, because of the location of the development access road, the school parking is moved further up the School Road (away from the School) then additional crossings will be required at Tutnel Road to allow the Safety of the children at Morning peak, the afternoon is not so busy. Who will fund this? All of this could be done now if there was real concern for the safety of the children.

674 - It is not clear which part of School Road this plan seeks to "retain the historic landscape", as the look and feel as it is now will be destroyed from the School to Ashford Road if the additional status of green belt is removed from the north side of the road. There is no justification or benefit of doing this, other than to allow the additional building on that side of the road, which is outlined in 671. If that is the "implied" reason, why is it not clearly stated and the numbers included and the rest of the document and the same level of analysis given to the impact of these sites. What conditions as outlined in the Policy HH1 section would be assigned to the developers of those sites, and what then would the impact on the highway mitigation suggested in 672? This plan needs to be joined up to ensure the least worse outcome for the road,

and the village.

A number of the houses on the North side of the road have large land areas, and by removing the Green Belt status will pave the way for windfall developments. The existing proposal for 122 School Road, is an example, where the current proposal is for infill, but that is to allow the existing property to be demolished to allow for an access road to the land at the rear, and then housing opportunity. Maintaining the green belt will allow this type of development to be controlled.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10869

Object

Policy HH1 - Land South of School Road, Hockley Heath

Respondent: Mr Phil Brown

Summary:

The terms within the Policy document are too weak, either the policy is the policy and must be followed, or it is not and therefore has little value. There is little to give the reader any confidence that the document has to be followed or how one might determine if the actions expected in the policy have been delivered.

The Policy needs to provide more clarity and responsibility to make it deliverable and the performance measurable.

Change suggested by respondent:

1. The site allocation is to be read with the Concept Masterplan. Both have different house numbers in, which is the definitive document. Other planned developments are to be considered outside of the scope of this policy - why? I refer to Site 328 and 49.

2. i. - does this mean conserve it as it is, or enhance it to something different? Does it mean improve the towpath surface. Does it imply that the hedgerow os retained - it is not clear, where it is clear in part ii.

2. ii. - How much hedgerow and tree must be retained, would a token number constitute compliance with the policy?.

2. iv. - How far along either School Road or the Canal does this refer? Or is it limited just to the new development - it is not clear

3. i. - What Financial Contribution, made by who for what. I assume there is a contribution for each child currently, if the school is full there is little more support required, so what does this imply and how is it measured in a transparent way.

3. ii. - Highway improvements in the policy are determined as Speed Reduction and Access Improvements. These are not referred to in any other documents, however other documents do make note that the developer should provide a mitigation for congestion around the school (672) why is this not part of the policy?

3. iii. - "Developer Contributions to primary care health services in the vicinity" - What are these, to who and to provide what? There is no Doctors Practice in the village, so does this mean the developer has to contribute towards one, or is this just to support other locations (Dorridge, Cheswick Green or Shirley) How would anyone know it has happened? Again, why would this policy not apply to any other planned development site (328 & 49?) and "appropriate UHB secondary care". Again how would anyone prove this has been delivered. This type of support is ongoing, so I assume is not aimed at the developer - so what does it mean? - just woolly words!

I have had two recent situations where urgent NHS support was required in the locality of Hockley Heath. One where it was thought that my Mother In Law was having a stroke, while out at a Resturaunt. The Ambulance service suggested the wait would be a hour (4 miles from Solihull Hospital). Upon us taking her ourselves to Solihull Hospital, she waited over 4 hours to be seen by a Doctor.

On Friday afternoon (11/12), I was witness to a car accident involving a Cyclist along the route from School Road to Shirley. This time the Ambulance service would not provide a timescale, and it was in excess of 45 minutes before one turned up.

Both of these lead me to believe the services cannot cope with the current volumes today, adding more people to the extremity of the borough, just leaves these new houses, and those existing in Hockley Heath with an inferior service to those living closer to the built up areas, near the Doctors/Hospitals.

3. iv. - What are appropriate measures in this context? There is little point if the village people can get to the limited range of shops by walking or cycling, if there is no wider access to any real retail stores, any formal entertainment venues or any employment opportunities. What are the wider transport connections planned to join to the other locations being promoted by this Local plan, or just to London or Birmingham? Is it therefore accepted that the motor vehicle is to be used for all other journeys, and therefore where is the traffic studies, and where is the commitment to Electric Charging Points, either at the new properties or locally?

3. v. - Pedestrian crossing - there is no mention of this in any other part of the document. Is this to be near the School, and the access road into the development, or at the Saddlerswell Lane end of the development where the pedestrian footpath is shown on the master concept plan? or both? Is this to be provided by the developer? How is this built into the traffic mitigation plans and School congestion plans?

4. i. - How much access is to be provided is not clear, but how does this comply with 2.i. conserving and enhancing of the towpath. The wildlife needs careful consideration here, to ensure that the existing habitat and corridors are not lost - who is providing the control on this balance?

4. ii. - What does this mean? This development will destroy an area of Green Belt, what more is planned? The Greenbelt should be protected, and maintained as it is, It is not just to show unbuilt areas on a map, it is to provide a living for those working the land, and a home for those living on it. (wildlife) It does not need more people traversing it, whether walking, cycling or any other sort of non motorised activity.

5. Who is the custodian of the policy?, who will be able to defend and police the expectations it places on the allocation? Also when the other allocations 328 and 49 become reality, will the same policies be applied, and how will the people of Hockley Heath see transparent delivery of the Policy principles. If this was an Industrial Company defining its policies, then they would regularly publish, even just to the internal stakeholders, how they are progressing in aligning to the policies.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10752

Object

Blythe**Respondent:** Mr Richard Brown**Summary:**

Cheswick green can not cope with more houses. It will change the dynamic and will no longer be a village which is why we moved here.

Change suggested by respondent:

Scrap building more houses. Build them in more deprived areas where housing is actually needed rather than thinking of profit

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

10694

Object

Foreword**Respondent:** Mrs Helen Bruckshaw**Summary:**

The Forward mentions peoples wellbeing - having so many new homes in Shirley (between Bills Lane and Tanworth Lane) is not taking into consideration the wellbeing of existing or new residents. It is disproportionate for that area to have so many homes -congested roads, pollution, loss of green space etc will have a negative effect on wellbeing.

Change suggested by respondent:

The new properties should be shared out around the borough, it is disproportionate for the size and population of Shirley to have so many new homes.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

15175

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Helen Bruckshaw**Summary:**

The Forward mentions peoples wellbeing - having so many new homes in Shirley (between Bills Lane and Tanworth Lane) is not taking into consideration the wellbeing of existing or new residents. It is disproportionate for that area to have so many homes -congested roads, pollution, loss of green space etc will have a negative effect on wellbeing.

Change suggested by respondent:

The new properties should be shared out around the borough, it is disproportionate for the size and population of Shirley to have so many new homes.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10695

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Mrs Helen Bruckshaw**Summary:**

Shirley High Street - objective to reduce congestion - the plan for so many new homes in Shirley will add to congestion which has already seen a drastic increase following Dickens Heath being built and all the other new developments in Shirley.

Objective regarding public transport - I do not travel to Birmingham or Stratford on the train, despite living close by as the car parks at Shirley & Whitlocks end are full (disabled therefore would need to drive to the station) .

Change suggested by respondent:

Spread the load around the borough - do not allow so many new homes in Shirley.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15176

Object

Blythe**Respondent:** Mrs Helen Bruckshaw**Summary:**

Shirley High Street - objective to reduce congestion - the plan for so many new homes in Shirley will add to congestion which has already seen a drastic increase following Dickens Heath being built and all the other new developments in Shirley.

Objective regarding public transport - I do not travel to Birmingham or Stratford on the train, despite living close by as the car parks at Shirley & Whitlocks end are full (disabled therefore would need to drive to the station) .

Change suggested by respondent:

Spread the load around the borough - do not allow so many new homes in Shirley.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10696

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Mrs Helen Bruckshaw**Summary:**

Shirley:

Addressing safety for all users including improved facilities for pedestrians and cyclists and addressing accident hotspots. - Extra vehicles on already congested roads, will not improve safety.

Support economic recovery by improving the efficiency of the highway network through a range of interventions and technology improvements. - the 'improvements' already made have resulted in roads being more congested not less.

Change suggested by respondent:

Spread the load on new homes over the borough not allowing Shirley to have the lions share on top of the new developments already completed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10697

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Helen Bruckshaw**Summary:**

I can't get on the train now at Whitlocks end station, how will so many extra homes help this problem. The surrounding roads are already congested, how will extra homes help this problem.

Change suggested by respondent:

Spread the load on new homes over the borough not allowing Shirley to have the lions share on top of the new developments already completed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10698

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mrs Helen Bruckshaw**Summary:**

Completely disproportionate for so many homes to be built in this area. The plan is to move traffic to Bills Lane and Haslucks Green Road - these are already very congested, how will moving traffic to these roads help congestion, pollution, road safety etc.

So many people use the fields and paths for exercise, losing this will have a massive/negative effect on wellbeing

Change suggested by respondent:

Spread the load on new homes over the borough not allowing Shirley to have the lions share on top of the new developments already completed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10676

Object

Blythe**Respondent:** Laura Buckley**Summary:**

This plan is not fair for Shirley. We are taking more of the burden for new homes than elsewhere in the borough. This will impact on traffic, pollution, physical and mental health due to the lost of green space and oversubscribed doctors and health services.

Change suggested by respondent:

I propose regeneration in Chelmsley wood making better use of the HS2 interchange site for housing and bringing the Solihull Town Centre masterplan forwarded.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

11063

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Chantal Burden**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

> Infrastructure to support residential development at this scale has not been addressed in an effective or timely manner. A more sympathetic reflection on local residential development, focusing on the needs of the community first, and money second, would encounter less resistance and help establish a relationship of trust between sides

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

14622

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Hilda Burnett**Summary:**

Only comments on modifications (see below)

Change suggested by respondent:

- We would require clarity about the size of the public open space between Cheswick Green and site 12.
- We require assurances that given the large number of houses built in and around Cheswick Green in the last few years the Public open space between our village and Dog Kennel lane will remain.

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

11090

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Daniel Burnip**Summary:**

Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities.

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

13734

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Nikki Burns**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11255

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Lucy Burrell**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill

> Policy BC3 presents potential danger to residents and riders due to extra traffic generated.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14214

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Andrew Burrow**Petition:** 2 petitioners**Summary:**

Agree with Berkswell Parish Councils objection that 3 ecological sites should be linked. Request that Halls wood is also designated as an ecological area.

Change suggested by respondent:

Identify the land marked as Hall's Wood in the submitted plan as of ecological value on the Concept MasterPlan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14215

Support

Balsall Common**Respondent:** Mr Andrew Burrow**Petition:** 2 petitioners**Summary:**

We are writing to support that the land between Old Waste Lane and Waste Lane be ideally retained in Greenbelt or is designated as Local Green Space.

The land is crossed by the Millennium Way a national trail that stretches 100 miles from near Pershore in Worcestershire to Middleton Cheney in Northamptonshire The land also contributes to the Meriden Gap between Balsall Common and Coventry/Burton Green. The gap in the area of Waste Lane is the very narrowest part of the Meriden Gap and requires all the protection that is can get.

We therefore support its retention either within the Green Belt or as Local Green Space.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

14807

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Mr Andrew Burrow**Summary:**

I object to Wooton Green Lane being used as the access road for site BC5 as shown on the Concept masterplan.

The PC case states that Wooton Green Lane is narrow

Change suggested by respondent:

Balsall PC proposes that both entrances to this housing allocation are from the A452/Kenilworth Road

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15172

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Mr Andrew Burrow**Petition:** 2 petitioners**Summary:**

We are writing to support that the land between Old Waste Lane and Waste Lane be ideally retained in Greenbelt or is designated as Local Green Space.

The land is crossed by the Millennium Way a national trail that stretches 100 miles from near Pershore in Worcestershire to Middleton Cheney in Northamptonshire The land also contributes to the Meriden Gap between Balsall Common and Coventry/Burton Green. The gap in the area of Waste Lane is the very narrowest part of the Meriden Gap and requires all the protection that is can get.

We therefore support its retention either within the Green Belt or as Local Green Space.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

14216

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mrs Birgit Burrow**Petition:** 2 petitioners**Summary:**

Agree with Berkswell Parish Councils objection that 3 ecological sites should be linked. Request that Halls wood is also designated as an ecological area.

Change suggested by respondent:

Identify the land marked as Hall's Wood in the submitted plan as of ecological value on the Concept MasterPlan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14217

Support

Balsall Common**Respondent:** Mrs Birgit Burrow**Petition:** 2 petitioners**Summary:**

We are writing to support that the land between Old Waste Lane and Waste Lane be ideally retained in Greenbelt or is designated as Local Green Space.

The land is crossed by the Millennium Way a national trail that stretches 100 miles from near Pershore in Worcestershire to Middleton Cheney in Northamptonshire The land also contributes to the Meriden Gap between Balsall Common and Coventry/Burton Green. The gap in the area of Waste Lane is the very narrowest part of the Meriden Gap and requires all the protection that is can get.

We therefore support its retention either within the Green Belt or as Local Green Space.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

15173

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Mrs Birgit Burrow**Petition:** 2 petitioners**Summary:**

We are writing to support that the land between Old Waste Lane and Waste Lane be ideally retained in Greenbelt or is designated as Local Green Space.

The land is crossed by the Millennium Way a national trail that stretches 100 miles from near Pershore in Worcestershire to Middleton Cheney in Northamptonshire The land also contributes to the Meriden Gap between Balsall Common and Coventry/Burton Green. The gap in the area of Waste Lane is the very narrowest part of the Meriden Gap and requires all the protection that is can get.

We therefore support its retention either within the Green Belt or as Local Green Space.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

10699

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Burton Green Parish Council**Summary:**

The dangers arising from increased traffic using Hob Lane from this and other local developments in Balsall Common have not been taken into account.

Change suggested by respondent:

We strongly urge you to set aside Section 106 funds to improve Hob Lane to prevent serious accidents.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14013

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Sharon Butcher-Johns**Summary:**

- > New school will utilise shared and modern facilities for primary and secondary pupils.
- > Existing building outdated and expensive to maintain. New facilities will provide better sport, leisure and learning facilities that can be used and enjoyed by the wider community.
- > Will displace school traffic from Station Road, reducing traffic congestion and alleviating parking problems.
- > Safer environment travelling through and within the site for pedestrians/cyclists.
- > Allows existing Arden school site to be allocated for a The proposals will provide a mix of market and affordable homes, including smaller homes for young people and specialists, and housing that meets the needs of older people.
- > Help to regenerate Knowle and increase footfall along the high street .
- >

Change suggested by respondent:

I/We are satisfied that Policy KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a Place Based approach that I/we can fully support without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11236

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Catherine Byrne**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14826

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr William Cairns**Summary:**

Barrett's Farm is located at the narrowest point on the Meriden Gap 2km from Coventry boundary (para 515) and should be fully protected.

The SMBC Illustrative Concept Masterplan for BC1 (page 16) shows 4 roundabouts over a distance of only 1.5km through Barrett's Farm, a recipe for holdups and added pollution in a new residential area. In addition, those residents within the noise envelop of HS2 will be expected to cope further disturbance and noise pollution.

Concerned about how the relief road will be funded.

Will have a major impact on the village centre, its

services and facilities. Disappointed that the plan contains no proposals for the centre.

School unlikely to be built in time to meet the demand from new build elsewhere in Balsall Common.

Concern that the delay in HS2 will push back the site's delivery.

Unsound as it fails to recognise or address the lack of POS in Balsall Common and its own policy of a sports hub.

Fractious relationships now do not bode well for a development of 845 homes.

Access point locations inappropriate.

The commitment to enforcing Concept Masterplans needs strengthening

Change suggested by respondent:

Examine the alternatives presented.

Assessment of noise pollution created by the relief road running through Barrett's Farm and onwards along Hall Meadow Road needs to be undertaken

It must be a condition of the plan being approved by the inspector that the section of road from the junction at Waste Lane south to Meer End is completed when the section from Station Road the Waste Lane is built, otherwise it will become a rat run to avoid traffic on the A452 and the village centre will not benefit from the reduction in traffic.

Sources of funding needs to be explained.

The council should examine a by-pass route to the west of Balsall Common, as it would have significantly less impact on residential areas and be freer flowing than that proposed to the east.

Produce outline proposals for village centre improvements.

Bussing primary children to distant schools should not be considered an option.

No housing development or school build until HS2 construction and installation of the railway is completed.

Develop an achievable plan to establish a meaningful park.

All vehicular access when under construction and when completed should be via the relief road.

Concept plans need to have considerable strength and be robust to ensure that not only the main intentions are respected but also the detail observed.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

11098

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Deborah Callaghan**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10709

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Ciara Campbell**Summary:**

Cheswick Green cannot cope with any more developments

A disproportionate number of houses are being built in Cheswick Green compared to the rest of the Borough. Not enough houses are being built on brownfield sites.

Even more problems accessing local services

Strong likelihood of more flooding

Travel, employment and public transport

The environment

National planning policy confirms that Green Belt should be defined by permanent features such as roads, railways or water courses.

Change suggested by respondent:

Not being built

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments: None

14846

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs J Carpenter**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

10982

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mrs Claire Carter**Summary:**

I fully support the proposal for a new school to replace the current Arden site and all the proposals associated with the new school. If Knowle, Dorridge and Bentley Heath are to get additional housing, it is imperative that a new school is provided.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10755

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Martin Carter**Summary:**

All government & independent studies agree that an allocation of new housing is justified and warranted within this area.

It is also clear that:

- (1) recent new housing have contributed little in terms of improvement to local facilities; and
- (2) the long-term viability of quality learning in Arden Academy is unsustainable on the current site, it being long-overdue for re-development but having no means by which to undertake this work.
- (3) proposals align to KDBH NF policies

The proposals outlined in the Concept Masterplan therefore represent a balanced, justified, legally compliant and sound basis on which to meet these needs.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14774

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Stephen Carter**Summary:**

Objects to Policy BL2;

Concerns over school availability when school places are already in high demand - concerns over traffic congestion/speeding on Dog Kennel lane - Lack of privacy due to overlooking/new developments.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14775

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Stephen Carter**Summary:**

Objects to Policy BL2;
Concerns over school availability when school places are already in high demand - concerns over traffic congestion/speeding on Dog Kennel lane - Lack of privacy due to overlooking/new developments.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14483

Object

Policy BL1 - West of Dickens Heath**Respondent:** Rebecca Cartlidge**Summary:**

Objects to Policy BL1;
Flooding roads/gardens - Crime/Antisocial behaviour associated with new developments - complaints about the general change in the village over the years.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14536

Object

Policy BL1 - West of Dickens Heath**Respondent:** Rebecca Cartlidge**Summary:**

I have lived in Dickens Heath for 20 years. I have seen the amount of houses go up after being told no more would - the amount of issues that have risen from all these houses with no sufficient drainage so the roads and gardens flood (the fields that are left can't hold the water so how are more houses going to help?)

I have a horse near the village and since the new developments have been built, countless times now have we been vandalised e.g. broken into, things chucked in the field, people trying to get in the field with our horses (mostly kids because i assume they have nothing better to do), and now EVEN MORE housing is going up.. how is it going to help anything other than the fact a building company gets a big wad of cash. No concern to those who have been here from the start of Dickens Heath, no concern to those who have seen what it used to be like - a rural village surrounded by fields, farmers, livestock etc. But now roads are being ruined and nothing is done, crime rates are going up and nothing is done... see a correlation?

I'm sure if you even read this email you will probably think i'm talking nonsense. It used to be lovely and quiet and what is it now? You get jobs walking around doing drug deals outside your house, you get people going the wrong way around the roundabouts, people speeding down country lanes when there are working farms moving cattle, constant complaints about the state of the roads and about the flooding... but you don't choose to address the problems of those who have lived here from the start, you choose to listen to those who could move here and give you money.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15082

Object

Policy BL1 - West of Dickens Heath**Respondent:** Rebecca Cartlidge**Summary:**

Will add to flooding risk.

Will ruin wildlife habitats

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15223

Object

Policy S01 - East of Solihull**Respondent:** Catesby Estates - Hampton Lane**Agent:** Terence O'Rourke**Summary:**

Site S01 is supported in principle, but has complex land ownership and assembly issues. Given the overreliance on large sites, there is a need to select reserve sites. This area could provide additional housing as lower performing Green Belt with defensible boundaries and attached to settlement edge close to town centre.

Land south of Hampton Lane Solihull (Site 20) performs similarly to Site S01 and should be identified as a reserve site. Site is bounded by ribbon development and forms a logical defensible extension to the urban area close to Solihull town centre. It is accessible, could provide an opportunity to address traffic congestion at Hampton Lane/Bypass, is urban in character with no significant constraints, is well-contained with defensible Green Belt boundaries to south and east and accords with the Plan's Spatial Strategy. A Vision Framework is submitted

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

15222

Object

Meriden**Respondent:** Catesby Estates - Meriden**Agent:** Terence O'Rourke**Summary:**

Meriden well-served by facilities with ability for expansion without impacting on Green Belt, is identified for expansion and performs well in Sustainability Appraisal. Site ME1 is supported in principle. The village can provide more housing which could be identified as a reserve site.

Site 144 north of Fillongley Road is defined by the A45 to north, east and west and is well-related to village and should be identified as a reserve site. There are no significant constraints and green infrastructure can be enhanced. Would provide land for expansion of the primary school facilities including sports pitch and pickup/drop off area. A Vision Framework is submitted. Site performs well other than for Purpose 1 of the Green Belt Assessment, where contribution should be lower than for the wider refined parcel 25, as it is well-contained with a clear Green Belt boundary

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14450

Support

Spatial Strategy**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The Spatial Strategy, which seeks to focus significant development in locations that are, or can be made, accessible and sustainable is achievable. Given the Borough's characteristics, development on the edge of the urban area or in accessible locations within/on the edge of rural settlements is supported.

HS2 will ensure that the Borough and surrounding area are even more well-connected, making urban area of Solihull and its surrounding villages even more sustainable. The challenge of maximising the economic and social benefits and opportunities of High Speed 2 is key to the Borough's success, alongside protection of natural assets and rural setting whilst safeguarding high performing Green Belt areas

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14468

Object

Spatial Strategy**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

Consideration of the Green Belt Assessment is flawed and inconsistently assessed in the Site Selection process. Definition of parcels in the GBA include areas of different character within the same parcel. RP25 includes land north and east of Meriden which perform differently. The area to the north performs less well against Purpose 1 to check unrestricted sprawl as it is confined by A45 to the north, and should be lower performing.

Sites that perform similarly to allocated sites have been dismissed. RP29 and RP31 are similarly moderately performing, but RP29 is assessed as a single site, whereas only small portions of RP31 are assessed, resulting in a very different conclusion

A further review of Sites is required in the context of the overreliance on large sites and housing need.

Change suggested by respondent:

The methodology / site identification contained within the Green Belt Assessment should be reviewed.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14475

Object

Policy P5 – Provision of Land for Housing**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

Paragraph 162 of Introduction re housing land supply is supported in principle, but insufficient provision is made to address needs associated with the UKC Hub or the housing market area shortfall. Projections should be continually monitored. Plan dependent on a small number of large allocations requiring significant infrastructure being developed as and when anticipated, and may not occur. Reserve sites in locations that are, or can be made, accessible and sustainable, which are located on the edge of the urban area or within rural settlements with the greatest range of services must be identified should any allocations not deliver sufficient housing numbers

Change suggested by respondent:

In order to ensure a supply for fifteen years and a rolling five-year supply of housing land reserve sites should be identified should any allocations not deliver sufficient housing numbers or sufficient properties when anticipated.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14478

Object

Providing Homes for All**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The mix of social rented and shared ownership housing proposed in Policy P4A 7 and 8 differs from that proposed in the referendum version of the Balsall Parish NDP and the HEDNA, which propose ranges of unit size. The policy contains factors influencing provision which suggest that a range is more pragmatic, and that the approach is overly prescriptive and inflexible.

The mix range should be provided in a table contained within the supporting text which accompanies the policy, as opposed to the policy wording itself.

Change suggested by respondent:

The specific set percentage figures should be removed and a range of unit sizes, as justified and evidenced within the HEDNA [Paragraph 8.30] provided instead within a table contained in the explanatory text which accompanies Policy P4A.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14482

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The market dwelling mix detailed within Policy P4C 3 differs from the range in the referendum version of the Balsall Parish NDP and the HEDNA. The policy notes the factors that influence housing mix. A specific mix is counterintuitive and contradictory to other Plan policies, such as design. Paragraphs 186 – 190 state that a more flexible approach should be taken in relation to the policy, reflecting the findings of the HEDNA.

The mix range should be provided within a table contained within the supporting text which accompanies the policy, as opposed to the policy wording itself.

Change suggested by respondent:

The provision of a specific set percentage figures should be removed from Policy P4C and a range of unit sizes, as justified and evidenced within the HEDNA [Paragraph 8.32] provided instead within a table contained in the explanatory text which accompanies the policy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14488

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The requirement for self and custom build plots in Policy P4D is not supported by the HEDNA, unduly onerous and not justified. SMBC should provide a robust assessment of demand including an assessment and review of data held on the Council's Register, which should be supported by additional data from secondary sources to understand and consider future need for this type of housing. There is no evidence for the threshold at which provision is required or the percentage requirement, or clarity on the position if plots are unsold. This restrictive burden is contrary to national guidance which will lead to viability, delivery and management issues and similar proposals have been removed at examinations

Change suggested by respondent:

Policy P4D should either be deleted from the Local Plan in full or amended to remove the requirement for developers of allocated sites to contribute to self and custom build housing.

Should the self and custom housebuilding policy remain, it should be amended so as to be supportive and encourage such forms of building. The provision of such plots on allocated development sites should only be at the discretion of the developer and based on the market requirements at the time.

If the Council believe the policy is justified it is requested that the policy be amended to allow for either self-build or custom build plots, thus partly reducing the onerous nature of the policy whilst allowing developers to adequately plan and manage sites.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14494

Object

Policy P5 – Provision of Land for Housing**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The identification of housing need greater than the Standard Methodology minimum in Policy P5 is supported in principle, but given the need to significantly boost housing, economic growth at the UKC Hub and the housing market area need growth significantly exceeded past trends is required. There is overreliance on large complex sites with significant infrastructure needs, many in close proximity, a high windfall rate with significant Green Belt and little brownfield land, and significant growth at the UKC Hub and town centres.

Policy does not allow for contingency or flexibility so SMBC should identify reserve housing sites for release if monitoring indicates that they are required for 5 year land supply or shortfall outside the Borough

Change suggested by respondent:

Plan should identify additional reserve housing sites and the mechanisms for their release, should they be required, through an appropriately worded additional policy.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14495

Object

Policy P5 – Provision of Land for Housing**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

The housing allocations in paragraph 226 should have an approximate capacity rather than a fixed maximum to provide flexibility.

Change suggested by respondent:

The references to housing requirements in the site allocations should be expressed as 'approximate' to ensure that the policy isn't overly prescriptive, with the details to be determined as part of the consideration of the planning applications.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14496

Object

Policy P5 – Provision of Land for Housing**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

No reference is made under Policy P5 or within its supporting text as to the status of the Concept Masterplans referenced in paragraph 242, which are contained within a supplementary document.

Change suggested by respondent:

In order for the associated policy (Policy P5) to be effective the status of the Concept Masterplans should be made more explicit, as they are within the policies associated with each allocation.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14497

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Catesby Estates Limited**Agent:** Terence O'Rourke**Summary:**

Site BC3 is, in principle, supported, but should not be overly prescriptive. Should be allocated for 'approximately' 120 dwellings as opposed to a set figure to provide flexibility. Policy BC3 2vi requirement for self and custom build plots is onerous and unjustified.

Site performs poorly in the Green Belt Assessment and has defined boundaries so removal from Green Belt is justified.

Site is accessible to village centre and schools, with good connectivity with Meeting House Lane for walking/cycling.

A full assessment of the extent of harm to the setting and significance of Berkswell Windmill, and whether it can be acceptably mitigated should be undertaken at the time of a planning application in accordance with the NPPF tests. The reduction in area/capacity from the Supplementary Consultation is supported.

Whilst the ecological evidence contains errors and the existence of 'areas with significant habitat value' is disputed, the north-south and east-west ecological corridors are accepted and any potential constraints can be mitigated

Change suggested by respondent:

Policy BC3 1 should be amended so that the allocation is for 'approximately' 120 dwellings as opposed to a set figure which wouldn't allow the required flexibility.

Policy BC3 2 (vi) requirement to provide Self and Custom Build Plots should be removed.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14811

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs C Cavigan**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14594

Object

Policy BL1 - West of Dickens Heath**Respondent:** Blake Chadwick**Summary:**

Loss of pitches will affect our children.

The site is surrounded by Local Wildlife Sites and Ancient Woodland and its loss would be detrimental to wildlife.

The rural road network cannot take further development and is already overloaded.

These fields flood every winter.

Some of the mitigation measures included in the Plan are not achievable.

Character will be adversely affected.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10768

Object

Blythe**Respondent:** Mr Matthew Chan**Summary:**

The area is prone to flooding and this plan will make it severely worse, the area cannot handle a 400% increase in homes. The plans are being drawn up without full thought being given to other matters. E.g. GP, school and road capacity. Public transport is limited, calls to provide more have been ignored in times past. It is not viable, and will create problems that will be near impossible to fix. The plan is not sound, and the council have not complied with its duty to co-operate; they have failed to "engage constructively, actively and on an ongoing basis"

Change suggested by respondent:

Plans to build on what little remaining green belt between Cheswick Green and the edge of Dog Kennel Lane need to be pulled entirely. There will be other better-suited sites, away from a river and a flood-prone area to build on. The area has already expanded substantially with the new housing development (Bloor Homes' Cheswick Place), there is only so much the area, its infrastructure and its amenities can handle.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14512

Object

Policy BL1 - West of Dickens Heath**Respondent:** Phillippa Cheong**Summary:**

Objects to Policy BL1;

Already flooding on roads/gardens - Concerns over loss of habitat/wildlife currently located in proposed site - Village at capacity regarding parking/doctors/traffic - Birchy Leasowes Lane in particular is too narrow with little prospect of widening due to drainage ditches located on both sides - BL1 site is on greenbelt land - land is not very accessible and the nearest primary school (not at full capacity) is driving distance (not walking) - Already housing for elderly/those wishing to downsize being constructed in Shirley - Need for improved public transport - Sports facilities should not moved

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14010

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Leslie Cheriton**Petition:** 2 petitioners**Summary:**

> New building for Arden school urgently needed. Station road pavement very narrow for students (accident waiting to happen).

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11234

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Karin Chessell**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13780

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Phil Chessell**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10739

Object

Blythe**Respondent:** Cheswick Green Parish Council

Summary:

The Parish Council has submitted a detailed objection to the release of site BL2 from the Green Belt for residential development and a school/nursery.

It is clear from the publication draft of the Local Plan that the objections have been dismissed by the Council and, there is no new evidence that has been presented to justify the removal of land from the Green Belt that the Council's Green Belt Assessment 2016 rates as highly performing.

The land is rated as performing highly for the purpose of preventing towns and settlements from merging into one another.

The Council rate the land for the purposes of its release from the Green Belt as moderately performing despite the findings of the Green Belt Assessment 2016.

There is an existing and permanent Green Belt formed by Dog Kennel Lane. The Council propose to bypass this existing feature and create a new boundary. It is suggested that an estate road would fulfil this purpose.

Paragraph 139 indent F of the NPPF confirms that Green Belt boundaries should be defined by recognisable features that are likely to be permanent.

The policy does not specifically state that a feature must be existing but, we are extremely concerned that the creation of a boundary as proposed by the Council does not have the permanence of the existing boundary and could be open to amendment and movement as time goes by.

The release of the site from the Green Belt is not in accordance with national planning policy and 13 cannot therefore be justified.

The Council has not addressed the issues that have been previously raised concerning flood risk and flood mitigation measures.

The evidence used by the Council acknowledges that there is a flood risk in the area but provides no clarification of what type of mitigation will be used.

Policy BL2 uses the phrase that flood alleviation will be a likely requirement of development proposals rather than it being essential.

There is a complete reliance on the planning application process to determine the type and extent of any flood alleviation measures.

The land will have been released from the Green Belt by that point placing a presumption in favour of development with no surety that appropriate flood mitigation will be provided.

The Parish Council has previously raised concerns over the traffic levels and congestion within the area at the present time. The original objection includes details of the existing situation including photographs of traffic congestion in the area.

Policy BL2 proposes up to 1000 homes and a school/nursery that will add to the existing traffic levels in the area.

Yet, the Council has not produced a Transport Study for the site as has been done for development in Knowle and Balsall Common.

The Council has not therefore provided justification that the development of the site will be acceptable in traffic and infrastructure terms.

The site is also some distance from existing and emerging employment areas placing more emphasis on the use of unsustainable transport options in conflict with policies P7 and P8 of the publication draft Local Plan.

This also brings into question the distribution of development in the area which has been unfairly stacked towards the Blythe area.

Policy BL2 and the 2020 Concept Master Plan for the site do not provide the required level of surety that local heritage assets will be properly protected.

We have fully considered policy BL2 of the plan and the evidence used to support it.

The release of the land from the Green Belt for development is not justified and does not comply with NPPF policy.

Policy BL2 is therefore not sound and we request that it is removed from the emerging Local Plan.

Change suggested by respondent:

Please refer to attached statement. Land allocation proposed under policy BL2 should be omitted from the Local Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14888

Object

Policy BL2 - South of Dog Kennel Lane

Respondent: Cheswick Green Parish Council

Summary:

Object to Site BL2 on number of grounds (see reps):

Green Belt:

- GB boundary not comply with NPPF (Para. 139 f)
- Disagree that land in moderately performing area of Green Belt – 2016 GBA states in Appendix G that area in higher performing Green Belt land, especially in preventing settlements merging into one another.
- No justification in text for demotion
- Dog Kennel Lane is an established & permanent boundary feature providing distinct separation between built-up area and Green Belt.
- Updated evidence too vague.
- BL2 lacks permanent features required to define a Green Belt boundary, contrary to Para. 600 in Plan.
- Introduction of estate road as boundary feature (Para. 609) risks further development south of the road, and GB encroachment Proposed.
- Rest of landholdings could become target for further development.
- Gap to east of BL2 and Creynolds Lane at risk of infill in future.

Change suggested by respondent:

Delete Site BL2 from Plan

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14889

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Object to Site BL2 on number of grounds (see reps):

Flood Risk:

- Policy BL2 and updated evidence give no assurance that development will not worsen the current flooding situation for existing residents in Cheswick Green.
- Policy BL2 3 (ii) only refers to flood alleviation as 'likely' infrastructure requirement, and not properly considered flood risk evidence, which acknowledges flood risk exists and identifies there is a need to address flooding issues. - Should include solutions or recommendations in policy now to ensure that flooding issues will be addressed, beyond simply SUDs.
- Not satisfactory to rely on planning application process as principle of development will have been established then.

Change suggested by respondent:

Delete Site BL2 from plan

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14890

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Please refer to attached statement. Policy is not in accordance with NPPF policy and is not based on clear and robust evidence.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14891

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Object to Site BL2 on number of grounds (see reps):

Traffic:

- CGPC previously raised concerns, and Reg 19 Plan not addressed concerns.
- CGPC have carried out their own survey and provided photos of local traffic congestion.
- 2020 Transportation evidence includes Transport Studies for Knowle and Balsall Common, but not for Site BL2.
- Insufficient evidence on transport issues to make informed decisions at this stage.

Change suggested by respondent:

Delete Site BL2 from plan

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14892

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Object to Site BL2 on number of grounds (see reps):

Heritage and Landscape:

- Issue previously raised and not addressed.
- Updated evidence does not provide necessary clarity to assess how development could affect heritage assets and landscape within the area.
- Policy and Concept Masterplan both have a fall-back position that could allow development harmful to the heritage asset.
- Should be more certainty in the Plan.
- Site also includes an underground Nuclear Monitoring Station. Not listed as a heritage asset, but is an important relic from the cold war period. Structure is in poor condition and at risk of being lost (see photo).

Change suggested by respondent:

Delete Site BL2 from plan

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14893

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Objection to distribution of development:

- Issue raised previously and not addressed.
- Disproportionate development in Blythe.
- BL2 is some distance from national infrastructure projects such as HS2, and regional employers such as JLR. Site relatively close to J4 of M42, but proximity to motorway and displacement from major employment areas are concerning.
- Will increase car journeys, traffic and congestion and be contrary to Policies P7 and P8.

Change suggested by respondent:

Deleted Site BL2 from plan

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14894

Support

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Object to Site BL2 on number of grounds (see reps):

Location of School:

- Question justification of school within Site BL2 as traffic & congestion will be worsened by comings and goings associated with a primary school and nursery.
- Location at edge of site will also have a harmful impact on Green Belt purposes.
- No consideration has been given to possibility of locating school in non-Green Belt area, e.g. Blythe Valley Park.

Change suggested by respondent:

Delete Site BL2 from plan

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14895

Object

Foreword

Respondent: Cheswick Green Parish Council

Summary:

Timing of Consultation:

Council should have held back plan til more certainty in planning system, as Bromsgrove have done.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14896

Object

Foreword

Respondent: Cheswick Green Parish Council

Summary:

Accessibility of consultation:

- Not accessible to residents unaccustomed to online services or without internet access.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14897

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Cheswick Green Parish Council**Summary:**

Cheswick Green Parish Council have objected to Site BL2 at previous consultations.

Regulation 19 version does not address or ease concerns raised.

Clear that CGPC's objections have been dismissed by the Council, and no new evidence has been presented to justify the removal of this land from the Green Belt.

Change suggested by respondent:

Delete Site BL2 from plan

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14002

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Fazle Chowdhury**Summary:**

> Current school buildings and infrastructures are now failing due to age, capacity and spiralling regular maintenances costs.

> A new school will improve services and also increase the school capacity to admit more students and add various services which would be available to the local community.

Change suggested by respondent:

Most of our buildings still running old cables which tend to degrade over time which are hard to reach and replacement will cost a lot. A careful new school design layout would consider that making the whole system future proof including new improved computer server rooms, communication channels/cabinets/rooms etc which will make the whole system scalable and thus reduce long term costs significantly.

Also a greener new school would decrease the total CO2 emission significantly.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11054

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Antigoni Christodoulou**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11229

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Cinnamon Retirement Living Ltd**Agent:** Avison Young

Summary:

The plan, as drafted, will not deliver extra care facilities in accordance with the Council's aspirations. It fails to comply with test c) (effectiveness) of para 45 of the NPPF. See accompanying letter.

C2 uses do not attract the requirement to deliver "affordable housing" under the adopted Plan. The current proposal is that any care related development which counts towards the Council's supply of housing would be liable to deliver affordable housing.

Cinnamon has significant concerns about this approach as a matter of principle. There are two elements to the cost of delivering care: the capital cost of buying land and building care accommodation and secondly the ongoing cost of providing care within that accommodation.

The requirement to deliver "affordable care" places an ongoing financial burden on care operators which has the potential to render the sector unviable. The Council has not provided any information on how affordable care provision would be delivered or what the obligations on the operators of care villages / extra care facilities would be. The requirement to deliver affordable care will provide a significant additional financial burden on care home developers and operators. This will make land in C2 use less valuable than land in C3 use. Developers and landowners will be financially disadvantaged by the delivery of C2 facilities and consequently will attempt to offer the minimum required to satisfy policy.

Cinnamon's development includes ancillary facilities which are used by all residents. These include provision of a restaurant/dining area, café, lounges, hair and beauty salon, wellness centre and a club room for activities to be held in. All of these amenities contribute to creating a community within the care village. This ensures that the facilities go beyond the delivery of accommodation and care. The ancillary facilities deliver very significant health and wellbeing benefits through both engagement in the activities provided and the sense of community created.

The cost providing ancillary community facilities within this type of care model is significant. This cost further widens the gap between the land values generated by C3 (including affordable housing) and C2 (including affordable care and ancillary facilities).

The effect of the above is that Cinnamon and similar operators will be "priced out" of the market for land by C3 developers. In order to have any chance of being financially competitive they will not be able to deliver associated facilities. It will also be very difficult for operators to deliver care, because there will not be space in which to do so.

The Council's current approach will create a "bare minimum" approach to the provision of care facilities, the impact of which will be a significant reduction in the amount of amenity space for residents to enjoy on sites and the exclusion of any ancillary facilities. This would be a retrograde step back to old style "age restricted retirement flats" which had no communal facilities and very little, if any, care. The use of such units is C3. We don't believe the Council intends to create such a situation, but we must point out what is likely to occur.

Cinnamon maintains that this matter can be resolved easily through the allocation of sites specifically for C2 / assisted living uses. Such allocations would remove competition from C3 developers and would provide the financial flexibility needed to deliver exemplar healthcare schemes with associated health and wellbeing benefits. We appreciate that the Council has undertaken to test each scheme against policy on a site by site basis, through viability assessments to see what affordable housing of CIL could be delivered. However, this would be a failure of strategy and a waste of the local authority's time and money when compared with simply allocating sites for C2 use only. Testing each site would slow down the delivery of accommodation with care provision against a background of exponential growth in the need for it. This would jeopardise the policy ambitions the local authority has in encouraging the expansion of provision in this area.

The Wyndley site is a perfect example of a site that could accommodate C2 / assisted living only, hence our request that it be allocated specifically for C2 / assisted living use.

Change suggested by respondent:

The plan should include proposed allocations for sites in C2, extra care use only, including the Wyndley Garden Centre land.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11232

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

Respondent: Cinnamon Retirement Living Ltd

Agent: Avison Young

Summary:

The plan, as drafted, will not deliver extra care facilities in accordance with the Council's aspirations. It fails to comply with test c) (effectiveness) of para 45 of the NPPF.

The emerging local plan includes a general "catch all" policy on the provision of care accommodation on sites delivering over 300 dwellings. It also suggests that some sites could be suitable for care uses.

However, in the absence of any sites that are allocated for C2 / extra care only, landowners / developers will always have to consider the land value generated by C3 housing (including the provision of affordable / social housing) and the land value generated by care development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11211

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Joanne Clare**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13783

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Rebecca Clare**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

>Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities.

Concerned as doctors fails to provide appointments for the current population, the roads are congested, and the infrastructure cannot cope. Amount of housing proposed will make Balsall common unable to function.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13784

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Richard Clare**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13844

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Simon Clare**Summary:**

>Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities.

Concerned as doctors fails to provide appointments for the current population, the roads are congested, and the infrastructure cannot cope. Amount of housing proposed will make Balsall common unable to function.

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13855

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** John Clarke**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13848

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sue Clarke**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14795

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Brenda Clayson**Summary:**

Objects to Policy BL3;

Destruction of local habitat and ecological balance - Shirley South seeing disproportionate level of development - increased flood risk - exponential increase in car use - utility infrastructure cannot cope - Need to relook at Brownfield site available on the high street - impact on healthcare provision -

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14429

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Terry Clayson**Summary:**

Objects to Policy BL2;

Unsustainable - Brownfield sites need to be prioritised - detrimental impact on local/nearby wildlife sites - sites regularly flood leading to increased flood risk by building on them - Shirley is pedestrian/car dependant area proposed development will exponentially increase car use in the area - concerns over utility infrastructure such as gas, water electricity and sewage - Make use of empty retail units/ brownfield site brought on by a change in shopping hazards - detrimental impact on healthcare provision (hospitals/doctors surgeries etc.)

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14404

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Jennifer Clements**Summary:**

This is an objection to the new proposed site on damson pArkway.
It would add more traffic and pollution.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13782

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Rachel Clifford**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14023

Support

Policy S01 - East of Solihull**Respondent:** Caroline Elizabeth Clifton**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14031

Support

Challenges**Respondent:** Caroline Elizabeth Clifton**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14040

Support

Policy S01 - East of Solihull**Respondent:** Caroline Elizabeth Clifton**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

13735

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Nikki Cockerton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10845

Object

Blythe**Respondent:** mr Graham Cockroft**Summary:**

588. The plan makes unsupported claims about public transport improvements.

The sites are not on an existing public transport desire line, and developments of the size proposed will not lead to new or enhanced services.

589. The plan includes no clear proposals to enhance pedestrian or cycling connectivity. It is vital that these are improved, but we should see the proposals, which would be mainly outside the site boundaries.

Change suggested by respondent:

Remove the wording in 588 and 589. Or alter policies BL1 and BL2 to make development conditional upon these sustainable transport improvements being delivered.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10878

Object

Policy P7 Accessibility and Ease of Access**Respondent:** mr Graham Cockroft**Summary:**

P7.2.ii is intended to ensure that residents of new houses have ready access to good public transport.

Some sites, e.g. BL2, are about 1500m long and accessibility will vary greatly over the site.

Reference is made to distance to rail stations - but no similar reference to bus stops. A bus service is of no use to residents who cannot easily and safely access a bus stop.

Change suggested by respondent:

P7.2.ii For major residential development ensure all dwellings (or 85%) have safe access to a bus stop providing high frequency bus services within 400m; and/or 800m of a rail station providing high frequency services.

It is important that all residents have easy access to frequent, reliable, viable and sustainable public transport (bus) services. It cannot be assumed that all future residents could easily walk more than 400m. Thus the distance should be measured between the dwelling and the bus stop, not between arbitrary points on the site and the route of a bus.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10891

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

Not fully compatible with P7.

P7.1. Site is not in one of the most accessible locations. In particular access to the Central Hub area is poor, being the worst of all the larger sites. It would involve driving through Solihull Town Centre, an acknowledged problem, or via A34 and M42, both very congested normal at peak times.

p.7.2.ii. There is no high frequency bus service within a 400m walk of any part of this site.

Change suggested by respondent:

Delete policy BL2.

The site is has poor accessibility to the existing and proposed major employment centres.

There is no high frequency bus service near the site.

Travel to and from the site would be predominantly by car, which would exacerbate existing known congestion problems on A34, M42, and to and through Solihull Town Centre.

This is the wrong location for a major housing site. The site itself would be far too small to justify its own bus service. It is located in the wrong place to benefit from the re-routing of a high frequency bus service.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10895

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

Not fully compatible with P8.

P.8.1.i. The site is located away from existing high frequency public transport services. The main mode of travel to Central Hub, BVP and Solihull Centre will be by private car. This is contrary to the stated (and essential) environmentally sustainable aspirations of the plan.

P.8.2.i,ii. There has been no assessment of the impact of this development on pedestrian safety or traffic and public transport congestion. This site was not taken into account in the Stratford Road Enhancement study.

Change suggested by respondent:

Delete Policy BL2.

If the aspiration to address these shortcomings exist, site BL2 must not be released for development until there is a firm commitment to the proper provision of sustainable travel alternatives to the private car; and pedestrian safety and travel congestion issues have been addressed and resolved.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10906

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

The plan documents include 5 different versions of the site and its boundary. The Concept Masterplans document shows four different versions: Site Analysis Page52; Landscape Assessment P54; Developer Proposal P56; Illustrative Concept Masterplan P58. The proposed policies map shows a fifth. Until only one is defined, it is impossible to properly assess and address many of its impacts and associated proposals. Particularly Green Belt and boundary; hedge and tree retention; visual impact; whether or not a Country Park is intended, and its extent, impact and details.

Change suggested by respondent:

Make the plan documentation internally consistent. There can be only one definition of the site proposed for release.

Which is it?

Re-consult locally with an unambiguous proposal, and appropriate detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10915

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

BL2, 2.v. requires the preservation only of trees and hedgerows fronting Dog Kennel Lane. It is equally important to preserve these along Stratford Road, and to preserve all the existing significant trees within the site and the important historic hedgerows in the eastern part - similar to the protection proposed for the less prominent BL1 site.

Change suggested by respondent:

BL2 2.v. should be modified to:-

Trees and hedgerows along Dog Kennel Lane and Stratford Road should be retained to protect the character of the highway. All significant trees and ancient hedgerows within the site should be retained to enhance views into the site from public footpaths and the wider area, and to reflect the adjacent Arden Pastures Landscape.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10932

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

The location of the proposed new Green Belt boundary is unclear. The present boundary has been long established and marks a sharp distinction between open farmland and urban usage. Such boundaries should not be altered unless they can be replaced by an equally strong permanent boundary. BL2. 4. refers to Green Belt enhancements and a country park, with no information on their scope, extent or boundaries. This affects the viability of remaining farmland, and could have a serious impact on Cheswick Green. The much narrower Green Belt risks failing to properly fulfil GB purposes.

Change suggested by respondent:

Delete BL2.

Or at least clarify the location, form and appropriateness of the new green belt boundary.

Define the extent, purpose, uses and features of the proposed Country Park, and its impact on Cheswick Green.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10941

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** mr Graham Cockroft**Summary:**

The site should be expected to comply fully with policies P7 and P8. The wording within BL2 is weak. Compliance with these policies should be mandatory.

Also flooding caused by Mount Brook and River Blythe downstream of the site is a recognised problem. More floodwater storage capacity is required upstream. BL2.3.iii. should require the development to make a significant positive contribution towards reducing downstream flood risk.

Change suggested by respondent:

BL2 should include:-

Development of the site is dependent upon walking, cycling and public transport improvements being secured and capable of being viably maintained, in full compliance with P7 and P8.

Development of the site will positively contribute to reducing flood risk caused by Mount Brook and River Blythe at Cheswick Green and further down stream .

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

11066

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carol Colclough**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10674

Object

Policy BL1 - West of Dickens Heath**Respondent:** Miss Leigh Cole**Summary:**

- Schools in the area are oversubscribed (both primary and secondary). there has been talk of further primary schools, but not secondary
- site is located on sports fields that will affect our children who use the fields
- land is high grade Green Belt - Government policy is to protect Green Belt and develop Brownfield land first.
- site is surrounded by LWS & Ancient Woodland
- road network cannot cope with further development
- area around dickens heath and the site is prone to flooding.
- character & setting of the Village will be adversely affected and sense of community and identity compromised.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14514

Object

Policy P5 – Provision of Land for Housing**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

Local authorities must deliver in excess of the minimum local housing need calculated using the 2018 standard methodology if Government's targets are to be achieved. The new standard methodology from 2020 if introduced would mean the Council needs to recalculate and identify additional land to deliver its increased local housing need. This would lead to a requirement to release more land from the Green Belt to be allocated to housing.

Change suggested by respondent:

The housing target should be expressed as a minimum.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14515

Object

Policy P5 – Provision of Land for Housing**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

The Overall Approach Topic Paper sets out a summary of the positions adopted by various LPAs and is not a definitive assessment of housing land supply based on commitments in adopted plans. This does not form an appropriate basis of justification for the Council's proposed contribution to the delivery of unmet need in the HMA.

The Council has no formalised arrangement with any of its neighbouring authorities. This is contrary to the requirement to have entered into a SoCG by this. The new standard methodology when introduced will lead to additional unmet needs in the HMA, something the Council will need to address.

The Sustainability Appraisal concludes that a contribution of 3,000 dwellings towards the HMA shortfall would lead to impacts being largely the same as those from a contribution of 2,000 dwellings. Therefore clarification is required on how the Council has concluded that it could not deliver more than 2,000 dwellings.

Change suggested by respondent:

The contribution to meeting HMA needs should be increased.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14517

Object

North of the Borough**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

Land east of Coleshill Heath Road and adjacent to Birmingham Business Park could deliver up to 135 dwellings within the first five years of plan period.

The Supplementary Submission made in January 2020 proposed a new green belt boundary that could be set by the alignment of the pipeline, rather than the whole site being taken out of the green belt. This would retain separation between Birmingham Business Park and Coleshill Heath Road, and retain a link between the parcels of green belt that lie to the north and south of the site.

St Philips has demonstrated their willingness to work collaboratively to ensure the Metro is incorporated into the proposed development scheme.

Change suggested by respondent:

Land at Coleshill Heath Road should be removed from the green belt and allocated for housing with a site capacity of 135 dwellings in the Local Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14518

Object

Policy P17 Countryside and Green Belt**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

The Local Plan does not include any areas of safeguarded land to accommodate longer term growth. This will inevitably mean that Green Belt boundaries will need to be altered again through a local plan review. Decisions on where that safeguarded land must be evidence-based and related to an assessment of the performance of land against green belt purposes.

Change suggested by respondent:

Additional land should be taken out of the green belt to support residential development in this plan period. Land at Coleshill Heath Road should be allocated for residential development.

Areas of safeguarded land should be identified to meet needs beyond the plan period, or sooner if required as part of a review of the Local Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14519

Object

Policy P5 – Provision of Land for Housing**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

The housing land supply has been over-estimated.

There has been double counting, arising from several sources of supply (windfalls, BLR, sites identified in availability assessments and town centre sites). There is a lack of evidence to demonstrate why the sites fall into only one category and not several.

There is a lack of evidence to demonstrate why allocated sites in the adopted 2013 Local Plan will deliver units in the new plan period (Simon Digby site, Riddings Hill site and Meriden Road site).

There is a lack of evidence to demonstrate why a 10% discount figure has been applied and not a higher figure.

There has been an over estimation of delivery from windfall sites. How can the Council assume that this number of windfalls will be delivered in an area where non-Green-Belt opportunities have been exhausted.

There is an over reliance on the UK Central Hub Area and a lack of evidence to demonstrate delivery of infrastructure requirements to facilitate development. A sensible assumption is that delivery will begin in 2028, with 800 dwellings completed by 2036.

If the supply is adjusted to remedy these issues, the Council would not meet its own needs or make any contribution to the HMA unmet needs, or demonstrate a five-year supply on adoption of the Plan.

Change suggested by respondent:

Additional sites should be included in the 'Summary Table of Residential Allocations'. Land at Coleshill Heath Road should be allocated for housing.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14520

Object

North of the Borough**Respondent:** St Philips - Coleshill Heath Road**Agent:** Avison Young**Summary:**

Step 2 of the site selection process relied on planning judgement in respect of various 'Factors in Favour' and 'Factors Against'. No guidance has been given on how the judgment was applied.

'Land at Coleshill Heath Road' (Site 131) was relegated from a 'yellow' site to a 'red' site. This was not supported by the data and evidence base.

The Site Selection Process Topic Paper does not confirm whether any second 'checking' assessment has been carried out. Our assumption is the Site Assessments that supported the Supplementary Consultation continue to be relied upon. The Topic Paper excludes 'amber' sites, but this would have allowed participants to understand which sites are considered 'less harmful'.

The Council's conclusion that the site should be excluded and designated as a 'red' site is not justified. Evidence does not demonstrate that effects of development would be "severe or widespread". Our assessment against the 'Step 2' Criteria concludes the site performs positively.

Change suggested by respondent:

Land at Coleshill Heath Road should be removed from the green belt and allocated for housing with a site capacity of 135 dwellings in the Local Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10926

Object

Blythe**Respondent:** Mr Simon Coles**Summary:**

This area and its infrastructure cannot cope with a further 1k dwellings built in this area. A disproportionate number of houses are being built in this area on green field sites where brown field sites seem to be converted to retirement villages where affordable housing is actually required! GP surgeries, dentists, schools and especially roads are already over crowded. This development potentially brings a further 2k cars to the area the roads cannot cope. Flooding is an issue and removal of more trees will not aid this and the damage to the local environment must stop, we need green spaces.

Change suggested by respondent:

I would like the proposal to build 1k additional houses on dog kennel lane to be scrapped, I do not believe the local area can cope with it unless there is plans to heavily invest in the local roads and amenities also. Nothing like this has been detailed only plans to put yet more houses into an area that's seen many developments in recent years. Cheswick Place began as a good idea yet many that have moved into it are now looking to move back out due to issues with parking, lack of available GP appointments, etc or properties are brought by private landlords, this doesn't aid those wanting to buy a property in this area. Many moved to Cheswick Green due to its location and available green space, I soon fear there will be no greenery left if this type of proposal continues.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10975

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Una Cole**Summary:**

My daughter attends the school and I believe this will benefit the students, teachers and the whole community for generations to come.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14522

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Pauline collier**Summary:**

Objects to Policy BL1;
 number of houses required needs a more up to date calculation - BL1 site is a high performing green belt area - mitigation measures not achievable thus site is not sustainable - Sports fields should not be moved - other more suitable sites overlooked/ sustainability test not carried out correctly - character and setting of the Village will be adversely affected and sense of community and identity compromised - Falls out of the villages strongly defined boundaries - Impact on connectivity of local wildlife sites and ancient woodlands - not within walking distance of village thus unsustainable - BL1 in flood zone/ increased flood risk for surrounding area.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10642

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr ian COLLINS**Summary:**

I live in Cheswick Green a village in the country, I do not want to see houses totally surrounding me. We have had Cheswick Place added to our surrounding's and this alone has added to traffic congestion, no space at the village surgery and horrendous traffic with parents NOT WALKING but blocking the school approach.
 Flooding has always been an issue and more houses would cause increase this problem.
 This is GREEN BELT, I grow up in Solihull and i was taught to respect and appreciate the open fields, this would ride roughshod over our children's future countryside.

Change suggested by respondent:

Improve areas there homes need bringing into the 21 st century, proper homes in areas where people can get to shops.
 Use old industrial parts of Solihull.
 If building has to go on this site reduce the amount of homes and don't do a Dickens Heath.

Legally No
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

13724

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Miss Natalie Conway**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10692

Object

Policy S01 - East of Solihull**Respondent:** Mr Giles Cook**Summary:**

- Unsound because a) it is misleading to call it S01 as it clearly lies in Catherine de Barnes ward of Hampton in Arden Parish. It should be listed as HA3 to draw residents attention to this section.
- b) S01 has never been out for consultation in its present form. It is an amalgamation of previous sites. Residents are objecting strongly to the size of the present site.
- c) Increasing Catherine de Barnes from 400 to 1100 dwellings is against Solihull Green Belt Assessment 2016 and the long standing Meriden Gap policy.

Change suggested by respondent:

It is recognised that Solihull needs to build more houses but this location is currently worked as agricultural land, both pasture and arable. Therefore a ribbon development along Lugtrout Lane is more suitable for house building with small infill sites where appropriate between Lugtrout Lane and the canal and along Hampton Lane. This would leave productive Green Belt land untouched but allowing for a smaller increase in the size of Catherine de Barnes which already includes the development from site HA2 (Oak Farm)

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10760

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Roger Cook**Summary:**

The Council has failed to provide any viability assessment for this green belt site. The Council has not paid any or any sufficient regard to the made KDBH Neighbourhood Plan which carries statutory weight.

The proposed housing density is inappropriate and too high for the character of the existing Knowle village. The topography of the site is not appropriate for the proposed scale of housing. In addition, no provision has been made for health facilities and no community benefits are put forward as required by the residents as a condition of providing housing on the site.

Change suggested by respondent:

This whole site is not suitable for housing development and resides within the green belt. Remove this site KN2 from the Local Plan. Rebuild the Arden Academy School and include a primary school facility within the existing grounds.

In the event that the above is not agreed then refer to and adopt the set of representations submitted by the KDBH Neighbourhood Forum CIO.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

11241

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Lauren Coombes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11118

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Messrs G&A Coombs**Agent:** Claremont Planning Consultancy**Summary:**

Inappropriate to require a range of accommodation types and sizes to be provided within all developments. This is not feasible on many sites, where site size or constraints mean that only one model of care accommodation is possible to be provided.

Where operators are intending to provide Primary Care services within the development, this should be taken into account when requiring Primary Health Care services to be accessible to serve residents.

Policy will not secure an appropriate level of specialist accommodation across the plan period. HEDNA figures do not consider losses, closure and redevelopment accommodation.

Change suggested by respondent:

It is suggested that clause 1 should be deleted, or otherwise modified in order to acknowledge that provision of a range of housing types may not always be feasible.

Within Clause 6 and 7 of the policy relating to specialist housing and care homes respectively, references to access to Primary Health Care services sub-clauses should be modified to recognise the potential for on-site provision.

6 (ii) It can be demonstrated that satisfactory Primary Health Care services will be accessible to serve the residents of the development unless on-site provision is proposed;

7 (iii) There are satisfactory Primary Health Care services to serve the residents of the development within reasonable proximity unless on-site provision is proposed;

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

11121

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Messrs G&A Coombs**Agent:** Claremont Planning Consultancy**Summary:**

The Council's requirement in Paragraph 216 for care homes and specialist housing to be provided in accessible locations is supported, as it is important that such developments are sustainably located.

Change suggested by respondent:

N/A

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

11122

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Messrs G&A Coombs**Agent:** Claremont Planning Consultancy**Summary:**

Support the release of the site from the Green Belt. However, no collaboration or agreement between landowners and Solihull MBC on the masterplan approach, which inappropriately identifies the Stripes Hill House site as accommodating the replacement Arden Academy and new Primary School.

Land use distribution within the allocation is not soundly based upon evidence, particularly considering constraints, timescale for delivery of infrastructure (such as relocation of the Arden Academy) and appropriate viability testing and equalisation of land values. No information justifying that Arden Academy's relocation is financially viable or deliverable.

The masterplan proposed will not deliver the site.

Change suggested by respondent:

Reliance upon Concept Masterplan KN2 should be removed or the masterplan amended to ensure constraints can be appropriately assessed and impacts quantified, within adequate mitigation and infrastructure provision allowed for. The Allocation proposals for the Arden Triangle site should provide for the retention of Stripe Hill House and existing trees that are of significance and should be retained. The related Masterplan for the allocation should be suitably amended to respond to these considerations so that the educational development is relocated elsewhere within the allocation. Such a relocation will enable the delivery of the education facilities within the required timetable and to the standard required; without the ensured delivery of these educational facilities the strategic allocation of this site and the infrastructure it is intended to deliver is undermined. Similarly, the reasoning for the site's Green Belt release is also detrimentally affected.

It is recommended that further consideration of alternatives is undertaken, particularly with respect to the delivery of a new Arden Academy within the School's existing landholdings. Until the Council has agreement of the allocation masterplan, the policy should not rely upon the accompanying masterplan document to secure the various components of the allocation.

Specific deletion of paragraph 724 is also recommended.

An alternative Masterplan is provided for consideration.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

14625

Object

Foreword

Respondent: Sheila Cooper

Summary:

I believe the decision not to extend was unsound.
Flawed methodology and inaccurate data.

Change suggested by respondent:

The Council should revisit the entire Plan and resubmit it for further consultation.
The ONS Regulator is in the process of undertaking a review of the data/algorithm used to calculate projected housing need.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14631

Object

Policy P17 Countryside and Green Belt

Respondent: Sheila Cooper

Summary:

Irreplaceable Green Belt land, the Meriden Gap and Arden landscape should be protected and valued as buffer land between rural communities and fast expanding local towns.
The Plan fails to address Brownfields first.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14632

Support

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Sheila Cooper**Summary:**

Why was the Solihull Centre Master Plan not given a starring role as part of the Plan?

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

14636

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Sheila Cooper**Summary:**

The Plan does not comply with the requirements for sustainability.

The Plan does not meet the World Health Organisations (WHO) acceptable levels of noise.

The proposal to build a major by-pass on Hall Meadow Road is dangerously flawed.

Change suggested by respondent:

The Council should revisit the development of the Grange Farm proposal and the construction of a major Relief Road and useable By-Pass from the A452 to the South West of Balsall Common and onwards to JLR and the wider road and motorway networks road which would have a much lower negative impact on the health safety and wellbeing of existing residents and the existing infrastructure.

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:**

14644

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sheila Cooper**Summary:**

This site should be removed from the Plan as it is totally unsustainable. The site is within the Green Belt, the protected Meriden Gap and Arden landscape. It is an important wildlife site of National Ecological Significance.

The proposed site does not enjoy public transport and is outside the scope of most residents to walk or cycle to local schools, shops, facilities, the doctor's surgery or Berkswell Station.

Change suggested by respondent:

Remove site from plan

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14646

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sheila Cooper**Summary:**

The site is surrounded by 9 local wildlife sites and ancient woodland.

The proposals for site BL1 are unsustainable and would add to risk of flooding.

The proposals breach Solihull's criteria for sustainability, Local Plan 2013 Policies and NPPF Policy.

Change suggested by respondent:

Remove site from plan.

Alternative sites such as Arden Green are readily available for development in the area and are more sustainable, do not flood, have a lower Green Belt score and enjoy sustainable transport links.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14754

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** J Corbett**Summary:**

I am of the opinion that this area cannot support any further developments.
Strain on GPs and schools.
Prefer to not greenbelt, but to use brownfield site.
The roads are becoming overcrowded.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15165

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr J Corbett**Summary:**

I am of the opinion that this area cannot support any further developments.
Strain on GPs and schools.
Prefer to not greenbelt, but to use brownfield site.
The roads are becoming overcrowded.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10668

Object

Policy UK1 - HS2 Interchange**Respondent:** Mrs Jenny Corcoran**Summary:**

I object to the use of greenbelt land to build 15000 homes Arden Cross development. This will result in the loss of valuable wildlife habitat and corridor between Catherine De Barnes and Chelmsley Wood. This will also impact on climate change removing carbon absorbing trees and vegetation. I also object to use of greenbelt to build homes beyond the budget of local people. Why cannot brownfield sites be used. I would like the Arden cross development removed totally and improved housing provided on Chelmsley wood.

Change suggested by respondent:

Use of brownfield sites within chelmsley wood

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

11253

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ms Lisa Cordell**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10587

Object

Policy P12 Resource Management**Respondent:** Mr Adrian Court**Summary:**

The moving of the Household Waste and Recycling Centre to Damson Parkway is seriously flawed. The detriment to local residents health and well being due to the impact on amenity and health, including visual intrusion, noise and vibration, litter, odour, vermin and bird attraction and increased traffic in the immediate vicinity in addition to the new JLR logistic centre and proposed local housing. Solihull is supposed to be 'Urbs in Rure' and placing this additional facility so close to local housing/conurbation would have huge impact on the immediate local area.

Change suggested by respondent:

I think the council should seriously consider extending the current site as expansion of this site has the least impact on local housing, greenbelt, local transport infrastructure etc. Also if Damson Parkway is going to be considered it would be good to have a plan of the proposed development, size, access etc as currently there is no indication?

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14674

Support

Policy P5 – Provision of Land for Housing**Respondent:** Coventry City Council**Summary:**

PARAGRAPH 228

Welcome the allocation of additional sites within Solihull Borough, which go towards meeting development needs within the Birmingham HMA. We recognise the need for on-going discussions across the wider HMA regarding growth beyond 2031, particularly in relation to accommodating unmet need from a neighbouring HMA.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14675

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Coventry City Council**Summary:**

We acknowledge the need to balance economic investment and protection of the environment. We consider that the proposals as currently drafted allow for overall economic growth, particularly around HS2 and UK Central, whilst ensuring the continued protection of the Meriden Gap and wider Green Belt. We consider a sensible balance has been taken between the release of land for development in Balsall Common, which could be considered to be contained growth, allowing for expansion of the village and delivering investment to HS2, whilst not encroaching any further into the Meriden Gap than the existing settlement boundary. Therefore, we are satisfied that the proposals in Balsall Common do not reduce the Meriden Gap and do not reduce separation distances between Coventry and Balsall Common.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14676

Support

Policy P10 Natural Environment**Respondent:** Coventry City Council**Summary:**

As part of on-going collaboration and joint working we will continue to support biodiversity net gain and offsetting with links to both authorities being in the Habitat Biodiversity Audit partnership, and the Enhancement/Net Gain pilot. This continued joint working will enable further projects and evidence to create net gain in biodiversity and offsetting throughout the area and will further add benefit to the wider sub-region in relation to the environment, air quality, public health and biodiversity. On-going work to encourage modal shift to sustainable transport and will create opportunities for habitat creation and protection.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14678

Support

Policy P12 Resource Management**Respondent:** Coventry City Council**Summary:**

As part of our on-going work under the Duty to Co-operate and as members of CSWAPO and the WMCA and Minerals Working Group, we will continue on-going engagement and joint working over the lifetime of plan development. We welcome ongoing joint working in relation to minerals and waste to support joint agreements around the energy from waste plant and the expansion of the waste processing facility at Whitley in Coventry. The Coventry, Solihull and Warwickshire waste partnership will continue to play a key role in the continued successful delivery of recycling and energy generation across the area and will contribute towards the aims of the wider climate change agenda.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14679

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Coventry City Council**Summary:**

We support the concept of UK Central Hub and proposed developments in that locality, especially around HS2 and Arden cross. We see these developments bringing benefits to Coventry given the strategic location and direct links. We will continue to work together to foster those connections and opportunities, which could benefit both Coventry and Solihull, particularly in relation to the higher education sector. We continue to be committed to ongoing work around highway modelling and mitigation measures in partnership with TFWM and Highways England to support measures to promote modal shift across the area, which will also contribute to improvements in air quality and public health outcomes.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10626

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Adrian Cox**Summary:**

Shirley has more than its fair share of new housing and residential/care homes
BL2 has a listed building which should remain in its original surroundings
BL2 is meant to be kept as a green Belt buffer between Shirley and Dickens Heath.
Doctors and schools are already at capacity in this area and cannot cope already!

Change suggested by respondent:

Not to build on BL2 but to keep it as a Buffer to Dickens Heath and protect the listed building without an eyesore of new buildings around it. This needs to remain in its original surroundings

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14025

Support

Policy S01 - East of Solihull**Respondent:** John Leslie Cox**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14033

Support

Challenges**Respondent:** John Leslie Cox**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14042

Support

Policy S01 - East of Solihull**Respondent:** John Leslie Cox**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14857

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Lynda Cox**Summary:**

This policy is not considered to be sound for the following reasons:

-NOT DELIVERABLE -The main landholding's owner promised at Barratt's Farm Neighbourhood Action Group (BFNAG) that they will not build on their land in their lifetime.

-NOT DEVELOPABLE - dependant on the main landowner for access onto the "relief road".

-UNDERMINES THE AIMS OF THE DRAFT SUBMISSION PLAN - the main landowner, also has a legal veto over another landholding

Change suggested by respondent:

Land north of Old Waste Lane in BC1 should not be allocated until assurances can be gained by SMBC that the land will be available for delivery within the timescale of the Draft Submission Plan

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14859

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Lynda Cox**Summary:**

Site 101 -
 Owner not contacted.
 Cannot be delivered
 No amenity value
 Not demonstrably special
 Undermines aim of plan
 Backdoor way of achieving POS
 Will lead to further enforcement
 Site should be reserved (at this time)

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

10988

Object

Introduction**Respondent:** CPRE Warwickshire Branch**Summary:**

The Plan is not sound because NPPF 2018 provisions set out in para 11 (b) (i) and (ii) have not been applied in its preparation.

Change suggested by respondent:

Apply the provisions of NPPF 2018 para 11 titled 'The presumption in favour of sustainable development. Delete the allocations that are proposed what what is now Green Belt and the proposals to change the boundaries of the Green Belt to remove land from it.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10992

Object

Challenges**Respondent:** CPRE Warwickshire Branch**Summary:**

Challenge B is falsely stated. The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. The Plan is not sound.

Change suggested by respondent:

Revise Challenge B wording to make clear that the NPPF 2018 policy 'The presumption in favour of sustainable development' (para 11 (b) (i) and (ii)) applies. And that the Council will not be altering Green Belt boundaries of allocating new housing sites on land that is now Green Belt.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10994

Object

Spatial Strategy**Respondent:** CPRE Warwickshire Branch**Summary:**

The Spatial Strategy is not sound. The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. See NPPF 2018, paragraph 11.

Change suggested by respondent:

Revise the Policy wording to make clear that the NPPF 2018 policy 'The presumption in favour of sustainable development' (para 11 (b) (i) and (ii)) applies. And that the Council will not be altering Green Belt boundaries of allocating new housing sites on land that is now Green Belt.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

11005

Object

Policy P5 – Provision of Land for Housing**Respondent:** CPRE Warwickshire Branch**Summary:**

Provision of housing to meet the increase in households projected by ONS for Solihull up to 2036 can be achieved without any removal of Green Belt or allocation of housing on land now Green Belt, except at the UK Central Hub north of the A45.

The housing strategy is wrongly based on allocation of a small number of large housing sites, on land now Green Belt. Replacement of these by a strategy of small sites would enable the increase in households to 2036 to be catered for without the scale of loss of Green Belt that the Plan proposes.

Change suggested by respondent:

Change the housing requirement to the annual figure of household increase projected by ONS (632 pa).

Delete the large housing sites on what is now Green Belt allocated in the Plan listed in the Table at para 226.

Revise the housing supply at Solihull Town Centre to the higher figure now likely to be achievable.

Replace the policy of a small number of large new housing sites with a larger number of small sites, only a few of which would be in current Green Belt land.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

11007

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** CPRE Warwickshire Branch**Summary:**

The Chapter titled 'Improving Accessibility and Encouraging Sustainable Travel' was written before the Transport Study produced by Mott Macdonald was prepared and long before it was published. The Policies listed (P7, P8, P8A) are not a transport policy or strategy for the Borough. The requirement of the Planning Practice Guidance for Local Plans is that there should be a transport assessment carried out, at the main stages of Plan preparation. There is still no transport assessment as required by the PPG.

In the absence of a formal transport assessment the Plan is not sound.

Change suggested by respondent:

Produce a full transport assessment of the Plan as required by National Planning Practice Guidance and arrange public consultation on this assessment, before proceeding further with the Local Plan.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

14954

Object

Challenges**Respondent:** CPRE Warwickshire Branch**Summary:**

Challenge B:

- Clear that Solihull cannot meet its housing requirement of 15,270 homes without significant adverse harm to Green Belt and environment
- SM is not suitable basis for housing requirement and assumption is there are no constraints to meeting full requirement
- SM does not take into account in-and-out commuting of the Borough
- NPPF Para 11(b) should be invoked

Change suggested by respondent:

- NPPF Para 11(b) should be invoked concerning housing requirement.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14955

Object

Policy P5 – Provision of Land for Housing**Respondent:** CPRE Warwickshire Branch**Summary:**

- Clear that Solihull cannot meet its housing requirement of 15,270 homes without significant adverse harm to Green Belt and environment
- SM is not suitable basis for housing requirement and assumption is there are no constraints to meeting full requirement
- SM does not take into account in-and-out commuting of the Borough
- Citing Govt advisor Professor Wenban-Smith, it is dangerous to release too much land: 'over provision can never be corrected, under provision can be corrected later when needs are better defined.'
- Proposed delivery rate of 938dpa is a huge step-up for construction industry to achieve in the Borough – not been achieved in a single year since 2001 (highest being 836 in 2005/06)
- Average delivery rate over last 5 years is 706 dpa.

Change suggested by respondent:

- NPPF Para 11(b) should be invoked

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14956

Object

Policy P5 – Provision of Land for Housing**Respondent:** CPRE Warwickshire Branch**Summary:**

Housing Land Supply:

- Development should be focused on brownfield first, in accordance with Government advice
- More work needs to be done on capacity of final version of Solihull town Centre masterplan and capacity at Arden Cross.

Change suggested by respondent:

- Review housing capacities for Solihull Town Centre and Arden Cross

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14957

Object

Policy P5 – Provision of Land for Housing**Respondent:** CPRE Warwickshire Branch**Summary:**

Windfall:

As an impact of Covid-19, likely to be small reduction in office use as more people choose to work from home or shared offices. Therefore there will be an increase in windfall sites as offices become redundant, which will be more than enough to omit the most unsustainable site allocations from the Plan.

Change suggested by respondent:

- Review windfall sites in Plan

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14958

Object

Spatial Strategy**Respondent:** CPRE Warwickshire Branch**Summary:**

- Strongly challenge scale of proposed development in Blythe, Knowle and Balsall Common.
- Disproportionate and not justified by site selection methodology, or consistent with its spatial strategy and objectives
- Proposed site allocations perform poorly against sustainability measures, with adverse effect in these areas.
- In addition to previous comments, we add to this analysis following the updated information in the supporting documentation of the Plan below:
 - o Strategy fails to link adequately housing distribution to its economic and transport policies. These emphasise growth in accessible corridors inc. A45, A34 and Solihull town centre, as well as the corridor linking the town centre to the A45 hub.
 - o Spatial strategy does not reflect findings of assessment work, as demonstrated by large scale allocations in Balsall Common, Knowle & Dickens Heath.

Change suggested by respondent:

Review spatial strategy

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14959

Object

Balsall Common**Respondent:** CPRE Warwickshire Branch**Summary:**

- Large Scale allocations in Balsall Common will lead to significant additional journeys by car, contrary to the spatial strategy's objectives, and to policies P7, P8 and P9 in the DSP.
- Large numbers of homes in rural locations, away from main centres of employment.
- Car-borne travel and related congestion are inevitable outcomes
- Little relationship with Solihull Connected transport strategy
- Therefore fails to achieve its fundamental aim of sustainable pattern of development

Change suggested by respondent:

Review large scale allocations in rural area.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14960

Object

Blythe**Respondent:** CPRE Warwickshire Branch**Summary:**

Large scale allocations in Dickens Heath will lead to significant additional journeys by car, contrary to the spatial strategy's objectives, and to policies P7, P8 and P9 in the DSP.

- Large numbers of homes in rural locations, away from main centres of employment.
- Car-borne travel and related congestion are inevitable outcomes
- Little relationship with Solihull Connected transport strategy
- Therefore fails to achieve its fundamental aim of sustainable pattern of development

Change suggested by respondent:

Review large scale allocations in rural area.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14961

Object

Knowle, Dorridge & Bentley Heath**Respondent:** CPRE Warwickshire Branch**Summary:**

Large scale allocations in Knowle will lead to significant additional journeys by car, contrary to the spatial strategy's objectives, and to policies P7, P8 and P9 in the DSP.

- Large numbers of homes in rural locations, away from main centres of employment.
- Car-borne travel and related congestion are inevitable outcomes
- Little relationship with Solihull Connected transport strategy
- Therefore fails to achieve its fundamental aim of sustainable pattern of development

Change suggested by respondent:

Review large scale allocations in Knowle

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14962

Object

Foreword**Respondent:** CPRE Warwickshire Branch**Summary:**

Sustainability Appraisal

- November 2015 Interim SA found that large scale expansion of rural settlements was one of worst performing options.
- Major adverse impacts in terms of resource efficiency, and moderate adverse effects with regard to reducing need to travel and impact on landscape.
- Initial findings were ignored by Council, which opted for large housing allocations in rural villages over sustainable urban extensions.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14963

Object

Spatial Strategy**Respondent:** CPRE Warwickshire Branch**Summary:**

Site Selection

- Sites BL1, BC1 and BC3 do not conform with site hierarchy in DSP Para. 68.
- Not possible to understand how some sites fall into the green category, when they clearly have high impacts
- A sustainability score in line with recent Government policy would provide a different result.
- Credibility and robustness of process is undermined.

Change suggested by respondent:

Review site selection methodology

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14964

Object

Policy P10 Natural Environment**Respondent:** CPRE Warwickshire Branch**Summary:**

- Many local authorities are adopting 20% net biodiversity gain. Solihull should do the same.

Change suggested by respondent:

- Solihull should adopt 20% biodiversity net gain, not 10%.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14965

Object

Foreword**Respondent:** CPRE Warwickshire Branch**Summary:**

PRISM Transport modelling:

- Report acknowledges that PRISM transport assessment is a strategic network tool, focuses on 11 key strategic network routes, with limited validity on minor roads. This brings into question validity of site assessments, as these could be considered to be served by inadequate minor road network.

Change suggested by respondent:

- Carry out appropriate transport modelling.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14966

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** CPRE Warwickshire Branch**Summary:**

- Should not be allocated as in the Meriden Gap.
- See our 2019 response.
- Development contingent on eastern distributor road being completed, funding for which has not yet been provided.
- This road will further contribute to traffic congestion

Change suggested by respondent:

Delete from Plan

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14967

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** CPRE Warwickshire Branch**Summary:**

- Should not be allocated for reasons previously given.
- Site in Meriden Gap, or national strategic ecological importance.
- Not sustainable against Council's own criteria
- Omission sites within Balsall common and wider Borough which should have been allocated.
- Residents have proposed a Managed Open Space as a significant tourist attraction, with Berkswell Grade II* Listed Berkswell Windmill at its heart.
- Proposed Country Park would have diverse ecological nature, be a considerable asset to support north-south ecological corridor, and contribute to Balsall Common's shortfall in green space.
- CPRE fully support Country park proposals.

Change suggested by respondent:

Site should be omitted from Plan.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14968

Object

Policy BL1 - West of Dickens Heath**Respondent:** CPRE Warwickshire Branch**Summary:**

- Unsustainable site proved by large amount of proposed mitigation, some unachievable.
- Most adverse effects of sites proposed in Plan, including surrounded by 9 Local Wildlife Sites and ancient woodland.
- Readily available alternative sites such as Tidbury Green golf club:
 - o Does not flood on proposed housing areas
 - o Lower Green Belt score
 - o Not surrounded by LWS
 - o Equally accessible to the Whitlocks End station
 - o Could provide green and blue corridor with public footpaths and cycleways to new Lowbrook Farm development, a green lung between Bromsgrove and Solihull
- Likely that development will take place in future on green space of Site BL1

Change suggested by respondent:

- Part of Site BL1 should be deleted from Plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14969

Object

Policy S01 - East of Solihull**Respondent:** CPRE Warwickshire Branch**Summary:**

- Support Council in recognising areas of high ecological value on site
- Object to low density development at rear of Hampton Lane on loss of biodiversity

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14970

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** CPRE Warwickshire Branch**Summary:**

We object to this allocation for the reasons previously given and this site allocation should be reduced.

Change suggested by respondent:

Site allocation should be reduced

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14971

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** CPRE Warwickshire Branch**Summary:**

We also object to this allocation for the reasons previously set out.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10983

Object

Policy P12 Resource Management**Respondent:** Elmdon Church**Summary:**

The proposal to situate the HWRC at the top of Damson Parkway is ill-considered. The traffic in this area is becoming increasingly congested any way, partly as a result of the new JLR logistics centre - this proposal will make it much worse.

Change suggested by respondent:

A site should be selected which is further away from houses and businesses.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10985

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Elmdon Church**Summary:**

This is already a congested area, and becoming more so due to the JLR logistics centre. This facility should be situated elsewhere.

Change suggested by respondent:

The HWRC etc should be situated further away from houses and businesses.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

duty:

Attachments: None

15094

Support

Policy BL2 - South of Dog Kennel Lane**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Support inclusion of Site in Draft Submission Plan.

The site is in a sustainable and accessible location and the Council have adopted an appropriate strategy in identifying it for development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

duty:

Attachments:

15096

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Support principle of allocation, but a number of changes required to make Policy BL2 sound:

Part 1

The policy states that the site is allocated for 1,000 dwellings. However, elsewhere in the Local Plan the number of dwellings to be delivered on strategic allocated sites is stated as a 'capacity'. In order to ensure the effective optimisation of site's and delivery the required number of dwellings to meet SMBC's housing requirement, all strategic housing allocations should be stated as a 'minimum (unless mitigating factors determine otherwise)'.

Change suggested by respondent:

All strategic housing allocations should be stated as a 'minimum (unless mitigating factors determine otherwise)'.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15097

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Support principle of allocation, but a number of changes required to make Policy BL2 sound:

Part 2

Unclear how the requirement of 8.2 hectares of public open space has been derived and why it is necessary to define a specific amount of public open space in the policy.

This is not a sound, appropriate strategy and should instead refer directly to draft Policy P20 which requires a Part 7 for new housing developments to provide or contribute towards new open spaces (or improvement to existing provision) in line with the minimum standard of 3.57ha per 1,000 population.

Amount of public open space should be calculated at the time an application comes forward, so directly relate to the number of dwellings delivered on the site, the mix of houses and, consequently, a more accurate population yield.

With regards to part v which relates to the retention of hedgerows and trees along Dog Kennel Lane, this policy is accepted in principle, but it should be amended to allow for their removal where 'necessary'.

This will be necessary to provide the relevant vehicle access, including visibility splays. An amendment to this policy to allow this is suggested below.

Change suggested by respondent:**Part 2**

ii. Public open space and a range of play areas for children and young people should be provided in accordance with Policy P20.

v. Trees and hedgerows along Dog Kennel Lane should be retained, where possible, to protect the character of the highway.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15099

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Support principle of allocation, but a number of changes required to make Policy BL2 sound:

Part 5

In principle, it would be agreeable to Taylor Wimpey if the Concept Masterplans formed the starting point for future planning applications for the site. However, as set out in the representations submitted in relation paragraphs 242/243 and the Concept Masterplan for this site, a number of amendments would be required to ensure it has been prepared in accordance with national policy (e.g. establishing the Green Belt boundary) and the evidence prepared on behalf of SMBC and Taylor Wimpey's appointed consultants (note concerns relating to the SMBC heritage and ecology evidence base). This representation should be read in conjunction with those submitted by Taylor Wimpey in relation to the Proposals Map and the Concept Masterplans.

Change suggested by respondent:

Part 5

The Concept Masterplan document should be read alongside this policy. Whilst The Concept Masterplans are indicative only and may be subject to change in light of further work that may need to be carried out at the planning application stage. Future development proposals should adhere to the design principles and overall objectives set out in the Concept Masterplan document for site BL2. Justification should be provided where there is a significant departure from the principles/objectives.

Delete following: any significant departure from the principles outlined for Site 12 BL2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15100

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Positive that Council seeks to meet housing needs in full and contribute to wider HMA shortfall.

However, following elements of policy are unsound and would need amendment:

Part 1

- A buffer of 5-10% should be incorporated in order to meet the housing requirement and Greater Birmingham and Black Country Housing Market Area (GBBCHMA) contribution and not 5-year housing land supply. This is to ensure there is flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period.

- To this end, the Council would therefore need to identify additional suitable land supply, in the order of c.750-1,500 dwellings.

Change suggested by respondent:

Part 1 – add a 5-10% buffer to the stated housing requirement

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

15101

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Positive that Council seeks to meet housing needs in full and contribute to wider HMA shortfall.

However, following elements of policy are unsound and would need amendment:

P5(1) and (3) Windfall Sites (and para 223)

- An assumed supply of 200 dpa is made for windfall sites, up from 150 dpa within the adopted Solihull Local Plan (2013).
- The Plan purports that ‘there is compelling evidence that windfall sites consistently become available in Solihull’ (para 223), but although the 5YHLS (July 2019) sets out the number of annual completions from windfall sites, these are not set out on a site-by-site basis and therefore it cannot be concluded on the evidence available these provide a reliable source of supply, as required by NPPF paragraph 70.
- Additionally, although the 5 year annualised average appears sufficient, the level of fluctuation (2015/16: 190; 2016/17: 200; 2017/18: 158) suggest supply may not be sufficient enough to justify a proposed 200 dpa assumption.
- At 150 dpa, a resultant capacity of 2,100 dwellings from 2022-2036 would warrant the Council to identify to facilitate the delivery of a further 700 dwellings.

Change suggested by respondent:

Windfall sites – reduce delivery from 200dpa to 150dpa to reflect windfall delivery.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15102

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Positive that Council seeks to meet housing needs in full and contribute to wider HMA shortfall.

However, following elements of policy are unsound and would need amendment:

Part 2

- The trajectory fails to set out the anticipated rate of development for specific sites, against the requirements of NPPF paragraph 73.

Change suggested by respondent:

Set out the anticipated rate of development for specific sites.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15103

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Taylor Wimpey accepts Policy P4E, in principle, and its focus on ensuring new developments provide a mix of dwelling size and type to meet the identified needs of older people and those with disabilities and special needs. However, with regard to Parts 4 and 5 of this policy there is an inconsistency in how the Council will seek to enforce the policy. Part 5 suggests that this will be applied flexibly and, on a site-by-site basis. This position is supported by Taylor Wimpey. In contrast, Part 4 states that 'all developments of 300 dwellings or more must provide specialist or care bedspaces...' (Lichfields emphasis). This is not supported by Taylor Wimpey as the provision of this type of accommodation and/or facilities should be directed to those areas where there is an identified need. The need for and location of the provision of such accommodation should be considered having regard to a range of factors - such as need at that time, market demand, location of similar facilities, location of the site etc.- and this is not necessary on all large, strategic sites.

Change suggested by respondent:

Part 4 - replace 'must provide' with 'should consider providing':

All developments of 300 dwellings or more should consider providing specialist housing or care bedspaces in accordance with the Council's most up to date statement of need on older person's accommodation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15104

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Taylor Wimpey accepts Policy P4E, in principle, and its focus on ensuring new developments provide a mix of dwelling size and type to meet the identified needs of older people and those with disabilities and special needs.

However, with regard to Parts 4 and 5 of this policy there is an inconsistency in how the Council will seek to enforce the policy. Part 5 suggests that this will be applied flexibly and, on a site-by-site basis. This position is supported by Taylor Wimpey. In contrast, Part 4 states that 'all developments of 300 dwellings or more must provide specialist or care bedspaces...' (Lichfields emphasis). This is not supported by Taylor Wimpey as the provision of this type of accommodation and/or facilities should be directed to those areas where there is an identified need.

The need for and location of the provision of such accommodation should be considered having regard to a range of factors - such as need at that time, market demand, location of similar facilities, location of the site etc.- and this is not necessary on all large, strategic sites.

Change suggested by respondent:

Part 5: Add criterion 'v' to the sub-policy:

This policy will be applied flexibly, taking into account:

- i. Site specific factors which may make step-free access unviable;
- ii. The economics of provision, including particular costs that may threaten the viability of the site;
- iii. Whether the provision of housing at these standards would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;
- iv. The need to achieve a successful housing development
- v. Existing provision in the locality around the site and the demonstrable need for such provision at that location.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

15105

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Taylor Wimpey**Agent:** Lichfields

Summary:

- Support principle of Policy P4D and the broad approach to encourage self & custom build (SCB) plots.
- Not supportive of the specific policy requirement for the inclusion of 5% self & custom build housing on all site allocations and residential developments of 100 or more dwellings.
 - Council should not seek to burden developers with delivery of SCB plots.
 - Council should encourage landowners as per national policy.
 - Provision of SCB plots must be based on up to date evidence of demand, as per national policy and guidance.
 - Policy approach should be flexible, and realistic, so that where provided they do not remain unsold.
 - No rational for 100 dwelling or 5% thresholds.
 - Risk of over-supply on large sites and mis-match with actual demand, e.g. single plots in rural locations.
 - Larger sites typically more complex to deliver, more logistics and longer time periods. Coordination of SCB plots with wider site will be difficult.
 - If evidence to include such a policy is justified, then recommend amendment, that if plots unsold for 12 months then should be built out as market housing.
 - Further work required rather than blanket approach.

Change suggested by respondent:

Suggested amendments to the policy are outlined below:

Part 1 (

The Council will require developers of allocated sites to consider contributing to Self and Custom Build Housing on residential sites of 100 units or more.

Contributions should take the form of 5% of open market dwellings, but will take into account...

Part 2

The Council expects these plots to be offered for sale with outline planning permission, fully serviced to the boundary and unconstrained access to the highway for a period of 12 months to those Registered on Solihull's Self and Custom Build Housing Register. If after 12 months, the self/custom build option(s) are not taken up, the land will revert to being built out for market housing. The value of the plots will be subject to an independent valuation by a Registered Surveyor.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15106

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

support the overall thrust of Policy 4C which recognises that the Council will negotiate the housing mix on allocated sites. This is a proactive approach that enables the plan to be flexible and adapt to rapid change, as required by paragraph 11 (a), and ultimately effective in meeting the Borough's housing needs.

However, Part 2 of the policy appears to conflict with this positive approach in that it states that "concept masterplans will include details of the likely profile of housing types requiring market housing". This approach is considered unnecessary and would be too prescriptive for large, complex sites that will be built over a long period of time. It would also be inconsistent with paragraph 11 (a) as noted above in that it would not allow for sufficient flexibility to adapt and continue to meet the needs of the Borough over the time period the scheme is delivered.

It is not appropriate to apply a borough wide mix to each and every site. Development sites will have different locational and site characteristics which will influence the appropriate mix.

Change suggested by respondent:

Part 2 – delete. This is superfluous to Part 1 and overly prescriptive. It is also not consistent with the published concept masterplans.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15107

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

support the overall thrust of Policy 4C which recognises that the Council will negotiate the housing mix on allocated sites. This is a proactive approach that enables the plan to be flexible and adapt to rapid change, as required by paragraph 11 (a), and ultimately effective in meeting the Borough's housing needs.

However, Part 2 and Part 3 of the policy appears to conflict with this positive approach in that it states that "concept masterplans will include details of the likely profile of housing types requiring market housing".

This approach is considered unnecessary and would be too prescriptive for large, complex sites that will be built over a long period of time. It would also be inconsistent with paragraph 11 (a) as noted above in that it would not allow for sufficient flexibility to adapt and continue to meet the needs of the Borough over the time period the scheme is delivered. It is not appropriate to apply a borough wide mix to each and every site. Development sites will have different locational and site characteristics which will influence the appropriate mix.

Change suggested by respondent:

Part 3 – amend to instead link the suggested housing mix to the latest HEDNA (or another relevant document).

Market dwellings should be provided having regard to the most recent HEDNA (or another relevant document) as well as site location and characteristics.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15108

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Strongly support delivery of affordable housing as part of residential developments. However, a number of concerns over the detail (or lack of) contained within Policy P4A which are considered unsound as drafted.

Part 2

This part of the policy states that the definition of 'affordable' will be set out in a Meeting Housing Needs Supplementary Planning Document (SPD), which will be updated periodically to ensure it is up to date. While in principle this is accepted, due to the significant viability implications affordable housing can have on a development, the SPD should be made available now or the contents of the document included in the Local Plan and available for review/comment. It is not a sound approach to not publish a fundamental part of the evidence base prior to the submission and adoption of the Local Plan.

Change suggested by respondent:

SPD should be made available now or the contents of the document included in the Local Plan and available for review/comment.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15109

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields

Summary:

Strongly support delivery of affordable housing as part of residential developments. However, a number of concerns over the detail (or lack of) contained within Policy P4A which are considered unsound as drafted.

Part 3

To be Sound, the level of affordable housing proposed needs to be justified by the evidence and currently the Local Plan does not appear to tie in with the more

recent Viability Study. At the current time, there are concerns with some of the details in the Viability Study (the 'evidence') that need to be addressed to make

the evidence base robust and the Policy Sound. These are summarised below and explain in more detail in the Bruton Knowles 'Response the Cushman Wakefield

Study' attached to these representations:

1. Typologies to include the entire range of potential sites from the largest to the smallest, so that parameters can be tested.
2. Housing mix to reflect need and demand.
3. Consistency regarding Benchmark Land Value.
4. Infrastructure costs to be revised to 2020.
5. Consistency regarding construction costs.
6. Contractors profit to be reinstated for base build costs.
7. Transparency regarding cashflow modelling, enhancements, etc.
8. Consistency with retirement care homes.
9. Sensitivity testing to be undertaken.

Change suggested by respondent:**Part 3**

Contributions will be expected to be made in the form of 40% affordable dwelling units on all development sites that meet the threshold, but will take into account the following site circumstances...

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15110

Object

Policy P4A Meeting Housing Needs – Affordable Housing

Respondent: Taylor Wimpey

Agent: Lichfields

Summary:

Strongly support delivery of affordable housing as part of residential developments. However, a number of concerns over the detail (or lack of) contained within Policy P4A which are considered unsound as drafted.

Part 6/7/8

These parts of the policy define the amount and type of affordable housing to be delivered.

However, these policies make specific reference to certain types of affordable housing which is not consistent with Part 1 which lists the various types

of affordable housing such as "social rented, affordable rented, intermediate tenure and Starter Homes, which is available at below market price or rent and which is affordable to households whose needs are not met by the market."

These parts of the policy should be amended to refer to: affordable housing for rent (to include either social and affordable rent) and intermediate housing. The inclusion of Starter Homes is questionable.

With regards to the housing mixes specified for both affordable products, it is considered unnecessary to define these in a policy and certainly not applied to

each and every site that comes forward. The mixes proposed are appropriate for the whole Borough and each site with have different characteristics that may make them more suitable for a certain mix than others (ie central urban sites would be more suitable for 1 and 2 bed homes, whereas greenfield urban sites would be more suitable for larger family homes. The mixes would not be the same for each location, but the blended mix would achieve the needs of the Borough as a whole). Overall, mix should be linked to SMBC latest Strategic Housing Market Assessment (SHMA)/Housing and Economic Development Needs Assessment (HEDNA) (or other future relevant evidence base document) but not applicable in the same mix for each site location. This will ensure this policy aligns with the latest evidence base and remains effective and deliverable over the lifetime of the Local Plan.

Change suggested by respondent:**Part 6**

On-site provision and off-site contributions should be calculated based on a tenure split of 65% affordable housing for rent (to include social and affordable rent) with 35% provided as intermediate housing

Part 7

Homes for affordable rent should be provided having regard to the most recent HEDNA (or another relevant document), site characteristics and taking into account site circumstances listed in part 3 of this policy

Part 8

Intermediate homes should be provided having regard to the most recent HEDNA (or another relevant document), site characteristics and taking into account site circumstances listed in part 3 of this policy

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15111

Object

Foreword**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans - General comment:

Fair and reasonable that concept masterplans provided to give Council confidence on capacity and delivery of sites.

Status of CMPs in Plan, and weight to be accorded to them, is uncertain.

Text in Concept Masterplans introduction 'indicative broad level masterplans' vary with text in DSP Para. 404. 'Council will require developers to generally accord with principles in CMP.'

Imperative that weight of CMP is clear at development management stage to make Plan sound.

Change suggested by respondent:

To ensure that the Local Plan is 'effective' clarity is required on the weight to be given to the Concept Masterplans. If it is made clear that these are just the starting point for future applications and that changes can be made, then that would be acceptable. Alternatively, the Concept Masterplans need to be modified prior to the Plan being adopted.

Paragraph 243 – this should be amended as follows:

It will be expected that where there are multiple ownerships involved and to avoid piecemeal development, future planning applications should, where possible/relevant, demonstrate that the development will not prejudice what can be delivered on any remaining parts of the site. This needn't necessarily preclude a phased approach where one parcel of land or part of the site may be available for development in advance of another. It will, however, provide reassurance that one phase of development does not prejudice a future phase, nor place undue viability pressures on a later phase to complete necessary infrastructure to serve the whole development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15112

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Para. 242

Concept Masterplans - Site BL2

Taylor Wimpey have a number of concerns about the content of the Concept Masterplan for Site BL2 and need to be clear that either the Concept Masterplan will be modified before the Local Plan is adopted or that there would be the opportunity to present an application that does not respond fully to the Concept Masterplan. The reasons are set out below.

It is considered that the concept masterplan for site BL2 has not been prepared to take into account all available proportionate evidence, or in some instances, the evidence base is not well founded. The comments on the following bullets listed in paragraph 242 are provided below:

Change suggested by respondent:

See subsequent representations

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15113

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Para. 242. Concept Masterplans - Site BL2

- Bullet 2: key site constraints have been identified:

Flood Risk - Understood that SMBC have defined parcels based on avoiding flood risk following Level 2 SFRA modelling. Modelling was not intended for purpose of defining development parcels. CMP should follow Randall Thorp MP (from site promoters) which includes allocation of space for flood alleviation.

Change suggested by respondent:

Concept Masterplan - BL2

Development Parcels should be amended to follow Randall Thorp masterplan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15114

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 242

Bullet Point 2 (in relation to BL2)

Heritage - while the policy for the site allocation (BL2) and the wording of the Concept Masterplan design principles allows for development to come forward on land around the listed building (providing the appropriate design related measures are adopted to safeguard the setting of the heritage asset), the Concept Masterplan identifies an extensive area around Light Hall as 'public open space and play'. This designation is inconsistent with the draft site allocation policy and, should be removed from this designation and identified for development.

Development parcels based on recommendations from Heritage Impact Assessment, particularly regarding Light Hall, were overly stringent and not based on a sound understanding of how, in what way(s) and to what extent the setting of the designated heritage asset contributes to its significance.

EDP have carried out independent heritage assessment for site. No reason to believe that development around the listed building could not be delivered in accordance with the Council's statutory duty and in accordance with the relevant provisions of the NPPF so long as it responds positively and appropriately to the masterplan design principles set out above in this Appraisal (see attachment for further detail).

Change suggested by respondent:

The Concept Masterplan should:

- Remove the land to the west of Light Hall from the 'public open space and play' designation;
- Identify the land to the east of Light Hall for development, subject to impact on the heritage asset;
- Ensure 'area of development subject to heritage impact' covers all land around Light Hall to the north and west. and
- Include the design principles contained at paragraph 3.62 of the Archaeological and Heritage Appraisal prepared by EDP within the concept masterplan for site BL2.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15115

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 242

Bullet Point 2 (in relation to BL2)

Ecology:

Having reviewed SMBC's ecological evidence base, EDP have a number of concerns with the methodology used and conclusions made. These assumptions have been fed into the site analysis and design principles of the concept masterplan, raising a concern that undue weight has been applied to the retention of existing on-site features.

For example, EDP have concluded that the ecological evidence base lacks sufficient data to provide any informed recommendations regarding the retention of habitat and maintenance/enhancement of ecological connectivity.

Additional information regarding the methodologies adopted during any assessment of the Site should be provided, particularly before any weight is given to it within the local plan process.

Change suggested by respondent:

Concept Masterplan – Design Principles

The following text should be amended:

The trees and hedgerows along Dog Kennel Lane should be retained, where possible, in order to safeguard the character of the road.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15116

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 242

Bullet Point 3 (in relation to BL2)

Bullet 3: different land uses/proposals have been identified

The indicative capacity of the site at 1,000 dwellings is supported and it similar to that proposed by Taylor Wimpey through the previous Local Plan consultations and is considered to be deliverable.

A concerns is, however, raised regarding the Concept Masterplan itself and the location and quantum of open space shown.

Open space

It is noted in Policy BL2 that 8.2 hectares of public open space will be required to be delivered on site, however, the area of land shown significantly exceeds this amount and extends south far more extensively than the site ownership of Taylor Wimpey. As noted previously, it also includes the land to the west of Light Hall which while is currently not identified for development, could in future (see comments above).

Unless SMBC have a firm commitment from other landowners that the proposed public open space outside of Taylor Wimpey's ownership can be delivered, the Concept Masterplan should be amended accordingly.

Change suggested by respondent:

Concept Masterplan

Map should be updated to:

- Remove POS designation for land to west of Light Hall.

Unless SMBC have a firm commitment from other landowners that the proposed public open space outside of Taylor Wimpey's ownership can be delivered, the Concept Masterplan should be amended accordingly.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15117

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 242

Bullet Point 4 (in relation to BL2)

Bullet 4: key access and movement routes through and to the site

The SMBC Concept Masterplan for Site BL2 identified access from three proposed locations; from Dog Kennel Lane, from the A34 Stratford Road/Dog Kennel Lane roundabout and an access direct from the A34 (south of the Dog Kennel Lane junction). These are shown as indicative arrows, however, it is unclear if these are the accesses for any mode, or whether they are intended to represent purely accesses which vehicles can use, with other mode accesses not shown. It is considered that there is a much greater opportunity to connect to the existing and new communities than shown on the SMBC masterplan. Particularly in the context of the first sentence in the Introduction to the Local Plan, Challenges A, C, H, J and H, Policies P7 and P8, where there is a requirement for masterplans to lead with active travel accesses, for which there are numerous opportunities.

There is also a green buffer shown on the SMBC masterplan through the centre of the site and it is not clear from the plan if this would hinder a vehicular or active travel connection between the development parcels on either side of the green buffer.

Change suggested by respondent:

Concept Masterplans - Site BL2

Clarify access and movement points on concept masterplan.

Review connectivity of site.

The following text should be amended:

The trees and hedgerows along Dog Kennel Lane should be retained, where possible, in order to safeguard the character of the road.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15118

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 242

Bullet Point 7 (in relation to BL2)

establishing a clear and logical boundary to identify precisely the land to be released from the Green Belt.

The proposed Green Belt boundary does not follow existing features on the ground and should be modified according to accord with NPPF guidance; this is covered in the reps on the Policies Map.

Change suggested by respondent:

TBC

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15119

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Concept Masterplans. Para. 243 (in relation to BL2)

Noted that SMBC will be seeking a coordinated and comprehensive approach to the development of site, even when they are in separate ownership. In principle, this is agreed and accepted, and the Concept Masterplans should provide SMBC with the confidence that site's will be developed comprehensively. However, it is not appropriate to require 'evidence' demonstrating a joint, coordinated approach to development. This would place an unnecessary burden on the delivery of sites and would negate the need for a concept masterplan to be prepared at this stage. As with all planning applications for sites in multiple ownership, it will be up to the Council during the determination of any planning application to be satisfied that proposals do not prejudice development coming forward on neighbouring land.

To ensure that the Local Plan is 'effective' clarity is required on the weight to be given to the Concept Masterplans. If it is made clear that these are just the starting point for future applications and that changes can be made, then that would be acceptable. Alternatively, the Concept Masterplans need to be modified prior to the Plan being adopted.

Change suggested by respondent:

Paragraph 243 – this should be amended as follows:

It will be expected that where there are multiple ownerships involved and to avoid piecemeal development, future planning applications should, where possible/relevant, demonstrate that the development will not prejudice what can be delivered on any remaining parts of the site. This needn't necessarily preclude a phased approach where one parcel of land or part of the site may be available for development in advance of another. It will, however, provide reassurance that one phase of development does not prejudice a future phase, nor place undue viability pressures on a later phase to complete necessary infrastructure to serve the whole development.

Delete: the concept masterplan will show a coordinated and comprehensive approach to the development of the site that is supported by relevant site promoters/developers so that piecemeal development is avoided.

Delete: However it will be expected that evidence can be provided of a joint and coordinated approach so that

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15221

Object

Foreword**Respondent:** Taylor Wimpey**Agent:** Lichfields**Summary:**

Policies Map (in relation to Green Belt boundary for Site BL2)

Considered proposed boundary does not accord with NPPF Para. 35 & 139.

1) Appointed consultants to site promoters, EDP, have carried out an assessment (see attached) and conclude that the site does have well-defined and defensible boundaries for a new Green Belt boundary, contrary to statement Para. 609 in the DSP.

Considered that a well-vegetated field boundary, which could be enhanced with additional planting, would provide a much more appropriate and definable physical

boundary on the ground than a proposed new internal road and in doing so would maintain the existing field structure within the landscape.

To re-align to only a newly built man-made feature is unsuitable, and affords less opportunity to integrate the proposed development into the landscape setting, which may potentially impact the character of the countryside beyond and the perception of openness in the countryside and would make for an inefficient road layout and less permeable masterplan.

2) Parcel east of BL2 (south of Stratford Rd up to boundary with buildings west of Creynolds Lane) should be re-instated as part of Site BL2, as per the 2019 consultation.

Unclear why land has been removed between 2019 and 2020 consultations; is within a lower performing Green Belt parcel, no flood risk, unconstrained by ecological features and does not contain any heritage assets.

Release of land would have added benefit of additional land available for residential development.

Change suggested by respondent:

Suggested amendments to the policies map:

- Amend the site and Green Belt boundary of Policy BL2 to align with the Masterplan prepared by Randall Thorp which is based on a robust, justified and appropriate strategy. This can be found on page 56 of the SMBC

Concept Masterplan document or at Appendix 2 of this note for ease of reference.

- Remove the land to the south of Stratford Road and west of Creynolds Lane from the Green Belt and include it within the site allocation BL2 to ensure the site allocation is based on a robust, justified and appropriate strategy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15167

Object

Policy SO1 - East of Solihull**Respondent:** David Cuthbert**Summary:**

I believe the inclusion of site SO1 in the above Plan to be unsound on the grounds that it breaches a number of conditions as detailed in the NPPF:

- location of this site breaches the openness of the greenbelt
- no evidence of exceptional circumstances being put forward as justification why this particular site should be included within the Plan.
- Damson Parkway defines a clear any physical boundary between the existing urban area and the Green Belt

Change suggested by respondent:

This site should be withdrawn from the Plan .

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14198

Object

Policy BL1 - West of Dickens Heath**Respondent:** James Cutter**Summary:**

I strongly object to any plans to build on the recreational grounds.
The destruction of such a Solihull legacy would be tragic and simply unjust.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14124

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Berkswell Charities**Summary:**

Paragraph 160. Plan is not future-proofed to provisions of White Paper and underlying principles to achieve affordable housing. Fails to recognise & potentially excludes almshouse charities as form of affordable housing. Requires almshouse charities to provide financial contribution or provision of affordable housing and considers almshouse charities as unsuitable to provide affordable housing for developers. This approach leads to fewer almshouses being built and adds to costs, contrary to need to boost affordable housing

Change suggested by respondent:

Almshouse charities should be recognised as a legitimate provided of affordable housing

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14127

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Berkswell Charities**Summary:**

Policy P4A paragraph 2 should clarify that almshouse charities are a form of affordable housing, as they satisfy the NPPF eligibility criteria, and fall within the definition of social housing. Without this the policy is potentially discriminatory and work against the provision of almshouse properties in Berkswell Parish

Change suggested by respondent:

Policy P4A paragraph 2 should clarify that almshouse charities are a form of affordable housing

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14129

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Berkswell Charities**Summary:**

Paragraph 168/Policy P4A is prejudicial to some registered social housing providers such as almshouse charities as developers may be reluctant to enter discussions with an almshouse charity if it may seek to house those from the local community, which could be excluded by Borough wide need.

Change suggested by respondent:

Include specific reference to almshouses as a form of affordable housing, to community led housing which should be given the same recognition as affordable housing

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

14131

Object

Balsall Common**Respondent:** Berkswell Charities**Summary:**

Paragraph 242/544. A concept masterplan should be prepared for Riddings Hill, Balsall Common (SLP2013 Site 19), which should include the provision of almshouses

Change suggested by respondent:

Riddings Hill should be included in concept masterplans

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

14132

Object

Balsall Common**Respondent:** Berkswell Charities**Summary:**

Paragraph 531. The Trustees should be a key stakeholder as Berkswell C of E school is vested in the charity, and all housing proposals within Balsall Common fall within the terms of the charity scheme. Need for education strategy recognising other schools in area. Plan lacks detail of new school proposal, such as size, location, delivery, trigger point, community use, access/parking, constraints & design issues. Lack of Special Education Needs (SEN) provision. No indication of phasing of school to meet needs of housing across settlement. Does not factor in potential extra 300 homes at BC1.

Change suggested by respondent:

Should set out clear education strategy taking into account existing 3 schools and ensure availability of school places as needed and potential for expansion.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14134

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Berkswell Charities**Summary:**

Policy BC6. Berkswell C of E school is the nearest to this site, but a footpath/cycleway link is required. This would be consistent with the aim to support walking and cycling strategies

Change suggested by respondent:

Should make clear that a financial contribution to cycling/walking provision to Berkswell C of E school is required

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14135

Object

Policy P5 – Provision of Land for Housing**Respondent:** Berkswell Charities**Summary:**

Call for Site 43 Old Lodge Farm, Kenilworth Road should be included in the table of sites proposed for allocation, as it is above the threshold for small sites in the NPPF. A new policy including contribution for cycling/walking access provision to Berkswell C of E school is required

Change suggested by respondent:

Include Site 43 in table of allocated sites in paragraph 226

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14137

Object

Balsall Common**Respondent:** Berkswell Charities**Summary:**

Call for Site 43 Old Lodge Farm Kenilworth Road should be included as allocated site with policy requiring financial contribution to cycling/walking access provision to link to Berkswell C of E school

Change suggested by respondent:

Add new policy allocation for Site 43 Old Lodge Farm and include requirement for financial contribution towards cycling/walking access provision to link site to Berkswell C of E school

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14164

Object

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** Berkswell Charities

Summary:

P4B

1. The draft submission Plan fails to identify if the green belt land referred to includes the land that SMBC seek to release from the Green Belt or whether this is additional green belt land that SMBC would support the release of to meet a Local Need for housing. This policy is unclear and needs clarification.
2. If the policy is proposing the release of additional green belt land, it is unsound and fails to consider the provisions of the NOP whereby the view is that Brownfield sites should be considered at first instance
3. P4B ii is contrary to principles of freedom of choice to limit those in need of accommodation to allocated housing sites before access to a local needs' provider can be accessed.
4. The "local connection to the parish" provisions cannot override the terms of Trusts established within Charity Schemes as governed by the Charity Commission to which Charities are open public scrutiny, to do so fetters Trustees discretion which is an integral part of Charity Law. An exclusion within this clause should be applied in respect of registered Almshouse Charities.
5. The provision of Community-Led Housing is supported by the Parish Council to meet the needs of the local populace within the allocated sites.
6. By implication, green belt site allocation would not be within easy access of the local amenities or transport which is prejudicial and discriminatory to the local parish community whose personal circumstances may require accommodation nearer to amenities but which would not be available due to them by virtue of their characteristics.
7. A community-led housing project for those who are in the older age bracket, as is typically the case for the Almshouse Model, could risk being considered under the rural exceptions policy despite being a registered affordable housing provider for the most vulnerable in society as the Local Plan is currently drafted
8. The allocation of Local needs via the Rural Exceptions Policy demonstrates a total lack of community engagement regarding the need to respect and listen to the needs of the community. Any development envisaged by the rural exceptions rule by the Local Plan appears to be the only mode that Local Housing needs can be met and such a project would likely be under the umbrella of a Community-Led Housing Scheme. Yet the benefits of Community-Led Housing, the Strategic Vision for Solihull 2020-2025 and Partnerships with Birmingham together with the White Paper, "Planning for the Future" have been inadequately and woefully addressed within the Local Plan.
9. Policy 4(b) is contrary to the provisions of the Community Right to Build Orders and the Localism Act 2011
10. The Local Plan discriminates against Almshouse Charities who provides Affordable Housing via the Almshouse Model, the definition of which is recognised by the Central Government.

Change suggested by respondent:

Berkswell Charities would seek amendments to include specific reference and provisions to include Community-Led Housing within the Local Plan.

Berkswell Charities respectfully requests that the Inspector recommends SMBC develop a supportive policy environment to include enabling policies, and

aligning planning, corporate asset management and housing policies to create opportunities for CLH schemes

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

15171

Object

Balsall Common**Respondent:** Berkswell Charities**Summary:**

Call for Site 43 Old Lodge Farm, Kenilworth Road should be included in the table of sites proposed for allocation, as it is above the threshold for small sites in the NPPF. A new policy including contribution for cycling/walking access provision to Berkswell C of E school is required

Change suggested by respondent:

Include Site 43 in table of allocated sites in paragraph 226

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10585

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Anna Dallol**Summary:**

It is too close to residential area. Damson Parkway is already very busy and dangerous to walk Along with my small children. The extra traffick, noise, pollution this will create is unacceptable. Also loss of green belt land.

Change suggested by respondent:

Move away from residential areas, we walk down damson parkway with young children both into Solihull and to elmdon park if this goes ahead we will be forced to drive everywhere as walking or cycling will be unsafe with added traffic and pollution. This will have a negative impact on many peoples quality of life and physical health.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10584

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Dr Bander Dallol**Summary:**

It is too close to houses and traffic will be higher and loss of green belt in a condensed area already. Noise also is a consideration. Traffics not only by employees but from tip users.

Change suggested by respondent:

To make it in a remote area far from houses and schools and walking paths etc.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10640

Object

Policy P12 Resource Management**Respondent:** Mrs Jean Dalton**Summary:**

The plan doesn't take into account the disruption local residents have already suffered with building works for JLR on Damson Parkway, especially regarding the volume of traffic. This plan would further impact disruption to our daily lives. The plan is ill thought out with no regard or concern for residents.

Change suggested by respondent:

The relocation needs to be further away from residential areas.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14708

Object

Blythe**Respondent:** Pauline Daniels**Summary:**

Shirley has taken more development than any other area within Solihull.

Road congestion is getting to an impossibly dangerous level which in turn is increasing air pollution beyond a safe level and impacting on our children's health.

We have precious little green belt which should be protected for our future generations and also help with flooding which is a serious problem.

Doctors and schools cannot accommodate the population as it is.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11041

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Andrew Darby**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11210

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Jennifer K Darby**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11208

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Jennifer Davies**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10977

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Laura Davies**Summary:**

To provide a much needed new school with excellent facilities that will benefit students and the wider community. My children would benefit from this school in future years, they currently attend holiday camps at the existing school and the facilities aren't appropriate for the needs of children in the community.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10650

Object

Blythe**Respondent:** Mr Mark Davies**Summary:**

and our existing dentist, which we pay for, is at capacity. Appointments have to be made months in advance. Our local doctors surgery, it appears, is closing by stealth. Getting a doctors appointment is extremely difficult and cannot cope with the number of residents as it is.

There will be a lack of general leisure facilities for the new residents.

Traffic - The proposed plans will add to traffic chaos during construction and once the development is finished and then for residents.

Change suggested by respondent:

A smaller number of units allocated to the Shirley area.

An urgent review of the use of greenfield sites.

An urgent review of the provision of new schools.

An urgent review of medical facilities for the new houses, e.g. doctors and dentists.

These additional houses necessitate the need for additional leisure facilities, e.g. a swimming pool, health club etc along the lines of Tudor Grange leisure centre.

An urgent review of traffic provision for the new site and parking provisions. As a resident of a new development, a lack of visitor parking poses problems on the estate for many properties.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10750

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Miss tanaya davies**Summary:**

I live with my family in Cheswich green, and our house has a stream at the bottom of the garden. Since the development of the Cheswick place we have noticed the stream getting much higher almost leaking into our garden. Those that live on willow drive do have flooding since the development. We will not be able to cope with more development. We cannot cope already with local GP services with the volume of residents.

Change suggested by respondent:

There should be a stop in building retirement homes, heard Solihull being referred to as God's doorstep with the sheer volume of retirements homes being built!! these should be turned into general flats for families or general people.....

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

13965

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Elizabeth Davis**Summary:**

Fully supports Policy KN2 and believes it meets the Tests of Soundness and is compliant with relevant legislation. Believes Policy KN2 Concept Masterplan follows a Placed Based approach and will benefit all parts of the local community over the term of the Local Plan and beyond.

Change suggested by respondent:

I am satisfied that Policy KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a Place Based approach that I can fully support, without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10613

Object

Policy S01 - East of Solihull**Respondent:** Mr Mike Davis**Summary:**

The site is within the green belt and there's no very special circumstances to remove it. The Grade II listed Field Farm will be harmed. It'll cause access and safety problems using the existing sports pitches. Damson Parkway is a key transport corridor between the motorway and Coventry Road that has been negatively affected by the JLR expansion. An extra 700 homes will add 1,400 cars, creating more traffic and pollution. The access point opposite the Spire hospital causes a safety problem. This plan will result in more children yet existing schools can't accommodate them and there is no school.

Change suggested by respondent:

This site is precious green belt land that provides valued open space to the local community. This site is already a problem area due to traffic and cars heading from JLR. No building should take place here and certainly not at the size of 700 homes which is completely inappropriate for a historic area on the edge of Catherine-de-Barnes village. If building was to take place here, then the scale should be vastly reduced and be set back from the existing Damson Parkway to avoid future highways safety problems.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10614

Object

Policy P12 Resource Management**Respondent:** Mr Mike Davis**Summary:**

This site is not fit to house a relocated Household Waste and Recycling Facility as the area has already been heavily built on. It will cause highways and safety problems, adding more traffic to the roads in an area that has already seen the JLR expansion approved and has plans for 700 homes on Damson Parkway. The cumulative effect of this is traffic chaos on a key transport corridor in and out of Solihull, blocking access to and from the motorway. The site is not conducive to this as it is a residential area.

Change suggested by respondent:

Another location

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10648

Object

Foreword**Respondent:** Mrs Clare Davison**Summary:**

Publicity for the consultation has been inadequate-I found out about it because I happened to walk past an A4 piece of paper stapled to a lamppost on a walk around my local area. As you rightly state, the plan is one of the most important proposals for the people of Solihull. More effort to obtain the views of residents should have been made. The plans will negatively impact the local environment, wildlife, house prices, infrastructure, traffic flow and the ability for people in Solihull to enjoy and benefit from green spaces.

Change suggested by respondent:

Advertise the consultation to the people of Solihull - ensure that all residents in areas surrounding proposed development sites are made aware of proposals and given the opportunity to respond. Rethink the links being made between HS2 and housing need in Solihull. Protect our green spaces, remaining ancient woodland and green belt land by not allowing it to be built on. Do not overdevelop existing villages with defined borders making them into large concrete extensions of Solihull. Protect the quality of life of the people who live in Solihull now.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10605

Object

Policy S01 - East of Solihull**Respondent:** Mr Tom Davis**Summary:**

The site is within the green belt and there's no very special circumstances to remove it. The Grade II listed Field Farm will be harmed. It'll cause access and safety problems using the existing sports pitches. Damson Parkway is a key transport corridor between the motorway and Coventry Road that has been negatively affected by the JLR expansion. An extra 700 homes will add 1,400 cars, creating more traffic and pollution. The access point opposite the Spire hospital causes a safety problem. This plan will result in more children yet existing schools can't accommodate them and there is no school.

Change suggested by respondent:

This site is precious green belt land that provides valued open space to the local community. This site is already a problem area due to traffic and cars heading from JLR. No building should take place here and certainly not at the size of 700 homes which is completely inappropriate for a historic area on the edge of Catherine-de-Barnes village. If building was to take place here, then the scale should be vastly reduced and be set back from the existing Damson Parkway to avoid future highways safety problems.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10606

Object

Policy P12 Resource Management**Respondent:** Mr Tom Davis**Summary:**

This site is not fit to house a relocated Household Waste and Recycling Facility as the area has already been heavily built on. It will cause highways and safety problems, adding more traffic to the roads in an area that has already seen the JLR expansion approved and has plans for 700 homes on Damson Parkway. The cumulative effect of this is traffic chaos on a key transport corridor in and out of Solihull, blocking access to and from the motorway. The site is not conducive to this as it is a residential area.

Change suggested by respondent:

Another location.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14810

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs M Dawson**Summary:**

already a lot of development in the area which has closed the gaps in the greenbelt.

Change suggested by respondent:

Sites which were business properties should become residences with 24 hour services.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10589

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Mr Andrew Dean**Summary:**

The plan uses maps which are out of date. They do not take in to account development on existing properties that has taken place since the initial plans were submitted.

The allocation of the 'zone of significance' around listed buildings is arbitrary and illegally impacts the residential and development rights of existing properties arbitrarily placed inside said 'zone'.

Change suggested by respondent:

1. The Zones of Significance should be altered so as not to encroach on any existing dwelling / garden / plot. Failure to do so will result in legal action from representatives of 20 Balsall Street East.
2. There should be a formal footpath designated across the Holly Lane playing fields to facilitate pedestrian access to the schools. Even better (in addition) would be a footpath directly through to Balsall Street East at the northern or eastern part of the development.
3. The vehicular entrance road junction with Balsall Street East should have some element of traffic management, e.g. a mini-roundabout, to improve traffic flow in & out of the development and improve safety by reducing traffic speed along Balsall Street East.
4. All existing properties along Balsall Street East should be provided with an 'enhanced green edge' / bund to alleviate the impact to privacy of rear gardens - including houses backing on to the SI Grassland field to the West
5. Houses adjacent to the access road should have an 'enhanced green edge' to the sides of their properties to alleviate the impact of traffic noise, light and pollution of idling cars queuing to exit the development.
6. If (when?) the site is given the go-ahead for development, impacted residents should be proactively contacted to review and comment on the detailed development proposals prior to final approval.
7. Road lighting on the access road should be low in height so as not to impact the existing properties.
8. The access road should have speed calming measures and a 20mph speed limit.

Legally No
compliant:

Sound: Yes

Comply with No
duty:

Attachments: None

10590

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Mrs Helen Dean**Summary:**

Maps for this site are out of date and therefore SMBC are consulting on inaccurate maps. A development of 6 flats on the former site of Silverbirches (Frog Lane) is not captured. The access to this site has not been amended and the maps are misleading. In addition the current boundary line for the former site of Silverbirches is physically further forward of the line depicted in the consultation maps therefore the maps for this development site are flawed and the consultation on this site is unlawful.

Change suggested by respondent:

Maps which have been presented for consultation must be accurate and reflect the planning permissions granted and the actual development passed by SMBC and undertaken by developers in the many years which have passed since this development was initially proposed. The maps for the site of Frog Lane are out of date. Only when the maps for this site are up to date can residents be expected to make comments on this proposed development. Until this time SMBC's consultation on this site is unlawful.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

11233

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Judith Dean**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10732

Object

Balsall Common**Respondent:** Mr D Deanshaw**Summary:**

There is a need for a strategy to cover the potential requirement for expansion of Heart of England Secondary School to meet the additional numbers of pupils generated by the housing proposals, which could involve relocation of the existing Primary School.

Change suggested by respondent:

Include strategy for expansion of Secondary School in paragraph 532.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10734

Object

Balsall Common

Respondent: Mr D Deanshaw

Summary:

There is an inference in Paragraph 526 that Balsall Common may be subject to further development, depending on requirements from other locations.

Change suggested by respondent:

Include strategy to address possible additional development needs in Balsall Common.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

10735

Object

Balsall Common

Respondent: Mr D Deanshaw

Summary:

The existing Primary School is oversubscribed and needs expansion which will require relocation, needs to be addressed in this Plan, and will open up the possibility of the Secondary School expanding into the site. Options for relocation are Frog Lane, though this may be difficult given the housing proposal. Alternatives are Oakes Farm, recognising that the Plan already breaches the Balsall Street settlement boundary and this site has been submitted, or Grange Farm where the submission included a new Primary School, and the site is large enough for open space/parkland.

Change suggested by respondent:

Include proposals for a relocated and expanded Primary School.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

14205

Object

Balsall Common**Respondent:** Mr D Deanshaw**Summary:**

- > Concern over the sheer scale of development within Balsall common.
- > Two sites ignored/missed in the draft plan.
- > Triangular site in Waste Lane and a site of Kenilworth Road adjacent to Dengate drive.
- > Both sites (roughly 4 acres) were considered desirable in the Balsall Common Village Plan which was published ten years ago.
- > Has the support of the Campaign for the Protection of Rural England (CPRE).

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

13695

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mariana Defteraiou**Summary:**

- Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.
- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
 - > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
 - > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
 - > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.
 - > Visited Windmill on Holiday

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14279

Object

Policy P17 Countryside and Green Belt**Respondent:** Delta Planning**Summary:**

Policy P17 3i relating to limited infilling in washed over Green Belt settlements is not justified or consistent with National Policy. Proposals for limited infilling should be considered on a case-by-case basis as a matter of fact under the limitations of the NPPF, as concluded in various appeal decisions.

Change suggested by respondent:

In order to make Policy P17 sound, paragraph 3(i) should be deleted in its entirety to remove the list of villages where limited infilling is allowed.

Paragraph 423 should also be deleted from the plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11069

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carolyn Dennison**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

15243

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Stoford Developments**Agent:** Delta Planning**Summary:**

Supports UK Central concept as offering the greatest potential for economic growth in the Borough. The key objectives for development proposals set out in the policy fully align with our own proposals for Site UK2.

With specific regard to JLR and Site UK2, support the release of this land from the Green Belt to accommodate employment development and generally agree with the exceptional circumstances case set out.

The Concept Masterplan referenced at paragraph 107 is not included in the Draft Submission Plan. As site promoters we have included with these representations a Site Supporting Statement which sets out our vision for the site and contained within this is our Concept Masterplan which we put forward for consideration with the aim of having this agreed with Solihull MBC and included within the final plan.

The following text should be amended to make the policy clearer and support the soundness of the Local Plan.

- The heading 'Jaguar Land Rover' above paragraphs xii-xv of Policy P1, as well as the heading which precedes paragraph 104 in the supporting text to Policy P1, should be amended to make it clearer that this policy and text covers both JLR and Site UK2, given that these sites are distinctly different areas on the Proposals Map and that different policies apply to the two areas. This will help with clarification in reading the plan.
- Paragraphs xii-xv of Policy P1 which provides the details of Site UK2 should be amended to better align with Policy UK2. It would be clearer if there was a clear cross reference to Policy UK2 after the words 'employment development' on line 2, as this would help to define the proposals and by ensuring that it is Policy UK2 that ultimately sets out the site specific policy for Site UK2. It is important also to make clear that uses with links to JLR are not the only employment uses permitted on the site.
- Within paragraph 104 of the supporting text to Policy P1 reference to 'local' should be removed in relation to employment uses. There is no definition of what 'local' means within the plan with reference to economic development and the term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this which will clearly be a highly attractive location for both businesses relocating from within the District but also new inward investment and businesses relocating from within the wider region. The subsequent text should also be amended to cross reference to Policy UK2 as the principal policy for Site UK2.
- We see no need for the first two sentences of Paragraph 105 to make more specific separate reference to land on the south eastern side of Damson Parkway being attractive to the automotive and motorsport industries. There is no reason why this area is any different from the rest of the allocation area. These two sentences should be deleted.
- In the third sentence of Paragraph 105 reference is made to part of the site also being identified for a relocated Household Waste and Recycling Centre (HWRC) and Council Depot. We would suggest that this reference be clarified to reflect the Council's stated position on this matter in Paragraph 353 of the Draft Plan which is that the site has been identified as one 'option' for the HWRC relocation and that no final decision has yet been taken on this proposal. Indeed, it is apparent from the Council's 2019 evidence base assessment report that there are other sites also in contention for this use which have a higher suitability scoring.
- In the fifth bullet point of Paragraph 106 reference to the primary highway infrastructure should also be included in the list of already committed development, together with that fact that this and the other committed development within Site UK2 have now been constructed not just permitted.
- Given there are other possible sites for the Council's HWRC we do not consider that the 8th bullet point of Paragraph 106 adds anything to the special circumstances case for UK2. The case for Green Belt release is compelling without this.

Change suggested by respondent:

The heading for and the text of paragraphs xii-xv of Policy P1 that relates to JLR and Site UK2 should be amended as follows:

“Jaguar Land Rover (JLR)/and Site UK2

xii. The Council will support JLR to compete and further its success in the global vehicles industry. To achieve this, the JLR site will need to continue to evolve and where necessary expand, with the only realistic opportunity for significant expansion being to the north east.

xiii. The Council will support and encourage the development of JLR within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of JLR as a major manufacturer of vehicles.

xiv. Site UK2 on the Policies Map, will be released from the Green Belt to accommodate employment development as set out in Policy UK2. This will include employment development to meet wider identified needs, together with that required to meet the additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport. . The exceptional circumstances justifying the removal of the land from the Green Belt are set out in the justification to this policy.

xv. It will be expected that proposals for the development of Site UK2 will be promoted in a comprehensive and coordinated manner that can make provision for a phased approach, if required”.

2. Paragraphs 104 and 105 and the associated heading should be amended as follows:

“Jaguar Land Rover (JLR)/and Site UK2

104. The Council will continue to support the further development and modernisation of the vehicles plant in order to enable its continued success in the competitive global vehicles market. JLR is constrained in terms of its ability to expand by its location within the main urban area. To reflect this and having regard to the vital importance of JLR to the region’s economy and to job creation, Policy P1 includes proposals to remove land at Damson Parkway from the Green Belt to support this aim. As set out under Policy UK2, in addition to meeting JLR needs, Site UK2 will also provide for wider employment opportunities to meet the needs identified in Policy P3, as well as for potential ancillary requirements for Birmingham Airport.

105. Part of Site UK2 has also been identified as a potential location for a relocated Household Waste and Recycling Centre and Council Depot subject to ongoing options assessment by the Council. Further justification for this proposal is included in Policy P12.”

3. The fifth bullet point of Paragraph 106 should be expanded as follows:

“A significant part of the site already has planning permission and has been constructed for use as a despatch facility and logistics operations centre for Jaguar Land Rover, as well as the associated primary road infrastructure works for the site. These proposals were which was justified with very special circumstances”.

4. The 8th bullet point of Paragraph 106 relating to the Household Waste and Recycling Centre should be removed entirely.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments: None

15244

Object

Policy P3 Provision of Land for General Business and Premises

Respondent: Stoford Developments

Agent: Delta Planning

Summary:

Supports the inclusion of this site within the table of employment site allocations under Policy P3.

The area quoted within the table should however be clarified. Although the gross area is c94 ha, that area includes substantial areas of land that are already committed/built out as well as substantial areas that will form part of the blue/green infrastructure. The actual net available area remaining is approximately 39 ha.

This also applies to Site UK1, the available employment land within that allocation is, according to the Arden Cross Masterplan, only approximately 30ha.

Based on the conclusions of the HEDNA paragraph 142 concludes that there is a shortfall of around 5.2 - 6.6 ha of employment land that the plan should provide for. The employment land need is far more extensive than the identified shortfall derived from the GL Labour Demand and past trends Modelling. There is no allowance for the past trends of JLR expansion itself (including the major LOC facility within Site UK2) or to meet the very strong regional demand for employment space, in particular for logistics warehousing, as referenced at paragraphs 12.57-12.58 of the HEDNA. That wider need is evidenced through the West Midlands Strategic Employment Sites Study (WMSESS), part 2 of which is due to be published shortly.

Part 1 of that study however has already made clear that the M42 corridor is one of three areas within the West Midlands where there is an acute shortage of land supply set against the highest volume of demand, and that the case for allocating strategic employment sites is strong. On the back of this evidence, both Birmingham and North Warwickshire have released some Green Belt for strategic employment uses. It is evident from interim information arising from the Part 2 study that although this additional supply has come forward in recent years, the overall shortage of land remains and this situation further supports the allocation of Site UK2. We would suggest therefore that Paragraph 142 be expanded to provide a fuller picture of employment needs more clearly.

In line with these comments reference to 'local employment' within paragraph 145 should also be removed and just the term 'employment' should be used. This paragraph should also cross reference to Policy UK2. We also see no reason for reference being required to a plan-monitor-manage approach in this case or repeated Green Belt justification which is provided for elsewhere in the plan under Policy P1.

Change suggested by respondent:

Policy P3 Employment Allocations Table should be amended for Sites UK1 and UK2 to reflect the net available areas - Land at HS2 Interchange (UK1) C140 (gross) c30(net available) Land at Damson Parkway (UK2) c94 (gross) c39(net available).

Additional sentences should be added to paragraph 142:

"The HEDNA 2020 also notes that market intelligence shows a very strong demand for warehousing and industrial units across the spectrum which is concentrated along the M42 corridor and forecasts point to a clear need for additional warehousing. This is likely to be reinforced by the West Midlands Strategic Employment Sites Study Part 2. Previous Regional Studies which have consistently shown a shortage of land for strategic employment sites across the West Midlands, with the M42 corridor in particular being an area that has historically had a high volume of demand but a constrained supply. The inclusion of site UK2 can therefore also help towards meeting this wider regional strategic land requirement."

Paragraph 145 should be amended as follows:

"The above table also includes two allocations (Sites UK1 & UK2) which will necessitate land to be removed from the Green Belt. The justification for Policy P1 provides the exceptional circumstances for this approach. Whilst Site UK2 is partly intended to provide for JLR needs, much of this has already been committed in the form of the despatch area and logistics operations centre, approved under very special circumstances. The concept masterplan shows the development areas that are already committed and constructed and a number of phases remaining for development, which can meet wider general local employment needs together with that required to meet any additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport as set out in Policy UK2. The site can also accommodate a potential replacement Household Waste and Recycling Centre and Depot subject to ongoing options assessment by the Council as set out in Policy P12., Evidence indicates that Site UK1 is likely to have a role to play in meeting local employment needs, especially later in the Plan period."

Legally compliant: Yes
 Sound: Yes
 Comply with duty: Yes
 Attachments: None

15245

Object

Policy P9 Mitigating and Adapting to Climate Change

Respondent: Stoford Developments

Agent: Delta Planning

Summary:

Acknowledges the plan has a crucial role to play in securing mitigation against and adapting to climate change. Fully in support of the aims and objectives of Policy P9 and the general requirement that proposals for major development be accompanied by a Climate Change Assessment as set out under Paragraph 7 of the Policy.

However, some of the site level requirements within paragraph 3 should be less specific to ensure a holistic approach to sustainable design is taken. In particular concerned by mandatory BREEAM Excellent accreditation and a 15% renewable/low carbon energy source requirement as may not present best sustainability outcomes. Also securing BREEAM Excellent on green field sites can be extremely difficult under the new 2018 BREEAM standards. Other approaches can be just as effective in reducing carbon emissions, and could be set out in the Climate Change Assessment already contained in the policy.

As site promoters of UK2 for example we would approach building design to minimise operational carbon emissions based on a three-step approach of

- Step 1 - Passive Design Measures, including
 - i. high levels of air-tightness and insulation to reduce potential heat loss.
 - ii. rooflights to cover 15% of the warehouse roof area in order to maximise the use of daylight, while optimal orientation takes into account the path of the sun and the prevailing winds.
 - iii. Where possible offices are designed on a narrow floorplate with dual aspect glazing to take advantage of natural daylight and allow for effective passive ventilation.
 - iv. Provision of solar shading to ensure thermal comfort and avoid solar gain.
- Step 2 – Efficient Systems. Where energy use is required this can be specified and installed using the most energy efficient plant systems available. This can include intelligent lighting with low-energy LED fittings, daylight linking and presence-detecting controls. High-efficiency, low-NOX boilers with thermostatically controlled radiators to provide heating to offices, and the sub-metering of buildings to help users track and manage their energy consumption.
- Step 3 – Low or Zero Carbon Technologies. Once the operational energy use in the building has been minimised we then design and install low-or zero-carbon technologies to meet customer’s specific operational needs and, as a result, further reduce operational carbon emissions.

In addition to the above, we can undertake ‘cradle to rave’ Carbon Life Cycle Assessments based on the requirements of BS EN 15978 which show the significance of the embodied carbon emissions associated with the construction process which typically accounts for as much as 70% of lifetime carbon emissions of a warehouse, based on a 30-year assessment period. In this way we can therefore reduce embodied emissions through efficient design, the use of low carbon materials and the focused reduction of construction waste including diverting waste from landfill.

Therefore suggest that a more bespoke approach is taken to consider each site on its merits through the requirement to provide a bespoke Climate Change Assessment.

The policy should be clear as regard to which BREEAM standard it relates to (i.e. BREEAM new Construction 2018’ standard) and that these should be referenced as targets given there is no way to guarantee the outcome of an assessment

It is not realistic to expect minor development to undertake BREEAM Assessments

Change suggested by respondent:

Policy P9 Paragraph 3, criterion iii and iv. should be replaced with the following text:

“iii 'Major non-residential development should target BREEAM Excellent wherever possible using 2018 BREEAM Construction Standard. The approach to achieving this should be set out in the Climate Change Assessment required under paragraph 9.

iv Target at least 15% of energy where possible from renewable and/or low carbon sources for all major housing developments and non-residential developments of 1,000 sq.m of more”.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments: None

15246

Object

Policy UK2 - Land at Damson Parkway

Respondent: Stoford Developments

Agent: Delta Planning

Summary:

Support this policy and the accompanying text at Paragraph 857-86. As landowners and developers of the site we have set out our Concept Masterplan which we put forward for consideration with the aim of having this agreed with Solihull MBC and included within the final plan. This Plan fully aligns with the development principles listed in the policy and the infrastructure requirements listed, and also includes a phasing strategy.

There are some aspects of the detailed text we consider should be amended in order to make the policy clearer and which would further support the soundness of this aspect of the Local Plan.

These are as follows:

- The text within the Policy and at paragraph 859 should remove references to 'local' employment needs. As stated elsewhere in our submissions to the Plan, there is no definition of what 'local' means within the plan with reference to economic development and the term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this which will clearly be a highly attractive location for business relocating from within the District but also from new inward investment and businesses relocating from within the wider region.
- The list of acceptable development in the allocation area should generally be set out more clearly.
- References in the Policy and paragraph 859 to the inclusion of a Household Waste and Recycling Centre and Council Depot should be amended to make clear that the Council has not yet made a decision on this issue and other sites are still in consideration as set out in Paragraph 353 of the Submission Draft Plan.
- The opportunity should be taken in the supporting text to clarify the scale of the available allocated land.
- The special circumstances case for Green Belt release are contained in the explanatory text to Policy P1 and cross referenced at Paragraph 863. There is no need for Paragraph 859 to try and summarise this again.

Change suggested by respondent:

The opening sentence of the Policy UK2 should be amended to read:

“This site is allocated for employment development. It provides for general local employment needs together with the needs associated with the key economic assets in the UK Central Solihull Hub Area, and for a potential relocated Household Waste and Recycling Centre and Depot as set in Policy P12”

2. Paragraph 859 should be amended to read as follows:

“This is an employment land release of c94 ha (gross). Allowing for development already committed/built and green/blue infrastructure requirements the allocated area amounts to c39 ha. net. It will provide additional employment land to meet wider identified needs, together with providing for future expansion for JLR and JLR related activities and ancillary development to Birmingham Airport. Part of the site also provides a potential option for a relocated Household Waste and Recycling Centre and Depot as set out in Policy P12.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments: None

13802

Support

Foreword

Respondent: Dickens Heath Parish Council

Summary:

Dickens Heath Parish Council has established a positive and ongoing dialogue with Solihull Planners throughout the process and participated throughout in the consultation process & is comfortable with the level of consultation that has taken place.

DHPC does not raise objection to the legality, soundness or the details arising from the duty to co-operate within the Housing Market Area.

Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments:

13863

Object

Policy BL1 - West of Dickens Heath**Respondent:** Dickens Heath Parish Council**Summary:**

Key Infrastructure Issues:

Satisfied with proposed education facilities.

Understand commitment to provide adequate health service provision, but have reservations over CCG's ability to provide in time effective manner.

Existing traffic and parking congestion issues; particular concern is Dickens Heath Road/Tanworth Lane junction at Miller & Carter, junctions onto Tilehouse Lane from Birchy Leasowes and Tythe Barn Lane, plus flow of traffic through village due to hazardous parking on Dickens Heath Road.

DHPC expect to be consulted on Highways and Traffic Management matters throughout life of Plan.

Village centre parking seen as key priority, as long-standing issues and planning controls been ineffective.

Recognise importance of improved connectivity and public transport links & highway improvements along Tythe Barn lane to Whitlock's End station, as well as enlarged parking provision.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

13864

Support

Policy BL1 - West of Dickens Heath**Respondent:** Dickens Heath Parish Council**Summary:**

Principle of Development:

Welcome reduction in housing numbers to 350 from 700.

Seek more formal protection of mature trees and adjacent woodlands through TPOs, especially given recent losses on development sites.

DHPC regard proposed Green Belt boundary at Tilehouse Lane and Birchy Leasowes Lane as very important – further development should not be allowed in Tidbury Green Parish to retain a firm peripheral Green Belt boundary and prevent further urban sprawl. This should be considered with regard to deferred Bromsgrove Local Plan, with significant potential development sites along the Solihull boundary.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

13866

Object

Policy BL1 - West of Dickens Heath**Respondent:** Dickens Heath Parish Council**Summary:**

Proposed Sports Hub -

Serious concerns about loss of playing pitches and sports facilities on site south of Tythe Barn Lane.

Important to retain links to the village and their contribution to the health and wellbeing of the local community.

DHPC propose an alternative consolidated enhanced sports hub on the site north of Tythe Barn Lane (within the boundary of the 2016 Draft Local Plan proposal), that will incorporate the existing sports pitches.

Proposed alternative sports hub would not alter the proposed housing development in the concept masterplans.

Our indicative scheme has the support of the common landowner.

Can be delivered in a timely manner with seamless transfer of clubs, Highgate United FC and Old Yardleians Rugby FC onto new site.

Would keep the facilities close to the village and be of great benefit to new and existing communities, and not an undetermined remote location further into countryside.

Adequate parking and good access, reduced need to travel.

Potential for additional planting to meet climate change objectives.

DHPC seek to replace part of the proposed wilding area. The sporting use would have a greater community, healthcare and recreational benefits than the designated wilding area.

Sports hub would provide a much more efficient use of land.

DHPC anticipate the sports hub being supported by Sports England as a logical alternative and less disruptive site for longstanding sporting activities.

Large section of existing designated wildlife area on this site includes the Equine Rescue Charity with stables and grazing, which would be relocated by the landowner.

Scheme would retain nationally recognised Akamba Heritage Centre.

Final scheme should be approved through EiP process.

Change suggested by respondent:

Replacement Sport Pitches and Hub to be situated on land north of Tythe Barn Lane, and accord with proposed concept plan as attached.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13867

Support

Policy BL3 - Whitlock's End Farm**Respondent:** Dickens Heath Parish Council**Summary:**

Whilst DHPC would have preferred housing numbers to be reduced to 250 dwellings from 300, they agree that this is more sustainable location as closer to public transport hub at Shirley railway station than previous Site 13 proposal.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14885

Support

Foreword**Respondent:** Canal & River Trust**Summary:**

I can confirm that the Trust does not have any further comments to make on the Plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14546

Object

Policy BL1 - West of Dickens Heath**Respondent:** Philip Dilworth**Summary:**

The land is high grade green belt.

The development will be detrimental to wildlife.

The narrow rural road network cannot take further development or traffic

With increased development the removal of trees I am concerned that flooding will increase.

The proposal will reduce access to activities that keep people fit physically and mentally

Many of the mitigation measures included in the plan are not achievable

The character will be adversely affected

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10934

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr Steve Dingley**Summary:**

We need the green belt protected around the village

Change suggested by respondent:

Develop elsewhere

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14122

Support

Balsall Common

Respondent: Patricia Dixon

Summary:

█ Proposals are appropriate

Change suggested by respondent:

█ Property appears blighted due to the unknown route of this By Pass

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14121

Support

Balsall Common

Respondent: Roy Dixon

Summary:

█ Proposals are appropriate

Change suggested by respondent:

█ Property appears blighted due to the unknown route of this By Pass

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10666

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Michael Doble**Summary:**

Viability of the site is questionable given the different ownerships.

The football club may be subject to restrictive covenants and are unlikely to have the funds to develop the sports pitches ahead of the sale of their existing pitches given the topography of the site.

Difficult to see how the site will be delivered as a single entity, taking into account the various ownerships. Likely to be future disagreements over land values and who pays for what between the owners. Site is part of the Meriden Gap and is an extension of the urbanisation, rather than a "Rounding Off".

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14160

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Michael Doble**Summary:**

Questions the viability of including this greenbelt site in the Solihull Local Plan.

There are at least 4 owners of the site.

The Football Club is unlikely to have the funds to purchase and satisfactorily develop the steeply sloping site by the canal into workable level playing pitches ahead of the sale of their existing pitch.

Wonders who would pay for the removal of any covenants.

The development of Thacker's Nursery should be resisted as it forms part of "The Meriden Gap",

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14801

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Michael Doble**Summary:**

Objects to Policy KN1;

4 different ownerships of the site (site cannot be treated/delivered as a single entity) - If the site is taken out of the Greenbelt it is likely that the developers will seek permission to develop the former Thacker's Nursery on its own, which should be resisted as it forms part of "The Meriden Gap", and in the most part forms an extension of the urbanisation, rather than a "Rounding Off".

Change suggested by respondent:

Without evidence to demonstrate that this housing allocation and associated sports benefits is deliverable, the effectiveness of the Council's Local Plan is in doubt and the requirements of the test of soundness have not been met. In the absence of such evidence, Policy KN1-Hampton Road, Knowle and related text should be deleted from the plan,

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10762

Object

Policy SO1 - East of Solihull**Respondent:** Mr Cliff Dobson**Summary:**

I am not qualified to comment on legal compliance or duty to co-operate so my comments relate only to the soundness of Policy SO1 from the viewpoint of a local resident.

They relate to green belt, open space, access to the countryside and the town centre, traffic management, financial contributions for education and primary health care

Change suggested by respondent:

General Comments on SO1 Allocation

1. SO1 is within the parish of Catherine de Barnes and Hampton-in Arden. This proposal should recognise this relationship, and acknowledge that any new development could be part of the Catherine-de-Barnes community and impact that community. As an example, I note that bus stops along Hampton Lane which link the communities of Hampton-in-Arden, Catherine-de-Barnes and Solihull are not shown on the Illustrative Concept Master Plan whereas bus stops on Damson Parkway are clearly marked.
2. The status and significance of the BDG Masterplan Proposal is unclear. It seems to contradict the SMBC Illustrative Concept Masterplan. This is not at all helpful. There should be a statement that development will adhere to the Concept Masterplan
3. Green Belt – I understand that if the land identified for development in SO1 is released from green belt, the land occupied by existing houses on the northern side of Hampton Lane will remain green belt. This is perverse. It would be more equitable to use Hampton Lane itself as the southern boundary of SO1. There is some scope for infilling or redevelopment in this established ribbon development. If substantial housing development to the north of existing homes is approved, infilling and redevelopment opportunities should also become available to existing households on the northern side of Hampton Lane.

Detailed comments on S01 allocation and SMBC Illustrative Concept Masterplan (ICMP)

1. Retention of sports pitches, historical significance of Field Farm and the rural character of Field Lane are welcomed. However, the rural character of Field Lane could be further enhanced by
 - a) Designating the small SE area adjoining Field Lane currently ear-marked for development as public open space to retain continuous green space along Field Lane
 - b) Providing access to Field Lane for pedestrians and cyclists from S01 which would give immediate access to the countryside, and also the amenities of Catherine-de-Barnes. There are many cyclists who commute along Hampton Lane and a number of the new residents of S01 would wish to do the same. Accordingly there should be direct access to the cycle route down to Catherine-de-Barnes and up to the airport and beyond.
 - c) Closing Field Lane to vehicular through traffic between Field Farm and the sports pitches entrances, but retaining access for pedestrians, cyclists and horse riders.

2. Other open and green space – the ICMP suggests a reasonable amount of green and open space throughout the development, except where it borders existing dwellings some of which have small gardens. The ICMP shows green buffer zones within the proposed new development but not where it adjoins existing dwellings. To respect the existing properties, similar buffer zones should be provided using pathways or trees.

3. Pedestrian access to Solihull town centre. This is currently proposed along Pinfold Road which would give the shortest walking distance to the town centre. However, this appears to cross open space which would not feel safe after dark. For maximum use and to reduce traffic, the pedestrian access should be through housing development preferably via well-lit roadside pavements not quiet paths. Should the proposed open space in the south west corner leading to Pinfold Rd be developed instead of the remote field in the south east corner, which could then be used for access to Field Lane by pedestrians and cycles as suggested in 1a-c above?

4. Traffic management – additional local traffic generated by a development on this scale has not been competently addressed in 3.iii on P213 of local plan. The following needs addressing
 - a) the congestion that builds up around the Solihull bypass junctions with both parts of Hampton Lane will inevitably increase, so there will need to be considerable infrastructure investment to address this substantial shortcoming.
 - b) Field Lane is a “rat run” at busy times. Although I understand this single track lane may become one way at some time in 2021, this could lead to speeding traffic. It would be preferable to redesignate Field Lane as a no-through route. This may in turn reduce traffic on Lugtrout Lane.
 - c) Lugtrout Lane is not safe to walk along as only just wide enough for two way traffic and there is no pavement or verge along most of its length, and no space to create one. It also appears to be used as a rat run particularly by JLR commuters.
 - d) Although the local plan envisages local traffic travelling along Damson Parkway towards the airport to avoid Catherine de Barnes and Lugtrout Lane, will this actually happen in practice?
 - e) Suitable pedestrian routes, cycle routes and bus services may not have much effect on the amount of traffic from the development given the level of current car ownership.
 - f) How will excessive traffic on all the boundary roads be mitigated?

5. As the ICMP describes “low density housing with driveways” I can only assume all other housing will not have driveways. High density housing such as apartments may have some form of parking bays, but where will those in medium density housing park their cars? As most households will have one car and many two or more, will there be sufficient parking? The failure to provide sufficient parking for private cars is perfectly illustrated in the recent Dickens Heath development. The plan must make it clear how many driveways/parking spaces to be provided.

6. “Financial contribution for education provision” may be required from developers, but how would this be used? There is no proposal for a new school included in the plan. However the nearest primary school at Yew Tree school has little or no room for expansion and could be described as “cramped”. Do the children who attend Yew Tree not deserve a new school? Could a new school be developed within S01 and the current Yew Tree school site be redeveloped for housing?

Any primary school should be within a safe walking distance and the other schools in the area are too far for younger children to walk. State secondary school pupils living within the proposed development are likely to travel by private car unless an imaginative transport plan makes bus travel attractive. This will add further pressure on the already congested road network at peak times.

7. How would developer contributions for primary health care facilities be used? Would they be sufficient to create new facilities, or just to expand an already stretched facility?

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14331

Object

Policy BL1 - West of Dickens Heath

Respondent: David Dobson

Summary:

- Wildlife on proposed site will lose their extensive rich habitat if the proposed development takes place.
- Flooding Concerns
- Village of Dickens heath would be unable to deal with the additional dwellings regarding parking/doctors/roads. Character will be detrimentally changed.
- Birchy Leasowes Lane is narrow and cannot be widened
- Site in on Greenbelt land and prone to flooding, brownfield land should be used instead.
- The land is not highly accessible. Village already at capacity and nearest primary school is full/ 2nd nearest requires you to drive to it.
- Already plenty of housing for those wishing to downsize/need care in Shirley Town.
- No car parking spaces (after 07:30) and poor public transport which needs improved.
- Sports facilities are good where they are currently and relocating them could have a detrimental effect i.e. traffic.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14566

Object

Policy BL1 - West of Dickens Heath**Respondent:** Emily Dobson**Summary:**

High water table results in flooding.

There is an enormous amount of wildlife in these fields.

Parking is frequently an issue.

The character of the village will be detrimentally changed with a large development on this site.

There is no post office.

Traffic issue.

The site itself is prime greenbelt land.

Land in question is not highly accessible.

Moving the the sports fields may not be adequate.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14558

Object

Policy BL1 - West of Dickens Heath**Respondent:** Nicola Docker**Summary:**

The site is surrounded by local wildlife sites and ancient woodland.

Concerned about the loss of community green space and sports facilities.

There are also concerns around the site being prone to significant flooding

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14537

Object

Blythe**Respondent:** John Dodd**Summary:**

I wish to register my formal objection to the above proposed development. I believe it is not in the interests of the local Shirley community either from an ecological or sustainability aspect.

Yours sincerely,

John Dodd
41 Amington Road
Shirley
B90 2RF

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14118

Object

Policy P18 Health and Wellbeing**Respondent:** Domino's Pizza UK & Ireland**Agent:** DPP Planning**Summary:**

There is no sound justification for criteria 3 to 5 of Policy P18.

No evidence to justify that locating any A5/Sui Generis use within certain distances of schools causes adverse health consequences. The evidence base documents do not refer to takeaways as a specific issue, make a link between the location of schools next to hot food takeaways and unhealthy eating habits, or identify a proliferation of such uses where obesity rates are higher in specific wards within the Council's area.

Solihull fares very well in terms of childhood obesity, therefore it is difficult therefore to understand the evidence to justify Policy P18.

The approach conflicts with national policy which contains no support for a policy containing a blanket ban or exclusion zone for A5 uses. The sequential approach (as detailed at paragraph 86 of the National Planning Policy Framework) would be undermined by the approach as the policy provides no flexibility for sites which could be within 400m of a school but within a designated centre.

Domino's support any initiative to promote health, wellbeing, and obesity. The positive economic benefits of a Domino's are significant. National policy places significant weight on economic health/growth.

Change suggested by respondent:

Criterion 3 should be re-worded to deal only with the amenity impacts of such a use.

Criteria 4 and 5 should be deleted from the plan and policy altogether.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14119

Object

Policy P18 Health and Wellbeing**Respondent:** Domino's Pizza UK & Ireland**Agent:** DPP Planning**Summary:**

The Policy P18 approach has been found unsound by several planning inspectors elsewhere, both at appeal and Local Plan examination stage. The London Borough of Waltham Forest had such a policy in place for over a decade and its application has proven ineffective in tackling obesity. Nottingham City Council have very recently had a similar policy thrown out by the Local Plan Inspector.

Change suggested by respondent:

Criterion 3 should be re-worded to deal only with the amenity impacts of such a use.

Criteria 4 and 5 should be deleted from the plan and policy altogether.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14120

Object

Policy P18 Health and Wellbeing**Respondent:** Domino's Pizza UK & Ireland**Agent:** DPP Planning**Summary:**

Policy P18 takes an inconsistent approach towards new development that sells food and discriminates against operations with an A5 use, leaving nowhere reasonable for them to locate. The approach is likely to result in significant harmful impacts on the local economy.

Change suggested by respondent:

Criterion 3 should be re-worded to deal only with the amenity impacts of such a use.

Criteria 4 and 5 should be deleted from the plan and policy altogether.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14268

Object

Policy BL1 - West of Dickens Heath**Respondent:** Aisling Donaghy**Summary:**

- > Site is flood zone one, the area cannot facilitate more houses, and new building will further the risk of flooding to existing housing in the area.
- > Site within greenbelt land which is a habitat for natural wildlife. Tythe Barn Lane is a bat habitat - thus development as close as site BL1 should not be allowed due to its close proximity.
- > Whitlocks End car park already cannot facilitate the population in the area. Locals in the area should not suffer due to the council accepting ill thought out plots.
- > The addition of 350 houses when there are additional unfinished new builds nearby will worsen already poor traffic conditions, therefore making the area an incredibly inconvenient place to live .
- >Vital for the sport clubs located on the proposed site to stay in the local area for mental and physical health.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10657

Object

Policy BL1 - West of Dickens Heath**Respondent:** Elizabeth Donaghy**Summary:**

Below are the reasons I object to planning 350 more houses in dickens heath:

- Flooding - the site is flood zone. The area cannot facilitate houses and by building more you put the houses in the surrounding area at risk of flooding also.
- Green Belt - the land is high protected green belt land. It is a habitat for natural wildlife. We should not be allowed to build 350 houses only a few yards from where these protected animals live. Objection were ignored when the new plot on Dickens Heath Road was proposed, which impacted wildlife in the area.
- Facilities - Whitlocks End car park was only extended a few years ago and it already can not facilitate the growing population in the local area.
- Traffic - every morning Dickens's heath road is overflowing with traffic during rush hour
- Sports - there are two football clubs, a rugby club and a fitbox club on the area proposed to build these new houses. Local sport, leisure and physical activity can help people to live longer, healthier lives.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14477

Object

Policy BL1 - West of Dickens Heath**Respondent:** Lawrence Donaghy**Summary:**

Objects to Policy BL1;

Loss of sports fields - Land is green belt, should be using brownfield sites - Impact of local wildlife and ancient wildlife - road network cannot cope - Flood zone - mitigation efforts not achievable thus unsustainable - Character/setting of the village adversely affected - local infrastructure unable to cope.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10875

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Michael Donovan**Summary:**

Abomination of green space including public footpaths

ruined setting of historic light hall farm

inadequate references to public transport upgrade details

inadequate references to the required upgrades required to the surrounding highway network

no reference made to current highway network capacity issues at peak time

Change suggested by respondent:

It needs to be removed altogether from the plan. Solihull Council's shameless approach to decimating every last area of green space is a significant concern.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10910

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Michael Donovan**Summary:**

Destruction of extensive wildlife habitat

Inadequate reference to the aforementioned wildlife habitats

Inadequate reference to the unsuitability of the existing highway network

Inadequate reference to the upgrades required to the highway network to accommodate the proposals.

Loss of a key, safe pedestrian and cycle bridleway (and private road) in order to accommodate access to the development.

Inadequate highway network to accommodate the construction of the development.

Inadequate public transport currently exists to serve the development, leading to more private vehicle use.

Inadequate references to public transport improvements.

Change suggested by respondent:

PLEASE LEAVE OUR GREEN SPACES ALONE. This development makes a complete mockery of the recent removal of the adjacent development plot. This area is used by many people for varied uses and would be a loss of a key green space. It is rich in diversity of its users and in flora and fauna. The planners and their colleagues should take a walk on these paths and fields with local people to understand the devastating effect that ANY development of this area would have. I can guarantee that any ambition to continue with plans to develop this area will be fiercely fought by local people - my recommendation is to bin the whole development.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10675

Object

Policy P12 Resource Management**Respondent:** Mr Robert Doody**Summary:**

There has been no consultation with residents about the possibility of relocating the existing HWRC site and Moat Lane depot to the UK2 site in Damson Parkway until this Draft Submission Plan was issued. The proposed site is already congested and will also result in significant increase to traffic using the residential part of the Parkway.

Change suggested by respondent:

Inclusion of the possible relocation of the existing HWRC to land in Damson Parkway be removed from the Plan until full consultation with the public has been carried out.

Legally compliant: No

Sound: Yes

Comply with duty: No

Attachments: None

14849

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs K Drakes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14149

Object

Balsall Common**Respondent:** Rosemary Drinkwater**Summary:**

Objects to all sites within Balsall Common:

> Object to the use of greenbelt land for homes with options at the new HS2 interchange.

> More use should be made of Brownfield land, empty shops and offices in the town centres.

> No consideration for food to be sourced and produced and locally.

> Concerns over raising the already high water table in Balsall common.

> Particular concern over site on windmill lane destroying the view, and destruction of Barratts farm and surrounding land.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14388

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Ms Gill Dudas**Summary:**

I would like to object to the proposed plans for Uk2 Solihull local planning proposal due to increased traffic and noise and further use of greenbelt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14815

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Stephen Duffield**Summary:**

The roads in central Knowle are already subject to frequent gridlock at peak times.
Carparks are often full to capacity

Change suggested by respondent:

Give detailed consideration to a relief road either to the east of west of Knowle village.
Designate suitable sites for future car parks

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14816

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Stephen Duffield**Summary:**

I do not see how moving the entrance to the school from a quiet B road with little HGV traffic (because of the low bridge at Dorridge) to a busy A road can in any way improve Student safety.

Even using the most optimistic income and building cost

figures as supplied by the Council there is a funding shortfall of £14 million.

Change suggested by respondent:

the available funds would be far better spent on a thorough modernisation of the existing school.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15088

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Diane Duftane**Summary:**

By adding to the already busy road, pollution would increase tenfold and roads wouldnt cope.

There is currently no public transport on Bill's Lane.

The urbanisation of Dickens Heath has also removed public footpaths. One is unable to walk from one side of Dickens Heath to the other without Winding through the maze of roads, not a pleasant experience when walking breathing in all the fumes.

Every Acre of Christmas Trees grown produces the daily oxygen requirement for 16 people. A hectare of Christmas trees will absorb 6 tonnes of carbon dioxide each year. The potential for the damage to the environment is huge.

lose the identity of Shirley and it would become another metropolis of Birmingham, there would be no distinction between Shirley, Hall Green and Dickens Heath.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14305

Object

Policy BL2 - South of Dog Kennel Lane

Respondent: Mrs Carole Duggan

Summary:

- > Too large to be accommodated around the Cheswick Green Settlement. It fails to respect the important character and integrity of established village boundaries, puts additional strain on existing local services including NHS, local infrastructure, roads & transport and increases to risk of further flooding of existing properties. The use of Brown Field site should also be exhausted before Green Belt proposals.
- > The proposed development site drains into Mount Brook and on to the River Blythe increasing the flood risk to associated land and properties. '1 in 100 year' flood risk calculation no longer applies; Environment Agency has already set a precedent by using 1/1000-year calculation for storm defences in East Anglia. Mount Brook and River Blythe are subject to either increased home insurance costs and or the failure to obtain flood insurance. Further development will not improve this situation.
- > It is important to retain the gap between Cheswick Green and the Shirley/ Dickens Heath conurbation as per the original planning concept for Cheswick Green. The council with this development intends to create an artificial boundary by building a new road as part of the Development. This is against the spirit and intent of the policy.
- > The area cannot accommodate the scale of development being proposed in terms of local services, medical, education and amenities in general, in an area where the private motor car is the main source of transport. Public transport is poor and cannot guarantee easy future access to and from Cheswick Green. Local road network already severely congested/gridlocked at peak times. limited scope for 'entertainment/ occupation' of young people which has been the cause of anti-social behaviour in the past.
- > New dwellings which will replace a green field site will increase co2 emissions /climate change/risk of flooding. Additional strain on water/electricity/sewage supply.
- >Existing school and Medical facilities would need to be expanded.

Change suggested by respondent:

General

The development application detail only relates to this sole development which is insufficient considering the other determined and undetermined applications in the locality. The effects of these multiple applications need to be assessed as a whole when considering, flooding, transport, services, amenities and employment etc. This total BL2 proposal should be rejected.

Green Belt and Housing Numbers

Dog Kennel Lane is the only boundary between Cheswick Green and adjoining parts of the Borough. This boundary should be maintained to keep open the only green space between these areas, if not, not only will this green corridor be lost but then it risks further extensive development in the future.

The housing numbers are too large for the proposed development and insufficient space will be given in order to provide a good standard of living. If the development is agreed then a reduction in housing numbers will be required to overcome crowding. Recent planning approvals in Solihull have allowed the construction of back to back, shared drive, housing i.e. slums of the future to be developed. It is in the council's interest to build as many houses as possible as this increases the amount of rates going into their coffers. Not a good incentive for development control.

Flooding Risk.

In order to prevent the use of injunction and/or possible future prosecution it will be necessary for the Developer and Planning Committee to have the Flood Risk Assessment agreed and signed off by all the existing land and property owners who may be subject to the effects of any development as per a minimum 1/1000 year level.

Should planning be given then a condition of that development must be that the maintenance costs of any required flood defence should be paid upfront by the Developer to cover a minimum 25 year period. Flood defences have failed on recent developments due to lack of maintenance.

Infrastructure

Should the development be approved then the developer should be charged for the additional infrastructure facilities in the area to relieve congestion, provide schooling, medical and flooding control, footpaths and cycleways rather than through the tax/rate payer

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14310

Object

Policy BL2 - South of Dog Kennel Lane

Respondent: Mr Colin Duggan

Summary:

Too large to be accommodated around the Cheswick Green Settlement. It fails to respect the important character and integrity of established village boundaries, puts additional strain on existing local services including NHS, local infrastructure, roads & transport and increases to risk of further flooding of existing properties. The use of Brown Field site should also be exhausted before Green Belt proposals.

> The proposed development site drains into Mount Brook and on to the River Blythe increasing the flood risk to associated land and properties. '1 in 100 year' flood risk calculation no longer applies; Environment Agency has already set a precedent by using 1/1000-year calculation for storm defences in East Anglia. Mount Brook and River Blythe are subject to either increased home insurance costs and or the failure to obtain flood insurance. Further development will not improve this situation.

> It is important to retain the gap between Cheswick Green and the Shirley/ Dickens Heath conurbation as per the original planning concept for Cheswick Green. The council with this development intends to create an artificial boundary by building a new road as part of the Development. This is against the spirit and intent of the policy.

> The area cannot accommodate the scale of development being proposed in terms of local services, medical, education and amenities in general, in an area where the private motor car is the main source of transport. Public transport is poor and cannot guarantee easy future access to and from Cheswick Green. Local road network already severely congested/gridlocked at peak times. limited scope for 'entertainment/ occupation' of young people which has been the cause of anti-social behaviour in the past.

> New dwellings which will replace a green field site will increase co2 emissions /climate change/risk of flooding. Additional strain on water/electricity/sewage supply.

>Existing school and Medical facilities would need to be expanded.

Change suggested by respondent:**General**

The development application detail only relates to this sole development which is insufficient considering the other determined and undetermined applications in the locality. The effects of these multiple applications need to be assessed as a whole when considering, flooding, transport, services, amenities and employment etc. This total BL2 proposal should be rejected.

Green Belt and Housing Numbers

Dog Kennel Lane is the only boundary between Cheswick Green and adjoining parts of the Borough. This boundary should be maintained to keep open the only green space between these areas, if not, not only will this green corridor be lost but then it risks further extensive development in the future.

The housing numbers are too large for the proposed development and insufficient space will be given in order to provide a good standard of living. If the development is agreed then a reduction in housing numbers will be required to overcome crowding. Recent planning approvals in Solihull have allowed the construction of back to back, shared drive, housing i.e. slums of the future to be developed. It is in the councils interest to build as many houses as possible as this increases the amount of rates going into their coffers. Not a good incentive for development control.

Flooding Risk.

In order to prevent the use of injunction and/or possible future prosecution it will be necessary for the Developer and Planning Committee to have the Flood Risk Assessment agreed and signed off by all the existing land and property owners who may be subject to the effects of any development as per a minimum 1/1000 year level.

Should planning be given then a condition of that development must be that the maintenance costs of any required flood defence should be paid upfront by the Developer to cover a minimum 25 year period. Flood defences have failed on recent developments due to lack of maintenance.

Infrastructure

Should the development be approved then the developer should be charged for the additional infrastructure facilities in the area to relieve congestion, provide schooling, medical and flooding control, footpaths and cycleways rather than through the tax/rate payer

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

11094

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** David Dunckley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10852

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr S Dunleavy and family**Agent:** Portland Planning Consultants**Summary:**

The global promotion of UK Central Hub will generate migration demand likely to be different to the historical demand. Thus the migration trends arising from the UK Central Hub initiative are wholly different to the norm represented by the 2014 based housing projections. Analysis of a parallel project centred on Ebbsfleet on the HS1 route indicates extraneous migration is likely to be much higher than historical migration. Exceptional circumstances are considered to prevail as a result of the UK Central Hub. The objectors site is well placed to assist in contributing to the expected shortfall.

Change suggested by respondent:

1. Add further analysis to seek to quantify extraneous in migration generated by UK Central hub.
2. Add land at rear of 114 - 118 Widney Manor Road to the table of residential allocations.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15193

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Mr S Dunleavy and family**Agent:** Portland Planning Consultants**Summary:**

The global promotion of UK Central Hub will generate migration demand likely to be different to the historical demand. Thus the migration trends arising from the UK Central Hub initiative are wholly different to the norm represented by the 2014 based housing projections. Analysis of a parallel project centred on Ebbsfleet on the HS1 route indicates extraneous migration is likely to be much higher than historical migration. Exceptional circumstances are considered to prevail as a result of the UK Central Hub. The objectors site is well placed to assist in contributing to the expected shortfall.

Change suggested by respondent:

1. Add further analysis to seek to quantify extraneous migration generated by UK Central hub.
2. Add land at rear of 114 - 118 Widney Manor Road to the table of residential allocations.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10855

Object

Spatial Strategy**Respondent:** Mr S Dunleavy and family**Agent:** Portland Planning Consultants**Summary:**

The consultation draft fails to meet legal obligations under S39 of the Planning and Compulsory Purchase Act 2004. It fails to fulfil the obligation to articulate the Plan in the interests of sustainable development. Furthermore tests of soundness, which are required to be pursued under Government policy are not fulfilled due to a failure to test all potential development sites on a consistent basis, one with another to the extent that the choice of development sites is not justified. Furthermore the articulation of choice fails to meet government policy and is consequently potentially unlawful and unsound as a consequence.

Change suggested by respondent:

- Review the site selection methodology to accord with the approach above

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10858

Object

Balsall Common**Respondent:** Mr S Dunleavy and family**Agent:** Portland Planning Consultants**Summary:**

All sites in Balsall Common are poorly related to employment, and BC1 to BC5 have adverse impacts on the Green Belt compounded by their location in the sensitive Meridien Gap. BC1 will adversely affect the setting of several Listed Buildings contrary to case law.

Change suggested by respondent:

Reduce the amount of development taking into account case law on Listed Buildings and the impact on the openness of the Green Belt. Land at 114 - 118 Widney Manor Road to be allocated as a residential site in part compensation for a reduction at Balsall Common.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10860

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr S Dunleavy and family**Agent:** Portland Planning Consultants**Summary:**

The site intrudes into the openness of the Green Belt and is remote from employment opportunities.

Change suggested by respondent:

Remove from the list of allocated sites and add land at rear of 114 - 118 Widney Manor Road in part compensation to the loss of this site.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13999

Object

Spatial Strategy**Respondent:** Stephen Dunn**Agent:** Sworders**Summary:**

By allocating only two sites in Knowle, the spatial strategy is unsound because it does not inherently have any flexibility to ensure the continued delivery of new homes in Knowle, if the delivery of either or both of the allocated sites is delayed. The strategy should allocate further, smaller sites around Knowle, such as Land at Kenilworth Road; this site could be delivered in a much shorter timeframe, it has no significant constraints, and it could come forward without the need for significant infrastructure provision. The site covers an area of 3.8 hectares; a plan is appended for ease of reference.

Change suggested by respondent:

In order to make the Plan sound, the spatial strategy should be amended to allocate more sites for development around Knowle, to increase the flexibility of the spatial strategy, to ensure that the strategy delivers a steady supply of housing.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14000

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Stephen Dunn**Agent:** Sworders**Summary:**

The delivery of the two large sites at Knowle could be delayed due to the need to deliver supporting infrastructure. Land at Kenilworth Road (site 110 – see attached plan) could be delivered more quickly; it has no significant constraints, and could come forward without the need for significant infrastructure provision. The reliance on an assessment of large areas of land in the Green Belt assessment, provides a very blunt analysis. If smaller, detailed parcels were assessed, suitable land could be released from the Green Belt. As such, as in this case of land at Kenilworth Road, the most sustainable sites are not being released for development.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14001

Object

Policy P17 Countryside and Green Belt**Respondent:** Stephen Dunn**Agent:** Sworders**Summary:**

The land parcels used in the Green Belt assessment are not sufficiently detailed and do not account for differences within the parcel. The Plan relies on the findings of the Green Belt Assessment to inform the Council's decision on which areas of land perform less well against the purposes of the Green Belt, and which can be released from Green Belt and allocated for development.

As such, the Plan is not sound because it relies on an assessment of large areas of land, which provides a very blunt analysis and precludes smaller, more suitable sites coming forward.

Change suggested by respondent:

Further work should be done on the Green Belt assessment to assess smaller parcels of land adjacent to sustainable settlements, to enable land to be released from the Green Belt which does not perform highly against the purposes of the designation.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10740

Support

Policy UK2 - Land at Damson Parkway**Respondent:** Solihull Moors Football Club**Summary:**

Supportive in principle of Site UK2 and welcome opportunity to work with Council and key stakeholders to find an appropriate well-located site to meet the Football Club's long term vision and ambitions. Would welcome opportunity to present plans for a Community Club, embracing elite sport, community and recreational sport, education and sport, community hub and outreach and Solihull Villages of Forgiveness. Wish to understand how timing of development would dovetail with plans for Football Club over the next few years.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11230

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Eastcote Land Limited**Agent:** Avison Young**Summary:**

The plan, as drafted, will not deliver extra care facilities in accordance with the Council's aspirations. It fails to comply with test c) (effectiveness) of para 45 of the NPPF.

The emerging local plan includes a general "catch all" policy on the provision of care accommodation on sites delivering over 300 dwellings. It also suggests that some sites could be suitable for care uses.

However, in the absence of any sites that are allocated for C2 / extra care only, landowners / developers will always have to consider the land value generated by C3 housing (including the provision of affordable / social housing) and the land value generated by care development.

Change suggested by respondent:

The plan should include proposed allocations for sites in C2, extra care use only, including Eastcote Park, Barston Lane.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11231

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Eastcote Land Limited**Agent:** Avison Young

Summary:

C2 uses do not attract the requirement to deliver “affordable housing” under the adopted Plan. The current proposal is that any care related development which counts towards the Council’s supply of housing would be liable to deliver affordable housing.

Eastcote Land has significant concerns about this approach as a matter of principle. There are two elements to the cost of delivering care: the capital cost of buying land and building care accommodation and secondly the ongoing cost of providing care within that accommodation.

The requirement to deliver “affordable care” places an ongoing financial burden on care operators which has the potential to render the sector unviable. The Council has not provided any information on how affordable care provision would be delivered or what the obligations on the operators of care villages / extra care facilities would be. The requirement to deliver affordable care will provide a significant additional financial burden on care home developers and operators. This will make land in C2 use less valuable than land in C3 use. Developers and landowners will be financially disadvantaged by the delivery of C2 facilities and consequently will attempt to offer the minimum required to satisfy policy.

Eastcote Land’s development includes ancillary facilities which are used by all residents. These include provision of a restaurant/dining area, café, lounges, hair and beauty salon, wellness centre and a club room for activities to be held in. All of these amenities contribute to creating a community within the care village. This ensures that the facilities go beyond the delivery of accommodation and care. The ancillary facilities deliver very significant health and wellbeing benefits through both engagement in the activities provided and the sense of community created.

The cost providing ancillary community facilities within this type of care model is significant. This cost further widens the gap between the land values generated by C3 (including affordable housing) and C2 (including affordable care and ancillary facilities).

The effect of the above is that Eastcote Land and similar operators will be “priced out” of the market for land by C3 developers. In order to have any chance of being financially competitive they will not be able to deliver associated facilities. It will also be very difficult for operators to deliver care, because there will not be space in which to do so.

The Council’s current approach will create a “bare minimum” approach to the provision of care facilities, the impact of which will be a significant reduction in the amount of amenity space for residents to enjoy on sites and the exclusion of any ancillary facilities. This would be a retrograde step back to old style “age restricted retirement flats” which had no communal facilities and very little, if any, care. The use of such units is C3. We don’t believe the Council intends to create such a situation, but we must point out what is likely to occur.

Eastcote Land maintains that this matter can be resolved easily through the allocation of sites specifically for C2 / assisted living uses. Such allocations would remove competition from C3 developers and would provide the financial flexibility needed to deliver exemplar healthcare schemes with associated health and wellbeing benefits. We appreciate that the Council has undertaken to test each scheme against policy on a site by site basis, through viability assessments to see what affordable housing of CIL could be delivered. However, this would be a failure of strategy and a waste of the local authority’s time and money when compared with simply allocating sites for C2 use only. Testing each site would slow down the delivery of accommodation with care provision against a background of exponential growth in the need for it. This would jeopardise the policy ambitions the local authority has in encouraging the expansion of provision in this area.

Change suggested by respondent:

The plan should include proposed allocations for sites in C2, extra care use only, including Eastcote Park, Barston Lane.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14607

Object

Blythe

Respondent: Jennifer East

Summary:

- Object to BL1, BL2 and BL3.
- Existing Infrastructure (schools, surgeries and roads) is already struggling even both the completion of existing permissions.
- Traffic in Tidbury Green, Dickens Heath and Cheswick Green during rush hour creates gridlock. New houses will exacerbate the problem.
- Road network of narrow rural road network is already overloaded.
- full sustainability appraisal should have been carried out prior to site allocation rather than trying to make the preselected site allocations fit the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14608

Support

Policy BL1 - West of Dickens Heath

Respondent: Jennifer East

Summary:

this site will be unassociated, both visually and physically, with the surrounding villages which have clearly defined boundaries. This site will start to fill in the gaps between villages, removing the unique character of the area and destroying the connectivity between local wildlife sites and ancient woodland, as highlighted by Natural England. The BL1 site is in a high performing green belt area, which has not been taken into consideration in the Sustainability Appraisal. Central Government Policy is to protect the green belt and develop on brownfield land first.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15192

Object

Policy BL1 - West of Dickens Heath**Respondent:** Jennifer East**Summary:**

- Object to BL1, BL2 and BL3.
- Existing Infrastructure (schools, surgeries and roads) is already struggling even both the completion of existing permissions.
- Traffic in Tidbury Green, Dickens Heath and Cheswick Green during rush hour creates gridlock. New houses will exacerbate the problem.
- Road network of narrow rural road network is already overloaded.
- full sustainability appraisal should have been carried out prior to site allocation rather than trying to make the preselected site allocations fit the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15194

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Jennifer East**Summary:**

- Object to BL1, BL2 and BL3.
- Existing Infrastructure (schools, surgeries and roads) is already struggling even both the completion of existing permissions.
- Traffic in Tidbury Green, Dickens Heath and Cheswick Green during rush hour creates gridlock. New houses will exacerbate the problem.
- Road network of narrow rural road network is already overloaded.
- full sustainability appraisal should have been carried out prior to site allocation rather than trying to make the preselected site allocations fit the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15195

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Jennifer East**Summary:**

- Object to BL1, BL2 and BL3.
- Existing Infrastructure (schools, surgeries and roads) is already struggling even both the completion of existing permissions.
- Traffic in Tidbury Green, Dickens Heath and Cheswick Green during rush hour creates gridlock. New houses will exacerbate the problem.
- Road network of narrow rural road network is already overloaded.
- full sustainability appraisal should have been carried out prior to site allocation rather than trying to make the preselected site allocations fit the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10743

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Philip Edden**Summary:**

Site 12 Dog kennel lane
Currently Cheswick green can not cope with any further development due to inadequate road system. To many dwelling are being built in there and not enough on other available sites. When thr current project are complete thr will be in excess of 3000 dwellings with in sufficient NHS doctors, schools and flood defences.

Change suggested by respondent:

Any new developments on Blyth Valley or Dog Kennel lane Must Jane provision for junior school GP services with adequate parking

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

13957

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Anna Edelsten**Summary:**

- >Supports Policy KN2 as it takes a place based approach, with long term benefits for the local community.
- >New school is needed, and will help reduce traffic on Station Road, creating a better environment for those living and travelling through the area.
- >Will provide new homes for younger/older generations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14916

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Department for Education**Summary:**

- Welcome that policy highlights need for a new 2-form entry primary school, and for financial contribution towards additional secondary school places.
- Policy could be made clearer by indicating how primary school will be funded, in addition to text in Para. 531.
- Developer should meet cost of providing places in accordance with pupil yield generated by development.
- Recommend this includes provision of a suitable site as well as funds needed to build the school.
- This would make Policy BC1 consistent with BL3 and KN2, which both state developer contributions will be sought for provision of a new primary school.
- Helpful if concept masterplan indicated area of land required (in hectares) and safeguarded in accordance with DfE's requirements as set out in Building Bulletin 103.
- Policy should include information on key trigger points for delivery of primary school and funding for secondary school, to improve soundness of plan.

Change suggested by respondent:

- Policy could indicate how primary school will be funded.
- Should indicate area of land required in hectares for primary school.
- Policy should include information on key trigger points for delivery of primary school and funding for secondary school.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14917

Object

Foreword**Respondent:** Department for Education**Summary:**

Evidence Base: Draft Infrastructure Delivery Plan:

- Welcome reference (p.77) to DfE's Education Contributions Guidance.
- Need to ensure close working with neighbouring local authorities as high number of primary and secondary aged pupils outside of Borough attend Solihull schools.
- Would be useful to produce a Planning for Schools topic/background paper, expanding on evidence in Council's IDP and School Organisation Plan, setting out clearly how forecast housing growth at allocated sites has been translated (via an evidence-based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period.
- DfE recommends SoCG with neighbouring authorities on cross-boundary movement of school pupils between Solihull borough and adjoining areas.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14578

Object

Policy BL1 - West of Dickens Heath**Respondent:** Kate Edwards**Summary:**

- The land is high grade GREEN BELT home to wildlife which should be protected.
- Local infrastructure is already struggling and cannot support more housing.
- Floods quite often.
- The character and numerous sports fields would be affected.

Change suggested by respondent:

- look at brown sites to use as alternatives

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14728

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BC5 is supported in principle, subject to modifications.

Capacity should be 300 in interests of efficient use of land.

Green Belt enhancement requirement should either be deleted, or proportionate evidence and justification provided to:

- define 'significant',
- identify public open space 'south of site', and
- provide details of landownership and mechanisms for deliverability given that the landowners do not control any land south of the proposed allocation.

Change suggested by respondent:

It is recommended that Policy BC5 paragraph 1 is amended as follows:

1. The site is allocated for at least 300 dwellings.

Policy paragraph 4.i. 'Creation of a significant area of public open space to the south of the site'

- should be deleted or,
- sufficient evidence, explanation and delivery mechanism should be provided to justify and clarify the policy requirements.

Should there be any uncertainty over the deliverability or developability of housing on the proposed site allocation BC5 in its entirety (as delineated on the Policies Map and shown on the 'Concept Masterplan' document), a minor amendment to the site allocation 'red line' boundary could be made to exclude the Builder's Yard and 'Stoneycroft'.

It would still be entirely appropriate and compliant with national policy to use Wootton Green Lane as the new strong physical defensible Green Belt boundary with the opportunity of windfall development coming forward during the plan period on the land outside our Clients' ownership falling within the new proposed settlement boundary i.e. on the Builder's Yard, Stoneycroft and The Croft.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14729

Object

Policy P17A Green Belt Compensation**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P17A is unsound on the basis that no evidence, methodology, sustainability appraisal or viability assessment has been provided to justify the strategy proposed in the policy and linked site allocation policies. There is no evidence that alternative approaches have been considered. There is no clear link between the size of allocated sites and scale of compensation required.

No mechanism has been set out to demonstrate how the proposed compensation measures sought on Green Belt land outside the ownership of the developer would be delivered – contrary to the requirements of NPPF paragraphs 31 and 35 d) and PPG Paragraph 003 Ref ID: 64-003-20190722.

Change suggested by respondent:

Proportionate, robust evidence needs to be produced for the Green Belt compensation requirements appropriate for each site allocation where Green Belt land would be lost. The evidence should ensure that the most appropriate strategy is adopted, taking into account reasonable alternatives.

The Viability Study and Sustainability Assessment reports should be updated to take into consideration the implication of Policy P17A and associated site allocation policies where Green Belt loss is proposed.

Once the evidence has been provided, Policy P17A and all the site allocation policies which sit beneath this overarching policy, should be amended accordingly.

As a minimum:

- Any reference to Green Belt compensation/ enhancement requirements which fall within the site should be removed – only compensatory improvements to the environmental quality and accessibility can be required in the remaining Green Belt land.
- Any reference to a requirement which is on land outside the control of the site landowners/developer or the council, should be either deleted, or the mechanism for delivery should be set out.
- Details of the Green Belt compensation measures required on the site resulting in the most significant loss of Green Belt, i.e. 140ha at HS2 Inter-change (Site UK1), should be set out in Policy UK1 and on an agreed masterplan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14730

Object

Policy P5 – Provision of Land for Housing**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners

Summary:

Policy P5 is unsound on the basis that insufficient evidence has been provided to demonstrate cross-boundary collaboration under the legal Duty to Cooperate in respect of the proposed 2,105 dwelling contribution towards the housing land supply shortfall (paragraphs 227 to 228 of the SLP).

There is no published statement of common ground to demonstrate effective and on-going joint working – contrary to National Planning Policy Framework (NPPF) paragraphs 11, 24, 26, 27 and 60.

Insufficient account has been taken of the need to plan effectively for delivery of the anticipated growth over the plan period and beyond to avoid the need for an early Plan/ Green Belt review, and ensure timely delivery of development – contrary to NPPF paragraphs 33 and 139 c).

Change suggested by respondent:

The evidence in support of Policy P5 is deficient, requiring

- Publication of a statement of common ground, which addresses the HMA cross-boundary shortfall of sites to meet the minimum housing requirement to satisfy NPPF requirements.
- Modification of the housing delivery target number if/as appropriate following scrutiny of the statement of common ground.
- Allocation of small and medium sized sites for residential development; and
- Removal of a phased housing delivery target table at paragraph 224.

Proposed modifications to Policy P5 as shown below:

'1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Insert two new paragraphs beneath paragraph 4 of Policy P5, as follows,

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances:

- To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area;
- To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

14731

Object

Policy P5 – Provision of Land for Housing**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P5 paragraphs 222 and 225-226. Insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, BLR and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all BLR sites, SHELAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHELAA sites, BFL sites and planning permissions should be deleted from the SLP and housing land supply information (paragraphs 65, 222 and 225).

Where appropriate evidence is forthcoming, additional site allocations should be set out in the SLP and Policies Map which identify deliverable small and medium 'major' development sites.

In particular, it is considered the following modifications are required –

1. The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.
2. A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.
3. The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence should be consistent.
4. The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
5. The development of Arden Cross requires Green Belt compensation.
6. That the NEC and Arden Cross sites are fully assessed for their suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14732

Object

Policy BL1 - West of Dickens Heath**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BL1 is unsound on the basis that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site, contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

Evidence is required to justify Policy BL1 West of Dickens Heath, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document; and
- there is a fully developed strategy with mechanisms in place to ensure playing pitches are replaced to release the land for residential development.

Change suggested by respondent:

Insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site.

Evidence is required to justify Policy BL1 West of Dickens Heath

If these issues of soundness cannot be overcome paragraphs 225 and 226 should be amended to remove the estimated contribution of proposed site allocation BL1 from Delivery Phases I and II and Policy BL1 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14733

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Les Edwards**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy KN2 is unsound on the basis that insufficient evidence has been provided to demonstrate the site is deliverable with 'multiple and potential complex land assembly issues' (paragraph 709) still remaining to be resolved, as well as replacement playing fields. There is also insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School, to justify that it is an appropriate strategy. This is contrary to the deliverability and developability requirements for site allocations and the requirement to justify a strategy as

set out in NPPF Appendix 2: Glossary and paragraphs 35, 67 and 72.

Change suggested by respondent:

Insufficient evidence has been provided to justify Policy KN2, or to demonstrate delivery.

Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and

Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11072

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Claire Efthimiou**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13776

Object

Challenges**Respondent:** Ellandi LLP**Agent:** Williams Gallagher Town Planning Solutions

Summary:

In summary, the focus of the spatial strategy is very much on the objectively assessed need for housing and major economic (Use Classes E(B)/(G), B2 and B8) development schemes with less regard for the integral spatial planning requirements for retail and leisure uses. The evidence underpinning the retail and leisure requirements of the Plan are out of date and need to be updated and incorporated within the body of the Plan to inform site allocations.

It was recognised in the 2015 consultation that the Solihull Retail, Leisure and Office Study 2009 (refreshed 2011) is out of date. There has been no update despite the significant structural changes affecting the Borough including accommodating Birmingham housing overspill and the inclusion of Arden Cross. Without an up to date retail and leisure evidence base, the full quantitative and qualitative needs for the Borough are unknown. It is therefore not possible for the Plan to identify how and when these needs will be met in full and whether these will be delivered sustainably. This is a clear requirement of the NPPF

The plan does not identify the primary shopping areas in defined centres in line with the NPPF needed to inform sequential and impact tests. The Council has not assessed whether a locally set threshold for impact assessment is required but defers to the NPPF threshold of over 2,500 sqm. Such a quantum of floorspace is of concern as retail schemes of this size would impact significantly on more vulnerable centres such as Chelmsley Wood.

Policies on Blythe Valley and the HS2 interchange require clarity on the scale and type of retail that will be permissible as uncertainty will put investment in centres at risk.

The term 'commercial development' and 'employment uses' is used throughout the emerging Local Plan and seems to be used interchangeably to describe a number of different uses.

Change suggested by respondent:

-

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

13777

Object

Policy P2 Maintain Strong, Competitive Town Centres

Respondent: Ellandi LLP

Agent: Williams Gallagher Town Planning Solutions

Summary:

Objects to wording of P2. The local plan is not based on up to date evidence on retail and leisure need. It is significantly out of date and does not reflect the scale of development now proposed for the Borough and the timing of that development. Timing of this growth will influence the phasing for when and where retail led development should be directed and the preferred strategy. This will also impact on the sequential and impact tests needed through the NPPF. At present the policy defers to NPPF which is a missed opportunity to provide a robust and locally focused strategy that fosters investor confidence.

SMBC should undertake an assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for retail uses. The NPPF threshold of 2,500 sqm is too high, particularly in areas where town centres are vulnerable. A small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre.

Thresholds for impact assessment in relation to town centre uses at Arden Cross, Birmingham Business Park and Blythe Valley Business Park should be set. Otherwise there is no mechanism by which to assess whether the scale of development is commensurate with serving those developments only.

Objective 15 of P2 is not effective or consistent with national policy. It seeks to encourage new development on the edge of the town centre for a diverse range of uses. This has the potential to undermine the strength of Chelmsley Wood Shopping Centre if this is effectively giving support to competing retail and leisure town centre uses in an edge of centre location. The policy needs to be redrafted to give clarity to its purpose.

Change suggested by respondent:

Policy P2 provides no clarity over the strategy for Chelmsley Wood Town Centre and is poorly written. It needs amending to ensure retail and leisure uses within the core of the centre remain protected and are not diluted by additional edge of centre development which the current wording appears to support.

The policy needs to be redrafted to provide clarity to its purpose. It should include reference to a primary shopping area which is then annotated on the Proposals Map.

It should also have clear reference to the Chelmsley Wood Masterplan and provide guidance on the extent and acceptable locations for additional uses.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11050

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Angela Empson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10588

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Ian English**Summary:**

1. This "representation" task appears specifically designed to be difficult, if not impossible, for residents/voters to access.
2. This appears to be the only (intentionally hidden?) reference to relocating the Moat Lane depot and the Household Waste Recycling Centre to Damson Parkway.
3. The overall plan already includes significant residential growth in this local area. Perhaps undesirable, but necessary. As for moving a waste recycling centre so close to an increasingly densely populated residential area, already suffering traffic challenges, this seems ill-advised.
4. Surely for such an activity, a brownfield site would be most suitable.

Change suggested by respondent:

The need to relocate the Moat Lane depot is recognised, as is the need to relocate the household waste recycling centre. However, unless the Damson Lane/(expanded) Damson Parkway/Damsonwood residential area is to become gridlocked by traffic trying to access this centre, and littered with "spill" waste and fly-tipping by those denied access to or disinclined to use the proposed HWRC (the latter already a problem in Lugtrout Lane/Field Lane) - this is simply the wrong place to put it. It needs to be relocated further away from a residential area with higher capacity road access (as there is now from the A45). The existing proposal forces residents in the north to cross the A45 and those in the south to travel through the town centre - with everyone converging on Damson Parkway. It's simply an ill-conceived idea. This section needs removing from the proposed plan completely with a rethink undertaken.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

11176

Object

Challenges**Respondent:** Environment Agency**Summary:****RECOMMENDATION**

Challenge L - Improving water quality and flood risk.

We recommend this is amended to reflect the groundwater environment as we note there is no specific Challenge relating to brownfield land and/or legacy waste / landfill sites (of which there are a couple in your site allocations).

Change suggested by respondent:

Add reference to groundwater environment in Challenge L - Improving water quality and flood risk.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11179

Support

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Environment Agency**Summary:**

We welcome part 4 of policy regarding adaption methods, with particular note to flood prevention and mitigation measures Part 4 (i).

Pleased to see green infrastructure included in Part 4, as alongside climate change benefits, these measures bring about a wealth of positives to people and the environment. Suggest that where evidence may support it, specific elements of this policy are made more prescriptive i.e. green roofs would be required on a particular type or size of building. This would help make the policy more effective. This section should link with the SuDS requirements 7 and 8 of Policy P11.

Note at strategic level Part 2 (ii) making more efficient use of natural resources. Can also refer to eliminating waste and related emissions as far as possible and transition to a Circular Economy. This will also improve economic resilience by creating "Green" job opportunities and reduce dependence on raw materials.

Change suggested by respondent:

Part 4 can be made more prescriptive, i.e. green roofs would be required on a particular type or size of building. Links to Parts 7 and 8 of Policy P11.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11182

Support

Policy P10 Natural Environment**Respondent:** Environment Agency**Summary:**

We are supportive of Defra's proposals to mandate biodiversity net gain as an important first step, but we are equally keen to collaborate on developing and testing a wider approach to environmental net gain. We are supportive of this policy's inclusion of net gain, with a specific requirement of 10%.

Delivery of net gain should follow the sequential steps of the mitigation hierarchy: avoid impacts to biodiversity, mitigate impacts and finally compensate impacts. In addition, delivery of net gain should follow the spatial preference: deliver within the footprint of a development first and where this is not possible delivered at a suitable alternative site. Where net gain cannot be delivered on site or at a suitable alternative site the last option would be to compensate through a tariff system.

Consideration should be given to including issues relating to contaminated land and the chance to clean it up plus also need to consider the 'underground environment' i.e. groundwater resources, as water supply to rivers and wetlands and as a drinking or process water supply, rather than only in P11 and P14.

Change suggested by respondent:

Explore developing and testing a wider approach to environmental net gain, not just biodiversity net gain.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11183

Support

Policy P11 Water and Flood Risk Management**Respondent:** Environment Agency**Summary:**

We support the water quality policies in P11, particularly with ensuring that there is no deterioration of water quality. Package treatment plants provide a lower quality of sewage treatment than water company assets and are more difficult to regulate if issues arise. As a result we recommend that connections are made to the foul or combined sewer opposed to package treatment plants.

SUDS schemes help to remediate the impact of urban diffuse pollution such as historic misconnections which are often an issue for surface waterbodies, and are a particular issue for the River Blythe.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11184

Object

Policy P11 Water and Flood Risk Management**Respondent:** Environment Agency**Summary:**

Recommend that the more specific flood risk management requirements identified within Para.'s 347-348 are added into the body of this policy. In addition, it should be made clear that single-storey dwellings and habitable basements are not acceptable in Flood Zone 3, which links to section 7.3.3 of your level 1 SFRA.

Please note that the EA is in the process of finalising its updated guidance on changes to peak river flow and peak rainfall allowances which is expected to be published in 2021. As such any planning application should consider the most up to date climate change allowance guidance and approach the EA for the most appropriate climate change levels to use when assessing flood risk on a site. Any hydraulic modelling required as part of a planning application will need to be updated to the relevant climate change allowance for the vulnerability classification of the development and all major developments. A web application is being developed to provide more accurate site specific climate change allowances which will be available in 2021. This also links to Policy P9.

Change suggested by respondent:

Recommend that the more specific flood risk management requirements identified within Para.'s 347-348 are added into the body of this policy.

In addition, it should be made clear that single-storey dwellings and habitable basements are not acceptable in Flood Zone 3, which links to section 7.3.3 of your level 1 SFRA.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11185

Object

Policy P11 Water and Flood Risk Management**Respondent:** Environment Agency**Summary:**

Although we welcome the addition of text that acknowledges 'On previously developed land where there is contamination known or suspected, any infiltration proposals must be agreed with the Environment Agency', protection of groundwater resources should be given greater weight within this policy. Paragraph 334 recognises the importance of the Water Framework Directive, and the associated status of the rivers Cole and Blythe, but does not include any acknowledgement of the importance of groundwater bodies also covered under this legislation. This should be rectified. Paragraph 336 advises that '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.' Acknowledgement of the vulnerability of groundwaters to drainage proposals is welcomed, however this should go further with a commitment to protect groundwater quality and quantity more holistically.

Change suggested by respondent:

Protection of groundwater resources should be given greater weight within this policy, and acknowledgement of the importance of groundwater bodies covered under legislation.

Should go further with a commitment to protect groundwater quality and quantity more holistically.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11186

Object

Policy P12 Resource Management**Respondent:** Environment Agency**Summary:**

Plan does not seem to reference need to transition to a Circular Economy, although mentioned in Hendecca Waste Needs Assessment.

Waste will need to be embedded in economic landscape, rather than treated as a separate activity, or continue with linear economy approach of flow of raw materials to waste generation.

Future planning will need to consider far more the use of secondary and recovered materials, and the creation of jobs. Conversely, traditional waste disposal requires constant funding to run dedicated logistics and infrastructure, with the associated emissions.

Change suggested by respondent:

Policy should recognise the need to transition to a Circular Economy, where waste is utilised as far as possible as an economic resource, rather than treated as a separate issue to be 'managed.'

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13689

Object

Policy P12 Resource Management**Respondent:** Environment Agency**Summary:**

Part 1 - appears difficult to measure easily.

Should consider the metrics to be applied.

May be possible to quantify carbon reduction as well as waste reduction (link to climate change policy). Recommend consideration is given to Circular Economy thinking, where necessary, appropriate low carbon development also supports the demand for recovered and sustainable waste materials as far as possible.

Advocate the requirement for a "Whole Life" plan for any new buildings, -covering the design, construction, maintenance, refurbishment and end-of-life, to minimise waste production at each stage.

Consideration should be given to extending the obligation to refurbishment activities on existing buildings, rather than just on new development, although we acknowledge the loosening of controls over changes of use through permitted development regulations reduces the scope of controls over this.

Change suggested by respondent:

Part 1 - should consider the metrics that can be applied to measure this part of the policy.

Part 1 - Advocate requirement for a Whole Life Plan for any new buildings, covering the design, construction, maintenance, refurbishment and end-of-life, to minimise waste production at each stage.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13690

Support

Policy P12 Resource Management**Respondent:** Environment Agency**Summary:**

Part 2 - Query how the obligations will be monitored and if necessary enforced.

The first sentence does not specifically mention a circular economy, but this is implied.

It may be necessary to start to differentiate between potentially recoverable, reusable waste that could still offer economic value, and residual or other contaminated wastes (e.g. hazardous or clinical wastes) that will still require "disposal" arrangements. It also seems to be inferred that the reprocessing facilities will need to be located nearby, to reduce transport emissions, however the "direction of travel" has been for waste to travel longer distances. Hence the need for the provision of local reprocessing and remanufacturing capacity for both useful materials and for any necessary "disposal" as far as possible. This should be covered in Part 3, again differentiating between Circular Economy recovery/remanufacturing capacity and traditional residual "waste management" facilities.

Change suggested by respondent:

Need for provision of local reprocessing and remanufacturing capacity for useful materials and for any necessary 'disposal' should be covered in Part 3.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13691

Object

Policy P12 Resource Management**Respondent:** Environment Agency**Summary:****Safeguarding -**

Recommend that the general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors is considered within this policy as it is becoming an increasing concern. This is partly touched on in sections 8(x) 8(xiv) and 9.

Issues can include housing development close to waste operating facility.

'Safeguarding' can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.

It should be made clear that the Environmental Permitting Regulations do not demand 'zero impact', so conflict situations become inevitable.

Para. 182 of NPPF now makes reference to placing obligations onto the "Agent of Change" (i.e. the developers/applicants,) requiring them to ensure appropriate mitigations are put in place to protect neighbouring users from impacts.

Change suggested by respondent:

Recommend that the general issue of safeguarding regulated activity from proposed new sensitive receptors is considered within this policy as it is becoming an increasing concern.

Should be made clear that the Environmental Permitting Regulations do not demand 'zero impact', so conflict situations become inevitable.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13696

Object

POLICY P13 Minerals**Respondent:** Environment Agency**Summary:**

As stated in our previous consultation response, we recommended that point 8(viii) is amended to specifically provide guidance on how buffers between mineral extraction and rivers should be managed.

Change suggested by respondent:

We therefore recommend the policy is revised to read: Measures for mitigating any environmental, transport or other impacts or for compensation for loss or damage where appropriate, including the provision of buffers between extraction and environmental or other assets, and in respect of river buffers whether these are wide enough to accommodate natural changes to the river's location'.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13697

Object

POLICY P13 Minerals**Respondent:** Environment Agency**Summary:**

As acknowledged within our 2017 response given your proposed minerals allocations and areas of search, this is most likely applicable to the River Blythe. We welcome the addition of text in supporting paragraph 368 to specifically relate to a 30m buffer. We recommend this is incorporated into the policy itself.

Change suggested by respondent:

Recommend that 30m buffer to River Blythe in supporting text in paragraph 368 is incorporated into the policy itself.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13698

Object

Policy P14 Amenity**Respondent:** Environment Agency**Summary:**

Safeguarding of sensitive sites from waste uses should be reflected in this policy, as well as P12.

Reference to Contaminated Land in this policy appears out of place.

The protection and remediation of Controlled Waters is more of a water quality issue, so suggest it is included in P10 or P12.

Change suggested by respondent:

The protection and remediation of Controlled Waters is more of a water quality issue, so suggest it is included in P10 or P12.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13699

Object

Protecting and Enhancing our Environment**Respondent:** Environment Agency**Summary:**

Contaminated Land -

In addition to comments for P10 and P14, EA also recommend the following is added in relation to contamination (under either P10 or P12) explaining where developers should look for information to support their application, as there appears to be very little in the way of supporting text in terms of this subject.

Change suggested by respondent:

'The Environment Agency have set out a framework for our regulation and management of groundwater resource in the 'The Environment Agency's approach to groundwater protection' document In this they describe their aims and objectives for groundwater, their technical approach to its management and protection, the tools they use and the policies and approach to the application of legislation. Land Contamination Risk Management (LCRM) guidance also provides guidance on how to manage these risks.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13700

Object

Policy P15 Securing Design Quality**Respondent:** Environment Agency**Summary:**

We recommend that it is added into this policy that sites are laid out so that properties face onto rivers, streams and other waterbodies in order to prevent littering, pollution and to foster a sense of community ownership of the water environment.

Change suggested by respondent:

EA recommend that it is added into this policy that sites are laid out so that properties face onto rivers, streams and other waterbodies in order to prevent littering, pollution and to foster a sense of community ownership of the water environment.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13701

Support

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Environment Agency**Summary:**

We are pleased to have been able to review your Level 2 SFRA (October 2020).

Consider that the Level 2 SFRA adequately considers the risk posed to and from these sites, and that the recommendations from this assessment have been carried forward into the plan, namely to provide flood risk reduction wherever possible and not locate any built development within Flood Zone 2 and 3.

We defer any other flood risk comments on the other sites within the Level 2 SFRA to your internal drainage team as the Lead Local Flood Authority with a remit including surface water flooding and that flood risk from Ordinary Watercourses.

We are pleased to see that the LLFA has already been engaged in the drafting of this assessment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13702

Support

Policy BL1 - West of Dickens Heath**Respondent:** Environment Agency**Summary:**

We are pleased to have been able to review your Level 2 SFRA (October 2020).

Consider that the Level 2 SFRA adequately considers the risk posed to and from these sites, and that the recommendations from this assessment have been carried forward into the plan, namely to provide flood risk reduction wherever possible and not locate any built development within Flood Zone 2 and 3.

We defer any other flood risk comments on the other sites within the Level 2 SFRA to your internal drainage team as the Lead Local Flood Authority with a remit including surface water flooding and that flood risk from Ordinary Watercourses.

We are pleased to see that the LLFA has already been engaged in the drafting of this assessment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13703

Support

Policy UK2 - Land at Damson Parkway**Respondent:** Environment Agency**Summary:**

We are pleased to have been able to review your Level 2 SFRA (October 2020).

Consider that the Level 2 SFRA adequately considers the risk posed to and from these sites, and that the recommendations from this assessment have been carried forward into the plan, namely to provide flood risk reduction wherever possible and not locate any built development within Flood Zone 2 and 3.

We defer any other flood risk comments on the other sites within the Level 2 SFRA to your internal drainage team as the Lead Local Flood Authority with a remit including surface water flooding and that flood risk from Ordinary Watercourses.

We are pleased to see that the LLFA has already been engaged in the drafting of this assessment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13704

Support

Policy UK1 - HS2 Interchange**Respondent:** Environment Agency**Summary:**

EA are already closely engaged with the elements of the HS2 proposals controlled via specific Government Bills and associated legislation, and as such are satisfied that matters in relation to the tracks and the river diversion will have satisfactory controls via this route.

In terms of the development within the scope of the Local Plan, we welcome the policy proposals in relation to flood risk and water quality.

Urge the Local Plan to carry through aspiration of BREEAM Excellent rating for the HS2 station, and extend to wider area. A key part of the station's BREEAM measures is sustainable transport, with non-car travel solutions such as a cycle route over the M42 being integral to the success of the station.

Note and welcome the policy commitment to promote 'sustainable movement patterns to enable site wide and beyond connectivity', but not been explicitly referenced within the plan. Therefore must be included within The Hub Framework Plan and Arden Cross Masterplan to be effective.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13705

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Environment Agency**Summary:**

This is NOT an objection to the principle of the site, but a recommendation to fully consider the environmental permitting regulations.

BC6: Lavender Hall Farm, Balsall Common – the land is currently used as a permitted landfill site, and as such, redevelopment of the land will need to ensure effective surrender of their operational permit prior to redevelopment. Site design and redevelopment will need to consider the underlying landfill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13706

Support

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Environment Agency**Summary:**

This is NOT an objection to the principle of the site, but a recommendation to fully consider the environmental permitting regulations.

HA2: Oak Farm, Catherine-de-Barnes – has a historic landfill directly adjacent therefore prior to be redeveloped a risk assessment will need to be carried out to ascertain whether redevelopment will pose a risk to controlled waters through mobilising contaminants.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13707

Object

Policy S02 - Moat Lane Depot**Respondent:** Environment Agency**Summary:**

This is NOT an objection to the principle of the site, but a recommendation to fully consider the environmental permitting regulations.

S02: Moat Lane Depot is a currently licensed site and therefore the permit will need to be surrendered prior to redevelopment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13708

Support

Policy P11 Water and Flood Risk Management**Respondent:** Environment Agency**Summary:**

Welcome the submission of a flood risk sequential test report. Satisfied that the test has been carried out using an appropriate evidence base, in that the Level 1 SFRA used for this assessment includes up to date assessments of climate change.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13709

Support

Foreword**Respondent:** Environment Agency**Summary:**

Sustainability Appraisal -

The EA have reviewed the Sustainability Appraisal undertaken by aecom (October 2020) and have no concerns we wish to raise.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14842

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Leslie Eustace**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14062

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Stephen Evans**Summary:**

Make no comment but supports policy KN2

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

13852

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Extra MSA**Agent:** Pegasus Group**Summary:**

Paragraphs 288-291 are out-of-date and do not accurately reflect the current situation. Whilst the acknowledgement of need is supported, the wording should acknowledge the greater understanding of Active Traffic Management systems and how they interact with the motorway network.

Change suggested by respondent:

The following should be added to paragraph 291:

'Since then revised planning applications have been submitted and are currently being assessed by the Council and Highways England. During this time, greater understanding has been gained of how ATM systems operate and interact with the Motorway Network under Highways England's control. This is assessed by Highways England.'

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14260

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** F B Architecture Ltd**Summary:**

- > Emphasis on spreading Balsall common to the southeast has too many issues to be suitable.
- > Fewest sites to make up housing numbers does not meet the NPPF guidance on the expected mix of variety and sites.
- > Puts forward 3 smaller sites seen as better locations to the South West, West, and North West, balancing the sites proposed to the East, and within similar distances from the centre of the village.
- > The SLP Inspector may well have concluded that "the area was not so remote that it would justify the omission of the two sites in this parcel...." as it now extends no further South than the existing housing (Para 556), but that housing is also too far from the "key economic assets".
- > Remaining land is clearly of significant ecological value and this provides a further reason why it should therefore remain undeveloped.
- > The remaining land is clearly of significant ecological value and therefore should be undeveloped.
- > Sustainability and Green Belt issues do not appear to comply with the NPPF, the question of the setting of the extremely rare Grade 2* Listed Building adjacent to the site and the extent of any mitigation for this and the local ecology need not have been further researched.

Alternative sites put forward;

- Site 82 Land at the rear of 152 to 172 Kenilworth Road, (including 166 and 170).

This site is capable of taking up to 70 dwellings.

- Site 421 Silver Tees Farm, Balsall Street.

This site could take up to 16 dwellings.

- Site 422 Rose Bank Balsall Street.

This site could take up to 25 dwellings.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

10856

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Howard Farrand**Summary:**

Selection of site inconsistent with the feedback provided by residents during the "developer consultations" undertaken - brownfield sites not prioritised - the overall accessibility assessment does not meet the Council's own criteria - release of RP59 from the green belt would actively threaten adjoining parts and generate pressure for urban sprawl contrary to the green belt purposes - increased traffic flow/congestion - destruction of greenbelt and wildlife - lack of weighting given to this effect on the village community makes this proposal fundamentally unsound

Change suggested by respondent:

see my letter per. Balsall Street East proposal

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

14534

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sam Faulkner**Summary:**

The loss of the pitches will affect our children.
The land is high grade GREEN BELT.
loss of this land would be detrimental to wildlife.
The narrow rural road network cannot take further development and is already overloaded.
The character and setting of the Village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14126

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tony Fay**Summary:**

Doesn't want to lose the football pitches to housing as it would harm young people that don't have many places to play.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10838

Object

Spatial Strategy**Respondent:** Mrs Jennifer Fearn**Summary:**

Section G.4 - Proposed development around the periphery of existing densely populated areas. Diminishing/ destroying gaps between urban areas Shirley, South Birmingham, Wythall, Worcestershire. Diminishing gaps between settlements Dickens Heath, Cheswick Green, Tidbury Green.

Change suggested by respondent:

Distribution of development needs reassessment. Dickens Heath densely populated. Council expressed concerns re: mature areas in need of regeneration in Shirley ignored.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10839

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mrs Jennifer Fearn**Summary:**

It's acknowledge Stratford Rd has high levels of thru traffic and congestion. Yet almost 600 units are currently being built or planned for aged retired people along this road. Where are the children from the families in these new homes going to School? Currently parents of children attending Shirley Heath Juniors and Woodlands Infants are challenged by the Stratford Road hazard. Increasing distance children and parents have to travel increase car travel and creates parking nuisance to residents close to Schools. This concentration excludes existing retirement properties in Shirley, focusses need for increased health care, denies equal access to NHS

Change suggested by respondent:

More equal distribution across the borough for retirement and care units.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15190

Object

Blythe**Respondent:** Mrs Jennifer Fearn**Summary:**

It's acknowledge Stratford Rd has high levels of thru traffic and congestion. Yet almost 600 units are currently being built or planned for aged retired people along this road. Where are the children from the families in these new homes going to School? Currently parents of children attending Shirley Heath Juniors and Woodlands Infants are challenged by the Stratford Road hazard. Increasing distance children and parents have to travel increase car travel and creates parking nuisance to residents close to Schools. This concentration excludes existing retirement properties in Shirley, focusses need for increased health care, denies equal access to NHS

Change suggested by respondent:

More equal distribution across the borough for retirement and care units.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10840

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Mrs Jennifer Fearn**Summary:**

Where is the additional planned public green space? The existing space between Stretton Road and Dickens Heath is invaluable to both areas, this is one area where wildlife has come chance of exitance. The adjoining canal provides connectivity with green space in Earlswood.

Impossible for muntjac to now access Bills Wood.

Change suggested by respondent:

Protection of current green space referred to, no more isolated pockets of green.

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10843

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jennifer Fearn**Summary:**

BL1 - West of Dickens Heath, BL2 South of of Kennel Lane - Both funnel traffic towards Stratford Road adding to congestion. It currently create further serious congestion around the traffic islands at the junction of Tanworth Lane, Dickens Heath Road, Blackford Road and Dog Kennel Lane. Queues extend from this point to DH Village clock, Town end Tanworth Lane, queues extend into Woodlands Road and Stretton Road. No evidence of plans with traffic impact.

Change suggested by respondent:

Delay development in these areas until congestion on Stratford Road has been improved.

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

15191

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Jennifer Fearn**Summary:**

BL1 - West of Dickens Heath, BL2 South of of Kennel Lane - Both funnel traffic towards Stratford Road adding to congestion. It currently create further serious congestion around the traffic islands at the junction of Tanworth Lane, Dickens Heath Road, Blackford Road and Dog Kennel Lane. Queues extend from this point to DH Village clock, Town end Tanworth Lane, queues extend into Woodlands Road and Stretton Road. No evidence of plans with traffic impact.

Change suggested by respondent:

Delay development in these areas until congestion on Stratford Road has been improved.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14584

Object

Blythe**Respondent:** Mrs Jennifer Fearn**Summary:**

Inappropriate to mass elderly in Shirley/strain on healthcare services - Space between Stretton Road and Dickens Heath especially valuable to residents - Sites likely to add traffic congestion - Schools not able to provide for new families - increased school run traffic - lack of gaps between Tidbury Green and Wythall/Worcestershire/South Birmingham.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11243

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Linda Fenn**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13770

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Nikki Fenton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

13727

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Natalie File**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10913

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Angela Finning**Summary:**

The SUDs at the Bloor homes development in nearby Cheswick Green have proved inadequate to prevent flooding in Cheswick Green. (See Solihull.gov.uk flood report below)

The BL2 development would further increase the risk of flooding in Cheswick Green, as Cheswick Green is downstream of BL2. I am concerned that if the SUDs at BL2 are built to the same specification as those in Cheswick Green, they will be inadequate to prevent increased flood risk in Cheswick Green.

Change suggested by respondent:

In my opinion both the SUDs in Cheswick Green, and the SUDs at the proposed BL2 site need to be rebuilt/built to a higher specification eg to prevent flooding of surrounding area in a 1 in a 1000 year event.

<https://www.solihull.gov.uk/Portals/0/CrimeAndEmergencies/Flood-Investigation-Report-Various-Locations-Solihull-27-May-2018.pdf>

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

11238

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Kirsty Fitzgerald**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13730

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Jean Fleming**Summary:**

- Concern over insufficient infrastructure

- Loss of Greenfield detrimental to wildlife

- doesn't consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group 'PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common'

29.11.2020

Change suggested by respondent:

Remove site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13772

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Noel Fleming**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11052

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Beth Foster**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10830

Object

Policy P12 Resource Management**Respondent:** Mr Garry Foster**Summary:**

This plan further encroaches on what is and always has been a residential area

It would further turn the area into an industrial / commercial area which we will all be living on the edge of suffering a lesser quality of life that is brought with it e.g. additional traffic, pollution, noise, fly tipping (when people don't want to queue at the tip)

This is another example of disregard for residents in favour of industry and commercial settings

Change suggested by respondent:

This plan needs reconsider the use of land in or close to residential properties e.g. the current Bickenhill site is "out of town" accessible and has little or no impact on residents

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10832

Object

UK Central Hub**Respondent:** Mr Garry Foster**Summary:**

The plan while making references to e.g. green belt appears to support the expansion of commercial and industrial land in close proximity to residential areas to encroach into it

This is completely unsympathetic towards a long established residential area and the residents that enjoy and support it

Change suggested by respondent:

The plan would seem to need to consider how it is treating a residential area as simply a form of conurbation that can be expanded

with this expansion consisting of industry, commerce, and transport in a way that reduces quality of life for residents

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

11204

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Iain Foster**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13778

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Osian Foster**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10727

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Cherie Foxall**Summary:**

Consider the existing residents

Change suggested by respondent:

The plan needs to be scrapped

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14783

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Simon Foxall**Summary:**

Object to Policy BL1;

Should this proposed site be allocated and form part of the adopted local plan, we want to ensure that our property will be located within the new village boundary line - adopted highway of Tilehouse Lane is the clearly definably physical feature, we want to ensure that this is where the village boundary and greenbelt line is drawn.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10831

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Andrew Fox**Summary:**

The policy calls for the density of proposed new development housing in immediate proximity to reflect the density of existing housing. The concept master plan illustrations show Medium density housing near Old Waste Lane, which is low density. My house (Laurel Grove) lies behind the housing of Old Waste Lane, and would be adjacent to Medium Density housing according to the plans. This clearly contradicts the statement above about reflecting existing densities. All other parts of the Plan do seem to abide by this so why not Old Waste Lane?

Change suggested by respondent:

Make the sections near Old Waste Lane "Low Density" Housing to reflect the existing housing, to comply with the overall Solihull Local Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14684

Object

Policy P5 – Provision of Land for Housing**Respondent:** South Staffordshire Council**Summary:**

Paragraph 228

Reiterate concerns previously expressed about the scale of the contribution being proposed by SMBC towards meeting the housing shortfall identified in the GBHMA. It is considered that continuing with this approach risks the plan failing in meeting statutory requirements. Specifically, South Staffordshire considers that the post 2031 shortfall should be considered as part of this present Local Plan review rather than being deferred.

Concern that SMBC's approach to utilising Green Belt may not be broadly consistent with that taken by other authorities in the HMA. Specifically of classifying 'moderately performing' GB land as unlikely to be allocated. This is in contrast to BC approach that otherwise sustainable sites should only be automatically excluded from site selection on Green Belt/Landscape grounds if they were in both 'Very High harm' Green Belt land and 'Moderate-High sensitivity' landscape areas.

Should the examination of Solihull's approach suggest that other deliverable land is available within the Borough, we would strongly encourage this being brought forward in order to avoid the deferral of the GBHMAs post 2031 shortfall.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13835

Support

UK Central Hub**Respondent:** HS2**Summary:**

HS2 Ltd welcomes the opportunity to engage with the local authority through this process of consultation on the draft Local Plan document and is fully supportive of aims to maximise potential development opportunities that help support the HS2 Growth Strategy aspirations for employment, skills, environment and infrastructure in both Solihull Borough and wider West Midlands region.

HS2 Ltd welcomes the identification of the high-speed railway on the Policies Map so proposed allocated sites for development in the draft plan are visible relative to HS2 interests

HS2 Ltd wishes to clarify that existing high-level assessments of impacts shown in the Arden Cross Masterplan have excluded any analysis of highways, vehicular capacities, site wide drainage, inclusivity and pedestrian modelling impacts. Therefore, it should be noted that any rearrangement of proposed HS2 carparking and multi-modal provision will have a significant impact on the operation of the new Interchange station and will need to be assessed in detail as the both the ACL Masterplan matures and Draft Local Plan Review progresses further.

Change suggested by respondent:

The draft plan should reflect that the Schedule 17 submissions for HS2's new landmark Interchange station and Automated People Mover were approved by the Council and the surface car parking awaiting reserved matters permission.

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

13964

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Des Foxon**Summary:**

- > Plan creates a facility where young people can be educated in the best possible surroundings, and not in ageing building/facilities that are not fit for purpose.
- > Benefits of a shared single location for primary and secondary pupils utilising shared and modern facilities in a safe and pleasant learning environment.
- > Higher energy efficiency and lower maintenance costs purpose built educational setting, with better community facilities.
- > Provide better sport, leisure and learning facilities for wider community.
- > State of the art facilities will attract families, staff and pupils to the area.
- > Will displace school traffic from station road, reducing traffic congestion and alleviating parking problem.
- > Safer environment for travelling to and from school . Good pedestrian and cycling connectivity from both within and through the site to the schools.
- > Existing Arden school site freed up for a mix of market and affordable housing, helping to regenerate Knowle.
- > KN2 concept masterplan follows a place based approach and meets the required test of soundness and legal compliance.

Change suggested by respondent:

I am satisfied that Policy KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a Place Based approach that I can fully support without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10629

Object

Blythe**Respondent:** Edward Fraser**Summary:**

The draft proposals for the housing developments still has far too many sites with large numbers in the Shirley Area. We already have far too much traffic on roads due to people from Dickens Heath, Tidbury Green etc developments passing through our roads.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10630

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Edward Fraser**Summary:**

We already have a plethora of housing/apartments for elderly developments. It's time to build some affordable housing for first time buyers and young families. But we can't cope with the disproportionate amount of suggested development in and around Shirley.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10631

Object

Policy P18 Health and Wellbeing**Respondent:** Edward Fraser**Summary:**

The Doctors surgeries are full to overflowing with the present population

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10632

Object

Policy P17 Countryside and Green Belt**Respondent:** Edward Fraser**Summary:**

the erosion of Green Belt land is not acceptable

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15092

Object

Policy P12 Resource Management**Respondent:** Carleton Free**Summary:**

Traffic around this area is unbearable at certain times and becomes grid locked frequently. Also noise and light pollution will be a problem, let alone a real threat to local wildlife

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14100

Object

Policy P12 Resource Management**Respondent:** Mr Andrew Freeman**Summary:**

Policy P12 should be clearer and more succinct. Managing an equivalent tonnage to that arising is not appropriate due to reliance elsewhere. There is uncertainty over landfill/radioactive waste/waste water. Policy fails to ensure timely provision of facilities. Sequential approach misconceived, as on-site management only appropriate for major non-waste developments, industrial areas should be higher, and priority given to re-use of previously-developed land/sites identified for employment uses/redundant agricultural and forestry buildings/curtilages. Should support hazardous waste provision and management of secondary/recycled materials. No evidence that sites outside the Green Belt considered, and many sites/areas in Green Belt where very special circumstances required

Change suggested by respondent:**POLICY P12 – REPLACEMENT TEXT**

Insert between 2 and 3:

Provision to Meet Solihull's Needs

Local Authority Collected Waste; Commercial and Industrial Waste; and Construction, Demolition and Excavation Waste

Sustainable provision of waste management facilities will be made to meet the requirements identified in the Waste Needs Assessment for Solihull at the dates identified in the Assessment.

Other types of waste

On suitable sites, support in principle is given to the provision of:

- facilities for the management of secondary and recycled materials and minerals waste; and
- hazardous waste management facilities.

Replace 3 to 6 with:

Suitable Sites and Areas

Locations that are in principle acceptable for waste management include the strategic waste management sites identified on the Policies Map where consolidation or expansion may be appropriate; suitable industrial areas or sites allocated for industrial or employment purposes; and, for the co-location of complementary waste management operations, the Berkswell and Meriden quarries. The re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages will have priority.

Where it is not possible or appropriate for new operations to be developed in these locations, developers shall consider the potential of sites within the Area of Search for waste management facilities as identified on the Policies Map.

Many of the strategic waste management sites, and the Area of Search, are within the Green Belt. As such, development would not normally be permitted other than in very special circumstances. These are likely to include the particular locational needs of some types of waste management facilities and the absence of suitable sites elsewhere. Very special circumstances will need to be demonstrated in applications.

Replace 7 with:

Household Waste Recycling Site

Land is identified for a relocated Household Waste and Recycling Centre within UK2 Land at Damson Parkway which is allocated for employment purposes in Policy P1 and Policy UK2.

Split 9 into 2 sections:

Safeguarding Waste Management Facilities

In considering non-waste management development proposals, the Council will take into account any adverse impact on the strategically important waste management sites and the potential of the Area of Search for waste management facilities identified in this plan.

Provision of Waste Facilities in Non-Waste Development

Non-waste development will be required to accommodate facilities for the storage, sorting and presentation of waste arising from the development, and developers will be expected to demonstrate satisfactory provision for waste management.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14101

Object

Challenges

Respondent: Mr Andrew Freeman

Summary:

Consequential modification to Challenge I, Paragraph 38, resulting from objection to Policy P12, as managing an equivalent tonnage to the waste arising in the Borough is not an appropriate aim

Change suggested by respondent:

Replace "Providing sufficient waste management facilities to meet an equivalent tonnage to the waste arising in the Borough." with "Providing waste management facilities of an appropriate tonnage to meet the needs of the Borough at the right time and in the right place."

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14107

Object

Protecting and Enhancing our Environment

Respondent: Mr Andrew Freeman

Summary:

Paragraphs 350-358 should be redrafted to accord with changes proposed to Policy P12.

Change suggested by respondent:**REPLACEMENT TEXT (JUSTIFICATION)**

Delete 2nd clause of 3rd sentence of paragraph 350 and replace with 'treating it locally wherever practical'.

Delete paragraphs 351-352 and replace with:

'The circumstance with regard to capacity needs within the Borough are detailed in the Council's Waste Needs Assessment for Solihull, November 2018. In particular, future requirements are set out in Tables 49 to 51 of the Assessment. These relate to local authority collected waste; commercial and industrial waste; and construction, demolition and excavation waste. The Council will support the sustainable provision of waste management facilities to meet these forecasts at the dates and intervals set out in the tables (2020, 2025, 2030 and 2035).

Much of the required capacity is already in place. Appropriate additional provision will be made in accordance with Policy P12. In this regard, there are a couple of specific additional needs. These are considered below.'

Delete the 2nd clause of the 4th sentence and the 5th and 6th sentences of paragraph 353 and replace with:

',' and further consideration of the recommendations has concluded that a site within the proposed employment land allocation at Site 20 Land at Damson Parkway offers the most suitable option.'

Add new paragraphs after paragraph 355:

'In addition to the above, the policy is supportive of the provision facilities for the management of secondary and recycled materials and minerals waste. This is in recognition of the emphasis given, in national policy, to the contribution that can be made from the sources in the supply of minerals.

Policy P12 also offers support, in principal, to the provision of facilities for the management of hazardous waste. This is because of a general lack of such capacity within the Borough.

Sustainable provision will thus be made in a variety of ways. The provision identified above will address shortfalls in capacity within the Borough in a move to help satisfy local needs. Developments will complement on-going provision at the Coventry EfW facility, the Birmingham MRF and the Packington composting facility and such additional sustainable capacity as may be commissioned through the Borough's Municipal Waste Management Strategy.'

Delete 1st sentence and 1st clause of 2nd sentence of paragraph 356.

Delete 1st and 2nd sentences of paragraph 357.

Split paragraph 358 into 2 after 2nd sentence.

Add new paragraph after paragraph 358:

'On-site management shall be preferred unless the activities would result in unacceptable harm through impacts on the environment, on transport or on neighbouring uses or it is demonstrated that management elsewhere would have wider sustainability benefits. Particular opportunities include the on-site recovery of construction and demolition waste as well as provision of recycling infrastructure in housing, retail and employment developments.'

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14109

Object

POLICY P13 Minerals**Respondent:** Mr Andrew Freeman**Summary:**

Policy P13. Fails to distinguish between Mineral Safeguarding Areas and the safeguarding of minerals-related infrastructure sites, which should be safeguarded wherever they are. The criteria concerning prior extraction should include environmental considerations. Policy concerning alternative materials is unclear and should reference related treatment facilities, major rather than significant development, distinguish between temporary and permanent facilities, which should not be encouraged in Green Belt but in acceptable locations throughout the Borough. The quantity of aggregate to be provided over the Plan period is not justified by proportionate evidence, as the sales data is dated and could be unreliable, takes no account of demand or secondary/recycled materials, and the area is reliant on imports, and is not Solihull-specific. Landbank provisions have been applied incorrectly or not at all for silica. Designations referred to in the policy and the justification are not shown on the Policies Map. There is confusion over the criteria for mineral working and regarding restoration and aftercare, biodiversity should be covered and coal-related considerations removed, whilst paragraph 9 could be covered in justification.

Change suggested by respondent:

Policy P13

Delete reference to infrastructure from paragraphs 1-3 and re-order 2 and 3.

Add new paragraph 4 on minerals-related infrastructure sites:

'Minerals-related infrastructure sites, as identified, are also safeguarded from incompatible development. Redevelopment for unrelated purposes or encroachment by incompatible development will not be permitted unless alternative provision in the vicinity can be made in accordance with the development plan or there is no longer a need for the facility at this location.'

Reword paragraph 4:

'5. In all new development within the Borough, the Council will actively promote the use of alternative materials such as secondary and recycled aggregates and minerals waste. Subject to other development plan considerations, temporary facilities for the treatment of such materials will be encouraged at major development sites, including mineral workings. Permanent facilities will be encouraged at Strategic Waste Management Sites and other appropriate locations.'

Reword paragraph 5 and revisit quantum:

'6. Provision for primary sand and gravel resources will be made through a mixture of specific sites, preferred areas and/or areas of search to meet the identified requirement of XX million tonnes for the West Midlands Metropolitan Area over the plan period or such lesser amount as may be required following the Black Country Core Strategy Review. The provision will include sites already granted planning permission where not included in the current sub-regional landbank. In addition, the Council will seek to maintain a landbank of permitted reserved of at least 7 years.'

Delete paragraph 7.

Amend sub-heading to 'Criteria for mineral working', delete reference to underground extraction in paragraph 8 criterion v. and criteria ix, x and xi.

Add new sub-heading 'Restoration and aftercare' and replace paragraph 9 with:

'The Council will require restoration to a safe and high-quality condition with appropriate aftercare in accordance with agreed restoration and aftercare schemes and within an agreed period following the cessation of extraction. Reclamation to an agreed use shall prioritise the contribution the site could make to green infrastructure, the conservation and enhancement of biodiversity, including Local Biodiversity Action Plans, the enhancement and restoration of the Arden landscape, flood risk management, appropriate recreation uses and agriculture, as well as the availability of suitable infill material if appropriate.'

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:**

Attachments:

14114

Object

Protecting and Enhancing our Environment

Respondent: Mr Andrew Freeman

Summary:

Paragraphs 359-369 should be redrafted to accord with changes proposed to Policy P13. Amendments to the Policies Map are required to identify Specific Sites, clarify MIN1 to MIN5 and show minerals Area of Search.

Change suggested by respondent:

Delete 'within a defined area of search' from the 2nd sentence and replace 'significant' with 'major' in the last sentence of paragraph 360.

Redraft paragraphs 361-363 once production requirement has been revisited, adding the following policy commitment:

'At all times, the Council will aim to maintain a landbank of permitted reserves of sand and gravel of a least seven years.'

Amend Policies Map to identify Specific Sites, clarify MIN1 to MIN5 and show minerals Area of Search.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13966

Object

Foreword

Respondent: Friends of the Earth (Cities for People)

Summary:**Climate Change Agenda**

- Welcome that Solihull MBC has declared a climate emergency on 8th October 2019, and committed its support for UK's 100 Net Zero Local Leadership Club.
- Since Climate Change declaration, how many planning applications have been passed which do not show enough ambition? Conditions should be used to enable more progress across Borough on climate change action.
- Numerous statements in plan on reducing and minimising carbon emissions, however huge growth planned will increase emissions significantly.
- Many of the infrastructure projects will use huge amount of concrete. How are these emissions assigned within Borough's plans and climate objectives?
- What are climate implications of airport operations?
- How does local plan fit with Climate Emergency Statement of Intent of 19th October 2019?
- NPPF could and should go further in addressing climate change.
- Has SMBC considered adopting the UN Sustainable Development goals as part of its local plan?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13967

Object

Spatial Strategy**Respondent:** Friends of the Earth (Cities for People)**Summary:**

Pattern and locations of development:

- Danger the plan is out of date before it is examined, due to impact of Covid-19 on planning.
- Primary aim should be urban regeneration and conversion of shopping centres for housing. Many car-dependent shopping venues in Borough should be surplus to requirement. Could make way for high quality housing, which is low/positive carbon.
- Standard methodology algorithm may change to encourage town centre development, see Robert Jenrick announcement on 16th November 2020.
- Para. 63 – challenge statement that there are extremely limited options for land in urban area.
- Options E-G – Not homogeneous options. Need to travel and car reliance are likely to be higher, even taking account of rail provision. Seems significant reliance on housing development at edge of settlements. Additional capacity could be identified in urban area and mitigate the need for these sites. Could increase density, especially at UK Central.
- Also need to consider location of UK2, access and impact on traffic growth and CO2 emissions.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13968

Object

Policy P5 – Provision of Land for Housing**Respondent:** Friends of the Earth (Cities for People)**Summary:**

- Need additional work to test justification level of housing. -- Potential town centre regeneration in Solihull, given Covid-19 impacts on retail patterns, could provide additional housing capacity, as well as windfalls, densification and other supply sources.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13969

Support

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Friends of the Earth (Cities for People)**Summary:**

Plan includes positive policies in relation to sustainable transport, as well as emphasis on Rapid Transit & Metro in P8A.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13970

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Friends of the Earth (Cities for People)**Summary:**

- Despite positive policies in relation to sustainable transport, it is likely that development will result in huge increases in car usage and undermine positive transport policies.
- Para. 282 - Challenge need for bypasses and likely traffic impacts of proposed housing sites.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13971

Object

Foreword

Respondent: Friends of the Earth (Cities for People)

Summary:

Concept Masterplans:

- Concept Masterplans appear largely to have been provided by developers. Some, particularly those in less accessible location, designed on traditional cul-de-sac, car orientated basis.
- Design features should embed sustainable travel and favour reduction in CO2 emissions. Needs to be in individual [site] policies, especially if Planning White Paper proposals are carried forward, which will reduce opportunities for input post Plan adoption.
- Limited services on edge of settlements. Will new services be provided on sites?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13972

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Friends of the Earth (Cities for People)**Summary:**

Policy P9

- P9 is largely about how things are built. Development patterns need to also be addressed as they have significant impacts on climate change, especially if not covered by other policies in the Plan or in the SA.
- Energy policies should show real ambition. Large number of roof spaces across the borough could be used for solar power electricity and hot water generation. These should be considered in policy.
- Green Belt may limit opportunities for certain forms of renewable energy production, yet many places being sacrificed to meet growth.
- Risk that housing developments not benefit from district heating policy.
- Policy should introduce stronger monitoring measures, i.e. reduce emissions from a level at a certain time, monitor and then reduce again.
- UK Government committed to reduce greenhouse gas emissions by at least 68% compared to 1990 levels by 2030. Will plan achieve Solihull's contribution to UK target?
- As such plan is unsound.

Change suggested by respondent:

- Policy should introduce stronger monitoring measures, i.e. reduce emissions from a level at a certain time, monitor and then reduce again.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13973

Object

Policy P12 Resource Management**Respondent:** Friends of the Earth (Cities for People)**Summary:**

- Policy has some commitment to move up the waste hierarchy.
- Should include policies on biogenic waste, use of anaerobic digestion and new sources of energy generation. Will biogenic resources arising in Borough be treated by composting or AD? Modular treatment should be used to reduce capacity over time. Use of waste energy facility in Coventry conflicts with proximity principle in Para. 350. Plan not mention separate food waste collection from 2023 – this will require local treatment facilities within the Borough.

Change suggested by respondent:

- Should include policies on biogenic waste, use of anaerobic digestion and new sources of energy generation.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13974

Object

Policy P15 Securing Design Quality**Respondent:** Friends of the Earth (Cities for People)**Summary:**

■ Could principles be applied to alterations and redevelopment?

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15170

Support

Policy P8A Rapid Transit**Respondent:** Friends of the Earth (Cities for People)**Summary:**

■ Plan includes positive policies in relation to sustainable transport, as well as emphasis on Rapid Transit & Metro in P8A.

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14505

Object

Meriden**Respondent:** Frontier Estates**Agent:** Gillings Planning

Summary:

ME1 – West of Meriden (and Concept Masterplan)

The principles of this site allocation in terms of the quantum of development and the proposed density approach, are supported.

The proposed site allocation ME1; West of Meriden, would be suitable for a range and type of housing, including both C2 and/or C3 Use Classes – which would include accommodation suitable for older people. It should be recognised that the (proposed) 100 homes to be brought forward on this site can include provision for both Use Class C2 and/or C3 housing.

There appears to be no reasoned justification for the inclusion of the specific criteria of the policy (albeit that they apparently build on the Concept Masterplan for the site). The following points require greater clarity:

- "No development within any area of higher flood risk zones"
- 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D
- Retention of trees and hedgerows across the site to ensure the mature character of the site is safeguarded
- Provision of a minimum of 0.66 ha of Public Open Space to be provided around the pond and the group of significant trees within the centre of the site
- Policy wording should clarify that the requirement for any financial contribution to education provision would be applied to Class C3 housing only (for the general market), and not any housing for older people, which would usually fall within Use Class C2.

The Concept Masterplans are illustrative only and so the inclusion of a site layout plan (presented as a pre-application request) is not appropriate within a Concept Masterplan.

There is a discrepancy between the site layout plan and the illustrative concept masterplan, where the proposed access off Birmingham Road is shown in different locations.

Change suggested by respondent:

In order that the policy is considered 'sound' (so that it conforms with the provisions of national planning policy), it is suggested that the policy wording be amended to confirm that a housing mix / type could be brought forward on the site, and which could include provision for older person housing, in line with policy P4E.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14513

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Frontier Estates**Agent:** Gillings Planning**Summary:**

This policy is supported in general terms, where it is considered sound insofar as it is justified and in accordance with national planning policy. Further, it is based on robust evidence (HEDNA 2020)

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments:

14833

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Bridget Fryer**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14211

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mrs Sylvia Gardiner**Summary:**

Shirley will take 39% of planned homes - unfair share of homes required, with little open space. Object to further development in the Green belt, further development should take place on brownfield sites. Why is there no development in Dorridge and little in Knowle

Objection to site BL3:

- Increase in flooding
- Increase in Traffic around Bills Lane
- Greater strain on local services such as doctors surgeries

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11026

Object

Challenges**Respondent:** Inspired Villages**Summary:**

Challenge B (p13-14) 1st bullet seeks "to ensure" the full OAHN for the Borough is met, however the 6th bullet in referring to housing for older people merely seeks to "wider the range of options".

The Objective should similarly ensure the full needs for older persons housing need is met and this would then be consistent with Policy P4E(1) with the expectation that "new housing developments" "meeting the identified needs of older people".

Change suggested by respondent:

Challenge B 6th bullet to be amended to ensure housing needs for older people is met in full. Change to read "To ensure that the full housing needs for older people is met with a range of options including retirement housing, retirement communities / extra care and care homes."

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11027

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Inspired Villages

Summary:

P4A. Para 172 says Policy P4A also applies to C2 development that provides individual self-contained units. However, the SHMA Part 2 (Nov 2016) identifies accommodation required for pensioner households in 2033 is 76.6% owner occupation; 13.6% social rent/affordable rent (& similar figures in the HEDNA October 2020).

SHMA Part 1 (Nov 2016) para 6.5 has a lack of understanding of the Use Classes Order, citing "in terms of specialist dwellings for older persons (Use Class C3b), it is evidenced that in Solihull an additional 355 affordable and 870 market sheltered and extra care housing units should be provided over the plan period within the identified OAN." There is no recognition in the evidence base that retirement communities / extra care falls within the C2 Use Class.

The HEDNA has made some unjustified assumptions in calculating market extra care housing which suppresses the needs over the plan period.

The Local Plan Viability Study (14 Oct 2020) lacks understanding of extra care developments, other than para 7.1 which includes "additional typologies" tested including "Typical Retirement Housing Scheme (e.g. McCarthy & Stone type) on previously developed land, for 30 units."

The evidence base is flawed. A retirement community (extra care), such as that provided by Inspired Villages falls within the C2 use class and due to the minimum scale of development required / land take the evidence base has failed to model this. An Inspired Villages retirement community ranges from 130 to 280 units of accommodation plus communal and care facilities and because of the scale are typically on edge of settlement locations.

The Viability Study has modelled a Retirement Housing development on brownfield land with very few units and few facilities. This is not comparable with an Inspired Villages development which falls under extra care / housing-with-care and the evidence base must be updated to reflect this. To assist the Council with this modelling, they are referred to the ARCO website (Associated Retirement Community Operators) <https://www.arcouk.org/what-retirement-community> to understand the different typologies of housing for older people (and their HEDNA Oct 2020 which does acknowledge these).

In contrast to the Local Plan Viability Study, the HEDNA (Oct 2020) recognises viability as an issue to extra care (para 9.60 to 9.64). The Council must review the HEDNA to note that the Local Plan Viability Study is flawed in respect of the extra care model, is contradictory to the HEDNA which recognises the key issues to the sector including: non-saleable space, higher construction and fit-out costs, sales rates slower and struggle to compete with mainstream housebuilders (see para's 9.60 and 9.92) and para 9.61 says "it may well be that a differential and lower affordable housing policy is justified for housing with care" yet this has been ignored in draft policy P4A.

The Council is referred to the accompanying Inspired Villages Local Plan representations document which explains the use classes order / extra care and the recommendations at page 5 of what a Local Plan should include.

P4A seeks 40% affordable dwelling for C3 residential but based on para 172 this would also apply to C2 extra care. However, this is completely at odds with the tenure profile for older people where over three-quarters of homes are owner occupied. It would be unlikely that an owner occupier would be able to qualify for an affordable property and a 40% affordable housing provision is excessive and would result in imbalanced tenure.

(Continue on a separate sheet /expand box if necessary)

Change suggested by respondent:

1. The Local Plan Viability Study must be updated to properly assess and model the different typologies of older persons housing. The modelling should look at not just Retirement Housing, but also Retirement Communities (Extra Care / housing-with-care) and Care Homes on a range of site sizes and scales to inform the Local Plan policy and text.
2. With the updated evidence base we would expect this to recognise that it is not viable for a retirement community / extra care development to deliver 40% affordable housing. Furthermore, 40% is completely inappropriate given the tenure profile for older people is towards owner occupations.
3. The supporting text and policy will need to insert specific text for retirement community / extra care development to state that affordable housing is not required.
4. The policy should be specific to say that it only applies to 'C3 residential' and not development falling within the C2 use class in acknowledgement of the viability issues faced by C2 uses including extra care housing / retirement communities.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

11028**Object**

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

Respondent: Inspired Villages

Summary:

The Plan recognises the importance of the growth of the older persons population and P4E(1) refers to meeting the identified needs of older people “in accordance with current assessments of housing need and evidence”. In this context therefore it would be expected that this should be a policy of the highest importance in the Local Plan.

1. The Evidence base commissioned by the Council is flawed.

(i) SHMA Part 2 used the @SHOP toolkit which is flawed and which was identified at a planning appeal (see West Malling appeal decision – attached – reference APP/H2265/W/18/3202040 para’s 26 to 40). The SHMA states the unrealistic suggestion that because there is no existing Market Extra Care Housing that this means a future requirement is also zero.

(ii) It is acknowledged that the evidence base has been updated in light of the Richmond Villages appeal at Catherine de Barnes where para 32 noted the appellant and the Council’s respective positions on shortfall of extra care and bed spaces and para 31 states that the Council gave the clear need for older people’s housing as of significant weight.

The HEDNA (para 9.30) seeks to suppress housing with care rates stating that 45 units per 1,000 population aged 75 and over “is quite a high figure in the context of current supply” – however the fact that nil / limited extra care has been delivered to date does not justify this position.

Furthermore, it seeks to apply the same tenure split as housing-with-support, which is 50% market housing in more deprived areas up to 67% in less deprived locations, however, this does not correspond with the tenure profile of over-70s which has significantly greater levels of owner occupation to that %. This position is therefore not justified nor based on the evidence and would make it difficult to provide sufficient owner-occupied homes for older persons meaning their needs will not be met in full over the plan period.

The HEDNA (para 9.34) identifies the shortfall of the various typologies of older persons housing, including 469 units of extra care by 2036 “of which 70% is in the market sector”. It asserts the current supply in this category (in both tenures) is sufficient with the shortfall emerging in the future. This is at odds with the position accepted by the Council at the Catherine de Barnes appeal and which the Inspector recognised the need was significant. This conclusion by GL Hearn arises from their unjustified position to downplay the prevalence for extra care housing (market) to reflect the actual market demand – historic under supply, ageing population and tenure profile of the borough.

(iii) Para 201 states “many will prefer to remain in their own homes”, and para 202 says that “an important part of meeting need for older people will be through general purpose new homes built to accessible standards” and “this will include age-restricted general market housing”. However, these are subjective statements and is unevidenced.

(iv) HEDNA (Oct 2020) lists the 4 definitions of different types of older persons’ accommodation from the PPG. P4E references specialist housing – with a cursory definition in the supporting text; age restricted general market housing (para 202); and care homes at P4E(5). However, the policy and supporting text is completely silent on extra care housing which includes retirement communities. There is a lack of extra-care housing in the Borough at present and there is a major need for its provision over the plan period yet this is hampered by an evidence base which has sought to downplay the need and a policy that omits to mention it. Having regard to the significant need for all forms of older persons housing the Council should give consideration to include a requirement for strategic site allocations to make provision for older persons housing.

2. P4E needs to be explicit on what is or isn’t C2 or C3 use class. P4E(5) references care homes as C2 but is silent in respect of other uses – and as already stated is wholly silent on extra-care. Inspired Villages delivers Retirement Communities across the UK. We have received Counsel Opinion on our development which confirms we fall within the C2 Use Class and this is what underpins our applications, including recent consents in Reigate & Banstead, Wealden, Bedford Borough, Central Bedfordshire, Maidstone, etc. It is not acceptable for the Council to be ambiguous on use class as this is not helpful to the sector.

Change suggested by respondent:

The suggested modifications to the Local Plan are:

1. The 8 recommendations (p5) in the accompanying 'Representation by Inspired Villages: To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 2)' must be incorporated within the draft Local Plan, including a clear policy to address older person housing needs; setting figures for the amount of units required; how this will be monitored; inclusion of minimum numbers within the site allocations in the right circumstances; recognising the significant benefits of this form of accommodation (not properly acknowledged in policy or supporting text); and to reflect the use class fully.
2. The evidence base must be updated to properly reflect the ageing demographic and the application of the prevalence rates for all typologies of older persons housing, including extra care. We are prepared to engage with the Council to discuss the appropriate methodology to undertake a proper evidence-based test to ensure older persons housing needs are met over the plan period.
3. P4E should include a figure of how many older persons units are needed over the plan period to ensure that the Council are focussed on providing for this much needed form of accommodation and to recognise the different typologies (i.e. retirement housing; extra care / retirement communities; and care homes). This would ensure consistency with P4E(2) and (3) which express targets for units to be Category M4(2) or wheelchair user dwellings to M4(3).
4. Para 201 must delete the subjective comment which states 'many people prefer to remain in their own home'. This is unevicenced. It is acknowledged that some people may wish to remain in their own home, however, clearly there is also a need to provide specialist accommodation for older people. Para 212 is vague and lacks certainty. This must be updated to reflect the specific housing numbers set out in the para above.
5. Add new paragraph after para 201 to reference extra care housing (which includes retirement communities) and to list what they entail – to ensure consistency with para 202 which talks about 'age restricted general market housing'. Key with extra care (and in contract with age restricted housing) is that it does include communal and care facilities.
6. Para 213 is a vague statement. It fails to define what 'specialist provision' or 'specialist housing' means. This must be defined in the text or in a glossary. Reference to the PPG typologies should be made and as an expansion on para 214 which lacks precision relative to the PPG or ARCO definitions.
7. There is a lack of clarification on the use class. This creates uncertainty from an investor perspective. It is inadequate to express at para 219 that an applicant should seek clarification on use class at the pre-application stage. The Council should engage with ARCO and Retirement Community operators to enable a better understanding of the C2 use class.
8. The plan should make provision for strategic site allocations to include a specific target for older persons housing, e.g. 'at least 10% provision' or a specific minimum number of units, to ensure an adequate supply of potential sites to contribute to meeting older persons housing need over the plan period. As an example Policy KN2: South of Knowle (Arden Triangle) should be amended as follows:

Policy KN2

'...2.

...viii. On site accommodation for older people in accordance with Policy P4E with at least 150 extra-care units (C2 use class);...'

The provision of 600 dwellings at point 1. Should be expressly related to '600 residential dwellings (C3 use class)...

Legally No
compliant:
Sound: No
Comply with No

duty:

Attachments:

10857

Object

Policy P1 UK Central Solihull Hub Area

Respondent: Mr Clive Gaston

Summary:

My objection is to the siting of Waste management facilities to Damson Parkway.

Also this is close to a residential area on Damson Parkway

This is not a very good idea considering the traffic that will be using the JLR LOC and the JLR factory.

There are already queues of cars waiting for access to the site at Bickenhill that trail up the service road, this would create havoc at shift changeover times at JLR and for everyday people to go about their business and for residents of Damson Parkway area.

Change suggested by respondent:

Waste management area needs to be re homed in a more appropriate place which has suitable access and away from residential homes.

Legally No
compliant:

Sound: No

Comply with No

duty:

Attachments: None

10949

Object

Policy P12 Resource Management

Respondent: Mr Neil Gavin

Summary:

Developing a whole new waste management depot at the proposed site near Damson Parkway does not protect gaps between settlements because it is in a gap between residential areas and on Green Belt. Accessibility is actually reduced as access will be by smaller roads when currently it is major A road. the current site, if developed and managed properly, can meet the needs of the borough and the additional purposes outlined in the proposal. The new site will decrease the air quality around the area, increase the amount of vermin and create noise pollution.

Change suggested by respondent:

Develop the existing site at Bickenhill or identify appropriate brownfield land away from residential areas. If the site has to be relocated, find a site that is not near residential areas or areas already proposed for new housing.

Legally No
compliant:

Sound: No

Comply with No

duty:

Attachments: None

10950

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Neil Gavin**Summary:**

This is a flood risk area and development here will increase the severity and occurrence of these events. There will be increased traffic around the area especially Damson Lane which is already a rat run for people trying to avoid the traffic on Damson Parkway during peak times.

The development is near residential areas with more housing developments planned which will also lead to increased traffic parking and local unrest. I disagree that there will be improvements to the Green Belt because developments such as this only reduce the amount of Green Belt land.

Change suggested by respondent:

Develop the existing site at Bickenhill which is away from residential areas and serviced by an A road. Improve road access to the site and manage user traffic with a workable booking system.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14207

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

Plan fails to set out the current or future need for specialist housing for older people, for either care beds or extra care units required. Whilst Policy P4E requires sites of over 300 units to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older persons accommodation, there is no mechanism for delivery. Needs Report (January 2020) concludes there is a compelling need for both care bed spaces and extra units now, which will increase substantially over the next 10 years. Plan should be much more supportive of specialist housing

Change suggested by respondent:

Change to Policy H4E to be more supportive of Specialist Housing.

Allocation of specific sites for specialist housing in addition to the current allocations

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14208

Object

Policy P5 – Provision of Land for Housing**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

A Housing Need Report (Barton Willmore) identifies a major housing shortfall over the Plan period. Between 1,036 and 1,248 dpa are required to support UK Central. The deficit from the HMA is a minimum of 11,294 and 13,101 dwellings to 2031, a significant increase from 2,597 dwellings in the 2020 position statement.

29 units identified in the Brownfield Land Register should be discounted as there is no mechanism to deliver the numbers in the Green Belt.

Analysis of windfall supply in the Five Year Housing Land Supply Review (Lichfields, Nov 2020) concludes there is no evidence both large site windfalls and garden land will come forward.

Change suggested by respondent:

- Increase in Housing figures of between 1,036 and 1,248 dpa
- Reduction in windfall allocations from 200 dpa to 150 dpa
- Reduction in BFLR allocations by 29 - from 77 to 48.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14210

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

No evidence is provided to show that the complex land assembly issues associated with Site BC1 have been addressed, so doubtful that numbers can be delivered in the Plan period. No certainty over timing of HS2 or Relief Road. No evidence that the Relief Road can be delivered by the quantum of development proposed. Without HS2/Relief Road the site would have an indefensible Green Belt boundary, especially as part of site is within highly performing Green Belt in the Green Belt Assessment. Unclear whether eastern boundary is HS2 or the West Coast mainline

Change suggested by respondent:

Deletion of Policy BC1 Barrett's Farm, Balsall Common

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14212

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

No evidence that complex land assembly issues associated with Site BC4 have been addressed. Allocation not justified by Site Assessment that draws attention to part being higher performing Green Belt, in the Green Belt Assessment, low accessibility, should be subject to clear firm Green Belt boundaries.

Uncertainty over building of this section of Relief Road casts doubt over provision of firm eastern boundary. Plan and concept masterplan inconsistent over Green Belt boundary and line of Relief Road. Site cannot be considered available, achievable and deliverable

Change suggested by respondent:

Deletion of Policy BC4 Pheasant Oak Farm, Balsall Common

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14213

Object

Policy BC5 - Trevellion Stud, Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

No evidence that complex land assembly issues addressed for Site BC5, and firm defensible Green Belt boundaries will only be created if the site is considered in a comprehensive manner.

The site is identified as having high visual sensitivity in the Landscape Character Assessment and it is clearly evident that the land extends significantly out into open countryside, impacting considerably on the openness of the Green Belt at this point and contrary to the purpose to assist in safeguarding the countryside from encroachment.

Change suggested by respondent:

Deletion of Policy BC5 Trevellion Stud, Balsall Common

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14238

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

Site BC6 is unsuitable as an allocation, as it contradicts the assessment criteria. Site is completely divorced from the settlement with no link or appropriate setting, is within the highest performing Green Belt in the Green Belt Assessment, whilst the Landscape Character Assessment identifies that the site has medium visual sensitivity. A narrow belt between 2 highly used railway lines is unsuitable due to noise, vibration and visual sensitivity. Site breaches firm and defensible Green Belt boundary as applied to other sites in the settlement.

Change suggested by respondent:

Deletion of Policy BC6 Lavender Hall Farm Balsall Common

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14239

Object

Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

Site 19 Riddings Hill, Hall Meadow Road was allocated in the adopted Local Plan 2013. There has been no movement on bringing the site forward for development which raises doubts over its future delivery within the Plan period. It has not been demonstrated that this site is available, achievable and deliverable. Its continued inclusion as an allocation in the Plan is unsound.

Change suggested by respondent:

Deletion of SLP Site19 Riddings Hill/Hallmeadow Road

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14240

Object

Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

Omission Site 338 should be allocated for 100-130 dwellings. This site is supported by technical reports and being in one ownership without major infrastructure requirements, there would be no uncertainty about its delivery unlike the allocated sites. Sites that are better performing than Site 338 in the Green Belt Assessment have been allocated. Although higher performing, recent development in this part of the Green Belt parcel means it is likely to perform more moderately. Site is accessible, is surrounded on three sides by development with a defensible Green Belt boundary to the south that is more substantial than that for Site BC3 and does not extend further into the countryside than the existing settlement. There are no landscape, heritage or ecology issues.

Change suggested by respondent:

Site 338 should be allocated as a housing site or for C2 use within the Plan. A layout plan is attached to show how the site could work as a C2 allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14241

Object

Balsall Common**Respondent:** Generator (Balsall) & Minton**Agent:** DS Planning**Summary:**

Omission Site 338 should be allocated for 100-130 dwellings. This site is supported by technical reports and being in one ownership without major infrastructure requirements, there would be no uncertainty about its delivery unlike the allocated sites. Sites that are better performing than Site 338 in the Green Belt Assessment have been allocated. Although higher performing, recent development in this part of the Green Belt parcel means it is likely to perform more moderately. Site is accessible, is surrounded on three sides by development with a defensible Green Belt boundary to the south that is more substantial than that for Site BC3 and does not extend further into the countryside than the existing settlement. There are no landscape, heritage or ecology issues.

Change suggested by respondent:

Site 338 at Harpers Field, Kenilworth Road, Balsall Common should be included in the table of residential allocations at paragraph 226.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10833

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Dr David Gentle**Summary:**

Too many houses in relation to size of Knowle - will overload roads, retail, parking, medical.
 Plan based on aspirations of 2 organisations- little primary evaluation of community need.
 Site too far from Dorridge Station - leads to pollution, congestion and parking issues.
 Siting of School not central to B93 - difficulty of access from Dorridge and Bentley Heath.
 Site is 'wrong' side of Knowle - traffic for M42 and Birmingham has to go through Knowle centre.
 Affordable housing is all together - issues of social inclusion and quality of environment.
 Financial and viability issues problematic.

Change suggested by respondent:

- ☒ Substantially reduce the number of houses on the site by identifying brownfield sites or locations with good transport links.
- ☒ Distribute affordable housing into smaller huddles over several sites.
- ☒ Reinstate the Knowle relief road.
- ☒ Site school near Downing Close as previously planned.
- ☒ Use investment to expand primary medical care facilities.
- ☒ Consider new uses for some existing school buildings.
- ☒ Investigate and 'firm up' financial implications of site.
- ☒ Clarify management issues to ensure public access to sport and fitness facilities.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14411

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Carol George

Summary:

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14410

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Richard George**Summary:**

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14548

Object

Policy BL1 - West of Dickens Heath**Respondent:** Shelly Gibbs**Summary:**

Potential for increased crime.
Adversely impact on the community.
Loss of sports facilities will be felt by all.
Loss of natural environment
The road network in the area cannot cope with the existing traffic.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15084

Object

Policy BL1 - West of Dickens Heath**Respondent:** William Gibson**Summary:**

Will be a detrimental effect on local wildlife

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11060

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Adam Gill**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities.

Concerned as doctors fails to provide appointments for the current population, the roads are congested, and the infrastructure cannot cope. Amount of housing proposed will make Balsall common unable to function.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11096

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Debbie Gill**Summary:**

Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities. Concerned as doctors fails to provide appointments for the current population, the roads are congested, and the infrastructure cannot cope. Amount of housing proposed will make Balsall common unable to function. Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14853

Object

Policy S01 - East of Solihull**Respondent:** Pargan Singh Gill**Agent:** Satbinder Kaur Gill**Summary:**

Considers the site will have a negative impact and will be detrimental to the area, the residents and the natural habitat of the green belt.

it will add pollution, traffic, noise and cause harm to animals and environment.

Impact on social behaviour, constraints on already shortage of services such as education schools, GP's, Community health services

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10749

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** ms Babs Gisborne**Summary:**

The plan for 90-100 houses is unsound and unsustainable on a field/meadow for 6-9 horses and countless species of wildlife. The environmental damage will be immense, not just destroying natural habitats including the canal banks but putting extra stress on already stretched electricity and water supplies. Water pressure is so low I have had to install a water pump to shower in the morning. Electricity cuts happen frequently and the increased traffic will cause more air pollution. The cycle lanes should be planned into the road system and the nature-rich canal banks should not be dismantled to provide more access.

Change suggested by respondent:

The policy must not change the Green Belt zone. It should be pushing for developments such as S02 and NS1. The planning model is outdated, paying no attention to sustainability. Covid has proved not just locals (656) but people from the wider West Midlands have valued and used the country byways for their health and wellbeing. Eroding the Green Belt meadowland and wooded copses for housing will exacerbate the feeble road structure with its 200 extra vehicles, (672), circulating at the congested T-junctions either end of School Road. Neither are 90+ houses in keeping with the current ribbon development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14825

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Clifford Gledhill**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14824

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs J A Gledhill**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10737

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Ms Vanessa Glennan**Summary:**

I believe a disproportionate number of dwellings are being built around Cheswick green and I am worried the local infrastructure cannot cope. Nobody seems to worry about the flood issue, I've witnessed first hand in Dickens Heath major flooding problems, the balancing ponds do not work. New developments will create new flood issues in surrounding areas. Traffic on Stratford Rd is already a massive problem, more cars, more pollution, please build elsewhere!

Change suggested by respondent:

The only change I'd like to see is for the development to be axed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

13975

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Andrew Gnyla**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Object to inclusion of 'enhancing' in Section 3 of Policy P5:

"New housing will be supported on windfall sites in accessible locations where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness..."

See High Court Ref: CO/4467/2019, with regard to word 'enhancing'.

It is submitted that word 'enhancing' is too subjective.

Soundness tests:

- Not justified as introduces unnecessarily subjective test that could frustrate delivery of windfall sites.
- Not effective as windfall sites key component of housing delivery numbers. Potential delay in delivery. Solihull only authority in HMA to have such a policy. Could put pressure on greenfield sites if less windfall delivery.
- Not consistent - NPPF does not impose such a subjective test on development of backland or windfall sites.
-

Change suggested by respondent:

Modification is suggested to Policy P5:

Either omit the word 'enhancing':

"3 - New housing will be supported on windfall sites in accessible locations where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness..."

Or add an additional definition:

"3 - New housing will be supported on windfall sites in accessible locations where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness including through that housing provision.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14502

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Roger & Valerie Godwin**Summary:**

Shirley is already grid locked regarding road ways .
Lack of doctors .
Schools already over capacity .
Main roads grid locked .
8 additional care homes & retirement homes being built in Shirley .

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14503

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Roger & Valerie Godwin**Summary:**

Shirley is already grid locked regarding road ways .
Lack of doctors .
Schools already over capacity .
Main roads grid locked .
8 additional care homes & retirement homes being built in Shirley .

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14501

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Suraj Gohel**Petition:** 2 petitioners**Summary:**

Objects to Policy BL3;

Lay person cannot access soundness of plan - Poor quality plans relating to BL3 - Not enough time to analyse/digest information in the local draft plan - Site is high scoring greenbelt and should not be used - Concern over urban sprawl/ other high earning professionals will leave if setting is not preserved - Site BL3 and it's impact on local wildlife/ woodland and lack of ecological assessment - Loss of green space negative impact on health and wellbeing of local residents and climate change in general (removal of trees/ additional traffic) - Infrastructure is in place to support larger population (Public transport) - Increase in traffic pollution - Negative affect on neighbourhood amenity - object to visual impact of development - overdevelopment of site not in line with scale of existing neighbourhood.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

11062

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Charlotte Goldberg**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14798

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Charlotte Goldberg**Summary:**

Objects to Policy BC1;

Ecological assessment (December 2019): There is no allowance for these habitats or access to the ponds which have provided a complex series of drainage from homes on the edge of the village for 100 years. Indeed, a housing development and a school are marked along these notable habitats. This must be addressed and the fields surrounding the existing village preserved for animal life

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

11036

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Golden End Farms**Agent:** Delta Planning**Summary:**

Support the general approach of securing 40% affordable housing but disagree with paragraph 6 which does not comply with national policy and is therefore unsound.

Paragraph 6 is not consistent with paragraphs 1 and 2 of the policy or paragraph 177. It does not reflect national guidance to ensure that the provision that is secured caters for all tenure needs to enable mixed and balanced communities to be created. It is inflexible as it refers only to social rent and shared ownership, not other tenures that may be supported by the Council.

Change suggested by respondent:

Policy P4A paragraph 6 should be amended to make clear that the suggested split of affordable tenures will relate only to the element of affordable housing that is not provided as discounted market products. This will ensure the policy is flexible enough to respond to emerging Government Policy and accommodate discounted market products such as the emerging policy on First Homes. An additional paragraph in the policy also needs to be included to set out the appropriate mix of unit sizes within this category.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11038

Object

Policy P5 – Provision of Land for Housing**Respondent:** Golden End Farms**Agent:** Delta Planning**Summary:**

Provision of housing land significantly underprovides for the housing needs arising from the growth strategy. HS2 and UKC will have a profound effect on the Borough but the Plan fails to accommodate the housing need that will arise from it. Whilst historically there may have been significant in-commuting, this likely results from previously constrained housing supply. The Council should seek to reverse historic commuting patterns and provide housing to meet more of the forecasted jobs growth.

Also questions whether the plan does enough to help meet the wider housing shortfall in the housing market area, particularly beyond 2031.

Change suggested by respondent:

The housing requirement should be increased to ensure the plan meets the housing needs arising from the HS2/UKC proposals and as well as providing a greater contribution to meet HMA housing shortfalls. We estimate that the Local Plan needs to make provision for the delivery of at least 17,500 dwellings over the plan period, and probably nearer 20,000 dwellings to ensure the sustainable growth of the area and contribution to the wider HMA needs.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11044

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Golden End Farms**Agent:** Delta Planning**Summary:**

The site selection process is unsound. Additional land releases should be included in the plan to support sustainable patterns of growth and meet needs. Golden End Farm is more suitable than proposed allocations in the settlement. Both allocations in Knowle have complex issues. No confidence that these sites can deliver the housing and infrastructure proposed, or what stage in the plan period they would come forward. Viability of these sites is also questionable.

Golden End Farm should be included as an allocation. It is in a highly sustainable location and can provide an immediate contribution to housing delivery.

Change suggested by respondent:

In circumstances where the Examination is provided with insufficient levels of comfort that either of sites KN1 or KN2 are deliverable and viable, the relevant allocation should be removed.

Whether or not KN1/KN2 are removed, a new policy KN3 and associated justification text should be inserted into the Knowle, Dorridge and Bentley Heath Settlement Chapter allocating land at Golden End, Knowle for some 250 dwellings.

The justification can be taken from the commentary taken from the Council's Site Assessment summary dated November 2020.

Example of the Policy text is provided in supporting information.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11045

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Golden End Farms**Agent:** Delta Planning**Summary:**

Securing the benefit of an improved football club may not be achievable and only housing north of Hampton Road would be delivered.

Uncertainty over whether a comprehensive development is achievable and concern over deliverability and viability.

Site faces many challenges including topography, site capacity (due to site constraint mitigation), timing of club relocation. The site is complex and housing will not be delivered until later in the plan period.

If no co-ordinated approach to delivery of the whole site can be demonstrated, including viability regarding relocation of the Football Club, the allocation is not sound and should be removed.

Change suggested by respondent:

In circumstances where the site promoters cannot demonstrate during the examination a co-ordinated approach to delivery of the whole site, and a high degree of confidence that the relocation of the football club is viable, then the site allocation should be considered not sound and removed.

In circumstances where the above can be satisfied and the policy is retained, the wording of Policy KN1 and accompanying text should be amended to ensure the club relocation is delivered. In these circumstances Policy KN1 be amended as follows:

- Paragraph 1 should be amended as follows: "The site is allocated for 180 dwellings together with the re-provision of Knowle Football Club".

- Paragraph 4(iii) should be amended as follows: "The preferred site for the relocation of the existing football club is between the new development and the canal as shown on the concept masterplan. No housing development on any part of the site shall be allowed to commence until such time as the final football club site has been selected, and a commitment and timescale for re-provision is secured.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11046

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Golden End Farms**Agent:** Delta Planning**Summary:**

Questionable whether a comprehensive development is achievable, deliverable or viable. The school is promoted as a key benefit but concern that this may not be realised and that only the housing off Warwick Road or Grove Road is ever delivered.

Site faces complex issues meaning that much of the housing will not be delivered until the later in the plan period.

If there is no co-ordinated approach to delivery of the whole site and a high degree of confidence that the future redevelopment of the existing school is viable, then the site allocation should be considered not sound and removed.

Change suggested by respondent:

In circumstances where the Council and site promoters cannot demonstrate during the examination a comprehensive and co-ordinated approach to delivery of the whole site can be achieved and that it is viable in line with paragraph 709 of the Plan, then the site allocation should be considered not sound and removed.

In circumstances where the comprehensive treatment and viability of the site can be satisfied and the policy is retained, the wording of Policy KN2 and accompanying text should be amended to ensure the critical education infrastructure is delivered. In these circumstances the policy should be amended as follows:

- Policy KN2 Paragraph 3(i) should be replaced with the following: "Re-provision of the existing Arden Academy and provision of new primary school as an 'all through school. The preferred site for the school is on land immediately south of the existing school as shown on the concept masterplan. No housing development on any part of the site shall be allowed to commence until such time as the final site has been selected, and a commitment and timescale for the school development is secured, in addition to the necessary financial contributions".

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

10607

Object

Hockley Heath**Respondent:** Ms Cheryl Golding**Summary:**

Plan inappropriate for size of the site and rural nature of village. It increases homes by c12% in a small area which is susceptible to flooding and impact on flooding of neighbouring roads and homes, Tutnall Drive flooded regularly at junction of School Road. HH Academy oversubscribed already. 90+ new homes will have a detrimental impact on road congestion and safety, narrow and already busy. Local homeowners mostly have 2 cars, so further 150+ additional cars likely, emission and environmental impact close to school. Ancient woodland/veteran trees detrimentally affected, wildlife also seriously impacted. Current amenities lower than elsewhere in borough.

Change suggested by respondent:

Remove this site and also sites 49 and 328 (as well as other green belt sites in village communities within the borough), from the plan to retain green belt and rural nature of these villages. Use brownland in borough for new developments first to maintain the existing greenbelt as much as possible. If development has to be approved for the 3 sites in Hockley Heath, reduce number of dwellings to no more than 30 maximum to reduce impact on environment and emissions, to avoid overwhelming the village. Ensure speed bumps and other speed/traffic calming restrictions are put in place in the lane and an appropriate parking area is included for all school traffic within the site to reduce impact on side roads that are already problematic with pavements being blocked on both sides of side roads near the school. Create a wildlife/wetland reserve in the 3 sites instead, with proper flood management, preserve the wildlife and ancient woodland and veteran trees. There are resident bats in the trees off School Road. Improve all village amenities to ensure gutter/drain clearing is managed as regularly as in other areas in the borough. Drains are currently blocked with leaves, gutters and footpaths never cleared of weeds or fallen leaves and are hazardous to pedestrians. Ditches along School Road need to be maintained regularly, overgrown and flooding regularly as only cleared very infrequently. Improve and extend footpaths along School Road after Tutnall Drive junction towards Blythe Valley. Improve other facilities to include a health centre, reinstate a post office and improve bus services for less reliance on private vehicles. Canal path needs to be improved, it is muddy, waterlogged and impossible to use except after prolonged dry spells. Make Saddlers Wells Lane a one-way route to avoid congestion, already a weakened bridge and passing places used as dumping ground for waste which makes passing impossible,

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14082

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Wenke Gold**Petition:** 2 petitioners**Summary:**

- > Believes Arden school is currently in need of improvement and the proposed housing development means that a new primary and secondary education facility is absolutely necessary.
- > New facility will provide a better learning environment for students as well as better facilities for students and the wider community.
- > New school site located away from station road thus alleviating traffic congestion and parking issues. Safer travelling conditions for cyclists and pedestrians to.
- > Release the existing Arden site school for mixed development in the most accessible and sustainable parts of the Arden Triangle site.
- > Fully supports these proposals as the culmination of long-standing collaboration among stakeholders to find a deliverable and realisable development solution. It is clear that new residential development within Knowle is an inevitable consequence of Local and National planning needs and obligations. Given this, We firmly believe that these proposals maximise the community benefit of these inevitable developments.

Change suggested by respondent:

N/A

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14626

Object

Blythe**Respondent:** Ashley Gordon**Summary:**

There are far too many local developments of this kind, local roads and amenities are already struggle. Doctors appointments, schooling, parking. All of these everyday luxuries and continuing to be pressed.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10691

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Dr Andrew Gosling**Summary:**

The loss of high quality green belt land including the loss of a natural green belt boundary and the creation of an artificial boundary represents a serious decline in the attraction of the area. The area to the west of the A34 has been ridiculously over developed and before long the whole area will be covered with housing. No proper provision is apparently made for schools, medical facilities and other infrastructure. There are already serious problems with school places. The roads are at saturation point and no consideration has been given to flooding, particularly in Cheswick Green (Mount Brook)

Change suggested by respondent:

The plan is so flawed that it should be abandoned, far too much development has taken place in Blythe.

Where will the residents find work without considerable increase in traffic.

What happened to brown field sites?

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10766

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Margaret Gosling**Summary:**

Doesn't conform to NPPF for green belt. Dog Kennel Lane is a strong boundary, new build suggests a road is put in - will encourage further development. Inconsistency in green belt classification - moderate in latest, high 2016. Lack of background studies on flooding, traffic and other infrastructure; left to developers at planning stage. Flood risk downstream will increase. Remote from employment plus new school will cause traffic to increase. Amount of development in this part of borough is excessive - over 1,000 properties approved in recent years in Cheswick Green Parish. No guarantee heritage will be protected.

Change suggested by respondent:

More thought needed as to where housing should go relative to employment. Areas should be properly assessed before development allowed. This area should not be developed as will lead to merging of settlements which goes against planning rules. It should be removed from the plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11126

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Lansdowne Property Developers Limited**Summary:**

Support the allocation in principle and many of the specific requirements. However, no collaboration or agreement between landowners and Solihull MBC on the masterplan, which inappropriately identifies the Lansdowne site as accommodating the replacement Arden Academy and new Primary School.

Land use distribution within the allocation is not soundly based upon evidence, particularly considering constraints, timescale for delivery of infrastructure (e.g. relocation of Arden Academy) and appropriate viability testing and equalisation of land values. No information justifying that Arden Academy's relocation is financially viable or deliverable. The masterplan cannot be relied on to secure the various components of the allocation.

Change suggested by respondent:

Allocation Policy KN2 and paragraphs 720 -729 require modification. The accompanying Concept Masterplan KN2 also requires redrafting to be relatable to the documented evidence base and to demonstrate the allocation is deliverable.

The Concept Masterplan for Allocation KN2 should be amended or removed to ensure constraints can be appropriately assessed and impacts quantified, with adequate mitigation and infrastructure provision allowed for. Failure to provide sufficient flexibility at this early stage could jeopardise the proposed allocations through a risk of challenge to the development extents and impacts arising.

The educational development should either kept on its existing site or relocated on the Council's own site within the allocation. This will enable the delivery of the education facilities within the required timetable and to the standard required; without the ensured delivery of these educational facilities the strategic allocation of this site and the infrastructure it is intended to deliver is undermined. Similarly, the reasoning for the site's Green Belt release is also detrimentally affected.

It is recommended that further consideration of alternatives is undertaken, particularly with respect to the delivery of a new Arden Academy within the School's existing landholdings. Until the Council has agreement of the allocation masterplan, the policy should not rely upon the accompanying masterplan document to secure the various components of the allocation.

Specific alteration to paragraph 724 is also recommended (see para 5.1.5 of Representations document for exact wording).

An alternative masterplan is proposed.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

11174

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Ved Goswami**Agent:** Maelou Developments**Summary:**

Whilst there is support for many of the requirements of Policy KN2, the Masterplan represents significant change from previous iterations with no landowner engagement or agreement.

The reasons for re-providing Arden Academy are not supported by any robust or detailed evidence and can be challenged.

Land use distribution on site is not soundly based upon evidence, particularly considering constraints.

A revised masterplan is proposed which responds to the constraints identified by survey work and evidence.

Change suggested by respondent:

Revised Masterplan for KN2

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11239

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Miss LAURA GOULDING**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14600

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Roger Grainger**Summary:**

The site is in a high performing Green Belt area, which has not been taken into consideration in the Sustainability Appraisal Central Government Policy.

Mitigation measures unachievable.

The village has become a "rat run" with traffic and parking issues.

Flooding has been a big issue in this area.

Shops wont be close/accessible to the site.

Relocation of the pitches will cause disruption, not only to members of the clubs, but to wildlife.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15234

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Plan fails to adequately address future need for specialist housing for older people. Whilst specialist housing or care bed spaces is required on sites over 300 units, there is no mechanism for delivery.

Depending on larger sites to deliver specialist housing will not address the current need and is likely to exacerbate need going forward, due to lead in times, build out rates, and complex land ownership issues.

Specific suitable sites should be allocated rather than relying on larger sites address provision. These additional sites should be in addition to the allocations and numbers already identified within the Plan.

Change suggested by respondent:

Allocation of specific sites for specialist housing in addition to the current allocations.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15235

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Minimum housing need should be increased to account for UK Central job growth and 'acute' need for affordable housing.

Uncertainty and wide variation of figures about HMA shortfall. No evidence that Solihull's contribution has been agreed or that it meets duty to cooperate obligations. No Statement of Common Ground so no real commitment to resolving the shortfall within the GBBC HMA.

Numbers from the Brownfield Land Register are unreliable given no part 2 register and no guarantee that sites will yield the capacity identified.

Past trends are not compelling evidence that windfall is a reliable source of supply.

Change suggested by respondent:

Increase in Housing figures of between 1,036 and 1,248 dpa.

Reduction in windfall allocations from 200 dpa to 150 dpa as per the tried and tested number set out in the adopted Plan.

Reduction in BFLR allocations by 29 – from 77 to 48.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15236

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Land to the west of this site was allocated for housing in the adopted Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available, an alternative development solution delivering open space was forthcoming. This situation still exists and calls into question the allocation of HA1.

No evidence regarding viability of the site and how this may be affected by any potential contamination issues as a consequence of the former use of the site.

The site cannot be said to be available, achievable and deliverable and should be removed from the plan.

Change suggested by respondent:

Remove allocation HA1 from the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15237

Support

Hockley Heath**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

The potential development of the two areas either side of School Road would appear to fulfil the Council's criteria for limited and proportionate expansion of the settlement.

Removing land to the north of School Road from the Green Belt would conform with the Council's intention to address anomalies in Green Belt boundaries across the Borough (Paragraph 420 of the DSP).

This is also applicable to Jacobean Lane in Knowle.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15238

Object

Policy S02 - Moat Lane Depot**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Concerns over relocation of the current uses on the site and the timing of such a relocation is an issue.

No site has been identified for the relocation of the depot or referred to in the DSP, which merely states that the site is expected to become available during the Plan period. There are also particular issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.

The site cannot be said to be available, achievable and deliverable and should be deleted from the plan.

Change suggested by respondent:

Delete allocation S02 from the Plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15239

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Solihull Town Centre was identified as a location for housing in the adopted Plan. Identified locations within the town centre and subsequent Masterplans have yet to come to fruition.

From the conclusions which can be drawn from the adopted Plan and the experience and complexities of town centre redevelopment the housing figure proposed is over ambitious and unachievable within the Plan period.

To ensure the delivery of the appropriate number of dwellings within the Plan period additional allocations within the Plan should be provided.

Change suggested by respondent:

Additional allocations in the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15240

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

Uncertainty about site allocations in the Plan supports the inclusion of an additional site at Jacobean Lane (site 526).

Whilst currently in the Green Belt, the boundary around Knowle is inconsistent, denoted by fences and vegetation. The site is part of and well related to the village, rather than surrounding countryside. A strong, defensible Green Belt Boundary can be established and there are excellent access arrangements. Accessibility is excellent, the site is Brownfield and the reasons for excluding the site are not justified.

Same approach as is being applied to School Road in Hockley Heath should be applied in this case.

Change suggested by respondent:

Include site 526 at Jacobean Lane as an allocation.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15241

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

- Proposed allocation does not conform to statement in introduction to Blythe Chapter, that villages in Blythe have a distinct nature within and separated by attractive countryside and Green Belt giving villages a sense of remoteness.
- Development would result in coalescence of Dickens Heath with Whitlocks End and Majors Green.
- Intrinsic character of Dickens Heath village would be lost through an ill-thought out addition to the west of village. Insensitive treatment for an award-winning settlement.
- Concept masterplan does not reference how it would complement or enhance village of Dickens Heath.
- BL1 has been dismissed as an allocation at number of previous Local Plan/UDP Inquiries.
- Impact of BL1 considerably more devastating coalescence effect than de-allocated former Site 13.
- Despite reduction in capacity on site, the perception of coalescence persists.
- Lack of alternative sports pitches provision is cause of concern.
- Should have been resolved before got to DSP stage.
- Residual traffic concerns, particularly route to Shirley on narrow and winding roads & junctions.
- No contextual thought gone into allocating BL1, site cannot be considered available, achievable or deliverable, and should be deleted from the plan.

Change suggested by respondent:

Delete Site BL1 from plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15242

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr J Green**Agent:** DS Planning**Summary:**

- Accept Council's strategy of urban expansion
- Site raises concerns over compliance with government policy, 'essential characteristics of Green Belts are their openness and their permanence': land to south of Dog Kennel Lane clearly exhibits openness. Development would extend built development into open countryside.
- Site raises concerns over Council's own site selection methodology
- Concern is raised on Green Belt grounds: Para.'s 600 and 609 conflict, as site boundary not following a pre-existing feature, but to be formed by new road. Not conform with Government policy.
- Cannot be demonstrated that coalescence with Cheswick Green will be avoided.
- Concern is raised on Landscape Character Assessment grounds: substantial and detrimental impact on landscape character. Site located within area of high landscape sensitivity.

Change suggested by respondent:

Delete Site BL2 from Plan

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

11034

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Greenlight Developments**Summary:**

Support allocation of Site BC1 in principle, but object to Concept Masterplan/Site Analysis proposing open space on 3.05ha adjacent to Meeting House Lane, as undeliverable and contrary to paragraph 34 of NPPF. Ecological evidence is misguided as this area is not of high habitat distinctiveness, whilst pond and some features can be retained and enhanced. Development would not alter setting of Pool Orchard due to distance and landscaping. Concept Masterplan does not recognise need for vehicular access to land from Meeting House Lane. This part of Site BC1 can be delivered in first 5 year phase.

Change suggested by respondent:

3.05ha of land adjacent Meeting House Lane within Site BC1 should be designated for housing, with access from Meeting House Lane. Area of significant ecological value and zone of significance on the setting of the listed building should be removed from the Site Analysis and Concept Masterplan. This part of the site should be within phase 1 0-5 years for delivery.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

11031

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs P Green**Summary:**

The draft submission is local plan is not sound in proposing the allocation of Site BC3 for housing as it fails on 3 of the 4 tests of soundness.

>Not positively prepared in that it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para 11 has not been given due consideration. Building on Greenbelt land (Greenfield & Meridian Gap) is not required in order to comply with planning policy. Site BC3 not sustainable using the council's own criteria.

> Allocation not justified. Omission of sites within Balsall Common and in the wider borough which should have been allocated, based on merit or no justification for omission. Final findings from Solihull town centre Masterplan not incorporated and can't be reconciled with the draft local plan.

>Inconsistencies with NPPF (11; 94; 108; 109; 122; 138; 185 and 194) not complied with. This will result in unsustainable development not being achieved.

>Concerns over biodiversity in Site BC3 and the character of the Grade II listed Berkswell Windmill

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13805

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sarah Green**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14791

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Amanda Griffin**Summary:**

Does not support policy KN2;

Bigger not necessarily better - need for renovation - doesn't agree with housing being built.

Change suggested by respondent:

"I do not know enough about this to say".

Legally compliant: Not specified

Sound: No

Comply with duty: No

Attachments:

11048

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Dr Anna Griffin**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10806

Object

Balsall Common**Respondent:** Mr Dominic Griffin**Summary:**

The location of a primary school in the field centered on SP2442777314 will increase traffic on the already busy Station Road.

Change suggested by respondent:

The plan shows a new school located at what would be a junction with the proposed relief road. As the relief road is designed for traffic to bypass Balsall Common, it defeats the object of it going directly to the school, where it will congest with the local traffic trying to get into school from within Balsall Common.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10807

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Dominic Griffin**Summary:**

The plan does not appear to take into consideration the SMBC Additional Site Options Ecological Assessment 2019

Change suggested by respondent:

The Landscape Assessment of the area shows very clearly that there are notable habitats surrounding number 262, 264, 266, 268, Mews Cottage, Station Road and properties along Sunnyside Drive. The fields surrounding these properties are home to a diverse array of animals and plants and enhance the quality of life of local residents. This is the field in which grid reference SP2442777314 is identified in the report.

The Landscape Assessment States:

"Semi-improved grasslands occupy medium connectivity and those areas highlighted on the southern and western boundary should be enhanced as grassland creation and enhancement zones."

(Figure 7 Habitat Connectivity, SMBC Additional Site Options Ecological Assessment).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11180

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Emma Griffin**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10909

Object

Balsall Common**Respondent:** Yasmine Griffin**Summary:**

527. OBJECTION: Relief Road: further divides Berkswell Parish which already has an existing railway & HS2.

528. OBJECTION: The village centre is adequate for the village & proposed development with 4 supermarkets.

530. OBJECTION: There is no evidence to suggest transport links will be improved or that more transport links are necessary as this is a commuter village with 2 cars per household.

531. OBJECTION: location of proposed Primary School is on the site of an area significant ecological value. This is a wildlife haven that should be enhanced.

535. NOTE: green belt enhancement should be around the existing village.

Change suggested by respondent:

527: Proposal for the relief road to be made a bypass should be halted. This road should provide access to the new development only.

528: Proposal that further retail shopping areas should not be built in the Balsall Common area. This is a village which will lose its heart and soul if a retail development proceeds. There is access to Coventry, Resort World, Kenilworth, Birmingham for wider retail needs of the village.

530: There is no evidence to suggest local transport will improve with HS2. Commuters would prefer to continue to use Berkswell service for Birmingham, Coventry and London than drive to the NEC, park at considerable cost and then use HS2 services at considerable cost.

Proposal for a regular bus route linking Kenilworth to Balsall Common and onto the NEC and airport.

531: The proposal for a Primary School and Nursery at the northern end of Station Road is unacceptable and illegal. This area is designated a site of ecological significance and must not be developed on under any circumstances.

The fields and ponds between the railway and existing homes are full of diverse wildlife. The area is home to:
Bats Newts Frogs Toads Butterflies Bees Dragonflies Muntjac deer Shrews Voles Owls Kingfishers Heron Moorhens
Mallard ducks Pheasants Polecats Hedgehogs Jays Robins Sparrows Blackbirds Swifts

These animals will not be able to use the green space along HS2. Instead, these animals need corridors and connected spaces between the existing village and development to enable their survival and free access to roam across the countryside as they do at present. If these corridors are removed the wildlife and beauty of Balsall Common will be destroyed.

PROPOSAL 1: FOR A GREEN BELT FROM THE HORSE FIELD AND PRESERVED WILDLIFE AREAS AROUND ALL PONDS IN THE ECOLOGICAL AREA OF SIGNIFICANCE AT THE WESTERN END OF THE SITE AT STATION ROAD THROUGH TO WASTE LANE AND OPEN COUNTRYSIDE. This should be two fields deep behind all existing homes to ensure these areas are preserved. See Landscape assessment which states "those areas highlighted on the southern and western boundaries should be enhanced as grassland creation and enhancement zones."

PROPOSAL 2: FOR THE PRIMARY SCHOOL TO BE SITUATED IN THE CENTRE OF THE PROPOSED DEVELOPMENT. The proposed site on Station Road is an area of ecological significance and should not be developed. Instead the school should be in walking distances from all new homes in the centre of the development. Thus averting congestion and a bottle neck at Station Road with the round about, relief road, low bridge under the existing train line and HS2.

535: Proposal for green belt enhancement to be positioned between the existing village and the new development. This not only preserves valuable wildlife but enables natural woodland and grasslands for recreational use for the health and well being of all village residents. It also links communities to the heart of the village centre and amenities rather than simply providing access to the station.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10917

Object

Policy BC1 - Barratt's Farm, Balsall Common

Respondent: Yasmine Griffin

Summary:

Objection to the development of a primary school and housing from Station Road across to the east of the development behind existing homes.

The proposals for the development at Barretts Farm have not taken into account the area of ecological significance to the Western side of the development adjoining Station Road. Nor have they adhered to the ecological assessments recommendations for

"Semi-improved grasslands occupy medium connectivity and those areas highlighted on the southern and western boundary should be enhanced as grassland creation and enhancement zones" (Figure 7 Habitat Connectivity, SMBC additional site options ecological assessment 2019)

Change suggested by respondent:

1. Development should not be permitted on sites which are designated areas of ecological significance at the Station Road, western side, of the development.

The fields and ponds behind 262, 264, 266, 268 and Mews Cottage Station Road and properties along Sunnyside Drive are home a diverse array of animals and plants. All of which enhance the health and well being and quality of life of local residents.

"Semi-improved grasslands occupy medium connectivity and those areas highlighted on the southern and western boundary should be enhanced as grassland creation and enhancement zones" (Figure 7 Habitat Connectivity, SMBC additional site options ecological assessment 2019).

Yet the Concept Master Plan makes no allowance for these habitats. This is not acceptable. These habitats must be respected, enhanced and nurtured. The areas around these properties are home to:
bats newts frogs toads voles shrews polecats owls moorhens mallard ducks heron kingfishers wood peckers jays swifts robins sparrows blackbirds bees dragonflies butterflies and many many insects.

Proposal: These animals need corridors and connectivity to the open fields in order to survive. As such there should be a green belt strip behind 262,264,266,268, Mews Cottage, Sunnyside Drive that interconnect with the fields behind Meeting House Lane. THIS GREENBELT BEHIND THE EXISTING VILLAGE IS VITAL TO THE PRESERVATION OF EXISTING WILDLIFE. THESE HABITAT CORRIDORS AND CONNECTIONS TO OPEN SPACE AND THE COUNTRYSIDE BEYOND SHOULD BE PRESERVED AND ENHANCED.

This not only benefits the animal kingdom but their presence and connection to nature enhances the health and well being (mental health and physical health) of local residents.

2. Permitted access: There has been permitted access between property owners at 268,266,264 Station Road and Land owners for over 100 years in order to actively manage the trees and ponds.

Proposal: This permitted access from Station Road to the ponds must remain as there is no other vehicular access to the pond areas.

3. Drainage: the ponds across the southern section of Barretts farm are vital to drainage of properties along Station Road and Sunnyside Drive. These ponds regulate water flow to avoid flooding from surface water in this clay rich area.

Proposal: These ponds should be further enhanced and additional SuDs placed in the southern section of Barretts Farm to prevent flooding at the northern end of the site along the cycle route, HS2 and the current railway.

4. The area on Station Road is not a suitable site for the Primary School.

- it has been drawn on an area of ecological significance.
- it is not a safe area of the village where Hallmeadow Road meets the proposed relief road, HS2 and the low bridge under the existing train line. It is a bottle neck with fast traffic coming from Truggist Lane. As a mother of four I would not allow my children to attend this school for safety reasons.
- the area along Station Road is already plagued with parked cars making visibility as you enter and exit drives poor. There have been numerous accidents along this stretch of Station Road for many years. This will worsen with school traffic.
- the congestion in this bottle neck area of the village will simply worsen. Thus impeding travel, increasing travel times, increasing stress and decreasing mental health of local residents who are already significantly stressed by HS2 and the proposed housing development that is causing the destruction of the countryside.

Proposal for the school to be situated in the centre of the development for local children to walk and cycle safely to school. This will alleviate congestion at Station Road and prevent accidents.

Legally No
compliant:
Sound: No
Comply with No
duty:
Attachments: None

10876

Object

Policy BL1 - West of Dickens Heath

Respondent: Rob Grinnell

Summary:

Essential green belt land, especially during these times. Plans will merge Dickens Heath with Shirley, lose distinct boundaries between areas making it one large conurbation.

Change suggested by respondent:

Maintain distinct separation between Dickens Heath and Shirley. Keep essential green belt land for animals, plants/trees, people.

Legally No
compliant:
Sound: No
Comply with No
duty:
Attachments: None

10877

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Rob Grinnell**Summary:**

Essential green belt land, especially during these times. Plans will merge Shirley and Dickens Heath, lose distinct boundaries between areas making it one large conurbation.

Change suggested by respondent:

Maintain distinct separation between Shirley and Dickens Heath. Keep essential green belt land for animals, plants/trees, people.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11029

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Grove Road Residents**Agent:** Pegasus Group**Summary:**

The extent of allocation is inappropriate and is not adequately justified.

The southern portion of the site is sensitive in Green Belt, ecology, heritage and landscape character terms. Proposed access arrangements from the South are difficult and will adversely impact on the sensitive landscape and heritage on this part of the site. No evidence showing how the site will be delivered given fragmented ownership and complexity of issues.

Proposed transport mitigation measures will adversely impact on sensitive nature of the site.

Exceptional circumstances for Green Belt changes not demonstrated.

Issues with proposed Green Belt compensation measures.

Change suggested by respondent:

Masterplan must be re-drawn and Policy KN2 re-drafted. There are two reasonable alternatives which must be considered.

The first is to leave the extent of any built development to the South to extend no further than the existing public footpath linking Warwick Road with Grove Road. The area to the south of the footpath should remain Green Belt and enhanced for open space, ecology, heritage and to provide compensation for loss of Green Belt in relation to other parts of the allocation.

The second reasonable alternative is to utilise the line of the Cuttle Brook which is intended to be de-culverted and integrated into the drainage and environmental strategy for the site. This will be a strong physical feature, which will clearly demarcate the sensitive southern part of the site.

Without due consideration of reasonable alternatives and subsequent amendments, the allocation of site KN2 is considered to be unsound.

Vehicular accesses should be avoided from roads to the East which includes Station Road, Grove Road and Knowle Wood Road. These roads should be used to provide traffic free pedestrian and cycle routes.

Policy KN2 and supporting Concept Plan should be amended to retain the southern section of the site within the Green Belt. This area of the site can then be used for Green Belt compensation measures.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11030

Object

Policy P17A Green Belt Compensation**Respondent:** Grove Road Residents**Agent:** Pegasus Group**Summary:**

Policy does not accord with the NPPF.

It is clear from paragraph 138 that addressing 'compensatory improvements' should be addressed at the plan-making stage, not left to the planning application process. The concept masterplan (for KN2) makes no mention of Green Belt compensation and it is difficult to see how compensatory Green Belt measures will be achieved given the amount of built development on site. No off-site mitigation proposed. Comments in the masterplan document are vague and open to interpretation.

Change suggested by respondent:

Concept masterplans should identify specific Green Belt compensation measures.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10854

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Terry Grove**Summary:**

Given the effort and support of the local community for the Neighbourhood Plan that was prepared it is disappointing that many aspects have not been taken on board. The Solihull Local Plan does not clearly reflect the viability of the Arden Triangle and alternatives given the impact on the greenbelt, traffic and the village nature of Knowle.

The proposals show housing densities far in excess of those in the local area and where quoted seem to be deliberately open in terms of numbers eg 45dph+ and there is no clear mitigation to the traffic congestion this development will bring.

Change suggested by respondent:

Firstly for this plan to comply with the Neighbourhood Plan that the community supported and housing densities be reduced and capped in line with the village character and that a clear strategy is outlined to deal with the significant traffic impact this will bring.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10754

Object

Blythe**Respondent:** Mr Dave Hackett**Summary:**

The infrastructure can't cope with the extra pressure this would create. The roads, healthcare and impact on the countryside is not acceptable.

Change suggested by respondent:

Decline it. There is no need

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10753

Object

Blythe**Respondent:** Mrs Sally Hackett**Summary:**

There isn't the infrastructure, healthcare or transport to support the application.

Change suggested by respondent:

I don't think that there is the capacity available.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14555

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Denise Hackworth**Summary:**

Believe the plan/amount of houses should be recalculated due to covid/change of circumstances.

BL1 is in a high performing Green Belt area.

Mitigation measures unachievable.

Needs to consider more sustainable sites.

The site is surrounded by Local Wildlife Sites and Ancient Woodland.

The narrow, rural road network cannot take further development and is already overloaded.

Site is not within a recognised walking distance from the Village Centre facilities.

Area is susceptible to flooding

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14598

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr. Laurence Hackworth**Summary:**

Amount of houses should be recalculated due to covid/change of circumstances.

The site is high performing Green Belt area.

Mitigation measures unachievable.

Other sites not been tested.

The character and setting of the Village will be adversely affected.

The site is surrounded by Local Wildlife Sites and Ancient Woodland, its loss would be hard on wildlife.

The rural road network cannot take further development and is already overloaded.

Additional housing will only exacerbate the use of the car contributing to global warming.

Our garden (inc neighbours) are regularly flooded.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14050

Support

Policy S01 - East of Solihull**Respondent:** Halford Holdings Limited**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane. Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14051

Support

Challenges**Respondent:** Halford Holdings Limited**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14052

Support

Policy S01 - East of Solihull**Respondent:** Halford Holdings Limited**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

13912

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Andrew Hall**Summary:**

> Does not consider the local plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan review: Wilson, W. McGarry, J. Wilson, J. "Part A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020.

> Fully appreciates that new houses are required and no-one wants them on their own doorstep but believes the reasoning and evidence that the BARRAGE group has collated is sound and show's that this site is clearly not suitable

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14413

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Ann Hall**Summary:**

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14412

Object

Policy UK2 - Land at Damson Parkway**Respondent:** David Hall**Summary:**

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13800

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Rosemary Hall**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13807

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sarah Hall**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10661

Object

Blythe**Respondent:** Mr Steve Hall**Summary:**

Too much housing is being allocated to this ward (Blythe).

Flooding is increasingly an issue, especially since Cheswick Place has been completed.

We need to maintain the Green Belt between Shirley and Cheswick Green.

Change suggested by respondent:

We had 1000 houses in the original village. After Cheswick Place and Blythe Valley are completed we will have approx. 2300 houses. If the Dog Kennel Lane development is approved there will be an increase of a further 1000 dwellings without any apparent improvements to the local infrastructure. The likelihood is that flooding will increase and eventually the gap between Shirley and Cheswick Green will eventually disappear.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

11035

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Alexander Hamilton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11109

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Elspeth Hamilton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14805

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Elspeth Hamilton**Summary:**

Does not believe the local plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan review: Wilson, W McGarry, J. Wilson, J. "Part A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common" 29/11/202.

As such is objecting to the allocation of site BC3 for housing

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14162

Support

Policy KN1 - Hampton Road, Knowle**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Support the allocation with some objections to the policy and the masterplan.

Policy goes beyond the PPG by requiring that developments "should" provide the list of eight enhancements identified.

Disagree with the proposed Green Belt boundary - a revised boundary is suggested.

Dwelling numbers should be a minimum. A range of 250 – 275 dwellings could be delivered.

Object to:

-The open space requirement being included in the policy. This will require further negotiation and progression of the final masterplan.

-2 vii which should be deleted (see reps to policy 4D).

-The size of the heritage buffer and the proposed use (see separate heritage response submitted).

- The reduction in housing numbers which impact contributions for infrastructure improvements.

Support the principle of a care home, with clarification that C3 dwellings are equally as acceptable.

The reduction in housing numbers will impact on contributions to infrastructure improvements.

Object to conclusions of the Concept masterplan and do not wish for this to be taken forward as a basis for development of the site through its allocation in the local plan or an outline application. Revised masterplan submitted.

Change suggested by respondent:

The wording in item 6 should remove the word "should" and replace with "could".

The conclusions drawn by the technical work should be taken into account in the formation of a revised concept plan, as submitted with these representations. It is this concept Plan that we consider the Council should take forward to guide development of the site going forward.

Whilst we support the draft allocation of 180 dwellings, we consider that if the Green Belt boundaries were amended to more permanent features then the allocation would be more effective and deliver a further 70 – 95 dwellings.

The policy should be amended taking on board the findings of this technical work, which demonstrates in a concept plan the potential to deliver A range of 250 – 275 dwellings.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14163

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Likely that a very high level of delivery will be required to develop out 2,740 units across the UKC Solihull Hub area to 2036 as per paragraph 89 of the Plan. This has not been adequately demonstrated as being deliverable.

In 2018, the Hub Framework stated up to 550 homes as being delivered at the NEC up to 2022. No application for residential development at the NEC has been made. The levels of delivery envisaged, even in the early stages of the plan period are overambitious and the policy is not effective in the way that it is currently drafted.

Change suggested by respondent:

Further information is requested from the Council in relation to the planned trajectory and stages of delivery of these housing numbers. We understand that such details are not currently available. It is not clear how much residential development will be delivered around the area safeguarded for HS2 and the Interchange station and whether delivery will be effected by the safeguarding and or construction priorities. To confirm deliverability of the 500 dwellings, we consider that further information in relation the planned delivery of the site is provided to confirm that the delivery of the HS2 station does not prejudice the delivery of the 2,740 homes to be delivered up to 2036. We request further evidence from the Council to ensure that conclusions regarding housing delivery are effective to deliver a sound plan.

The proposals for circa 20% of the housing target in a single location should be reviewed as they are not considered to be sound, deliverable or provide an effective or justified strategy.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14165

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Does not provide developers with enough flexibility to consider the mix of housing at the planning application stage. Support the Council providing some guidance on housing mix but this should accord with the mix proposed in the HEDNA.

The HEDNA highlights the requirement for both social and affordable rent but recommends that the Council do not propose a rigid mix on the split. The housing mix should be updated and included in supporting text, rather than policy so a suitable amount of weight can be applied to the mix on a site by site basis.

The NPPF definition of affordable housing should be used.

Support recognition of the need to deliver more two and three bed homes than is set out in the Housing Needs SPD.

Change suggested by respondent:

The use of a housing mix to guide affordable housing mix is unduly onerous if greater flexibility is not provided. Although there is reference to site circumstances, it should be given more weight within the policy that site circumstances are an important consideration. Reference to a specific mix should not be set out in the policy, rather it should be for guidance only within the supporting text. This would ensure that the policy is sufficiently justified and effective.

Criterion 13 should be deleted, as it is a duplicate of criterion 12.

It is requested that Policy P4A be amended to include reference to a requirement for social and affordable rent rather than purely social rent.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14166

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Object to setting a market dwelling mix on a borough wide basis and consider it unduly onerous. Consideration of mix should be determined at the planning application stage, following consideration of a range of site specific circumstances.

There are differences between the mix requested by the Local Plan versus the requirements of the made KDBH Neighbourhood Plan. Clarification on which mix should be taken forward if there is a situation in which both housing mixes are part of the Development Plan, is required.

Conclusions drawn from the HEDNA should be taken into account to form a policy which provides advice on the likely mix, but not rigidly apply the mix to all development sites, rather, housing mix should be bespoke to specific sites.

Change suggested by respondent:

Clarification of which housing mix should be taken forward if there is a conflict between the emerging local plan and the made Neighbourhood Plan.

It is unclear if the concept masterplan referred to in criterion 2 are those produced by the Council in respect of allocated sites within the consultation document. If so, we are not aware that the concept plan shows such detail referred to in the policy. Notwithstanding this point, it is not consider that this level of detail should be prescribed at the plan making stage, rather it should be considered in a collaborative approach between the applicant and Council at application stage.

Consideration should be given to paragraph 60 and 61 of the NPPF which require market signals to be taken into account when devising a housing mix.

We request that the Council removes reference to mix (point 3) from Policy P4C and instead refer indicative housing mix ranges in accordance with the HEDNA within the explanatory text.

Developers should be 'encouraged' and not 'required' to accord with the mixes set out in the explanatory text.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14167

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Object to the onerous approach being applied to the delivery of custom and self-build housing. Whilst it may widen housing choice, on large scale allocations there is a risk that the delivery of housing could be slowed.

Having reference to the PPG there is no requirement for self or custom build to be provided as part of larger allocated sites.

Applying the 5% requirement leads to potentially multiple separate contracts that would need to be agreed with interested parties.

Whilst the Self Build register may provide an indication of the level of interest, this needs to be analysed further to uncover the specific requirements of respondents. Where suitably evidenced, specific sites could be allocated for self-build and/or custom housebuilding.

Change suggested by respondent:

The Council should provide a robust assessment of demand including an assessment and review of data held on the Council's self-build register. The register may provide an indication of the level of interest, but this needs to be analysed at a deeper level to uncover the specific requirements of respondents. Without this exercise having been undertaken and supporting the Council's conclusions, the policy is not justified.

The policy should be amended to allow for the provision of such plots to be left to the discretion of the developer based on market trends, which are liable to change over the plan period. On larger sites we consider this requirement should be left to the developer's discretion. This would ensure that the policy is suitably justified.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14168

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Criterion 2 & 3 are onerous as they go above what is required through the Building Regulations. Standards can be exceeded where there is a justified need. The requirement to build all dwellings to Category M4(2) standards should be evidenced and balanced against the need to make the most efficient use of land.

Criterion 4 does not consider existing specialist housing or care provision in the locality and whether any additional provision is needed.

Criterion 5 does not include reference to the suitability of a site to accommodate accessible dwellings, for example topography or local demographics. The policy should be amended to accord with the PPG (Reference ID: 56-008-20160519) or provide evidence which justifies the position.

Change suggested by respondent:

If differing standards are applied, there is potential for a situation to occur in which decisions about technical appropriateness is considered by planning officers, rather than qualified building inspectors. The policy should be amended to remove any requirements above current building regulations where this is not suitably justified.

The requirement for all dwellings to be built to Category M4(2) standards should be removed, unless evidence can be provided to justify this blanket approach or a percentage requirement that is evidenced based on an appropriate assessment of need to ensure that developments can still make the most efficient use of land in accordance with the NPPF (paragraphs 122 and 123).

The criteria listed under Point 5 of Policy P4E should be amended to state "Site specific factors which may make step-free access unsuitable or unviable". For example not every site identified is flat and able to accommodate level access in a uniform matter.

Any requirements for specialist housing or care accommodation should be the subject of an evidence based review in conjunction with specialist operators, and appropriate locations identified based on this evidence. This would include reviewing existing provision and the need for further provision based on demographic and health trends.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14169

Object

Policy P5 – Provision of Land for Housing**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Criterion 5 should be amended to remove the requirement to comply with Nationally Described Space Standards. This should be something that “should” be complied with, as it is not always possible.

There has been a large increase in the level of windfall allowance included in the estimations of capacity compared to previous versions of the Plan. This appears to correlate with the capacity that has been lost on allocated sites.

There is no certainty regarding the delivery of windfall and it is not clear where in the Borough and in what form these dwellings will be delivered.

Rather than windfall, as many dwellings as possible should be provided through the Plan’s allocations.

Do not consider that 200 dwellings per annum of windfall dwellings is realistic or an effective way to plan for the future.

Change suggested by respondent:

Criterion 5 should be amended to remove the requirement to comply with Nationally Described Space Standards. Rather this should be something that “should” be complied with, as it is not always possible.

Rather than relying on windfall provision, the Council should consider maximizing the potential opportunities associated with draft allocations in the plan. For example, the Hampton Road site was originally allocated for 300 dwelling, but reduced to 180. As demonstrated in our representations, the Green Belt boundaries proposed are not robust and should both be extended further north. This would enable the delivery of an additional dwellings and could provide positively planned development, as opposed to relying on more windfall.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14170

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

At 3 i, it is not for the planning system to place requirements over and above building regulations. The PPG states that Local Plans can set higher standards but only up to the equivalent of Level 4 of the Code for Sustainable Homes". If this is required, changes to Building Regulations should be brought forward.

In 3ii, the government does not require net zero carbon dwellings now or from April 2025. It is unclear what the rationale of this requirement is.

In 3 iv, the practicality of requiring at least 15% of energy to be provided from renewable sources should be considered.

In 4 ii, it should be noted that it is not always possible (for example due to site constraints) to orientate every home to enhance natural ventilation and lighting. This is unjustified.

With regard to viability, £6000 per dwelling just to meet energy requirements without any other requirements being taken into account is considered significant.

Change suggested by respondent:

Amend Policy P9 to 'encourage' development to apply the energy hierarchy to reduce energy demand and minimise carbon dioxide emissions. The policy should state that this will be subject to viability and suitability considerations at the application stage. The requirement to reduce energy demand to over and above Building Regulations Part L should be removed as this does not comply with the PPG.

We are unclear whether the Future Homes Standard referenced in the viability report is the same as the net zero carbon dwellings that are required in 3 ii. Furthermore, other requirements such as the need to provide 15% of energy from renewable sources has not been considered within the viability report. We request clarification of whether full costings have been undertaken in relation to the delivery of such policy requirements. If this cannot be demonstrated we do not consider that this policy can be justified and effective.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14171

Object

Policy P10 Natural Environment**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Not clear whether the Council intend to bring a 10% "net gain" in biodiversity requirement ahead of the Environment Bill being passed, which would not be justified unless it can demonstrate evidence of this requirement being evidence based. Support reference to Natural England standing advice in relation to ancient woodland and veteran trees.

In point 16 i, clarification of what tranquillity is, and how the impact on tranquillity will be measured. We are unsure how this will be assessed as part of a planning application. Without this evidence we do not consider the policy as written to be justified or effective.

Change suggested by respondent:

The requirement for a biodiversity net gain of 10% should be removed from this policy and any requirements left to SPD once the Environment Bill is passed and secondary legislation has been brought in.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14172

Object

Policy P14 Amenity**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

1 ix makes reference to development proposals being required to demonstrate that they have considered impact on tranquillity. We request that the Council clarify what is meant by this, we are unsure how this will be assessed as part of a planning application.

We note that paragraph 123 of the NPPF references that planning policies and decisions should aim to "identify and protect" areas of tranquillity. It is however not clear where the Council considers these areas to be with the Borough, and requirements for consideration of tranquillity within a planning application. We request this clarification to ensure that the policy requirement is effective and justified.

Change suggested by respondent:

As required by the NPPF, the Council should undertake further work to appropriately identify tranquil areas and what in particular makes them tranquil, concluding on how development in the area should respond to this. This could be formalised through adoption of a specific SPD.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14174

Support

Policy P15 Securing Design Quality**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Generally support the approach to this draft policy but suggest that amendments are required to 2iv to make the policy more effective as follows:

"Where possible, make appropriate provision for water management within development, without causing unacceptable harm to retained features, utilising innovative design solutions." "Where possible" should be added to this policy to ensure that recognition is given to constraints such as ground conditions that may be present preventing delivery of SuDS.

Change suggested by respondent:

Request that the following amendments are made to the wording of this policy:

Point 2 iv of this policy should be amended as follows: "Where possible, make appropriate provision for water management within development, without causing unacceptable harm to retained features, utilising innovative design solutions." "Where possible" should be added to this policy to ensure that recognition is given to constraints such as ground conditions that may be present preventing delivery of SuDS.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14175

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Policy goes beyond the protection of heritage assets to encompass (in paragraphs 2. and 3 of Policy P16) the protection of landscape character and local distinctiveness outside the settings of conservation areas and listed buildings.

The landscape character and distinctiveness that would be protected by draft Policy P16 should not be equated with the settings of these heritage assets or the contribution of settings to the heritage assets' significance. In terms of considering the significance of Grimshaw Hall and the contribution of its setting, paragraphs 2 and 3 of Policy P16 are not relevant, and in paragraph 3 the use of the word "significance" is misleadingly ambiguous, as it does not specifically mean the 'significance' of heritage assets.

Change suggested by respondent:

To ensure that is effective, the policy should be reworded to ensure it does not go beyond the protection of heritage assets to encompass the protection of landscape character and local distinctiveness outside the settings of conservation areas and listed buildings.

The landscape character and distinctiveness that would be protected by Policy P16 should not be equated with the settings of these heritage assets or the contribution of settings to the heritage assets' significance. The policy should be reworded to reflect this.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14176

Object

Policy P17A Green Belt Compensation**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

The Council should set out Green Belt compensation projects which can be paid for through CIL. Communities could then identify projects that compensation could fund.

Where compensation cannot be provided on site or would result a reduced net developable area, there should be an effective strategy to enable off site contributions to be made in other locations e.g. through the identification of donor sites. It is not clear from item 4 of this policy where the Council will be using section 106 funds to make compensatory improvements.

No indication of how the level of compensation will be determined. A formula or calculation should be provided to allow developers to plan for this requirement on top of the other contributions sought.

Change suggested by respondent:

Request that the Council amend Policy P17A to refer to the use of CIL as well as S106 agreements to set out the Green Belt compensation projects. We also seek confirmation from the Council as to the level of compensation that will be requested for sites removed from the Green Belt.

This policy should make reference to land which the Council has identified as "donor sites" for compensatory improvements to be made via section 106 contributions secured by the Council for off-site contributions. This would make the policy more effective and justified. This change would also assist in making policy P10, in respect of biodiversity net gain more effective and justified.

We consider that this policy is unduly onerous and should be amended to allow for flexibility in the application of concept plans. As set out above there are a range of compensatory improvements that could be provided. The concept plans included within this Local Plan should not be relied upon to provide such detailed information because the Council's evidence base is considered to be high level, whereas the evidence prepared on behalf of the landowners is more detailed. In particular the Council's heritage advice is strongly objected to. HRD have had two separate opinions on the report prepared by David Burton Pye which concludes that the concerns and restrictions raised in respect of Grimshaw Hall are both inaccurate and unnecessarily restrictive. During the preparation of the local plan significant landscape and heritage detail was provided to the council to justify the proposals being promoted by HRD and it was requested that this detail be considered further at the planning application stage.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14177

Object

Policy P18 Health and Wellbeing**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Object to the requirement at 2 vii for all new development to deliver new and improved health services. This is not justified and not effective due to requirement being placed on all development sites without site specific consideration.

New health facilities should not be a blanket requirement.

Where improvements are needed, but a new building or facility is not required, then financial contributions could be sought to improve existing facilities.

Recommend the policy is amended to allow for financial contributions where improvements are identified as the necessary mitigation to make development acceptable in planning terms.

Supports the principle of this policy.

Change suggested by respondent:

Propose that the policy is amended to allow for financial contributions where improvements are identified as the necessary mitigation to make development acceptable in planning terms.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14178

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Object to the policy wording that a minimum standard should be applied across the whole Borough in relation to green space. This should be something that is informed by ward level data, as set out in the open space assessment and taking into consideration at a site by site basis at the planning application stage. Strategic priorities can be set, but to provide a specific green space standard at a Borough wide level is unduly onerous.

Object to the requirement in point 10 that new development should look to accommodate the needs of existing population. Any contribution or enhancement to be agreed through a section 106 agreement should be directly related to the development.

Change suggested by respondent:

Point 10 of the policy should be amended to remove the reference to a Borough wide minimum standard of Green Space, as this does not allow the policy to be effective.

Reference should also be removed providing for the open space needs of the existing population as this would be contrary to regulation 122 of the Community Infrastructure Levy Regulations (2010).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14179

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Hampton Road Developments Ltd**Agent:** Savills**Summary:**

Criterion 4 of the policy states that the plan has been subject to a Viability Assessment to ensure the policies are deliverable.

Disagree with the viability conclusions regarding site KN1 and request the viability assessment is re-run taking into account concerns identified.

The Council should seek to respond to this critique either with robust evidence or make the changes proposed within their assessment.

Change suggested by respondent:

The Council should seek to amend the draft viability report to take account of the concerns raised by Savills.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10641

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Hampton-in-Arden Parish Council and Catherine-de-Barnes Residents' Association**Petition:** 153 petitioners**Summary:**

Site HA2 is allocated for 95 dwellings, but is also recognised as suitable for 'Housing for Older and Disabled People' (Policy 4e use).

However, the SHLAA Site Assessments September 2012, concluded that the site was unsuitable for family housing, mainly because of poor accessibility to schools.

The site remains unsuitable for family housing as no new schools have been provided locally, no footpaths provided to improve pedestrian access and no new infrastructure exists. The site is poorly served by public transport. A self-contained facility, such as a care home/village, could be accommodated without significantly impacting on local facilities.

Change suggested by respondent:

Policy HA2 should be restricted to housing for older and disabled people

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10643

Object

Policy S01 - East of Solihull**Respondent:** Hampton-in-Arden Parish Council and Catherine-de-Barnes Residents' Association**Petition:** 153 petitioners**Summary:**

Site S01 (formerly site 16) should be deleted because:-

- 1) It cannot be reconciled with the previous position that the site (or components thereof) would impact on the openness of the green belt and threaten coalescence between settlements.
- 2) The development fails to meet the objective referred to in Challenge E 'Protecting key gaps between urban areas and settlements'
- 3) Current infrastructure does not support a development of this size, and current development plans for land on Damson Parkway in particular, will result in significant traffic issues which have not been truly taken into account.
- 4) Lack of evidence of a Traffic Impact Assessment for the Plan period and specifically for site S01.
- 5) Contradicts para 430 of the Plan to take account of the setting and special character in considering development proposal.

If not deleted, any development north of Lugtrout Lane should be ribbon development, with the site capacity substantially reduced to minimise impact on rural character.

The site is within Hampton-in-Arden Parish and should be included in the Hampton-in-Arden settlement chapter.

Change suggested by respondent:

Site S01 should be deleted. If not deleted, capacity should be reduced north of Lugtrout Lane. The site should be relocated into the Hampton-in-Arden settlement chapter

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10644

Object

Policy P5 – Provision of Land for Housing**Respondent:** Hampton-in-Arden Parish Council and Catherine-de-Barnes Residents' Association**Petition:** 153 petitioners**Summary:**

Para 224 indicates that that some of the larger sites will not make a significant contribution to completions until mid-delivery phase. There is no evidence to support this statement. All but one of the larger sites (BC1), consisting of over 300 dwellings, are to start in the 1st Phase and due to be delivered during periods I and II; there is no evidence of the scheduling of delivery through this period. 83% of the larger sites are due to commence delivery in period 1 and completion in phase 2. No discussions have been held to discuss the phasing of development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10645

Object

Providing Homes for All**Respondent:** Hampton-in-Arden Parish Council and Catherine-de-Barnes Residents' Association**Petition:** 153 petitioners**Summary:**

The planning regulations need to ensure developers deliver sites with planning approval, and introduce regulations to ensure derelict /empty properties are developed, to ensure that only development that is truly necessary and warranted is allocated.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10662

Object

Blythe**Respondent:** Mr Peter Hanlon**Summary:**

- Shirley taking 39% of proposed housing within the Borough which seems disproportionate.
- Loss of the Green belt.
- Increase traffic on unsuitable roads
- Increase in Air and light pollution
- Doctors/Schools already under pressure - what proposals are there for additional services.
- More older accommodation therefore pressure on doctors.
- More emphasis should be given to homes that are needed such as social and affordable housing in locations which provide sustainable travel

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10579

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Simon Harding**Summary:**

- Points 831 - UK2 Point 1 and 859 - Relocation of Bickenhill Waste Centre to Damson Parkway.

Change suggested by respondent:

Damson parkway is already heavily congested at various points in the day with residents in the surrounding area suffering on yearly basis changes to the JLR development and increased traffic. The waste recycling centre does not need to be positioned here adding further stress to the road network in the area and bringing more noise and various pollution to the area of Damsonwood.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10656

Object

Policy BL1 - West of Dickens Heath**Respondent:** Hilary Hargrave**Summary:**

- Loss of sports facilities that are fundamental for local communities.
- The land is high grade GREEN BELT – Government policy is to protect Green Belt and develop Brownfield land first.
- The site is surrounded by LWS and Ancient Woodland - proposals will affect different species
- Highway infrastructure in the area is already overloaded. High levels of upgrading and potential destruction of more green belt would be needed to create anything like a sustainable access route into any proposed development.
- Site is in Flood zone 1
- Sustainability – Some of the mitigation measures included in the Plan are not achievable, therefore it isn't sustainable. Other sites are more sustainable.
- The character and setting of Dickens Heath and Tidbury Green has already been decimated by developments in nearby areas.
- The facilities for the village are already way below what is needed for the number of residents - i.e. shops, hospitality, public transport, car park.
- Local schools would not be able to accommodate additional housing

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14788

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mrs Lisa Hargreaves**Summary:**

- Would cause drainage issues.

Change suggested by respondent:

- The development in my opinion should have allocated affordable housing.
- Would add to existing problem with speeding traffic coming past the canal into Knowle.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10944

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Geoff Harley-Mason**Summary:**

I support this proposal to build house and a new school in Knowle. Arden school is one of Knowle's major assets and is in dire need of re-development. A plan that will bring a much needed school building will only help to continue the successful education the school is bringing to our local children.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14587

Support

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Harris Strategic Land & Colchurch Properties**Agent:** Richard Brown Planning**Summary:**

Support Policy BC1 Land at Barratt's Farm which, provides a suitable opportunity for a sustainable urban extension to Balsall Common. Site is wholly appropriate for Green Belt release, given its highly sustainable location and being well served by public transport. Site is deliverable due to its suitability, availability and achievability.

Landscape and Visual constraints across the site are not considered to be significant; indeed there are significant opportunities for landscape and visual diversity and enhancement. The Concept Masterplan is supported. Landscape led approach will enable delivery, as a minimum, of the 875 residential units, local centre and primary school, together with the areas of Public Open Space, including those of importance for the setting of the listed buildings.

All policy matters will be delivered, including the Relief Road between Station Road and Waste Lane.

Areas of significant ecological value are retained, and will be linked together via wide green corridors to create ecological connectivity across the site.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10707

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Ms Cathy Harris**Summary:**

A disproportionate number of houses are being built in Cheswick Green compared to the rest of the borough. Why not build on brownfield sites? .The infrastructure is not in place to cope with a doubling of numbers of residents ie schools, health centres . There are no plans for a new GP surgery. The integrity of Cheswick Green as a separate village is being slowly eroded as the space between CG boundaries with Shirley are shrinking.

Change suggested by respondent:

I would like to see a GP practice included. However I would prefer the housing development to be moved to a brownfield site.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

11206

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ms Jane Harris**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11254

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Lorraine Harris**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14197

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Lorraine Harris**Summary:**

I do not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review: Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020 As such, I am objecting to the allocation of Site BC3 for housing.

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10617

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Charles Harrison**Summary:**

I live on Alveston Grove which backs onto the proposed development, KN1 Purnells Brook to Hampton Road. The immediate plan to build 'medium density housing' closest to the current development does not appear at first glance to be 'in-keeping' with the current housing already in situ. I have no objection per-se to the housing development however, I believe that the current proposal is not in sufficient detail as to the type and format of the housing proposed to allow for full appraisal of the plan. Low density housing needs to be next to the current housing.

Change suggested by respondent:

To build low density housing next to the current dwellings already in situ and to provide a full plan of the type of housing to be built to enable a proper appraisal of the plan by local residents.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10771

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Ms Fiona Harrison**Summary:**

Unsuitable infrastructure under too much pressure already, will exacerbate existing problems of "village" life.

Change suggested by respondent:

No more building in the Dickens Heath area. This area has born the brunt of development, it is being ruined and we will never get back what we have lost. When is enough enough?

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

15179

Object

Blythe**Respondent:** Ms Fiona Harrison**Summary:**

Unsuitable infrastructure under too much pressure already, will exacerbate existing problems of "village" life.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

11058

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Rob Harrison**Petition:** 2 petitioners**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10815

Object

Challenges

Respondent: Mr Stephen Harrison

Summary:

Site BL1 is in a very high performing green belt area. The sustainability appraisal does not take this into account.

Brownfield sites are not being developed ahead of the green belt which government policy is there to protect.

Why do we need to relocate sports clubs that are well established?

There is substantial wildlife and ancient woodland, this should be protected and not destroyed when there are areas for development that do not involve the demise of life and natural Beauty.

Green belt should mean just that. If we keep moving the goalposts, where will it end?

Change suggested by respondent:

The plan in general for Solihull must be reviewed as a whole, it is important to understand that the world is changing and the answers to providing home quotas cannot be simply solved by building over green belt, supposedly protected land.

Other sites must be considered, 'brown field sites' - areas that are in need of regeneration and improvements.

There must be areas that are better served by existing traffic networks , schools and vital facilities.

There are areas that are not in flood planes and that do not require vast infrastructure and sustainable drainage to make them viable.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

15187

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Stephen Harrison**Summary:**

Site BL1 is in a very high performing green belt area. The sustainability appraisal does not take this into account.

Brownfield sites are not being developed ahead of the green belt which government policy is there to protect.

Why do we need to relocate sports clubs that are well established?

There is substantial wildlife and ancient woodland, this should be protected and not destroyed when there are areas for development that do not involve the demise of life and natural Beauty.

Green belt should mean just that. If we keep moving the goalposts, where will it end?

Change suggested by respondent:

The plan in general for Solihull must be reviewed as a whole, it is important to understand that the world is changing and the answers to providing home quotas cannot be simply solved by building over green belt, supposedly protected land.

Other sites must be considered, 'brown field sites' - areas that are in need of regeneration and improvements.

There must be areas that are better served by existing traffic networks , schools and vital facilities.

There are areas that are not in flood planes and that do not require vast infrastructure and sustainable drainage to make them viable.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

15163

Object

Policy BL1 - West of Dickens Heath**Respondent:** Jim harte**Summary:**

Rail service is already overloaded.

Lack of services to the proposed UK Central site.

No direct cycle or pedestrian access to Dickens Heath village.

This site would remove the greenbelt gap to only a field.

The proposed new housing would make this Village around 2,100 dwellings. However, the roads and infrastructure have not been designed or improved to accommodate this increase.

Concerned about the local wildlife site.

There would be a loss of character and identity.

There would be a loss playing fields with no alternative proposals.

The land is liable to flooding as the sub-soil is deep boulder clay.

Change suggested by respondent:

suggest that the smaller site to the north of Tythe Barn Lane and bounded by the canal to the north is acceptable for development of approximately 100 dwellings towards the end of the Plan period due to its high performing (8) Green Belt status.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15164

Object

Blythe**Respondent:** Jim harte**Summary:**

Disproportionate housing allocation of development in the Blythe and South Shirley area.

The roads and infrastructure have not been improved to accommodate this increase.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10978

Object

Foreword**Respondent:** Mrs Debbie Hatfield**Summary:**

I cannot see any duty to co-operate with other areas. All the promises of protecting the Greenbelt and the Meriden Gap have been broken. Balsall Common will be destroyed by this plan. We are already dealing with the awful consequences to the environment of HS2. Our greenery and wildlife are disappearing before our eyes.

Over 31% of the new homes will be built in Balsall Common - totally disproportionate. New developments are better served by areas which are not reliant on vehicles. Over 84% of residents in Balsall Common have to drive outside of the area for work.

Change suggested by respondent:

I do not believe that all of the brownfield options have been utilised. The area at the HS2 Interchange station is capable of taking far more than the 500 homes suggested. We know that more housing is required, but we are taking way more than our fair share. Why is site BC1 in the Meriden Gap so desirable? The site has a multitude of landowners, all with their own agenda, whereas Grange Farm only has one owner - namely L & Q (owners of Gallagher Estates). Sadly, I personally feel that Solihull have only discounted this site as Gallagher originally took the Council to court over the 2013 plan. This site could probably be also developed earlier than BC1 as it is not in such close proximity to HS2

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10841

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Alexander Hawke**Summary:**

Originally marked as a Conservation area

Change suggested by respondent:

Keep as a conservation area

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10842

Object

Balsall Common**Respondent:** Mr Alexander Hawke**Summary:**

Not appropriate to put a Primary School next to a station. Will also cause issues with parking, safety and congestion.

Change suggested by respondent:

Not to put a primary school next to the station

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14839

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr K Hazelwood**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14840

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Anne Hazlewood**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10930

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr William Heaps**Summary:**

Opposition:

Use of greenbelt land

Lack of infrastructure improvement - Road, public transport and parking. Increased traffic congestion on Knowle High Street plus excessive strain on Grove Road (including vastly increased pedestrian footprint)

Increased population creating further stretching of already fully booked two local GP surgeries with no provision to support in plan.

Increase in school places required predominately because of excess building in the village over the last ten years, and accepting pupils outside of catchment

Change suggested by respondent:

Stop the excessive building on green belt land - and use brown belt land instead

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10931

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr William Heaps**Summary:**

Use of greenbelt land

Lack of infrastructure improvement - Road, public transport and parking. Increased traffic congestion on Knowle High Street plus excessive strain on

Increased population creating further stretching of already fully booked two local GP surgeries with no provision to support in plan.

Increase in school places required predominately because of excess building in the village over the last ten years, and accepting pupils outside of catchment

Change suggested by respondent:

Stop building on greenbelt land - move to brown belt land elsewhere

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

14425

Support

Balsall Common**Respondent:** Heart of England Co-operative Society**Agent:** Harris Lamb**Summary:**

Heart of England Co-operative Society currently operate a retail foodstore located on Kenilworth Road, Balsall Common. HOECS are generally supportive of the overall strategy in the Plan and have no objections to the town centre and retailing policies in the Plan.

Support Policy BC5 Trevallion Stud for housing and consider that there are exceptional circumstances that justify the amendment to the Green Belt boundary and its

release for development. Balsall Common is a sustainable settlement with a good range of local services, shops and facilities and new housing will assist with meeting the needs of the settlement.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

13779

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Paul Hebdith**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14151

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mrs Elisabeth Hedley**Summary:**

Concerns over lack of evidence on the deliverability and viability of this allocation.

Sports facilities crucial to the original rationale of allocating two large sites.

Mentions that the site is subject to a restrictive covenant used only for the purposes of recreational games but doubts that the football club could cover the costs associated with more facilities, and that additional facilities would generate more traffic in an area not accessible by public transport.

Questions the site's accessibility

The site north of Hampton road has topographical constraints, the LWS and Grimshall Hall.

States that the Savills site proposals should be deleted as its now superseded by the SMBC one.

Needs clarification on the inclusion of a cricket pitch.

Refers to Para 242 - necessity for a clear phasing and delivery programme, which doesn't appear in the plan.

Change suggested by respondent:

No Credible evidence to show deliverability of this allocation.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14154

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Elisabeth Hedley**Summary:**

The Local Plan is unsound in that it has not provided the evidence to demonstrate that this large strategic site is viable and deliverable. Comprehensive delivery of the new Academy alongside the new housing is essential in view of the rationale for the site's selection. Further concerns relate to accessibility; the effectiveness of proposed infrastructure mitigation measures and unacceptable impacts of proposed densities on layout and design having regard to the character of the area.

Questions the data in the accessibility study, especially in relation to accessibility to public transport and GP surgeries. Says mitigation in respect of transport and health are minimal.

Concern over proposed densities and design don't reflected what's in the KDBH Neighbourhood plan.

Change suggested by respondent:

Needs to be lower density.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10730

Object

Policy BL1 - West of Dickens Heath**Respondent:** Wythall Parish Council**Summary:**

Wythall Parish Council Planning Committee have grave concerns over the effect to the surrounding area, particularly Majors Green, of policy BL1. Traffic will increase enormously on already busy and historically dangerous rural roads including Haslucks Green Road which has a hump back bridge, blind bend and adverse camber within a stretch of a few hundred metres. The Plan contains no measures to mitigate this detrimental effect on neighbouring parishes.

Also, there will be an increase in passenger numbers using Whitlocks End Train Station, yet there is no mention within the plan of how the already full car park will cope.

Change suggested by respondent:

As this development is right on the border with the parish of Wythall, some evidence of consideration and collaboration should be included with plans of how the local road network will be improved to cope with the additional traffic.

Ideally a reduced number of houses would be preferable.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10731

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Wythall Parish Council**Summary:**

Wythall Parish Council Planning Committee have grave concerns over the effect to the surrounding area, particularly Majors Green, of policy BL3. Traffic will increase enormously on already busy and historically dangerous rural roads including Haslucks Green Road which has a hump back bridge, blind bend and adverse camber within a stretch of a few hundred metres. The Plan contains no measures to mitigate this detrimental effect on neighbouring parishes. Also, there will be an increase in passenger numbers using Whitlocks End Train Station, yet there is no mention within the plan of how the already full car park will cope.

Change suggested by respondent:

As this development is right on the border with the parish of Wythall, some evidence of consideration and collaboration should be included with plans of how the local road network will be improved to cope with the additional traffic. Ideally a reduced number of houses would be preferable.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10774

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Jon Hendry**Summary:**

the new development will reduce the vital greenbelt land in the area. although there is a new school it will still place more pressure on the school in cheswick green and other nearby facilities such as doctor surgery. there will be a big increase in traffic in the area which already suffers from a high volume in traffic. overall it will affect public safety . the development is still far too close to the grade 2 listed building

Change suggested by respondent:

move the development altogether

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

14086

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Youssef Hennous**Summary:**

- > The current school is ageing and is increasingly expensive to maintain. A new school facility will help the school to achieve higher results and improve students outcomes.
- > New facilities will also be a benefit for the local communities.

Change suggested by respondent:

The current main builds weren't built to host so many people and the design layout wasn't purposely thought of and therefore a new purpose built school is desperately needed in order to overcome the challenges caused by the old and inadequate layout; an example of this is like the space in corridors and stairs is not built to cope with so many people and also the services such as drainage, electrics are all in desperate need of replacement, but this will cost more than having it done as part of a new school build.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10723

Object

Balsall Common**Respondent:** Mr James Henry**Summary:**

I moved into Balsall Common with my family in 1984. The plans for housing are unfair. I understand we should take our fair share of future housing but we have been allocated over 30% of the dwellings even though our village has only around 3% of the population of the Borough.

These proposals will mean that Balsall, a large village or small town with inadequate infrastructure, will balloon into an even bigger town with village-standard facilities way below what one would expect in such a densely-populated urban area.

Change suggested by respondent:

The Arden Cross Development (site UK1) has only got plans for 500 dwellings in the plan period. The total planned for this new town is 3,000 homes. Building all 3,000 during the plan period would take a lot of pressure to build in semi-rural areas like Balsall Common.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14866

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Julian Henwood**Summary:**

The location of the school will exacerbate the existing parking and traffic issues and create noise issues.

Change suggested by respondent:

Provide large car park

Multistorey car park at Berkswell station

double yellow lines along station road, brickrad close and riddings hill.

plant some trees to count the noise.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

10974

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Linda Heslington**Summary:**

Cheswick green cannot cope with more development, any further increase will put a strain on the NHS for hospital appointments and more locally GP appointments as I understand there are no plans to build a new go surgery alongside these additional 1000 houses. It is likely to increase the risk of flooding and some homes on Cheswick already live with the worry of their properties flooding again. The surrounding roads are already very busy and likely to become grid locked at peak times and a new transport policy is not included within the draft plan.

Change suggested by respondent:

Amenities provided for the additional development such as Gp surgery, local shops, school, addition funds available for people in the local area to protect their homes against flooding and lastly a transport policy

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

13726

Object

Vision**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Reference to 'protection of the Green Belt' in the Vision does not take into account the fact that there are exceptional circumstances which justify the release of appropriate Green Belt sites. The current wording is therefore considered unsound as it is not consistent with national planning policy.

Change suggested by respondent:

The Vision should refer to 'protection of the remaining Green Belt (which contains the strategically important Meriden Gap) as necessary, alongside sustainable growth...'

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13748

Object

Spatial Strategy**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The level of growth apportioned via the spatial strategy is unsound as it is not justified or consistent with national planning policy. There is potential for further growth to be accommodated within the spatial strategy, including more growth to Hampton in Arden.

There is scope for additional reasonable alternatives for growth options to be identified that lie within Option 3 (16,000 dwellings) and Option 4 (19,000 dwellings). These could be delivered via additional sustainably located Green Belt sites in accordance with the spatial strategy. The Site Assessment methodology has unduly constrained the capacity for further sustainable Green Belt release.

It is unclear why the preferred option (Option 2a) has been selected over additional growth as the SA recognises that Option 3 could be accommodated without generating further significant effects that would not arise under Option 2.

Change suggested by respondent:

Additional reasonable alternatives for higher levels of growth (particularly for options between 16,000 and 19,000 dwellings) should be tested.

The identification of additional Green Belt sites for consideration should be based upon a reappraisal of the Site Selection process.

The potential for additional Green Belt release to deliver levels of growth over and above 19,000 dwellings should be considered, as an alternative to the larger scale expansions of Balsall Common and Land South of A45.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13749

Object

Foreword**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Under all of the Options in the Sustainability Appraisal where the UK Central Hub is identified as part of the supply it is for 1,500 dwellings. This is not consistent with the draft plan which identifies the capacity for 2,240 dwellings.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13750

Object

Spatial Strategy**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

No settlement hierarchy is provided which sets out the sustainability credentials and growth potential of individual settlements. This would focus growth on those settlements identified as appropriate for development and reflect the range of facilities and services available.

Change suggested by respondent:

A more clear and explicit settlement hierarchy should be added.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13751

Object

Spatial Strategy**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The plan does not consider the longer-term permanence of the Green Belt boundaries beyond the plan period. It is considered unrealistic to assume that further Green Belt release will not be necessary beyond the plan period.

Change suggested by respondent:

The Plan should identify safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13752

Object

Hampton-in-Arden**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

We have concerns with the application of the Site Assessment methodology in terms of its transparency and consistency.

The site assessment of Site 418 is based on an incorrect site area and should be updated. The latest Vision Document proposes a capacity for around 292 dwellings rather than 901 dwellings. The Site Assessment process has not considered the ability for the issues identified to be addressed via a lower site capacity.

There are inconsistencies between the different evidence base documents used to inform the Site Selection process for Site 418, in relation to proximity of listed buildings and accessibility.

It is not clear in the Site Assessments what factors have been given greater weight and whether the ability to mitigate adverse effects has been taken into account consistently.

There is no justification why Site 418 is not coming forward alongside HA1 and HA2, based upon the Site Assessment methodology. Mitigation measures are not applied consistently to all sites. Mitigation measures related to accessibility for HA1 have been proposed within the policy, however mitigation measures for defensible boundaries for Site 418 were not similarly considered.

Change suggested by respondent:

The Site Selection process should be reviewed for consistency and transparency to provide a justified evidence base for the draft Plan.

The process should consistently consider the potential for mitigation measures in the assessment of sites.

Issues relating to Site 418 should be addressed, including the incorrect red line boundary area and assumptions around dwelling numbers.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13753

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The requirement in Policy P4D goes beyond the guidance provided in the PPG which seeks local authorities to "engage" with landowners and "encourage" them to consider self-build and custom housebuilding. There is an over-reliance upon the Self Build Register to justify the requirement, with the criteria for expressing an interest being relatively limited.

Change suggested by respondent:

The requirement to provide 5% on allocated sites of 100 dwellings or more should be replaced with an 'encouragement' to provide self-build on allocated sites of 100 dwellings or more having regard to the latest robust evidence.

Criteria 2 of Policy P4D should make it clear that after the marketing period (which should be less than 12 months), any unsold plots should revert back to the original developer.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13754

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

It is unclear whether the evidence base supporting Policy P4E is robust, including around viability and deliverability. The Viability Study does not make reference to P4E in Round 2 testing. Specialist housing may be appropriate on some sites, this should be tested.

Change suggested by respondent:

Policy P4E should reference supporting evidence, to ensure deliverability of development sites is not affected by the requirements of the policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13755

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Policy P5 is unsound in respect of the housing requirement identified.

It is imperative that sufficient homes are provided to support the envisaged economic growth. The HEDNA should test an additional UK Central Hub growth scenario (22,998 jobs) to determine how many homes might be required in Solihull if all jobs are filled by residents of Solihull.

We consider that there is a need for between 16,570 and 19,975 dwellings (2020-2036). A reasonable mid-point suggests that 18,500 dwellings should be provided to deliver the envisaged jobs growth at UK Central Hub.

Change suggested by respondent:

The housing requirement should be increased to a minimum of 18,500 dwellings to reflect the outcomes of additional, realistic economic uplift scenarios to meet the envisaged jobs growth at UK Central Hub.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13756

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

There is no clear evidence on the level of contribution to the unmet housing needs of the Greater Birmingham Housing Market Area (GBHMA) or the extent of agreement with other GBHMA authorities. The Council has not published a separate Duty to Cooperate Statement or any Statements of Common Ground.

We consider that the shortfall against the Birmingham Development Plan unmet need figure is in between 11,294 and 13,101 dwellings up to 2031.

The implications of the Standard Method calculation for local housing needs (2019) should also be considered. Across the GBHMA this would result in a minimum unmet need of 25,543 dwellings up to 2031.

We have concerns with the supply identified up to 2031. Some of the capacity identified in the GBHMA to meet the shortfall is not secured and should not be relied upon.

The Position Statement only addresses the housing market area shortfall up to 2031. A shortfall post-2031 will exist. We consider the existing Standard Method for the GBHMA would create an unmet need of between 17,000 and 18,400 dwellings for the period 2031-2040.

Change suggested by respondent:

The extent of agreement from the other GBHMA authorities should be detailed in full.

The housing requirement should be increased to provide more flexibility to help meet GBHMA housing shortfall needs up to 2031 and beyond (up to 2036).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13757

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The draft Plan requirement for 40% affordable housing on major market housing sites only will result in a shortfall in meeting the identified needs. A higher housing requirement could deliver additional affordable dwellings and address the affordability issues in the Borough. There are potential issues around viability for some major allocations, with no evidence that significant infrastructure requirements have been tested with P4A.

Change suggested by respondent:

The housing requirement should be increased to maximise the contribution towards meeting the affordable need.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13758

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Policy P5 is unsound in respect of the housing land supply identified.

Sites identified in land availability assessments and in the brownfield register are not secured via any planning permissions or allocation and are at risk of not coming forward.

There is a substantial reliance on windfall developments which should be justified by evidence taking into account future trends.

Without a detailed site-specific trajectory for the UK Central Hub Area, relating to the delivery of infrastructure and the relocation of existing land uses, it is difficult to determine the delivery timeframe. The Arden Cross proposals are reliant upon significant infrastructure coming forward, which is a risk that should be considered in identifying the need for further flexibility.

No detailed site-specific trajectories for allocated sites are provided. Land assembly and infrastructure issues could potentially impact upon the timing and phasing of delivery.

A stepped requirement for the housing requirement means that should there be delays to the larger site allocations this will exacerbate the shortfall in meeting needs.

Change suggested by respondent:

Further housing land supply should be identified to provide flexibility to the housing requirement.

Further detail and evidence is required to justify the windfall allowance, the housing trajectory overall and sites specific trajectories should be provided.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13759

Support

Policy KN1 - Hampton Road, Knowle**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Support the principle of Allocation KN1 given the spatial strategy and sustainability of the settlement. We query whether 180 dwellings could be delivered given the extent of constraints, including heritage and ecology.

The proposed Green Belt boundary does not include the proposed Sports Hub, meaning it would rely on very special circumstances being demonstrated for its delivery. If mitigation is required to offset the loss of pitches, its deliverability should be assessed and agreed at the allocation stage.

The requirement of a financial contribution towards the new all through school of KN2 should be tested within the Viability Study as well as the delivery of the Sports Hub.

Change suggested by respondent:

A full assessment of the Site KN1 obligations and requirements should be undertaken and this should allow for sensitivity testing for a potentially lower number of dwellings given the site's constraints.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13760

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Support the principle of the KN2 allocation but have significant concerns that the level of growth identified is not deliverable. The Council should assess the delivery of an all through school through its Viability Study. The site has a number of landowners which could affect assembly and deliverability.

Change suggested by respondent:

A full assessment of the KN2 availability, obligations and requirements should be undertaken, particularly around the deliverability of the new all through school.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13761

Object

Balsall Common**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The level of growth proposed in Balsall Common will require a relief road. There is insufficient evidence around its deliverability, and therefore the deliverability of the large housing allocations that rely on it. The timescales for delivery (2022-2925) appears very optimistic given it relies on a number of landowners. The Viability Study does not specifically mention the relief road, bypass or any additional infrastructure costs for Balsall Common.

Change suggested by respondent:

The Sustainability Appraisal should be exploring alternative options, including elsewhere in Balsall Common and/or other highly accessible settlements such as Hampton-in-Arden.

The allocations in Balsall Common should be revised to refer to updated, robust evidence around the infrastructure requirements and deliverability; otherwise they should be deleted.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13762

Object

Foreword**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

We object to the approach for the new Sports Hubs which are required in five locations across the Borough to deal with replacement/new provision. It is not clear whether the land is available to deliver these hubs, or the cost and timing of when they will be delivered.

Change suggested by respondent:

The draft Plan should state what mitigation is required and how it can be delivered, with support from the evidence base.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13763

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Policy P5 Point 5, which requires all new homes to meet nationally described space standards, is considered unsound. There is no evidence providing justification for this taking full account of need, viability and timing, as required by national planning policy.

Change suggested by respondent:

The requirement should be removed.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13764

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The policy requirements of Policy P9 Points 3 (i), (ii) and (iv) are unsound as they are not justified or effective, particularly in relation to viability considerations. The Policy does not contain sufficient flexibility related to site specific viability or site-specific constraints.

Change suggested by respondent:

The Policy P9 Points 3 (i), (ii) and (iv) requirements should be removed, or additional clauses should be included within the policy that allow for site specific flexibility in relation to viability and site-specific constraints.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13765

Object

Policy P10 Natural Environment**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

The requirement in Point 8 of Policy P10 goes beyond the guidance in the NPPF in relation to biodiversity net gain. It would be more appropriate to require a net gain and then allow any future legislation to deliver the specific figure.

The requirement in Points 9 and 12 of Policy P10 for net gain to all developments on site may not be achievable on all sites, due to site constraints and/or viability issues for example.

Change suggested by respondent:

Policy P10 should be amended to require a net gain without specifying a number; and to refer to the potential for off-site improvements to be considered not as a last resort but as part of the most sustainable solution for individual developments.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13766

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Heyford Developments Ltd**Agent:** Barton Willmore**Summary:**

Policy P21 does not make reference to the Infrastructure Funding Statement to help inform judgements regarding the use of planning obligations and pooling.

National planning policy states that authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in the infrastructure funding statements which infrastructure they expect to fund through CIL.

Change suggested by respondent:

Policy P21 should be amended to include a reference to the use of the Infrastructure Funding Statement to inform decision-making on the use of planning obligations, including pooling.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14618

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Object to omission of Site 413 - Land at Knowle Farm, Dorridge.

This site is available, deliverable and suitable for meeting housing need in a sustainable way, early in the Plan period. It should be removed from the Green Belt and identified as a residential allocation.

In the context of the site selection process it is difficult to understand why the site, which is identified as lying within a lower performing Green Belt parcel with defensible boundaries, in a landscape of medium sensitivity, with high accessibility, no significant constraints, and performs comparatively well in SA terms (mainly neutral effects) has not come forward for allocation.

Site could also assist with the costs for new school in Knowle and a Sports Hub in the settlement, if required.

Site size and extent is incorrect in Site Assessment. Vision Document accompanies submission.

Change suggested by respondent:

The site should be removed from the Green Belt and identified as a residential allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14623

Support

Vision**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Generally supportive of the Vision. However, note that the reference to 'protection of the Green Belt' does not necessarily take into account the fact that there are exceptional circumstances with Solihull Borough which justify the release of appropriate Green Belt sites. The current wording is considered unsound as it is not consistent with national planning policy.

The Vision emphasises the opportunity around HS2-related growth, particularly UK Central. However, there is a disconnect between these economic growth aspirations and the level of housing growth proposed. If this is not addressed, the Vision will not be realised in the most sustainable manner.

Change suggested by respondent:

The Vision should refer to 'protection of the remaining Green Belt (which contains the strategically important Meriden Gap) as necessary, alongside sustainable growth...'

The level of housing growth is insufficient in terms of its contribution towards wider unmet needs and to deliver balanced growth alongside UK Central. Without additional numbers the Vision will not be realised. As a minimum, the growth level of 16,000 dwellings should be accommodated (requiring the use of 'Amber Sites' as part of the additional supply), which is not considered to have any significant effects over the current preferred option of 15,000 dwellings (Option 3a in the SA).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14624

Support

Spatial Strategy**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Supportive of the principles of the spatial strategy. 'Exceptional circumstances' exist to justify the release of Green Belt via the 'balanced dispersal' strategy. However, there is potential for further growth to be accommodated and the level of growth apportioned to settlements is not justified.

SA should test additional options. No justification for preferred level of growth, when a higher level of growth could be accommodated with similar impacts.

The extent to which the spatial strategy is being applied consistently is questionable. There is potential for further growth to be accommodated in rural settlements identified as suitable for development.

A clear and explicit settlement hierarchy should be added to reflect the Council's approach.

Unrealistic to assume that further Green Belt release will not be necessary beyond the plan period. Safeguarded land should be identified in accordance with the spatial strategy.

Change suggested by respondent:

The draft SLP should test additional reasonable alternatives for higher levels of growth (particularly for options between 16,000 and 19,000 dwellings) which includes the use of additional Green Belt site releases in accordance with the spatial strategy (over and above the current identified 'Limited Green Belt Release'). The identification of additional Green Belt sites for consideration should be based upon a reappraisal of the Site Selection process. The potential for additional Green Belt release in accordance with the spatial strategy to deliver levels of growth over and above 19,000 dwellings should also be considered, as an alternative to the larger scale expansions of Balsall Common and Land South of A45 currently tested.

The draft SLP should include an explicit settlement hierarchy within the policy to guide the direction of this additional growth, focusing on those settlements identified as appropriate for development via the spatial strategy approach to date. This should reflect the range of facilities and services available with higher priority given to those settlements with sustainable transport links, particularly railway stations.

The draft SLP should identify safeguarded land in accordance with the spatial strategy to ensure longer term development needs are met.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14628

Object

Spatial Strategy**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Site Selection approach not fully justified. Concerns with the application of the methodology in terms of its transparency and consistency. Some Green Belt sites rejected unjustifiably and capacity for further Green Belt release in accordance with the spatial strategy has been unduly constrained.

Not clear from the site assessment commentary on what grounds a site has been rejected.

Inconsistencies between the different evidence base documents used to inform the Site Selection process e.g. the SA and accessibility study. Site Assessment commentary does not appear to reflect the most up to date SA commentary i.e. in terms of the number of effects and whether these are positive or negative.

Inconsistencies between why some sites allocated others not. E.g. site Policy KN1 notes Grimshaw Hall as a constraint.

The site assessment makes no reference to it under constraints.

Change suggested by respondent:

The draft SLP Site Selection process should be reviewed for consistency and transparency to provide a justified evidence base for the draft SLP. We consider this would give rise to the conclusion that further Green Belt sites are suitable for allocation in accordance with the spatial strategy.

The draft SLP Site Selection process should be more fully justified by consistently considering the potential for mitigation measures in the assessment of sites, potentially enabling the identification of further Green Belt sites that are suitable for allocation in accordance with the spatial strategy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14629

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

The 5% requirement for self and custom build plots is unsound. It places the burden on developers only, and goes beyond the PPG which seeks local authorities to "engage" with landowners and "encourage" them to consider self-build and custom housebuilding.

The HEDNA suggests an 'encouragement' approach alongside a policy requirement for strategic sites. On the basis of the current Register, it identifies that Solihull should be seeking to deliver 116 plots per annum. However, over-reliance upon the Register should be cautioned against in justifying any policy percentage requirement, particularly given the criteria for expressing an interest are relatively limited i.e. whilst an individual may express an interest the degree to which this is a realistic ambition cannot be determined.

Change suggested by respondent:

The following changes are required:

- The requirement to provide 5% on allocated sites of 100 dwellings or more should be replaced with an 'encouragement' to provide self-build on allocated sites of 100 dwellings or more having regard to the latest robust evidence.
- Point 2 of the policy should also be clear that after the marketing period (which should be less than 12 months), any unsold plots should revert back to the original developer.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14630

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

We query whether the evidence base supporting this policy and its requirements is robust, including around viability and deliverability. The Viability Study makes reference to P4d being included in Round 2 testing, but not P4e. This has the potential to undermine delivery of much needed housing and affordable housing. Whilst specialist housing may be appropriate on some sites, this should be tested. Additional sites to deliver this specific need may need to be explored if supported by evidence.

Change suggested by respondent:

Revise policy, with reference to supporting evidence, to ensure deliverability of development sites is not affected by the requirements of the policy.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14634

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Policy P5 is unsound in respect of the housing requirement identified.

Imperative that sufficient homes are provided to support the envisaged economic growth. The HEDNA should test an additional UK Central Hub growth scenario (22,998 jobs) to determine how many homes might be required in Solihull if all jobs are filled by residents of Solihull.

No justification for the HMA contribution and no agreement with other Local Authorities. Birmingham shortfall is significantly higher than position statement suggests.

Housing requirement should be increased to a minimum of 18,500 dwellings to reflect the outcomes of additional, realistic economic uplift scenarios and to help meet HMA shortfall to 2031. Acute affordability issue need to be addressed, so the recommended local housing need of 816 dwellings per annum within the HEDNA should also be increased.

Question whether the true capacity for further growth has been fully realised.

Change suggested by respondent:

The draft SLP housing requirement is not currently justified and should be increased to a minimum of 18,500 dwellings to reflect the outcomes of additional, realistic economic uplift scenarios to meet the envisaged jobs growth at UK Central Hub, tested via our review of the evidence base (HEDNA).

The draft SLP housing requirement should be increased to provide more headroom to help meet GBHMA housing shortfall needs up to and beyond 2031.

More needs to be done to address the acute affordability issue and so the recommended local housing need of 816 dwellings per annum within the HEDNA should also be increased to maximise the contribution towards meeting this need.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14637

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Housing Land Supply: There are a several issues associated with the identified housing land supply which give rise to concerns that the draft SLP will not be effective in delivering the housing requirements.

No certainty that sites identified in land availability assessments, Brownfield Land Register or Town Centre sites will come forward. Additional flexibility is needed.

Too much reliance on windfall.

No evidence to demonstrate that 2,740 dwellings at UKC Hub area can be delivered.

No site-specific trajectories for allocated sites. Assumption underpinning delivery periods are not detailed. Several sites also have complex land ownership issues or dependent on infrastructure, which could impact on timings.

No flexibility / contingency in housing land supply requirement.

Change suggested by respondent:

Further housing land supply should be identified to provide flexibility to the draft SLP housing requirement. This would serve to provide a contingency in the event of the identified supply not coming forward as anticipated, particularly those which are reliant upon substantial and/or site-specific infrastructure being delivered at the necessary point in time. This should have regard to the levels of flexibility considered appropriate in recent Local Plan examinations.

Further evidence is required to justify the windfall allowance within the housing land supply.

Further detail and evidence is required to justify the housing trajectory overall and site specific trajectories should be provided within the draft SLP.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14639

Object

Policy P5 – Provision of Land for Housing**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

National Space Standards: Policy P5 - Point 5 requires all new homes to meet nationally described space standards. This element of Policy P5 is considered unsound as it is not justified or consistent with national planning policy. There does not appear to be any evidence providing justification for this taking full account of need, viability and timing, as required by the NPPF, Footnote 46 and the PPG.

Change suggested by respondent:

The requirement should be removed to ensure the draft SLP is justified and consistent with national planning policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14645

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Requirement for a 30% reduction in energy demand/carbon reduction improvement over and above the requirements of Building Regulations goes beyond the Future Homes Standard (2019) consultation proposals and beyond the current PPG.

Under Point (viii) developments are required to provide one electric charging point per vehicle. Proposals must be supported by evidence to demonstrate that they are deliverable.

In Point 3 (i) energy and carbon reduction are two separate measurements. The Future Homes Standard (2019) refers to carbon emission reductions; this should be clarified.

The Viability Study does not test the impact of the 15% energy from renewable/low carbon sources requirement, contrary to the PPG and the 'energy efficiency hierarchy'.

Unclear what up to date local evidence informs the requirements.

Policy does not contain sufficient clauses related to site specific viability or site-specific constraints which may impact upon the implementation of the requirements.

Change suggested by respondent:

The Policy P9 Points 3 (i), (ii) and (iv) requirements should be removed, or at the very least additional clauses should be included within the policy that allow for site specific flexibility in relation to viability and site-specific constraints.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14655

Object

Policy P10 Natural Environment**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

The requirement in point 8 goes beyond the guidance of the NPPF, which encourages developers to provide net gains. Points 9 and 12 applies net gain to all developments on site, but net gain may not be achievable on all sites in-situ, for example due to site constraints and/or viability. This may constrain delivery of development land.

Whilst Point 12 allows for the provision to be off-set this is considered a 'last resort'. The Natural Environment Topic Paper (paragraph 42) refers to a Local Nature Recovery Network evidence base being in production to support implementation of the policy. This should be used to support strategic, plan-level solutions on net gain, rather than potentially less beneficial site by site solutions.

Change suggested by respondent:

The Policy should be amended to require a net gain without specifying a number; and to refer to the potential for off-site improvements to be considered not as a last resort but as part of the most sustainable solution for individual developments.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14658

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Point 3 refers to site specific planning obligations being sought where appropriate. Point 5 refers to Community Infrastructure Levy (CIL) developer contributions being used to fund strategic infrastructure. Point 6 notes that planning obligations from more than one development may be pooled to fund infrastructure. The Policy does not make reference to the Infrastructure Funding Statement to help inform these judgements regarding the use of planning obligations and pooling. This is unsound.

The PPG states that where CIL is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authority's infrastructure needs. Authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in the infrastructure funding statements which infrastructure they expect to fund through CIL.

Change suggested by respondent:

The Policy should be amended to include a reference to the use of the Infrastructure Funding Statement to inform decision-making on the use of planning obligations, including pooling.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14661

Object

Balsall Common**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Concerns around the level of growth directed to Balsall Common compared to Knowle and Dorridge.

Potential inability to deliver the Balsall Common relief road and therefore the deliverability of the housing allocations that rely on it.

The Viability Study does not specifically mention the relief road, bypass or any additional infrastructure costs for Balsall Common besides secondary school contributions. This brings into question the robustness of the Viability Study.

The Council's evidence base appears to question whether this is the appropriate location for a relief road. The Transport Study suggests that the western route for the bypass should also be considered, however it is not clear from the SA that this has been explored as a reasonable alternative for growth in the draft SLP.

Change suggested by respondent:

There is insignificant evidence to justify housing allocations which are reliant on a road which is not demonstrably deliverable. The SA should be exploring alternative options, including elsewhere in Balsall Common; or more preferably the delivery of additional growth at other sustainable settlements such as Dorridge. The allocations should be revised to refer to updated, robust evidence around the infrastructure requirements and deliverability; otherwise they should be deleted.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14662

Support

Policy KN1 - Hampton Road, Knowle**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Support the principle of the allocation but query whether 180 dwellings can be delivered given extent of constraints. Proposed Green Belt boundary does not include the proposed Sports Hub, meaning it would rely on very special circumstances being demonstrated for its delivery. If mitigation is required to offset the loss of pitches, its deliverability should be assessed and agreed at the allocation stage.

A financial contribution towards the new all through school on KN2. has not been tested within the Viability Study, nor has delivery of the Sports Hub. The ability for this site to be delivered, let alone with a full policy-compliant affordable housing provision, has not been demonstrated.

Change suggested by respondent:

A full assessment of the site's obligations and requirements should be undertaken and this should allow for sensitivity testing for a potentially lower number of dwellings given the site's constraints.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14663

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Support the principle of the KN2 allocation but have significant concerns that the level of growth identified is not deliverable.

The relocation and delivery of an all through school is not listed in the IDP -it only refers to requirement for primary school places. If the new school will be part funded by developer contributions and other sources, this should be made clear as it will be key to establishing that the school and housing is deliverable. Delivery of an all through school should be assessed through the Viability Study in order to determine whether the site can be delivered at all, let alone with a policy-compliant affordable housing provision and other infrastructure requirements.

The site has a number of landowners which could affect assembly and deliverability. Lack of evidence is submitted to demonstrate availability and deliverability.

Change suggested by respondent:

A full assessment of the site's availability, obligations and requirements should be undertaken, particularly around the deliverability of the new all through school. It is likely additional sites will be needed to help fund this, and our Client's land can assist. This should be reflected in the IDP and Viability Study.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14666

Object

Foreword**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Some sites have not been considered within the SA as reasonable alternatives without explanation. In the Supplementary Consultation (2019) 'amber site' A1 was consulted upon as part of the consideration for further site options (identified in step 1 of the site selection process as 'likely allocation'). However, the Site Assessment document (site reference 345) states that the SA does not assess the site. Therefore, the SA could not have informed the overall conclusions of the Site Assessment process (which for this site concludes it is 'red' – no allocation).

At Section 7.2 the SA provides 'outline reasons' for the selection of proposed housing sites at the plan level, however the SA does not provide any outline reasons for individual sites in terms of why they have or have not been selected for allocation. This is not fully in accordance with the Strategic Environmental Assessment Regulation h) which requires an 'outline of the reasons for selecting the alternatives dealt with'.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14667

Object

Foreword**Respondent:** Heyford Developments Ltd (Dorridge Site)**Agent:** Barton Willmore**Summary:**

Five new Sports Hubs are required across the Borough to deal with replacement / new provision. The Plan is unclear on the precise location and deliverability of this mitigation, and it is unclear whether the land is available to deliver these hubs, or the cost and timing of when they will be delivered. It is implied that in some instances very special circumstances will be required at the application stage. We object to this approach. The draft SLP should clearly state what mitigation is required and how it can be delivered, with support from the evidence base – for instance transport, Green Belt, landscape, viability. It cannot be considered an afterthought.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14028

Support

Policy S01 - East of Solihull**Respondent:** Jonathan David and Simon Nicholas Hillcox**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14036

Support

Challenges**Respondent:** Jonathan David and Simon Nicholas Hillcox**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14045

Support

Policy S01 - East of Solihull**Respondent:** Jonathan David and Simon Nicholas Hillcox**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10598

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Mrs Kate Hillman**Summary:**

I fully support the objections submitted by the Hampton In Arden PC and Catherine-De-Barnes Residents Association. To add, I don't feel there's been community involvement for this policy. Whilst I've been able to make a submission regarding the Care Home proposal on this site, I've not been able to comment about a housing proposal or removing this land from the green belt. This plot is the gateway to Catherine-De- Barnes and as such should be protected. It's been noted in the past that this plot is unsuitable for family housing and nothing has changed since that date, particularly regarding schools.

Change suggested by respondent:

No development of any kind should be proposed for the current green belt, there is an area of brown field site which could accommodate part development, but family housing would continue to be unsuitable due to the lack of facilities. More information should be provided regarding volumes and management of traffic through the village, particularly regarding the narrow canal bridge and blind spot on the Hampton side of the bridge. More information should be given about how the village could sustain such an influx of people. And there should be a proper community engagement.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10599

Object

Policy S01 - East of Solihull**Respondent:** Mrs Kate Hillman**Summary:**

I fully support the objections submitted by Hampton In Arden PC and Catherine-De-Barnes Residents Association. This is an invasion into the green belt. It's hugely inappropriate to build an extra 700 houses in a village with currently only 400 homes. It's misleading in the extreme to say 'it functions as part of the urban area' when it's within the Catherine-De-Barnes boundary and Hampton In Arden parish. Putting it in the Solihull section of the plan misleads local residents. There has been no community engagement. Local roads and key services will be overwhelmed. Previous applications have been rejected on this plot.

Change suggested by respondent:

This whole policy should be removed from the plan. There has not been enough consideration given to the impact on the local road network (Lugtrout Lane is a small country lane), volumes of traffic within the village and congestion on the main incoming roads. The local infrastructure will also be unable to cope with the influx of that many families. There's not enough capacity at local schools or medical facilities. Previous individual applications on this plot have been rejected in the past due to the green belt considerations and past housing proposals have also been rejected and not included in local plans. This proposal directly contradicts various comments in the plan about the special character of the villages and in particular a point raised in paragraph 632, 'The parish area of Hampton in Arden will require protection from excessive development that may impact upon the character and attractiveness of the village'.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10637

Object

Policy BL1 - West of Dickens Heath**Respondent:** Ms Sally Hill**Summary:**

Object to building of 350 houses in Dickens Heath. Land is high grade Green Belt. Government policy is to protect Green Belt and develop Brownfield first.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14532

Object

Policy BL1 - West of Dickens Heath**Respondent:** The Rev Anne Hinks**Summary:**

Objects to Policy BL1:

Flooding issues currently, building will only exacerbate issues - Traffic problems/Lack of room for new roads/lack of parking in the village - Air pollution from increased traffic - lack of public footpaths/ fast traffic on rural roads - Need for green space being overlooked by need for housing - football/rugby grounds should not be lost - suggested housing numbers are excessive

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14254

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Historic England- West Midlands Region**Summary:**

Detailed wording of policy requires some amendments.

Concept Masterplan

It is unclear what is meant by 'zone of significance on the setting of the listed building' in terms of assessing impact on heritage assets or setting.

Use of English Heritage (or Historic England) logo inappropriate.

Listed building gradings should be roman numerals

2019 Heritage Impact Assessment refers to 'significant' harm, but unclear whether this amounts to 'substantial' harm.

Noted that area to south not taken forward.

Change suggested by respondent:

Amend wording of

2 i Conservation or enhancement of heritage assets and their setting;

2 ii Insert 'grade II*' before Berkswell Windmill

2019 Heritage Impact Assessment & Concept Masterplan - further discussions required before EIP to establish whether the concept plan and Policy BC3 could be tightened up further in respect of impact on the GII* Berkswell Windmill and its setting.

LPA will need to be satisfied that the functionality of this heritage asset would not be affected through the proposed development.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14255

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Historic England- West Midlands Region**Summary:**

Wording in Policy KN1 requires alteration in line with NPPF requirements for harm (this may be duplication however if text for Policy P16 is revised)

Concept Masterplan

It is unclear what is meant by 'zone of significance on the setting of the listed building' in terms of assessing impact on heritage assets or setting.

Use of English Heritage (or Historic England) logo inappropriate.

Listed building gradings should be roman numerals

Change suggested by respondent:

2019 Heritage Impact Assessment & Concept Masterplan - further discussions required before EIP to establish whether the concept plan and Policy KN1 could be tightened up further in respect of impact on the setting of the GI Grimshaw Hall.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14256

Object

Policy P5 – Provision of Land for Housing**Respondent:** Historic England- West Midlands Region**Summary:**

Policy P5: Provision of Land for Housing.

Section 1 - The Policy refers to a table setting out allocations which is one table of a number of unnumbered tables which follows the policy.

Section 6 - The setting of heritage assets is not referred to within the policy at present, as required by the NPPF.

Change suggested by respondent:

Section 1 – The tables should be provided with Figure numbers so that the allocation table can be linked with Policy P5.

Section 6 - Density criteria (iii) be revised to read '...and, heritage assets and their setting'.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14257

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Historic England- West Midlands Region**Summary:**

Policy P16 should be refined to reflect the NPPF heritage policy.

The proposed policy wording does not differentiate between harm and substantial harm as set out in the NPPF and we are of the view that this should be addressed within the policy.

Change suggested by respondent:

The policy should include the following text, or a similar alternative:

Great weight will be given to the conservation of all designated assets and their settings (and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments). Such assets should be conserved in a manner appropriate to their significance, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Development which leads to less than substantial harm to a designated heritage asset will be weighed against the public benefits of the proposal.

Development which leads to substantial harm to, or total loss of, the significance of a designated heritage asset will only be acceptable where it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or where all of the following apply:

the nature of the heritage asset prevents all reasonable uses of the site;

no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible;

and the harm or loss is outweighed by the benefit of bringing the site back into use.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14258

Object

Policy P5 – Provision of Land for Housing**Respondent:** Historic England- West Midlands Region**Summary:**

Paragraphs 242-243

Concept Masterplans

It is unclear what is meant by 'zone of significance on the setting of the listed building' in terms of assessing impact on heritage assets or setting.

Use of English Heritage (or Historic England) logo inappropriate.

Listed building gradings should be roman numerals

Change suggested by respondent:

Clarify use of 'zone of significance on the setting of the listed building' in terms of assessing impact on heritage assets or setting.

Use alternative logo.

Use roman numerals for listed building gradings.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

14011

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Phillip Hitchmough**Summary:**

> Development of a new school is the most practical way forward, and will help to breathe economic life into the village of Knowle, its businesses and its communities.

Change suggested by respondent:

None

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments:

13845

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sophia Hobbins**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10847

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Hockley Heath Parish Council**Summary:**

Limited infrastructure in Hockley Heath, The Parish Council raises the following:

- Bus service to Birmingham is on Sunday/bank holidays only.
- Nearest train service, Doctor's surgery and pharmacy is 2.5 miles away, via an hourly bus service.
- No Post Office.
- Primary school concerns regarding over subscription.
- Catchment secondary school located 5 miles away.
- Large volumes and speed of traffic on School Road and A3400 - SMBC not undertaken a localised traffic impact assessment.
- Site HH1 suffers from flooding.
- Other rural areas identified for limited expansion have more facilities (i.e. Doctor's).
- Pressure on Hockley Heath from Warwick and Stratford upon Avon developments.

Change suggested by respondent:

Before demonstrating that exceptional circumstances exist to remove land from the greenbelt, SMBC needs to exhaust all Brownfield land use. Within Solihull, there remains a small number of brownfield sites that have not been taken forward for development due to isolation and infrastructure, but solutions need to be identified to overcome these and include them in the Plan before releasing undeveloped greenbelt.

Attention should also be given in the Plan to the exact location of medical services for residents in the proposed developments. Hockley Heath is located the furthest distance from any GP medical facilities than other rural areas in the Plan identified for expansion, all other proposed areas for development are within easy reach of Dr surgeries.

The Plan should also clearly state in detail the infrastructure available within the area. Hockley Heath does not have a bus service to Birmingham Monday - Saturday. The local bus service from Hockley Heath to neighbouring areas with a larger range of services is hourly. Development should take place in areas with a wider range of services and improved/frequent public transport links as opposed to more rural settlements with limited facilities/transport.

The Plan should detail the impact of the motorway network upon areas proposed for development. Hockley Heath is surrounded by both the M42 and the M40 and the village becomes heavily congested when issues on the motorway network arise. The village is also a designated diversion route for the motorway.

The Plan should provide details of improvements required along the canal network where developments are proposed adjacent to canals. Site HH1 would place additional pressure on the canal bridges, one of which needs repairing and would be likely to see an increase in vehicle traffic. Towpath improvements should also be detailed in the plan for developments that are likely to see an increase in towpath use due to their proximity to canals.

Due to a lack of services and infrastructure in Hockley Heath, and the flooding issues experienced in the village, site HH1 should not feature in the Plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

13873

Object

Spatial Strategy**Respondent:** Councillor A Hodgson**Summary:**

- Distribution of proposed housing is biased towards two geographic areas, resulting in 31% of total being proposed in Balsall Common area of Meriden Ward, and 39% within Shirley South/Blythe Ward Areas (if previous Site 11 included). Majority of land involved is within the Green Belt.
- Local Plan does not conform with NPPF as brownfield sites should be considered before Green Belt. Land at Arden Cross and Solihull Town Centre should be considered ahead of Green Belt land.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13874

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor A Hodgson**Summary:**

- No numbers are provided within the Draft Submission Plan on the proposed housing provision in Solihull Town Centre, Arden Cross and the National Exhibition Centre. This is a significant omission. These sites could take significant pressure off the Green Belt areas proposed for growth.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13875

Object

Blythe**Respondent:** Councillor A Hodgson**Summary:****Key Infrastructure Requirements:**

- Dickens Heath primary school is a single form entry with no scope for expansion. Both Cheswick Green and Tidbury Green Primary Schools are in the process of being extended to two-form entry. A further two-form entry is proposed at Site BL2.
- Increased number of houses will generate significant traffic level increase in the surrounding area, that are already busy roads with some effectively being country lanes.
- Will also increase already high traffic pollution during school drop off and pick up periods. This will affect the Council's developing Net Zero Carbon Plan.
- Congestion is already a problem at Dickens Heath and Cheswick Green schools as there is no off-road parking provision there.
- Local Plan proposals in current form will add to significant pressures on local health service provision. No documented proposals to enhance health service to support increase in population.
- Concern about flood risk and run off from sites affecting the River Cole to north, and potentially Nethercote Gardens and River Blythe to south, e.g. Cheswick Green village. Area been affected by two 1:100 year flood events within last 15 years.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13878

Object

Blythe**Respondent:** Councillor A Hodgson**Summary:**

Suitability of Blythe Area for Housing:

- Distribution of proposed housing is biased towards two geographic areas, resulting in 39% within Shirley South/Blythe Ward Areas (if previous Site 11 included). Majority of land involved is within the Green Belt.
- Proposals will cause merging of existing settlements in Blythe Ward.
- Roads in Blythe ward are all very busy and not conducive to cycling and walking.
- Local bus services are infrequent and follow circuitous routes, not conducive to encouraging large numbers of users.
- Due to above there is high car dependency and proposed developments will only worsen situation and increase levels of pollution.
- Would not accord with climate change agenda.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13879

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Councillor A Hodgson**Summary:**

There is no defensible boundary identified between site BL2 and Cheswick Green village.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13880**Object**

Foreword

Respondent: Councillor A Hodgson

Summary:

My final concern is that there are mainly inaccuracies within the issued Local Plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13881**Object**

Balsall Common

Respondent: Councillor A Hodgson

Summary:

Distribution of proposed housing is biased towards two geographic areas, resulting in 31% of total being proposed in Balsall Common area of Meriden Ward.
Majority of land involved is within the Green Belt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14582

Object

Blythe**Respondent:** Jo Hodgson**Summary:**

Objects to Policy BL1/2/3

Housing distribution not evenly spread - Loss of greenbelt/brownfield sites not being utilised - sites will increase the flood risk - gap between Shirley and Dickens Heath/Cheswick Green being narrowed - distinct separation between the built-up area of Shirley and the Green Belt should be maintained - impact on primary healthcare services - inadequate time for public consultation (disproportionate amount of supporting evidence was uploaded in October) - loss of recreation space - unsustainable from a transportation point of view - traffic congestion/ increase in pollution - allocating so many Green Belt sites will not in accordance with policies.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15184

Object

Policy BL1 - West of Dickens Heath**Respondent:** Jo Hodgson**Summary:**

Objects to Policy BL1/2/3

Housing distribution not evenly spread - Loss of greenbelt/brownfield sites not being utilised - sites will increase the flood risk - gap between Shirley and Dickens Heath/Cheswick Green being narrowed - distinct separation between the built-up area of Shirley and the Green Belt should be maintained - impact on primary healthcare services - inadequate time for public consultation (disproportionate amount of supporting evidence was uploaded in October) - loss of recreation space - unsustainable from a transportation point of view - traffic congestion/ increase in pollution - allocating so many Green Belt sites will not in accordance with policies.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15185

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Jo Hodgson**Summary:**

Objects to Policy BL1/2/3

Housing distribution not evenly spread - Loss of greenbelt/brownfield sites not being utilised - sites will increase the flood risk - gap between Shirley and Dickens Heath/Cheswick Green being narrowed - distinct separation between the built-up area of Shirley and the Green Belt should be maintained - impact on primary healthcare services - inadequate time for public consultation (disproportionate amount of supporting evidence was uploaded in October) - loss of recreation space - unsustainable from a transportation point of view - traffic congestion/ increase in pollution - allocating so many Green Belt sites will not in accordance with policies.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15186

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Jo Hodgson**Summary:**

Objects to Policy BL1/2/3

Housing distribution not evenly spread - Loss of greenbelt/brownfield sites not being utilised - sites will increase the flood risk - gap between Shirley and Dickens Heath/Cheswick Green being narrowed - distinct separation between the built-up area of Shirley and the Green Belt should be maintained - impact on primary healthcare services - inadequate time for public consultation (disproportionate amount of supporting evidence was uploaded in October) - loss of recreation space - unsustainable from a transportation point of view - traffic congestion/ increase in pollution - allocating so many Green Belt sites will not in accordance with policies.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13888

Object

Spatial Strategy**Respondent:** Councillor T Hodgson**Summary:**

- Housing growth not fairly distributed across the Borough
- 31% in Balsall Common and 39% in Blythe (inc. Site 11 from previous proposals)
- Other areas such as Dorridge will not meet their housing need.

Change suggested by respondent:

- Imbalance of housing distribution should be addressed by modification in the Local Plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13889

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor T Hodgson**Summary:**

- The loss of Green Belt is too great considering that brownfield sites at Solihull Town Centre and Arden Cross (HS2 Interchange) are being under-utilised for housing and masterplans for both locations are not included in the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13890

Object

Blythe**Respondent:** Councillor T Hodgson**Summary:**

Green Belt boundaries and coalescence:

Quantum of development in Shirley/Blythe area will result in narrowing of gap between Shirley and Dickens Heath and Cheswick Green.

Significant community concern that remaining narrow gaps will be filled in leading to urban sprawl.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

13891

Object

Policy BL1 - West of Dickens Heath**Respondent:** Councillor T Hodgson**Summary:**

Object to proposals on grounds of:

- Flood Risk
- Disproportionate level of housing in Blythe ward
- Lack of detail in plan on how it will cater for increased demand on primary care services
- Erosion of Green Belt
- Coalescence between settlements
- Increase to existing traffic congestion
- Increase to pollution

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

13892

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Councillor T Hodgson**Summary:**

Object to proposals on grounds of:

- Flood Risk
- Disproportionate level of housing in Blythe ward
- Lack of detail in plan on how it will cater for increased demand on primary care services
- Erosion of Green Belt
- Coalescence between settlements
- Increase to existing traffic congestion
- Increase to pollution

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13893

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Councillor T Hodgson**Summary:**

Object to proposals on grounds of:

- Flood Risk
- Disproportionate level of housing in Blythe ward
- Lack of detail in plan on how it will cater for increased demand on primary care services
- Erosion of Green Belt
- Coalescence between settlements
- Increase to existing traffic congestion
- Increase to pollution
- Concerned at proposal to form a new Green Belt boundary by introducing a new road. Dog Kennel Lane provides a well-established and distinct separation between the built-up area of Shirley and the Green Belt, and this should be maintained.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13934

Object

Blythe**Respondent:** Councillor T Hodgson**Summary:****Infrastructure Issues:**

Flood Risk - lack of evidence to support that sites BL1, BL2 & BL3 do not pose a significant flood risk. These sites feed into the Rivers Blythe and Cole catchments. In past 15 years this area has had multiple 1:100 year flood events.

Climate change will increase risk, and impact of 1,600 homes cannot be underestimated.

Health services - Current facilities are struggling to cope with housing numbers, proliferation of care homes and homes for older people, and system fallen over during Covid-19 pandemic. No planned care in Local Plan for this area.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13935

Object

Foreword**Respondent:** Councillor T Hodgson**Summary:****Consultation process:**

- Plan rushed through

- Inadequate timescale for public consultation, especially in view of the Covid-19 pandemic, e.g. Traditional outreach methods, like public meetings, not possible.

- Opposition councillors unanimously backed extensions to consultation, but all requests at Full Council on 08.10.20 and 06.12.20 denied.

- Residents reported numerous difficulties in accessing online forms, many been excluded from consultation, in particular the digitally excluded.

- Documents in support of Plan were uploaded after 30th October, some alterations in final week of consultation, should have extended timescales to accommodate this.

- Disproportionate number of documents were uploaded in October, thereby a limited window to review documents.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13939

Object

Spatial Strategy**Respondent:** Councillor T Hodgson**Summary:**

Green Belt

- Section 11 of NPPF states that strategic policies should prioritise brownfield land
- Vast majority of land put forward for allocation is in the Green Belt
- Flawed approach as Green Belt least sustainable location, resulting in high car dependency with poor active travel links and public transport
- Will worsen traffic congestion and air pollution, which are already poor in Shirley/Blythe
- Sites will not accord with policies P7 and P8
- Plan contradicts FAQs which states that sites will be in sustainable locations with good transport links
- Green Belt land important for CO2 sequestration
- Priority should be given to verticalisation in urban areas
- Plan will result in thousands of acres of Green Belt land being lost unnecessarily, whilst housing needs of many parts of the Borough will not be met.

Change suggested by respondent:

Housing sites should be modified.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13943

Object

Providing Homes for All**Respondent:** Councillor T Hodgson**Summary:**

Housing need:

- Recognise that Solihull, as rest of country, is facing a housing crisis
- Troubled by position of young people being able to access affordable homes
- Council has recently encouraged older persons accommodation, now a surplus for over 55s in Shirley, while younger people struggle to be housed.

Change suggested by respondent:

Need stronger policy in the plan on addressing affordable homes for our younger residents.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13945

Object

Foreword**Respondent:** Councillor T Hodgson**Summary:****Conclusion:**

- Like all Opposition Councillors, I voted against this plan when it came to the Full Council meeting on 6 October 2020.
- Consider Plan does not meet the needs of the whole Borough
- Plan sacrifices Green Belt, which could be avoided
- Disproportionate housing numbers in Shirley/Blythe and Balsall Common area; insufficient homes elsewhere
- Inadequate infrastructure to support growth
- Objections raised by residents, opposition Councillors, Parish Councillors and other third parties ignored
- Consultation not inclusive.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11216

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

Policy P4C does not provide flexibility and therefore is not effective in line with paragraph 35 of the National Planning Policy Framework. The mix of housing should be considered at application stage on a site by site basis. Not all sites will be able to meet an overly prescribed housing mix requirement because of size, type of proposed development, site specific circumstances and viability.

Change suggested by respondent:

Indicative housing mix ranges should be included in Policy P4C in accordance with the HEDNA. The explanatory text should note that developers should be 'encouraged' not required to accord with the housing mix ranges and recognise that the mix should be agreed on a site by site basis.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11217

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

We do not support Policy P4D and the requirement of allocated sites of 100 dwellings or more to contribute 5% of open market dwellings in the form of self and custom build plots. National guidance does not require allocated sites to contribute land for self and custom build plots (Planning Practice Guidance (PPG) Reference ID: 57-025-201760728).

The Council's 'Self Build and Custom Housebuilding Register' provides an indication of the level of interest, but further analysis is required on the specific requirements of respondents. There is no robust evidence provided as to how the threshold of 100 dwellings was calculated nor the provision of 5%.

Change suggested by respondent:

The self and custom build requirement should be removed from the Local Plan. The Council should only encourage landowners to provide these plots where appropriate.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11218

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

Policy P4E must be supported by robust evidence. The PPG sets out the evidence necessary to justifying a policy requirement for optional standards. There is no evidence on the accessibility and adaptability of the existing housing stock which could be adapted to meet the needs of the older population.

Point 5 of Policy P4E fails to take into account site specific factors such as vulnerability to flooding, site topography and other circumstances.

Sufficient evidence has not been provided to justify the requirement that developments of 300+ dwellings provide specialist housing or care bed spaces.

Change suggested by respondent:

All new homes should be built to Building Regulation Part M Category 1 standards. The requirement for all dwellings to be built to Category M4(2) standards should be removed and any proposed requirement should be based on an appropriate assessment of need.

Point 5 of Policy P4E should be amended to state "Site specific factors which may make step-free access unsuitable or unviable".

The requirement for 300+ dwellings to deliver specialist housing or care bedspaces should be removed. Specific sites for specialist and senior living should be allocated to deliver this specialist provision.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11220

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

The housing requirement is not 'aspirational'. The Council should state that the housing requirement figure of 15,017 is a 'minimum' requirement.

Change suggested by respondent:

Policy P5 should clearly state that the housing requirement figure is a 'minimum'.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11221

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

The housing requirement figure to be increased-

- The Government's revised standard methodology results in the minimum housing need figure for Solihull increasing by 25% (1,011 dwellings per annum).
- A Statement of Common Ground should be prepared to demonstrate compliance with the Duty to Co-operate. No evidence has been provided to justify how the 2,105 dwelling contribution towards the HMA shortfall was calculated. There will be a significant HMA shortfall post-2031 which should be addressed not deferred.
- The expected housing delivery for UK Central is not justified or supported by evidence. Due to the amount of development proposed, we consider that the majority of dwellings delivered will be apartments. No evidence has been provided to demonstrate apartments are needed.

Change suggested by respondent:

Additional sites should be allocated in the plan in light of the revised Standard Methodology calculation, the identified HMA shortfall up to 2036 and the unrealistic expectations for the UK Central Site.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11222

Object

Blythe**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

The Council will need to identify additional sites to meet the increased housing need. Land at Winterton Farm, Blythe Valley offers an opportunity for the future expansion of Blythe Valley Park. There is potential to create a footpath link through the site between Blythe Valley Park development and Cheswick Green to link settlements and improve accessibility.

The site has not been assessed within the Council's updated Site Assessment (October 2020). It is considered that the constraints identified in the Council's previous Site Assessment (January 2019) can be overcome. The site is located within a moderately performing Green Belt parcel, is highly accessible and was assessed as having 9 positive, 3 neutral and 5 negative effects in the Sustainability Assessment.

Change suggested by respondent:

Land at Winterton Farm, Blythe Valley (SHELAA reference 173) should be considered for a residential allocation.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11223

Object

Policy P17 Countryside and Green Belt**Respondent:** Mr Mark Hogan**Agent:** Savills**Summary:**

A significant HMA housing shortfall is expected from 2031 so it's likely additional dwellings in Solihull will be required. The Council has not sought to safeguard any land for development as part of the Local Plan Review. There are limited brownfield opportunities available in the Borough therefore the Council should be seeking to release Green Belt land.

Change suggested by respondent:

The Council should identify areas of land that could be released from the Green Belt in this Local Plan Review and safeguarded for future development. Land at Winterton Farm, Blythe Valley should be considered for allocation or be safeguarded for future development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10678

Object

Blythe**Respondent:** Mr Stuart Holder**Summary:**

The proposed development of Blythe is totally disproportionate to the Borough as a whole. The area is already under tremendous strain in terms of traffic congestion, education and medical facilities and cannot be expected to shoulder the burden of another 1000 homes and families. Our precious green belt is continually being eroded by developers and I do feel that it would be only a matter of time before the the 'adequate separation' as referred to (para 587) merges into one. I have no confidence in this proposal whatsoever.

Change suggested by respondent:

A more equitable development of the Borough prioritising sites other than those in Green Belt. The term is fast becoming a joke, it would be funny if it were not so serious.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

11260

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mrs Fiona Holland**Summary:**

Significant issues relating to the environment have been raised; wildlife (woodland bird) otters, fauna and flooding are major constraints as evidenced in the Solihull Metropolitan Borough Council Additional Site Options Ecological Assessment dated December 2019. So too is the high biodiversity value and rarity of ancient semi natural woodland represented "upmost importance " to retain these is documented within the report.

2. Historical Landscape Character; Hockley Heath is a very small village. The proposal is not conducive to the needs of the village and the existing shortcomings that already exist - basic services are not currently provided - Doctors surgery, post office, just one grocery shop etc. and the recent large scale builds of shared ownership and social housing at Blythe Valley have already impacted traffic/road usage/pollution.

3. The village already has very recent housing developments and social housing to accommodate the residents.

4. The infrastructure required is not in any way proportionate to the development of 90 dwellings the plan could provide in a more established environment

Change suggested by respondent:

The plan should not include the land in Hockley Heath at this time where other more established areas/ sites have been identified within the plan for the reasons outlined above "Hockley will required protection" and the reasons clearly highlighted within section 662-667. The plan clearly identifies the need for the village to be protected from excessive development and whilst the proposal of 90 dwellings in isolation appears proportionate in order to maintain the character and so forth, the items identified in order to provide the necessary infrastructure needed viable are not proportionate and do not consider the natural environment; the traffic adjustments as a key example. The plan should remove Hockley Heath from its proposals.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14071

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Bus Action Partnership (KDBH)**Summary:**

- Para. 685 - Object to assertion that area is well served by public transport.
- Dorridge train service not convenient for Knowle residents, given station parking issues.
 - Night time return services from Birmingham to Dorridge are poor. See Solihull Connected's references to Community Liveability Programme.
 - Currently no bus service along Hampton Road.
 - KDBH already has high car ownership, imperative that bus service is improved to enable Sites KN1 and KN2.

Change suggested by respondent:

Paragraph 685 should be amended to reflect true transport provision in KDBH. This would accord with 'Justification' criteria in Para's 268, 271 & 276.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14076

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Bus Action Partnership (KDBH)**Summary:**

Para. 690 – Object – Area is not well served by public transport. Infrequent, unreliable, unpunctual bus service.

Change suggested by respondent:

Suggest amendment to wording:

"The area is not well served by the bus network and in accordance with Objective 5 of the Council's evidence based "Solihull Connected" we will work with the local community and Council Partners to facilitate an improved and sustainable bus service."

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14077

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Bus Action Partnership (KDBH)**Summary:**

Para. 696 – Object – Improvement required immediately to bus services. Recent survey by Bus Action Partnership showed dissatisfaction with frequency, reliability and punctuality of services.

N.B. See Para. 253 of Plan - KDBH has 10% of Borough's population, but transport operators claim it is difficult to achieve sustainable modes of transport as area is categorised as rural.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14078

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Bus Action Partnership (KDBH)**Summary:**

Policy P7 2ii - Standard would not apply to majority of Knowle, or most of sites KN1 or KN2.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14080

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Bus Action Partnership (KDBH)**Summary:**

- Plan refers to Local Walking and Cycling Implementation Plan and routes, but these are not marked on Concept Masterplans for KN1 and KN2.
- Illustrative Masterplans could show indicative safe & attractive walking and cycling routes.

Change suggested by respondent:

- Modification – Plan should reference Knowle Transport Study, and make concept masterplans compatible with evidence.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14081

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Bus Action Partnership (KDBH)**Summary:**

- Plan refers to Local Walking and Cycling Implementation Plan and routes, but these are not marked on Concept Masterplans for KN1 and KN2.
- Illustrative Masterplans could show indicative safe & attractive walking and cycling routes.

Change suggested by respondent:

- Modification – Plan should reference Knowle Transport Study, and make concept masterplans compatible with evidence.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

10619

Object

Policy P12 Resource Management**Respondent:** Mr Joe Holyoake**Summary:**

With the government initiatives towards a Zero Waste economy, I find it difficult to believe that the waste for Solihull is going to increase by 52%. This suggests that any initiatives the government has, will fail, especially in Solihull.

1. Household waste increase by 25% equates to 13,000 new households, WHERE?
2. Commercial & industrial waste increase by 44% and Construction and demolition waste by 59%. WHERE?

I can only surmise that JLR will make up the majority of this increase in waste, and if so, why was the planned expansion agreed upon without a clause to manage waste responsibility.

Change suggested by respondent:

I think the expectations for waste increases in Solihull need to be reassessed in full in line with my comments above and in line with Government initiatives to reduce waste.

The position of the waste site should also be reassessed away from existing houses in the area.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

10620

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Joe Holyoake**Summary:**

With the government initiatives towards a Zero Waste economy, I find it difficult to believe that the waste for Solihull is going to increase by 52%. This suggests that any initiatives the government has, will fail, especially in Solihull.

1. Household waste increase by 25% equates to 13,000 new households, WHERE?
2. Commercial & industrial waste increase by 44% and Construction and demolition waste by 59%. WHERE?

I can only surmise that JLR will make up the majority of this increase in waste, and if so, why was the planned expansion agreed upon without a clause to manage waste responsibility.

Change suggested by respondent:

I think the expectations for waste increases in Solihull need to be reassessed in full in line with my comments above and in line with Government initiatives to reduce waste.

The position of the waste site should also be reassessed away from existing houses in the area.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

10719

Object

Policy P12 Resource Management**Respondent:** Mrs mary holyoake**Summary:**

It seems that no consideration has been made to the impact on the residents of the area. Increase in noise, smell, rats and excessive traffic would OF COURSE happen. If we are working on reducing waste (as government policy) why make a bigger site. Effective recycling etc would have a greater impact on the environment without the need for a new tip.

Change suggested by respondent:

It is stated that around 16 acres of land would be used. The Government has committed to reducing waste and recycling more. The money allocated to the move of the tip would be better spent on finding ways to reuse waste, reducing the need for such a large area. Also, not decimating the area proposed which houses wildlife. More could be done to reduce waste (encouraging shops to not use plastic). There is already a problem with rats in the area this would get worse. It would create a problem with the sale of houses/house prices. Which would fall, creating a deficit unproductive to the area. The expansion of the A45 and JLR have already made an impact on the area, more disruption is unnecessary.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

10720

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs mary holyoake**Summary:**

Thought has not been given to the existing infrastructure. To overload an already overloaded area with more traffic, pollution (noise, light and air quality) would not make sense. The increase in JLR use of the land has already caused and will continue to cause problems for residents. The noise of the traffic, airport and JLR is disruptive and unfair. The smell of the proposed tip would make living in the area untenable.

Change suggested by respondent:

Make the tip more effective where it is. Or move it to another part of the district.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

10844

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Carolyn Honour**Summary:**

I have lived in and around Cheswick Green for 40yrs. In that time from being a relatively Rural Village, the area is being gradually encroached upon with developments. Dickens Heath was built on Green Belt Farmland and Dog Kenne Lane and surrounding farmland was earmarked in all LDP's to be kept as a buffer between the 2 Developments. First we had to accept further development at Cheswick Green and noe development in Blythe Valley, which began as a Nature Reserve! There is a now because of these developments not enough infrastructure for the proposed number of houses and people.

Change suggested by respondent:

I think the development needs re-evaluating in terms of the proposed amount of houses. There needs to be a new Primary school built either in Blythe ValleY or Hockley Heath, and most definitely new medical facilities ie. Doctors surgeries, not least because of the extra developments on the Stratford Road (A34). It would seem that land is being developed from all sides and the congestion lack of planned infrastructure is going to blight all the local communities involved.

The proposed amount of another 1000 plus houses will put too much pressure on our local communities and needs to be re-evaluated.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10618

Object

Blythe**Respondent:** Miss Daisy Hopkins**Summary:**

Affordable housing is needed - not overpriced new builds that won't benefit first time buyers. Shirley is to take on 39% of the new builds - more than its fair share and decimating the greenbelt that makes the area attractive. This is on top of the countless retirement homes already being built here over the last couple of years. Shirley is already an ageing population and extra retirement homes means that'll go up - our GPs are already stretched thin and the older our population is the worse this will become.

Change suggested by respondent:

Focus should be on regeneration of deprived areas like Chelmsley Wood. New builds should be affordable to those on a full time minimum wage. Shirley attracts people due to its proximity to greenbelt and that should be protected. Stop building massive and ugly retirement homes here - we have enough now and the doctors won't be able to cope with all the elderly.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

14280

Object

Policy BL1 - West of Dickens Heath**Respondent:** Alan Horton**Petition:** 2 petitioners**Summary:**

- > Generate more traffic issues on mainly rural routes. (i.e. Congestion and road safety concerns).
- > Loss of sport facilities (no mention of when or where they will be replaced).
- > Proposed bus rout down Birchy leasowes lane not a feasible junction as ancient woodland on either side would prevent alterations being made for safe bus turning.
- > Flooding on Tythe Barn Lane already an issue, removal of playing pitches will exacerbate issues.
- > Proposals will result in the permanent loss of local wildlife and ancient woodland adding to the problem of climate change.
- > Need to utilise Brownfield sites before using green belt land.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14282

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Alan Horton**Petition:** 2 petitioners**Summary:**

- > Traffic is already an issues and the site will exacerbate the issues caused i.e. Road safety and congestion.
- > A number of local wildlife and ancient woodland sites would be lost forever, adding to climate change problems.
- > Need to better utilise brownfield sites before using green belt land.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10981

Object

Policy S01 - East of Solihull**Respondent:** Mrs Rajinder Hothi**Summary:**

Proposal goes against the green belt and natural setting of the site and brings in more ecological issues outweighing any potential benefits. There is no outline of how the additional traffic/ pollution/ congestion/ works schedule etc. in order to minimise the safety and air quality for my family consisting of 2 adults and 3 small children.

Represents inappropriate development which is harmful to the Green Belt and fails to preserve the openness of the land.

No due consideration has been represented for the natural habitat of the animals that live on this Green Belt. No ecological study representations.

Change suggested by respondent:

I would like the proposal to remove the development proposed adjacent to and behind 225 Lugtrout Lane and would also like them to re-confirm no development will take place on the football ground opposite 225 Lugtrout Lane.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14155

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Councillor Diane Howell**Summary:**

Policy BC1 Criteria 2vii does not prevent temporary access from Meeting House Lane which is narrow with no pavement. Meeting House Lane would not be appropriate as a temporary access point prior to the relief road being constructed.

Change suggested by respondent:

Policy BC1 Criteria 2vii should be amended to state 'temporary and permanent access from a limited number of access points from the Relief Road'.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14156

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Councillor Diane Howell**Summary:**

Policy BC1 Criteria 2vi (likely infrastructure requirements) only provides provision for half of the relief road to be built which could lead to an increase in traffic down Windmill Lane, in turn disturbing the historic setting of the Berkswell Windmill. Road users are unlikely to use an incomplete bypass which does not link with the major road network.

Change suggested by respondent:

Policy BC1 Criteria 2vi should be amended to state 'Provision of the whole length of the Balsall Common Relief Road between Station Road and the A452'.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14157

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Councillor Diane Howell**Summary:**

Policy BC2 Criteria 2i does not state how the rural character of Frog Lane will be retained. The current wording does not provide explicit protection and would allow for a variety of interpretations.

Change suggested by respondent:

Policy BC2 Criteria 2i should be amended to state 'retention of the rural character of Frog Lane by preserving the hedgerow boundaries and key ecological features; No vehicular access to the site from Frog Lane'.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14158

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Councillor Diane Howell**Summary:**

The Concept Masterplan references 3 future access points from Wootton Green Lane to BC5. This would likely lead to overuse. Wootton Green Lane is rural with many mature trees and hedgerows. Most of the lane is too narrow to allow 2 cars to pass.

The concept masterplan also does not consider the new roundabout by Park Lane currently being built by HS2.

Change suggested by respondent:

Amendment to the concept masterplan to accurately reflect the future road layout including the new Park Lane roundabout. Provision of all access points from the Kenilworth Road to protect the rural character of Wootton Green Lane and to protect the lane from being overwhelmed by traffic.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14828

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs J A Howles**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14837

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Roger Howles**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14827

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr S C Howles**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10621

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs R Hubble**Summary:**

2015-CHESWICK GREEN HAD 1000 HOUSES, NOW - 2000.INCREASING TO 3000 WITH BLYTHE VALLEY. NEW PLAN INCREASES IT TO 4000+. DISPROPORTIONATE INCREASE TO THE REST OF THE BOROUGH. EXTRA STRAIN ON NHS, IMPACTING ON AVAILABILITY OF HOSPITAL AND DOCTOR APPOINTMENTS. FLOODING ISSUE HAS NOT BEEN RESOLVED.THERE WILL BE AN IMPACT ON INCREASED ROAD USEAGE AND LOCAL EMPLOYMENT.GREEN BELT SHOULD BE DEFINED BY ****EXISTING**** BOUNDARIES. THIS PLAN CREATES A ***NEW*** ROAD WHICH IS NOT IN THE SPIRIT OF NATIONAL PLANNING POLICY.DOG KENNEL LANE IS THE BOUNDRY. IF THAT IS LOST IT IS LIKELY THAT VERY LITTLE GREEN SPACE WILL REMAIN.

Change suggested by respondent:

REDUCING HOUSING QUOTA
 RETAIN THE NATURAL BOUNDARY TO PRESERVE GREEN BELT AT DOG KENNEL LANE
 ADDRESS INCREASE IN TRANSPORT ,
 ADDRESS IMPACT ON EDUCATION RESOURCES
 ADDRESS IMPACT ON ACCESSIBLITY AND PRESSURE FOR GP AND HOSPITAL HEALTH APPOINTMENTS
 ADDRESS IMPACT ON LACK OF LOCAL EMPLOYMENT
 ADDRESS IMPACT ON FLOODING ISSUES THAT ARE ALREADY A LOCAL ISSUES DO TO DISPROPORTIONATE INCREASE IN DWELLINGS IN THIS LOCL AREA

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10951

Object

Policy S01 - East of Solihull**Respondent:** Mr Gerald Hudson**Summary:**

The construction of 700 dwellings would completely overwhelm the local infrastructure. Particularly the local roads, which are already congested with JLR traffic and will soon become even more so with the opening of the new JLR logistics centre. Such a development will ruin the feel of the nearby village of Catherine de Barnes. The construction of this site will bring severe noise, pollution and disruption to residents of the Damson Parkway estate.

Change suggested by respondent:

The plan should be abandoned and other locations chosen, preferably those that are already established residential areas with supporting infrastructure that would not be overwhelmed by such a large development.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10956

Object

Policy UK2 - Land at Damson Parkway

Respondent: Mr Gerald Hudson

Summary:

The construction and operation of a waste disposal and recycling facility in the proposed location of Damson Parkway would bring severe levels of noise, pollution and disruption to the residents of the Damson Parkway estate. The siting of such a facility so close to a residential area will have a great impact on the levels of harmful emissions, both from the plant itself and the vehicles accessing it. This facility will have a detrimental impact on the quality of life and on the mental health of those living nearby and bring dangerous levels of vehicle traffic.

Change suggested by respondent:

The plan to locate the waste facility at this location should be abandoned and an alternative location chosen. The chosen location should be in an existing industrial setting and not one that is near to a residential area.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14352

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes

Respondent: Mr Gerald Hudson

Summary:

The number and size of the proposed housing developments, particularly those proposed for sites in Catherine De Barnes and Lug-Trout Lane. Some 795 new homes in what have always been quiet rural or semi-rural locations and will completely dominate those locations.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14353

Object

Policy S01 - East of Solihull**Respondent:** Mr Gerald Hudson**Summary:**

The number and size of the proposed housing developments, particularly those proposed for sites in Catherine De Barnes and Lug-Trout Lane. Some 795 new homes in what have always been quiet rural or semi-rural locations and will completely dominate those locations.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14354

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gerald Hudson**Summary:**

This proposal is problematic for the following reasons:

- the environmental impact, noise and disruption in the construction of such a site. No doubt this will be a significant development with many months of major construction works.
- the destruction of yet more valuable green belt land, which is in short supply and which the council claims to hold so sacred!
- the noise and pollution that this site will bring when it becomes operational, particularly from heavy vehicles entering and leaving the site
- the traffic chaos that will be caused by traffic using the site having to compete for limited road space with JLR factory traffic and that from the soon to be opened JLR logistics centre. Traffic chaos already exists at JLR shift changeover times and on match days for the Solihull Moors Football Club.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14863

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gerald Hudson**Summary:**

The proposed relocation of the Bickenhill Waste disposal site to the corner of Damson Parkway and the A45 Coventry Rd.
 This proposal is problematic.
 The environmental impact, noise and disruption.
 The destruction of yet more valuable green belt land.
 The noise and pollution.
 The traffic chaos.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14559

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Andrew Hughes**Summary:**

Objects to Policy BL1;
 Analysis of available brownfield sites around Solihull town centre needs to be completed before green belt sites are released - impact on local wildlife/ancient woodland - unachievable mitigation efforts make site unsustainable - relocation of sports fields is flawed/unpractical - character/identity of the village will be adversely affected - traffic and parking in the village is already an issue - new development not within walking distance of the village making it unsustainable - increased car ownership will lead to further pollution - Further development will increase flooding for surrounding area

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11064

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Christine Hughes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14858

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Melanie Hughes**Summary:**

Objects to Policy BC4;

new development cause overlooking - effect on mental health and wellbeing - worsen issues with flooding - increased traffic - not in keeping with existing rural character - infrastructure/services not place to deal with new developments - development BC4 closing the gap between Coventry - Brownfield sites not being prioritised - destruction of local wildlife/habitat - use of infill sites should be prioritised - improvements to public transport - provision of leisure facilities/activities - provisions of better green space/green buffers

Change suggested by respondent:

Removed from Final Local Plan/Draft Submission Plan

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13810

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sheri Hughes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13849

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Terry Hughes**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14367

Object

Policy BL1 - West of Dickens Heath**Respondent:** Terry & Tracey Hughes**Summary:**

> Grave concerns over the size of area and excessive loss of greenbelt regarding site 12((BL2) and site 4 (BL1).

> Objects due to excessive housing numbers for sites 12 BL2 and sites 4 BL1 which if go ahead will cause serious overcrowding and local infrastructure problems for the south Shirley area and will increase pollution and a great loss of environmental wildlife. Added to this we are too close to the border draft plans of Bromsgrove and Worcester who are also planning large scale allocations near the area proposed.

Change suggested by respondent:

My personal recommendation after consultation with the CPRE is that you would consider to halve the proposed housing numbers for both sites BL1 site 4 and site BL2 site 12. which would preserve some much needed space and green belt. and the excess housing numbers should be re considered for the area east of the borough near the HS2 interchange which would benefit from cutting excessive commuting across the borough and pollution.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14368

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Terry & Tracey Hughes**Summary:**

- > Grave concerns over the size of area and excessive loss of greenbelt regarding site 12((BL2) and site 4 (BL1).
- > Objects due to excessive housing numbers for sites 12 BL2 and sites 4 BL1 which if go ahead will cause serious overcrowding and local infrastructure problems for the south Shirley area and will increase pollution and a great loss of environmental wildlife. Added to this we are too close to the border draft plans of Bromsgrove and Worcester who are also planning large scale allocations near the area proposed.

Change suggested by respondent:

My personal recommendation after consultation with the CPRE is that you would consider to halve the proposed housing numbers for both sites BL1 site 4 and site BL2 site 12. which would preserve some much needed space and green belt. and the excess housing numbers should be re considered for the area east of the borough near the HS2 interchange which would benefit from cutting excessive commuting across the borough and pollution.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14426

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Tracy Hughes**Summary:**

- Objects to BL2;
- Insufficient infrastructure to support new homes (Roads/Doctors/Schools) - Increased Pollution - more elderly housing not required - Cheswick Green and Dickens Heath being slowly merged together.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14428

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mrs Tracy Hughes**Summary:**

Objects to BL3;

Insufficient infrastructure to support new homes (Roads/Doctors/Schools) - Increased Pollution - more elderly housing not required - Cheswick Green and Dickens Heath being slowly merged together.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14508

Support

Foreword**Respondent:** Mrs Beryl Hukin**Summary:**

Is happy with the details.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

14545

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Adam Hunter**Summary:**

The land is high grade green belt.
 The development will be detrimental to wildlife.
 The narrow rural road network cannot take further development or traffic
 With increased development the removal of trees I am concerned that flooding will increase.
 The proposal will reduce access to activities that keep people fit physically and mentally
 Many of the mitigation measures included in the plan are not achievable
 The character will be adversely affected

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14562

Object

Policy BL1 - West of Dickens Heath**Respondent:** Alex Hunter**Summary:**

The land is high grade green belt.
 The development will be detrimental to wildlife.
 The narrow rural road network cannot take further development.
 Concerned that flooding will increase.
 Reduces access to activities that keep people fit physically and mentally.
 The mitigation measures included in the plan are not achievable
 The character and setting of the village will be adversely affected.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14567

Object

Policy BL1 - West of Dickens Heath**Respondent:** Fiona Hunter**Summary:**

The land is high grade green belt.

The development will be detrimental to wildlife.

The narrow rural road network cannot take further development.

These fields flood every winter.

Developing on these fields will reduce the access to activities that keep people fit physically and mentally.

Mitigation measures included in the plan are not achievable.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14569

Object

Policy BL1 - West of Dickens Heath**Respondent:** Kate Hunter**Summary:**

The land is high grade green belt.

The development will be detrimental to wildlife.

The narrow rural road network cannot take further development.

Concerned that flooding will increase.

Reduces access to activities that keep people fit physically and mentally.

The mitigation measures included in the plan are not achievable

The character and setting of the village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14091

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Michael Hunter**Agent:** Marrons Planning**Summary:**

- Draft allocation would remove area of higher performing Green Belt (RP71)
- Erode separation between Dickens Heath and Whitlock's End, and reduce separation between Dickens Heath with Major's Green & Trueman's Heath.
- Impact on landscape area that is particularly sensitive to change
- Better alternatives, in lower performing Green Belt areas, are available
- Plan is unable to mitigate the significant loss of sports pitches, lack of certainty on re-provision, contrary to NPPF
- Site relates poorly to Dickens Heath, and eastern boundary constraints mean it will be difficult to integrate with settlement
- Pedestrian and cycle links not appropriate through Dickens Heath
- Important that Tyburn Coppice, Ancient Woodland and LWS, is protected from development. Ecological Assessment recommends 30m buffer.
- Introducing pedestrian, cycle and public transport links along Tythe Barn Lane & Birchy Leasowes Lane will adversely impact local character, landscape and ecology.
- Allocation risks disrupting connectivity between important edge Local Wildlife Sites & adverse impact on biodiversity
- Unclear how biodiversity will be managed positively
- Policy is not effective, justified, consistent with national policy, or deliverable

Change suggested by respondent:

Site Policy BL1 - West of Dickens Heath should be removed as an allocation in the Draft Local Plan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

15168

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Michael Hunter**Agent:** Marrons Planning**Summary:**

- Would remove area of higher performing Green Belt (RP71 in Green Belt Assessment)
- Erode gap between Whitlocks End and Dickens Heath
- Draft plan should release lower performing parcels first
- Site BL1 relates poorly to existing Dickens Heath village
- Pedestrian and cycling connectivity links between site and village are constrained by LWS and ancient woodland at Tythe Barn Coppice
- Tythe Barn Lane and Birchy Leasowes Lane are narrow country lanes unsuitable for pedestrian and cycling links and public transport improvements
- Development risks severing connectivity between Local Wildlife Sites that surround BL1
- Unclear how ecological enhancement of the site will be achieved
- Impact on landscape area particularly sensitive to change
- Significant scale of development, not in-keeping with the local character and rural setting
- Unable to mitigate the significant loss of the playing pitches, and therefore not an effective contribution to the spatial strategy
- Should accord with NPPF Para. 97
- Council's search for sports hubs could result in further travel for local users; no certainty on their provision.
- Better alternative locations available.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14219

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Mr Matlub Hussain**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The Gables Hotel, located on Old Damson Lane Hotel is located within the UK Central Hub identified as an allocation within Policy P1 (UK Central Solihull Hub Area) and UK2 (Land at Damson Parkway), and proposed for removal from the Green Belt. Expansion of the hotel has previously been prevented due to its location in the Green Belt.

The opportunities arising from the UK Central Hub allocations and its removal from the Green Belt are welcomed and it is considered that the opportunities this provides would in return provide valuable support to the key objectives of both Policy P1 and UK2.

The Hotel is possibly the closest small hotel to the JLR plant and within walking or cycling distance. The Hotel does offer some travel and shared lift options. With a larger facility these more sustainable modes of travel would be more economic and affective. The Hotel supports the key economic assets by providing accommodation in close proximity, specifically in respect of JLR and their workforce, but also in providing accommodation for operational workers during the build phase and customers during the running of conferences, exhibitions and concerts, and for travellers arriving/departing from Birmingham Airport and in the future the HS2 railway interchange. The opportunity to undertake major works to the Hotel would enable a modernised design both internally and externally, creating a new sense of identity for the site and improving the overall impression along this key approach to Birmingham city centre.

Policy P1 provides support to key assets associated with the operation of Arden Cross, the NEC, Birmingham Airport, JLR and Birmingham Business Park.

It is clear that our client's Hotel is ideally placed to support these key economic assets and as an existing hotel on a key strategic approach road to the city centre. Accordingly, our client supports Policy P1 and in return would provide support to meeting its objectives.

Change suggested by respondent:

-

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

14226

Support

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Matlub Hussain**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The Gables Hotel, located on Old Damson Lane Hotel is located within the UK Central Hub identified as an allocation within Policy P1 (UK Central Solihull Hub Area) and UK2 (Land at Damson Parkway), and proposed for removal from the Green Belt. Expansion of the hotel has previously been prevented due to its location in the Green Belt.

The opportunities arising from the UK Central Hub allocations and its removal from the Green Belt are welcomed and it is considered that the opportunities this provides would in return provide valuable support to the key objectives of both Policy P1 and UK2.

The Hotel is possibly the closest small hotel to the JLR plant and within walking or cycling distance. The Hotel does offer some travel and shared lift options. With a larger facility these more sustainable modes of travel would be more economic and affective. The Hotel supports the key economic assets by providing accommodation in close proximity, specifically in respect of JLR and their workforce, but also in providing accommodation for operational workers during the build phase and customers during the running of conferences, exhibitions and concerts, and for travellers arriving/departing from Birmingham Airport and in the future the HS2 railway interchange. The opportunity to undertake major works to the Hotel would enable a modernised design both internally and externally, creating a new sense of identity for the site and improving the overall impression along this key approach to Birmingham city centre.

Sub paragraph 2 of Policy UK2 identifies that the allocated site is to be developed in accordance with Concept Masterplan, that is yet to be developed and thereby not included within the Solihull Local Plan Concept Masterplans (October 2020) that forms part of the plan-making process.

Through the concept masterplan the opportunity to provide certainty to future investment plans at the Hotel as a landowner within the allocation area is welcomed and it is requested that there is opportunity to actively contribute to its formation.

Change suggested by respondent:

None

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

10711

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Dr Victor Hu**Summary:**

I think this plan will help all parts of the community. In particular, it will help meet the educational needs of primary and secondary students in the area. The current Arden academy is in very poor repair and is very expensive to maintain, and also environmentally unfriendly. School traffic will be moved away from Station road which can get very congested.

Travel to and from school will be safer for students and staff.

The housing development plans will help provide a range and mixture of housing types, including for younger and older people.

I think the environmental considerations are good.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10690

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Christina Hyde**Summary:**

I support the plans because Arden Academy desperately needs new buildings and facilities.

Some of the older buildings are not fit for purpose.

A brand new school would be much more energy efficient and the plans also solve lots of other issues such as lack of parking at the school and traffic congestion on Station Road.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13894

Object

Knowle, Dorridge & Bentley Heath**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Site 502 should be allocated specifically as a site suitable for specialist housing for older people in need of care (over 55s), given the evidenced need in Solihull. The site is suitable, available and deliverable which will meet the housing needs of the District, both general and specialist, as well as the wider region. The landscape and area can be enhanced through good urban design and a strong landscape-led approach. It is feasible to provide a footpath from Jacobean Lane to Warwick Road, and the sustainable transport options that are available there. A concept masterplan for the site is provided.

Change suggested by respondent:

Inclusion of the site in the plan as an allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13895

Object

Introduction**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

The introduction should reference the diverse needs of the population within Paragraph 8 in order to ensure sustainable development.

Reallocation of sites in Solihull Local Plan (December 2013) without any justification as to their deliverability, is an incorrect approach.

With regard to Neighbourhood Plans, the NPPF sets out that the most recently adopted Policies will take precedence. The LPR will take precedence upon adoption.

Change suggested by respondent:

Existing allocations should be tested for deliverability prior to re-allocation.

The hierarchy of neighbourhood plans should be made clear.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13896

Object

Challenges**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Challenge B – Bullet point 6 should be split into separate points with the housing needs for older people, including the need for a range of typologies, as a separate bullet point. This is in order to not conflate two separate issues that the plan will have to address.

Challenge E - Should reference meeting other types of development beyond just meeting housing needs.

Challenge J -should reference the requirement for high quality housing and accommodation require for elderly people within its objectives.

Change suggested by respondent:

Reference to meeting the housing needs of older people should be made more explicit, and not conflated with other issues.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13897

Object

Vision**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Meeting the housing needs of older people should be expressly included within the SMBC's vision.

Given Paragraph 59 of the NPPF states that the Government's objective is to significantly boost the supply of housing, the wording relating to meeting the needs of the housing market area should be more positive.

Paragraph 50 sets out that SMBC are seeking to protect the integrity of the Green Belt. Wording should be included setting out that lower performing parcels could be released to protect higher performing parcels while meeting identified and evidenced needs.

Change suggested by respondent:

The vision should reference the need to provide housing for older people in line with the evidence base.

The vision should be more positively worded in order to significantly boost the supply of housing.

The need to release lower performing green belt to meet identified needs, and preserve higher performing parcels, should be set out.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13898

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Object to the specific housing mix requirements set out by this policy which is weighted towards smaller (3 bedroom or fewer) houses. This approach does not take into account the length of the Plan Period and that market requirements may change over this period. Further, the specific requirement does not accord with Paragraph 62 of the NPPF which seeks to create mixed and balanced communities.

As such, we consider that a more pragmatic and flexible approach is taken, utilising latest market evidence. This is the approach taking for other matters within this policy, and should be extended to the mix.

Change suggested by respondent:

Amendment of policy to allow for housing mix based on up to date market evidence.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13899

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Requiring all sites of over 100 houses to provide 5% of open market dwellings in the form of self-build plots is unreasonable and unjustified when considering data from the 2020 AMR. This is far in excess of the need shown and the Council should consider providing specific site/allocations to meet this need, in line with Paragraph 61 of the NPPF.

The provision of such plots on strategic -size housing sites is likely not what those on the register are seeking, meaning they are left empty which could delay the delivery of housing.

This policy should be deleted, and SMBC should either allocate specific provision of this need, or offer general support for this type of housing but not set specific thresholds.

Change suggested by respondent:

Deletion of specific policy requirement and replacement with specific allocations or general support for self-build sites.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13900

Object

Policy P7 Accessibility and Ease of Access**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

The requirement for major residential development should be clarified to set out that there may be other ways in which sustainable access options can be implemented. The distance to a bus stop/train station should not be seen as the only measure of sustainable access.

Change suggested by respondent:

Policy should be clarified that there are other ways of ensuring sustainable transport options are available.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13901

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within point 2(ii), SMBC are seeking to bring in a further test which would not be in accordance with the NPPF. This should therefore be deleted.

Change suggested by respondent:

Point 2(ii) should be deleted.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13902

Object

Policy P11 Water and Flood Risk Management**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

With regards to point 6, the confirmation of discharge into a public sewer falls under Section 106 of the Water Industry Act 1991. As such, it should be made clear that planning permission can be granted prior to this being confirmed, as it falls within a different regulatory regime.

With regards to point 14, it should be clarified that contribution through a Section 106 Agreement is only required where it meets the tests set out in NPPF Paragraph 56.

Change suggested by respondent:

Deletion of point relating to confirmation from relevant infrastructure owner.

Clarification as to obligation requirements and the necessary tests.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13903

Object

Policy P17 Countryside and Green Belt**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Point 1 - reference to best and most versatile agricultural land (BMVAL) within a Green Belt policy seeks to conflate two separate issues. The NPPF does not require the safeguarding of BMVAL. Planning policies are required to contribute to and enhance natural and local environment by recognising economic and other benefits from BMVAL.

Point 4 – In considering very special circumstances, a further factor should include providing for a clearly evidenced need. For specialised housing for older people, this factor was taken into account in two recent appeals.

Point 5 – Requirement goes beyond the scope of Green Belt as set out in the NPPF.

Change suggested by respondent:

Deletion of point 1.

Inclusion of further factors which may create very special circumstances.

Deletion of point 5.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13904

Object

Policy P17A Green Belt Compensation**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Given that none of the emerging masterplans show any compensatory improvements within the Green Belt, it would appear that P17A is relying on there being additional land being available within the control of applicants (which may not be the case), or the payment of contributions.

SMBC's viability evidence does not take this requirement into account, and no detail is provided as to how these contributions will be spent or what level of contribution is required. This therefore brings uncertainty, and the Policy should be reconsidered to ensure what is required is clear, and that it will not impact upon the viability of schemes.

Change suggested by respondent:

Reconsideration of the policy to ensure that it is evidenced based, does not impact upon viability of schemes, and is in accordance with national policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13905

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Point 8 requires well -designed new and improved open space and their maintenance as an integral part of new development (including care homes). It is unclear if this requirement is for public or private open space.

Whilst open space provision is included within the viability testing for residential sites this is not the case for care homes where the Section 106 buffer only includes biodiversity net gain and primary care contributions.

Given specialist housing for older people serves a specific need, and there is a requirement set out within point 12, the requirement for care homes to provide for open space should be deleted.

Given the users of specialist housing for older people would have limited need for some types of open space, if this is retained, it should be clarified what provision is required.

Change suggested by respondent:

Deletion of point 8 (in relation to care homes).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13906

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Policy P21 expected major development to provide or contribute towards the provision of measures to directly mitigate its impact and physical, social, green and digital infrastructure.

SMBC's viability testing does not take into account digital infrastructure within the testing and, as such, it should be evidenced that this will not render development (especially specialist housing for older people) unviable.

Change suggested by respondent:

Confirmation that digital infrastructure provision allows for viable development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13907

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Concern that the Site will not be delivered within the required period, given the infrastructure requirements and land assembly issues.

No clear plan how the relief road will be delivered early as funded by CIL payments, which are only collected after a scheme has been commenced (or later).

Lack of employment within the village will increase the need to travel, which raises questions as to the suitability of the settlement to provide for 31% of all proposed allocations.

Question whether developments can be delivered in Balsall Common, taking into account the infrastructure requirements and funding. Additional sites may be needed.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13915

Object

Policy BL1 - West of Dickens Heath**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

This Site proposes the redevelopment of the existing sports pitches and the current land use also contains a Local Wildlife Site and designated Ancient Woodland as well as historic hedgerows.

SMBC should ensure their assessments are fair, robust and objective and the site is sequentially acceptable when weighed against others.

The work required in connection with replacement of the displaced pitches has not moved forward since the previous consultation.

SMBC should ensure that replacement pitches of equivalent or better quality in a suitable location are shown. This should be shown to be feasible before the Site is allocated for development. Another option would be to reduce the capacity of the Site in order to retain the pitches.

Change suggested by respondent:

Reprovision of the sports pitches should be secured prior to allocation.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13916

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

It is noted that the policy states that this may be suitable for specialist housing for older people, and has been subject to a recently dismissed appeal for such uses. However, given the Site is allocated for unrestricted housing, and is below the 300 home threshold of Policy P4e, there is no guaranteed this will include any specialist provision and this should not be relied upon.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

13917

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

The allocation requires the re-provision of sports pitches. In this instance, the re-provided pitches are currently shown within the Green Belt to the north of the allocation.

The Council, within Paragraphs 713-715 state that it's likely that very special circumstances will exist to support development in this location and, as such, the re-provision will likely be acceptable.

However, this pre-judges any application, for which the detail is not know, and as such cannot be relied upon. Therefore the housing that would be provided on the sports pitches should not be included until the re-provision of the sports pitches is secured.

Change suggested by respondent:

Reprovision of the sports pitches should be secured prior to allocation.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14110

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

The requirement for affordable provision for C2 development is held within the justification rather than within the policy.

It is not specifically defined what types of C2 development will require to provide affordable housing (either on-site or off-site). The reference to 'self-contained units' does not allow for any distinction between the types of C2 uses.

The Viability Study only tests one C2 typology which is a 30 (one and two bedroom) unit retirement apartment housing scheme and it is unclear the level of communal area that has been assumed. The viability study scenarios also show that this is not viable when CIL is also included.

The HEDNA does not justify that 40% affordable provision is required on C2 uses and that the affordable need is lower. This indicates that requiring a 40% affordable housing obligation would be unjustified. This point is further evidenced by the Older People's Housing Need Report (January 2020) produced by Barton Willmore.

NPPG Paragraph 64 confirms that specialist accommodation is exempt from the requirement for 10% of homes (as part of the affordable housing contribution) are to be made available for affordable home ownership.

Change suggested by respondent:

Deletion of Paragraph 172 and of the requirement for certain C2 development to provide for affordable housing.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14159

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning

Summary:**P4E**

1. The HEDNA (2020) significantly underestimates need, principally because it assumes provision rates that are too low.
2. The HEDNA significantly underestimates the proportionate requirement from owner-occupiers for specialist provision
3. There is a clear immediate requirement for specialist older people's housing within Solihull. Greater emphasis should be placed on increasing the supply of specialist housing that suits older people's needs and preferences.
4. By providing housing more suitable to this age group that addresses its needs and preferences (for leasehold accommodation in particular), the family homes that they presently under occupy will become available to the market, in addition to new build family homes, thereby addressing the significant need for family housing that the Solihull Local Plan seeks to address.
5. P4E will not deliver the level of provision required. The policy does not actually guarantee deliver of any specialist housing for older people. There is a need to allocate specific sites for specialist provision.
6. The Policy seeks to provide for specialist housing for both older and disabled people. This conflates the two different and specific needs. The requirement for M4(2) or M4(3) housing does not provide specialist housing for older people as it will not create the types of housing needed as set out by the HEDNA
7. These additional requirements are not seen as viable within the Council's viability testing. As such, if this requirement is to be retained for specialist housing, it should be evidenced that it will not impact upon viability/deliverability. Wording should also be included setting out it may not be required/feasible in certain instances
8. The Policy also requires provision of specialist accommodation in line with the SMBC's most up to date statement of need. This does not appear to be available. We would question how the policy complies with Paragraph 34 of the NPPF in showing what contributions will be expected
9. The rate of delivery also needs to be considered. The HEDNA sets out that the majority of the shortfall is needed by 2026. SMBC's stepped trajectory assumes the majority of housing will be delivered during Phases II and II of the Plan Period (2026-2036). As such, there is a risk with the current mechanism that any specialist housing delivered will not come forward in line with when the need occurs.
10. The Site at Jacobean Lane is well placed to provide for this need, and the technical information shows it can be delivered early in the Plan Period.

Change suggested by respondent:

Reconceptualisation of Policy P4E and the allocation of specific sites (including the Site at Jacobean Lane) to meet the evidenced specialised need

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15060

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Housing Need evidence in 2020 HEDNA:

- PPG state that SM only minimum
- Expected growth at UKC Hub meets criteria in PPG to increase SM
- HEDNA state 13,000 jobs at UKC Hub, over 10,000 Experian baseline
- HEDNA assume only 25% of jobs occupied by Solihull residents.
- Barton Willmore carried out own analysis at 0.93 and 0.98 commuting ratios
- Demographic modelling shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario
- HEDNA identifies acute affordable housing need in Borough, BW analysis conclude HEDNA housing need should increase to meet this component of need.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15061

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

GBBCHMA Unmet Housing Need:

- o Barton Willmore analysis of unmet need in wider GBCCHMA suggests that 2020 Position Statement's conclusions under-estimate the remaining unmet housing need from Birmingham up to 2031; Birmingham's deficit alone is between 11,924 – 13,101 dwellings up to 2031.
- o Furthermore, if using the current standard methodology, then significant unmet need from Birmingham City and Black Country between 25,543 and 27,350 dwellings up to 2031.
- o If we were to assume the increased capacity for Birmingham City (65,400 dwellings 2011-2031) set out in the 2020 Position Statement the unmet need would still be between 11,243 and 13,050 dwellings up to 2031.
- This increases significantly based on the uncapped Standard Method figure for Birmingham City which would come into effect in January 2022.
- o Taking into consideration the proposed changes to Standard Method (consulted on by Government in summer 2020), this would lead to there being unmet need against emerging/existing housing requirements in all but one of the GBBCHMA authorities;
- o Unmet need post 2031 should be considered, as referenced to in the 2020 Position Statement. Based on data available at the present time and the most recent Local Plan figures, Barton Willmore calculate this to be a minimum 17,700 dwellings 2031-2040.

Change suggested by respondent:

- Review of demand and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

15062

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

'Sites identified in land availability assessments'

It is unclear what is meant by 'sites identified in land availability assessments'.

Given these are sites which do not benefit from a draft allocation, then they are by definition, windfall sites which means that there is double counting from unknown sources of supply.

Change suggested by respondent:

Consider that the SMBC's supply is actually 11,496 (rounded) before any reduction in windfall or the deletion of draft allocations which are unlikely to be delivered is taken into account.

Therefore: Amend supply and spatial strategy in Plan.

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15063

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Consider automatic allocation of 2013 Solihull Local Plan sites, which have been allocated for a number of years, without any justification as to their deliverability, is an incorrect approach.

Sites not come forward despite Council lacking a 5YLS, points to deliverability issues with sites.

Change suggested by respondent:

Existing 2013 Local Plan site allocations should be tested for deliverability prior to re-allocation

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

15064

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Brownfield Land Register (BLR)

We query the separate identification of sites identified in the BLR – this BLR is subject to periodic review and thus will not be fixed as a permanent source of supply.

We consider that any sites to be delivered in this way should be considered as windfall developments.

Change suggested by respondent:

Amend supply and spatial strategy in Plan. Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15065

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Windfall allowance

The windfall allowance is justified by reference to past windfall rates however it fails to recognise that 'town centre sites' (a traditional source of windfall supply) are allocated in the plan through the town centre masterplan and the Council have identified other sources of supply through the brownfield register. In the absence of any assessment / analysis of this component demonstrating the projected level of future windfall provision taking these factors in account, we consider that the level of windfall should be reviewed and adjusted accordingly.

Change suggested by respondent:

Amend supply and spatial strategy in Plan. Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15066

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

- Consider scale and delivery rates of UK Central hub proposals are unrealistic, and neither details on trajectory and delivery timescales, nor commitments from delivery partners, have not been included in consultation documentation.
- Based on LPR adoption date of 2022, we consider first likely completions to be ca. 2030. This is based on Lichfields' Report ('Start to Finish', Feb 2020) analysis that concludes the average time from outline planning app to first completion is 8.4 years.
- Given information within the August 2020 consultation {Arden Cross?}, we consider a 160dpa build out rate between 2030-2036 is reasonable, to delivery 960 dwellings. Type of supply should also be considered, as geared towards apartments. Amount of infrastructure required also needs consideration.

Change suggested by respondent:

Vulnerability of housing supply:

- Consider scale and delivery rates of UK Central hub proposals are unrealistic, and neither details on trajectory and delivery timescales, nor commitments from delivery partners, have not been included in consultation documentation.
- Based on LPR adoption date of 2022, we consider first likely completions to be ca. 2030. This is based on Lichfields' Report ('Start to Finish', Feb 2020) analysis that concludes the average time from outline planning app to first completion is 8.4 years.
- Given information within the August 2020 consultation {Arden Cross?}, we consider a 160dpa build out rate between 2030-2036 is reasonable, to delivery 960 dwellings. Type of supply should also be considered, as geared towards apartments. Amount of infrastructure required also needs consideration.

Legally Not specified**compliant:**

Sound: No

Comply with Not specified**duty:****Attachments:**

15067

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Note that the 10% lapse rate applied does not take into account windfall, the UK Central Hub Area or allocated sites. We consider that a 10% lapse rate is suitable, but that it should be applied to future development as well.

Change suggested by respondent:

10% lapse rate should be applied to future development as well.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15068

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - Land at Jacobean Lane, Knowle**Agent:** Barton Willmore Planning**Summary:**

Vulnerability of housing supply:

Trajectory:

- SMBC are seeking to provide a stepped trajectory as some of the larger sites will not make a significant contribution to completions until the mid-delivery phase.
- We refer you to Guildford Local Plan Inspector's report, which concludes the Liverpool method does not meet the Government's objective to boost housing supply in the shorter term.
- Consider Solihull should follow same approach as Guildford and allocate more sites.
- As with withdrawn Uttlesford Local Plan, a stepped trajectory may create a fragile 5 year land supply.
- Stepped trajectory may worsen the affordability problem as it delays delivery.

Change suggested by respondent:

Amend housing supply and strategy Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15006

Object

Vision**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

- Support Vision, namely to provide a range of quality homes across the Borough by 2036, whilst setting out opportunity to maximise economic and social benefits of HS2 Interchange
- Vision fails to identify important link between new employment opportunities and requirement to deliver new homes within Borough – therefore unbalanced and uncoordinated Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

15007

Object

Spatial Strategy**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

- Support Para. 63-67 and focus on Options E-G
- Failed to account for specific settlement hierarchy.
- Preferred Growth Options should be accompanied by a settlement hierarchy, that would identify how vision and spatial strategy will be delivered through plan period.
- This should be supported by SA taking into account factors such as public transport
- Would assist Development Management and delivery of windfall sites.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

15008

Object

Spatial Strategy**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

Site Selection Methodology (see also Topic Paper):

- Raised concerns previously and these have not been addressed
- Step 1 – Hierarchy criteria does not align with NPPF Para. 138, and preferring Green Belt sites well served by public transport
- Site Hierarchy should reference land well served by public transport
- Step 2 of refinement criteria (p.14 Topic Paper) do not include sites well served by public transport as 'factors in favour'. Therefore not accord with NPPF.

Change suggested by respondent:

Site selection methodology should be amended should be amended to align with the recommendations within the NPPF.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15009

Object

Blythe**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

Alternative Site:

CFS 554 at Rumbush Lane (sub-site of CFS 141) should be considered for site allocation as site selection appraisal incorrect:

- CFS 554 would accord with Site Selection methodology, if process complied with NPPF and included criterion as located on main railway line, site would have been classified as green site at Step 1.
- Hard constraint can be mitigated easily and not affect suitability of site.
- Site provide strong defensible GB boundary
- Could provide wider planning gain
- Accessible location with 3 services/hour in morning peak, and 2/hour on weekends.
- SHELAA 2016 classed site as Category 1
- 2016 Landscape Character Assessment states that it's not possible to establish a definitive baseline sensitivity to change without proposals details – Vision Document provides such assessment.
- SA assessed larger site and identified 3 significant negative effects – loss of high quality agricultural land can be mitigated through presence of exceptional circumstances.
- Smaller parcel submitted in April 2020 was not considered as part of SA.
- Proposed convenience store would mitigate need for short trips

Change suggested by respondent:

Allocate CFS 554 in Local Plan for residential development.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15010

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

- Pleased to note that SMBC have reverted back to 40% of overall dwellings
- Support built in flexibility to allow negotiations on site by site basis

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15011

Object

Blythe**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

Evidence for alternative site, CFS 554 at Rumbush Lane:

- Single land ownership
- Highly sustainable location, immediately adjacent to Earlswood station
- Development opportunity comprises land located in Stratford-on-Avon's district boundary.
- Site been promoted in 2016 and 2019 DLP Reg. 18 consultations
- Previous submissions focussed on much wider site area, approx. 90-95 ha around Earlswood station. Site been reduced in scale, see CFS 554 compared to CFS 141 and updated Vision document.
- Vision Document shows site can provide:
 - o Up to 62 homes for older persons accommodation
 - o Landscape buffer to prevent coalescence
 - o Opportunity for community shop with café, shop, hairdressers to support C2/C3 uses
 - o Up to 5.88ha of public open space
 - o Enhancements to PROW
 - o Creation of village green
 - o Stratified movement hierarchy with multiple points of access
 - o Adjacent to under-utilised railway station, 25 mins from Birmingham and Stratford upon Avon.

Furthermore, GL Hearn Strategic Growth Study (2018) identified broad, non-specific area between Birmingham and Stratford upon Avon as potential for a new settlement, such as location of CFS 141/554.

Wider potential:

- Opportunity to expand development in SDC – See Vision document and appendix 3. Potential for 74 additional homes.
- Total 136 new homes plus 1.37ha of older persons accommodation, and up to 7.54 ha of public open space OR
- 116 homes, plus 1.94 ha of older persons accommodation and up to 7.54ha of POS

Change suggested by respondent:

Allocate CFS 554 in Local Plan Review

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15012

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

- Barton Willmore report (Jan 2020) states immediate requirement for specialist older person's accommodation, of 3,612 units.
- Separate analysis state current need for 491 registered care places, rising to 1,229 by 2035, accounting for population growth.
- Agree that applications for specialist older persons housing should be supported
- Review of evidence by SMBC would further strengthen policy
- Beneficial for SMBC to identify areas that would be most suitable for providing specialist housing for older people, such as CFS 554 (141).

Change suggested by respondent:

- Allocate areas most suitable for providing specialist housing for older people, such as CFS 554, land at Rumbush Lane.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments:

15013

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

- Housing Land Supply:
- Should refer to additional homes at UK central Hub (2,740) and state 8,010 net additional homes in period 2020-2036.

Change suggested by respondent:

- Housing Land Supply:
- Refer to additional homes at UK central Hub (2,740) and state 8,010 net additional homes in period 2020-2036.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments:

15014

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

GBBCHMA housing shortfall

- Unmet need of wider GBBCHMA been under-estimated

- See Barton Willmore report 'Solihull Borough Housing Need Technical Note' (Dec 2020) in Appendix 4:

o Birmingham's real deficit is 11,294 – 13,1010 dwellings up to 2031

o SMBC not include HMA shortfall post 2031

o Not consider additional shortfall arising from Black Country Plan review

o Post 2031 unmet need calculated to be a minimum of 17,700 dwellings between 2031 and 2040.

o Should include review policy or trigger to address additional shortfall once tested.

o Limited additional housing requirement arising from UKC Hub Area is at odds with Borough's ambitious Vision for UK Central Hub Area

o BW report state between 1,036-1,248 homes per annum required to meet UKC scenario, or 3,520-6,912 dwellings increase over plan period.

Change suggested by respondent:

Review GBBCHMA housing shortfall in plan as underestimated figures in plan.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15015

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

LHN and Housing Requirement

- IM have concerns about evidence supporting housing requirement.
- Agree that SM is good starting point.
- PPG state this is just a minimum starting point.
- PPG state several circumstances where SM should be exceeded, and these apply to Solihull:
 - o Potential for 'Supergrowth' at UKC Hub area
 - o Further work required on housing need impacts of planned growth and strategic infrastructure improvements at UK Central Hub
 - o 2015 Midlands HS2 Growth Strategy state significant potential to deliver growth on nationally significant scale, over and above HS2 construction.
- Concerns been raised at previous consultations

Change suggested by respondent:

Review and revise housing requirement for Local Plan to take into account impact of economic growth planned in UKC Hub Area.

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

15016

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM LAND - Land at Rumbush Lane, Earlswood**Agent:** Turley**Summary:**

Windfall Sites

- 2,800 dwellings on non Green Belt sites appears ambitious, even in context of past delivery.

Change suggested by respondent:

Review windfall sites allowance

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

14616

Object

Spatial Strategy**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

The strategy lacks focus and is a random combination of locations based on multiple growth options rather than a coherent strategy; many sites are large or complex and need new infrastructure or relocation of existing uses that makes them slow to deliver; smaller sites in sustainable villages can redress an over reliance on large or complex sites and will deliver the housing requirement. There is greater potential in the villages within the Borough than currently recognised, particularly in respect of Meriden, which is in a highly accessible location with a good level of services including a primary school that can easily be extended to accommodate increased capacity.

The spatial strategy in the DSLP appears to be a combination of every option set out in the Scoping consultation rather than a focus on any specific elements such as high frequency public transport corridors and the expansion of sustainable settlements. As a result, the strategy lacks focus and has become a collection of approaches driven largely now by where land is available. A range of types of sites and locations are needed to allow the best chance of the housing requirement being met. The proposed allocations do provide a range from the urban area, edge of urban area, UKC and village sites, but many are large scale and will need new infrastructure to allow site delivery or have existing uses such as business or sports that need relocating. Smaller scale greenfield sites should be identified to ensure the delivery of housing in the short term to avoid any shortfall in housing land supply. Only 2,135 of the total allocation of 7,700 are sites that can be easily delivered, which equates to just 27%. There is greater potential in the villages for unconstrained sites than currently acknowledged by the Local Plan Strategy. For example, land north of Main Road Meriden

Change suggested by respondent:

Additional smaller sites in sustainable villages should be allocated to redress an over reliance on large or complex sites and will deliver the housing requirement;

- It should recognise there is greater potential in sustainable villages, particularly in Meriden which is a highly accessible location with a good level of services including a primary school that can easily be extended to increase capacity;
- Growth Option A - High Frequency Transport Corridors should recognise the opportunity offered by the high frequency X1 bus service through Meriden which provides the opportunity to for additional growth in the settlement;
- Growth Option F - Limited Expansion of Villages should recognize that Meriden has greater capacity for new development, particularly to the east where it is unconstrained and where Green Belt is moderately performing. Site 556 overall is highly sustainable and accessible;

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

14647

Object

Spatial Strategy**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP

Summary:

Comments on Draft topic paper on overall approach

There is no explanation why only rail and not bus is included as high frequency travel corridors in rural areas within Option A and no explanation why certain villages are categorized as limited or significant expansion within Options F and G.

Growth Option A – High Frequency Public Transport Corridors misses an opportunity as it refers solely to rail in the rural areas. Meriden has a high frequency bus service, as well as a local service, between Coventry and Birmingham. It is an express service with limited stops, it runs approximately every 20 minutes almost 24 hours a day, 7 days a week and there is a bus stop within 100m walking distance of the site proposed north of Main Road. The bus runs via the NEC and airport and will pass the HS2 interchange station presenting many employment opportunities. Meriden is a settlement that has a good level of services and facilities and is highly accessible. Growth Option F allows for the settlement to take proportionate growth and IM Land consider it is suitable and capable of accommodating a higher level of growth than the 100 houses proposed.

The Topic Paper concludes in respect of Meriden village, a medium to high accessibility rating and land to the east moderately performing in Green Belt terms but it is only included for limited expansion. The land promoted north of Main Road lies to the east so is not covered by mineral safeguarding constraint.

There is however no explanation in the Topic Paper or in the Topic Paper 4 of the previous consultation plan how the rural settlements have been split into two groups between Growth Options F and G as either for limited expansion or significant expansion of rural settlements.

It would appear that for significant expansion a settlement could be highly accessible or have a wider range of services including a secondary school, it does not have to have both. Dickens Heath for example is not as accessible as Meriden and has no secondary school. The Topic Paper provides a very similar assessment to that of Meriden but on capacity finds that Dickens Heath has capacity for significant growth. It gives no explanation how it reaches the conclusion. The accessibility study finds sites in Meriden to be highly accessible scoring higher than Dickens Heath. Meriden has a wide range of facilities and services. It is suggested that the settlement is constrained by lack of capacity at the primary school however no evidence has been put forward to comment on this. IM Land has therefore sought its own evidence and Turley have

prepared a report Education Assessment. This indicates that the primary school is already operating over capacity and neither the allocation of 100 houses in Policy ME1 or the land north of Main Road Meriden can be accommodated without school expansion. The level of demand for primary places generated by Policy ME1 West of Meriden (100 houses) and land north of Main Road (100 houses) together at 50 primary school places could be accommodated through expansion of the existing school. Meriden is capable of taking additional growth over and above that proposed and has site opportunities potentially more accessible and less constrained than other locations in the Borough.

Change suggested by respondent:

Additional smaller sites in sustainable villages should be allocated to redress an over reliance on large or complex sites and will deliver the housing requirement;

- It should recognise there is greater potential in sustainable villages, particularly in Meriden which is a highly accessible location with a good level of services including a primary school that can easily be extended to increase capacity;
- Growth Option A - High Frequency Transport Corridors should recognise the opportunity offered by the high frequency X1 bus service through Meriden which provides the opportunity to for additional growth in the settlement;
- Growth Option F - Limited Expansion of Villages should recognize that Meriden has greater capacity for new development, particularly to the east where it is unconstrained and where Green Belt is moderately performing. Site 556 overall is highly sustainable and accessible;

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14665

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

The policy is neither justified or effective as the Local Plan is over reliant on the housing numbers that can be delivered from UK Central Hub Area in the plan period. It is unclear what part is being referred to as part of UKC.

It has been assumed that across the whole UKC Solihull Hub Area there will be 2,740 dwellings coming forward in the plan period split 2,240 at the NEC and 500

at Arden Cross. It is unclear why North Solihull, the Town Centre and Blythe Valley are not included as they are also stated to be UKC. Furthermore, elsewhere in the DSLP completions of 2,500 are stated, not 2,740 which needs

clarification. Further evidence is needed to justify the delivery timescale and the trajectory for the housing numbers. The number of houses to be completed in the plan period from NEC and Arden Cross is too high. Even if the necessary road and social infrastructure is available to allow housing completions

from 2026, this assumes a high completion rate of 274 houses per annum. The nature of the developments being largely apartment based means it is more likely, the whole amount will be delivered on block at the end of the plan period leaving a shortfall early on. This could leave a significant shortfall in delivery to meet OAN and housing delivery in the first 5 years of the Local Plan period. Therefore, to add flexibility to the plan, the number of completions at UKC Hub should be reduced and a smaller scale allocation north of Main Road Meriden should be added to compensate for

this overreliance on large sites dependent on significant infrastructure and to ensure housing need is met as set out above through the plan period.

Change suggested by respondent:

The plan should be modified reducing the number of completions expected in the plan period.

Instead the plan should allocate additional smaller sites such as land north of Main Road, Meriden to bring flexibility to ensure the housing need for the Borough is met in the plan period.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14677

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

Whilst IM Land are supportive of the principle of self and custom build, it is considered a better approach would be to allocate specific smaller sites for up to 5 dwellings for self-build rather than require a proportion of general housing allocations to accommodate this provision. The nature of self and custom build is that it is better related to smaller more individual sites to reflect individual and unique design rather than being part of larger housing developments. NPPG offers other ways local authorities can facilitate self build such as such using LA land or other land suitable for housing in the ownership of other landowners. The Policy is unsound as it may not be effective in delivering suitable self-build and custom housing. The Policy should be reconsidered.

Change suggested by respondent:

The Policy is unsound as it is not effective in delivering suitable self-build and custom housing.

The Policy should be reconsidered.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14693

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

Whilst IM Land are committed to meeting needs for all, the requirements for specialist housing are set out in Building Regulations and do not need to be repeated in plan policies. It is recognised there are optional national standards over and above the minimum Building Regulations requirement that can be applied through plan policy where there is a need. National planning guidance highlights the need to consider a range of factors such as such as accessibility and adaptability of the existing stock, needs across tenures and impact on viability as well as site specific matters such as flood risk and topography. The Council point to the HEDNA for some evidence and Policy P4E is to be applied flexibility taking into account site specific factors and viability, but more detail is required to justify the blanket approach of Policy P4E that relates to all major sites for parts 2 and 3 and sites over 300 for part 4.

Change suggested by respondent:

A better approach would be to apply the requirements where need is justified, to specific sites in the Settlement Chapters of the DSLP so site allocations have already taken account of site-specific matters.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14698

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

Barton Willmore's demographic modelling shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario.

Barton Willmore's calculations suggest that the deficit in unmet housing need from Birmingham City being delivered by HMA Local Plans amounts to a minimum of between 11,294 and 13,101 dwellings up to 2031, a significant increase from the 2,597 dwellings concluded on by the 2020 Position Statement. This increases when the unmet need from the Black Country is considered. Additional unmet need will be created post 2031.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14699

Support

POLICY P13 Minerals**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP**Summary:**

IM Land support removal of the Minerals Safeguarding Area from the Plan. The Minerals safeguarding topic paper accords with the case submitted on behalf of IM Land to the previous stages of the local plan preparation in that as Daw Mill Colliery from which coal was being extracted, has closed and there are no plans for working of the coal resource. It also concurs that alternative sources of energy are now sought to meet climate change targets. The minerals safeguarding area for coal is rightly no longer in the Plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

14872

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** IM Land - North of Main Road, Meriden**Agent:** Stansgate Planning LLP

Summary:

The allocation is not justified or effective as the site does not have the capacity to accommodate this amount of housing without significant harm to the landscape character on the approach into the settlement, and through loss of vegetation and impact on its designation as a potential Local Wildlife Site. To achieve 100 dwellings a density of 50 dwellings per hectare would be needed which conflicts with the council's approach to density. It would require 3 storey blocks that would be difficult to screen.

Despite part of the site being identified as an area of flood risk the council's site analysis does not adequately deal with flood risk. There is a strong likelihood that less units will be delivered or the density will increase further to accommodate 100 houses. Site ME1 was originally planned for 50 dwellings which was already high given the constraints such as its designation as a Potential Local Wildlife Site, its significant trees and water body; and its prominent location on the approach to the village. The Landscape and Visual Appraisal with Green Belt Review August 2020 prepared for IM Land identifies that the site is well vegetated and forms part of the green gateway to Meriden. High density development within this parcel of land on the approach to Meriden would be uncharacteristic.

Site constraints restrict its capacity, 1ha of 4 ha site is designated for public open space and there is no reference to the pLWS. Site area is considered to be 3ha rather than 4ha and the required density to accommodate 100 dwellings is too high and more suited to transport corridors and more urban areas. Housing provided at ME1 should be at a lower density relative to its landscape setting.

Policy ME1 should be modified to remove the site or reduce the site from 100 houses to up to 50 houses and a new site or additional site should be allocated for up to 100 houses on land north of Main Road, Meriden.

Land North of Main Road performs better in the site assessment. It has 'very high' accessibility, compared to Site ME1, has no potential Local Wildlife Site designation, is within an overall low/moderate performing Green Belt parcel, compared to Site ME1 within a moderately performing parcel and performs better in the Sustainability Appraisal.

Land north of Main Road, Meriden should be an allocated site. It is highly accessible; has moderate impact on Green Belt; can provide about 6 hectares of new Green Infrastructure; is not constrained by minerals safeguarding; is visually well contained; and has the maximum SHELAA score. There are no known technical constraints. The Council's evidence base demonstrates land north of Main Road, Meriden is a highly sustainable location that is suitable for delivery of up to 100 houses in the plan period. It is available now, offers a suitable location and is achievable without significant new infrastructure. Housing can be delivered in the short term.

The development proposal can provide 3.4 hectares of residential development for up to 100 dwellings and 6 hectares for public open space, recreation, local play provision and community gardens

IM Land has provided a full set of technical information including an Arboriculture Survey; Archaeological and Heritage Assessment; Ecological Appraisal; Preliminary Biodiversity Impact Assessment; Education Assessment; Drainage Strategy; LVAGBR; Minerals Resource Assessment Report; Transport Report to demonstrate the deliverability of the site.

The overall conclusion is that Meriden can take more development. The Site performs well against the DLP evidence base. To add to this IM Lands' evidence has taken the high-level strategic assessments to a more detailed stage and demonstrates the Site is highly accessible; has 'Some to Limited' impact on Green Belt; is not constrained by minerals safeguarding; is visually well contained; the landscape has 'Medium' capacity to accommodate change; and it has the maximum SHELAA score. There are no known technical constraints and land north of Main Road, Meriden (Site 556) should be allocated.

Change suggested by respondent:

The Plan should include a new Policy ME2 - North of Main Road, Meriden to allocate the site for up to 100 houses. Policy ME1 should be modified to either remove the site or reduce the site from 100 houses to up to 50 houses and a new site or additional site should be allocated for up to 100 houses on land north of Main Road, Meriden.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments: None

14200

Object

Policy P3 Provision of Land for General Business and Premises

Respondent: IM Properties - Employment Land

Agent: Turley

Summary:

The employment land supply set out in Policy P3 is inadequate to meet the longer term needs of the borough for industrial and warehousing land. This is based on two premises:

- (a) The HEDNA underestimates local industrial and warehousing need by some margin
- (b) The plan does not address the acknowledged need for strategic employment sites based on the 2015 study

Policy P3 should plan for a higher amount of industrial floorspace (between 22.1 and 60.7ha) than what was concluded in the HEDNA.

The approach of the HEDNA is justified however there are a number of shortcomings to the specific method used by the HEDNA:

- Tables 101 and 102 appear to contain errors, incorrectly transposing the VOA data cited at Table 100;
- The decision to use only a two year margin is insufficiently justified where it is commonplace to apply a more generous five year margin, to ensure sufficient flexibility in the supply calculated as being needed; and
- There is insufficient justification for the dismissal of recent evidence of much stronger growth in the industrial stock, when focusing on the period back to 2011 rather than the longer-term period back to 2001.

Recent employment changes have been the result of structural changes in the distribution and retail / e-commerce markets which are acknowledged within the HEDNA. The UK has emerged as the third largest online shopping market in the world and the largest in Europe.

The demand for logistics space is directly related to changes in the size of the population. The HEDNA confirms, with reference to various scenarios, including one incorporating the UKC Hub, that the population of Solihull is projected to increase significantly. It has been evidenced that as the population grows, there is likely to be a corresponding increase in consumer demand and the need for warehouse space. The HEDNA confirms that the population of Solihull has grown at a greater rate over more recent years, with Figure 9 suggesting that the rate of growth will increase to an even greater extent when meeting even the minimum need for housing implied by the standard method.

Using VOA data and incorporating data from March 2020 the annual net change in industrial/warehouse floorspace shows a rising trend in the past decade. Last year's data (2019/20) shows a new record level of growth, a continuation of the short-term trend would see more pronounced growth than the longer-term trend.

Accounting for last years growth would identify a greater need than the 16ha concluded in the HEDNA. Even if the short-term trend was not sustained it would be reasonable to conclude that a more representative position would fall somewhere within this range of between 19 and 52 ha. In the context of the evidence relating to sustained growth of e-commerce and a projected strong local growth in population that the upper end is more likely to represent a reasonable level of need to be planned for, to ensure the plan's resilience.

Even the lower end of this need aligns with the Labour Demand Growth Scenario identifying a need for 19.1 ha, this should be the absolute minimum to be planned for. If flexibility of 5 years take up was included it would be sensible to plan for between 22.1 and 60.7ha.

This strongly indicates that the shortfall in industrial land to which the Plan should respond, in quantitative terms alone, is much higher than concluded in the HEDNA.

Change suggested by respondent:

-

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14201

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** IM Properties - Employment Land**Agent:** Turley**Summary:**

The plan is unclear about the role of the land at Damson Parkway in Policy UK2 which, at one level, is significant in terms of site area when measured against the HEDNA's assessment of local need, but in policy terms is identified as capable of meeting the specific and unique needs of JLR and/or the airport. What proportion is expected to meet local needs or, whether as part of UKC Hub, it is in effect a strategic site requires clarification.

In either event, market evidence points to a need to identify a more robust supply of industrial and warehouse land as there are very unlikely to be any windfall sites and the only other option would be to consider removal from the Green Belt which should take a plan-led approach.

The HEDNA infers that UKC Hub employment growth scenario and related developments at UK1 and UK2 are intended to accommodate a combination of both local and strategic needs.

The amount of strategic warehousing accounted for as part of UKC is modest and does not take account of the acknowledged sub-regional shortage in the provision of strategic employment sites in this market area.

The 2015 West Midlands Strategic Employment Sites Study¹³ (WMSESS) highlighted an immediate need for additional sites across the region.

An updated second stage of the WMSESS is awaiting publication and it is anticipated that this will reaffirm the immediate shortage of strategic employment sites, with a specific focus on the M42 corridor including Solihull. The draft Plan does not adequately acknowledge or respond to this need for strategic sites and when the study is published and identifies such a need, it will be necessary for the Plan to engage with the issue positively.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14202

Object

Policy P1A Blythe Valley Business Park**Respondent:** IM Properties - Employment Land**Agent:** Turley

Summary:

IM are pleased to see that the Plan continues to provide policy support for the ongoing development of Blythe Valley. In particular, Policy P1A and its supporting text outline what is expected of future development

In relation to the existing BVP site:

- Policy should provide maximum flexibility to reflect market demand. The broad range of the types of uses that could be brought forward in the policy should not be seen as an exhaustive list. It should be made clear within the policy wording that a wide range of employment activities will be supported including offices, industrial and warehousing, but also including research and development and other 'non-traditional' employment uses.
- The residential part of the site is now subject to reserved matters approvals. It may therefore be appropriate to remove reference to "the residential element of Blythe Valley Park" from this policy
- Reference is made at Paragraph 110 to "an area of land of some 7 ha remaining to be developed". This figure is incorrect, and should instead read 3 hectares. Amendments should be made to the Plan in this regard to ensure that it is sound, and any references within the Council's evidence base updated accordingly. IM are already formulating plans to develop out the remaining land at BVP during 2021, at which point there will be no developable employment land along the A34 corridor
- Paragraphs 111 and 112 of the supporting text make reference to various expectations that the Council have of any development at BVP. Given the extent of development that has now been brought forward, we consider that this supporting text should be updated to better reflect the current position with the site

Change suggested by respondent:

In relation to the existing BVP site:

- Policy should provide maximum flexibility to reflect market demand. The broad range of the types of uses that could be brought forward in the policy should not be seen as an exhaustive list. It should be made clear within the policy wording that a wide range of employment activities will be supported including offices, industrial and warehousing, but also including research and development and other 'non-traditional' employment uses.
- The residential part of the site is now subject to reserved matters approvals. It may therefore be appropriate to remove reference to "the residential element of Blythe Valley Park" from this policy
- Reference is made at Paragraph 110 to "an area of land of some 7 ha remaining to be developed". This figure is incorrect, and should instead read 3 hectares. Amendments should be made to the Plan in this regard to ensure that it is sound, and any references within the Council's evidence base updated accordingly. IM are already formulating plans to develop out the remaining land at BVP during 2021, at which point there will be no developable employment land along the A34 corridor
- Paragraphs 111 and 112 of the supporting text make reference to various expectations that the Council have of any development at BVP. Given the extent of development that has now been brought forward, we consider that this supporting text should be updated to better reflect the current position with the site

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14203

Object

Policy P1A Blythe Valley Business Park**Respondent:** IM Properties - Employment Land**Agent:** Turley**Summary:**

As has been set out in previous representations to the Plan, IM also control an area of land to the east of the M42. This land is bound by the BVP estate road to the south, the A3400 to the east, and the M42 to the west

Whilst the site lies within the Green Belt, it is considered to be in a suitable location for further employment uses due to proximity to the motorway network and the cluster of high quality employment uses that have developed in this location, based at both BVP and Fore Business Park

Whilst the site was not specifically considered within the PBA Employment Land Review report in 2017, it has many of the same characteristics as the wider BVP site. It therefore has strong potential to form part of the wider BVP scheme.

The 2020 SHELAA assessed the site and confirms that there would be 'good' demand attractiveness to occupiers. Analysis of the HEDNA shows there is a greater need for employment sites within the Borough than have currently been identified. It is therefore respectfully requested that further consideration is given to the potential of this site to meet this need.

Change suggested by respondent:

Land to the east of the M42 bound by the BVP estate road to the south, the A3400 to the east, and the M42 to the west should be include in BVP to meet additional employment needs.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14204

Object

Policy P9 Mitigating and Adapting to Climate Change

Respondent: IM Properties - Employment Land

Agent: Turley

Summary:

Policy P9 'Mitigating and Adapting to Climate Change' sets out an expectation that development within the Town Centre should contribute towards "existing or planned district energy and/ or heat networks".

Given the pace of change within the sustainable energy sector, IM would suggest that to ensure this policy is future-proofed over the life of the Plan period, text should be added to the end of clause (2iv) that reads "or other suitable sustainable/ low carbon energy solution". This would support the ambitions of the Government, as set out within the NPPF (paras 149 – 151).

Change suggested by respondent:

IM would suggest that to ensure this policy is future-proofed over the life of the Plan period, text should be added to the end of clause (2iv) that reads "or other suitable sustainable/ low carbon energy solution". This would support the ambitions of the Government, as set out within the NPPF (paras 149 – 151).

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14206

Object

Policy P2 Maintain Strong, Competitive Town Centres

Respondent: IM Properties - Employment Land

Agent: Turley

Summary:

No specific reference is made to Mell Square within this policy. Clause (7) of Policy P2 states that "A range of opportunity sites will be identified under this policy". However, it is not clear where these sites will be identified. There seems to be no link made to the emerging Town Centre Masterplan, and it is not clear whether it is intended that the Masterplan will contain relevant information about these 'opportunity sites'. IM would suggest that clause (7) is clarified, and that reference is made to the Town Centre Masterplan or any other documents as appropriate.

The supporting text is inconsistent in how it refers to the 'Town Centre'. At paragraph 116, bullet four, reference is made to the 'Heart of Solihull' area, but it is not clear from the text what area this relates too. Paragraph 116 of the Plan sets out a list of the "primary retail frontages" where retailing activity should remain the main street level use. Specific reference is made within bullet four of point two to 'Mell Square'. IM are concerned that this approach to protecting retail frontage is too restrictive to allow delivery of the flexibility that is referred to within the main Policy.

It would be more appropriate for this supporting text to refer to 'active uses' rather than 'retail use'. This would allow for alternative uses to be brought forward that would retain street level activity, and contribute to the vibrancy of the centre.

IM welcomes the preparation of the masterplan, and the additional guidance that this gives in terms of more specific proposals and high level design. Would suggest that reference to the Masterplan being "updated by the end of the year" (paragraph 120) are removed. There appear to be inconsistencies between figures quoted within the SLPDS Plan, and the Town Centre Masterplan:

The presence of a comma at the end of paragraph 128 may indicate that it was intended to further clarify the position with further text. IM would welcome further text to avoid any confusion regarding what level of delivery is anticipated during the Plan period. Early feasibility work has indicated that Mell Square could accommodate 400 units.

Paragraph 129 of the supporting text makes reference to an economic appraisal and market analysis undertaken by Amion in 2020. In reviewing this IM consider in the context of current and forecast market conditions the potential for 50,000sqft of office floorspace to be brought forward to be ambitious.

It is therefore important that the Plan and the Town Centre Masterplan contain sufficient flexibility to allow for this to 'shift' to other uses if it can be demonstrated that there is a need for them. This is the case in policy P4a and the supporting text to Policy P4c which make specific reference to the fact that town centre residential development may result in a different mix, type or size of housing being provided by new development in these locations.

Change suggested by respondent:

No specific reference is made to Mell Square within this policy. Clause (7) of Policy P2 states that “A range of opportunity sites will be identified under this policy”. However, it is not clear where these sites will be identified. There seems to be no link made to the emerging Town Centre Masterplan, and it is not clear whether it is intended that the Masterplan will contain relevant information about these ‘opportunity sites’. IM would suggest that clause (7) is clarified, and that reference is made to the Town Centre Masterplan or any other documents as appropriate

The supporting text is inconsistent in how it refers to the ‘Town Centre’. At paragraph 116, bullet four, reference is made to the ‘Heart of Solihull’ area, but it is not clear from the text what area this relates too. Paragraph 116 of the Plan sets out a list of the “primary retail frontages” where retailing activity should remain the main street level use. Specific reference is made within bullet four of point two to ‘Mell Square’. IM are concerned that this approach to protecting retail frontage is too restrictive to allow delivery of the flexibility that is referred to within the main Policy.

It would be more appropriate for this supporting text to refer to ‘active uses’ rather than ‘retail use’. This would allow for alternative uses to be brought forward that would retain street level activity, and contribute to the vibrancy of the centre.

IM welcomes the preparation of the masterplan, and the additional guidance that this gives in terms of more specific proposals and high level design. Would suggest that reference to the Masterplan being “updated by the end of the year” (paragraph 120) are removed. There appear to be inconsistencies between figures quoted within the SLPDS Plan, and the Town Centre Masterplan:

The presence of a comma at the end of paragraph 128 may indicate that it was intended to further clarify the position with further text. IM would welcome further text to avoid any confusion regarding what level of delivery is anticipated during the Plan period. Early feasibility work has indicated that Mell Square could accommodate 400 units.

Paragraph 129 of the supporting text makes reference to an economic appraisal and market analysis undertaken by Amion in 2020. In reviewing this IM consider in the context of current and forecast market conditions the potential for 50,000sqft of office floorspace to be brought forward to be ambitious.

It is therefore important that the Plan and the Town Centre Masterplan contain sufficient flexibility to allow for this to ‘shift’ to other uses if it can be demonstrated that there is a need for them. This is the case in policy P4a and the supporting text to Policy P4c which make specific reference to the fact that town centre residential development may result in a different mix, type or size of housing being provided by new development in these locations.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14209

Support

Policy P3 Provision of Land for General Business and Premises**Respondent:** IM Properties - Employment Land**Agent:** Turley**Summary:**

Fore Business Park is an existing allocation in the Plan, under Policy P1. IM are very supportive of this allocation, it is relevant to note that given the success of the current park, and that much of the floorspace approved through previous planning permissions has been built out, it is unlikely that any significant further floorspace would be brought forward within this location. This is further reinforced by the presence of Green Belt to the north of the site, preventing any significant future expansion in this direction

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15214

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** IM Properties - Employment Land**Agent:** Turley**Summary:**

Fore Business Park is an existing allocation in the Plan, under Policy P1. IM are very supportive of this allocation, it is relevant to note that given the success of the current park, and that much of the floorspace approved through previous planning permissions has been built out, it is unlikely that any significant further floorspace would be brought forward within this location. This is further reinforced by the presence of Green Belt to the north of the site, preventing any significant future expansion in this direction

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11148

Object

Blythe**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Sustainability Appraisal has not fairly considered reasonable alternatives in respect of levels of housing and employment growth. Higher levels of growth perform equally as well as the Plan's preferred approach- Option 2. The Sustainability Appraisal demonstrates that a higher level of growth could be accommodated sustainably.

Only two spatial options (at either Balsall Common or land south of the A4) were put forward by the Council to assess the level of growth associated with Option 4 which could skew the conclusions of the Sustainability Appraisal.

The two spatial options were selected from the GBHMA Strategic Growth Study not the Council's own SHELAA evidence. The Sustainability Appraisal should have assessed options at levels of growth above 16,000 dwellings utilising its own evidence base.

Local employment needs are being addressed through existing commitments and the allocation of Employment Site 20. No appraisal has been undertaken of any reasonable alternatives in relation to employment.

Change suggested by respondent:

The Sustainability Appraisal should be updated to re-consider higher levels of housing growth and assess reasonable alternatives in relation to the location of employment growth.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

11149

Object

Blythe**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

There are a number of inaccuracies in the specific assessment of Site 62 (AECOM 114 CG4 Stratford Road/Creynolds Lane) in the Sustainability Appraisal, including the effects in relation to ecology (should be neutral not negative), landscape sensitivity (should be neutral), amenity and noise (should be neutral) and access to leisure and play facilities. The site performs well and there are no significant adverse effects or reasons to not allocate the land.

Change suggested by respondent:

The Sustainability Appraisal of Site 62 should be amended to reflect the updated and correct position.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

11150

Object

Spatial Strategy**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Plan should contain strategic policies which set out the overall strategy for development. The absence of a clear Spatial Strategy and settlement hierarchy makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan.

Change suggested by respondent:

The Spatial Strategy should be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11151

Object

Spatial Strategy**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

Options A to D propose growth around Shirley Town Centre and the A34 corridor. The A34 Corridor runs from Junction 4 of the M42 to the northern boundary of the Borough.

Certain sites might fall within Options E to G as well as under Options A to D. It is unclear whether the three further criteria introduced at paragraph 65 which inform the location of growth take precedence over Options A to G.

Change suggested by respondent:

The Spatial Strategy should be set out as a strategic policy in the Plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11152

Object

Spatial Strategy**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The site selection methodology which is set out in the Topic Paper departs from national policy in relation to Green Belt. It does not first consider previously developed land and land well served by public transport, and it makes no reference to whether the loss of Green Belt can be offset through compensatory improvements to the remaining Green Belt. The implications of the Spatial Strategy and site selection methodology are that Green Belt sites that perform well in relation to national policy were not selected.

Change suggested by respondent:

The Site Selection methodology should be amended to reflect Paragraph 138 of the Framework.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11153

Object

Blythe**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

Site 62 (Land west of Stratford Road) is well served by public transport and should be regarded as having a 'High' Accessibility Score within the Council's evidence.

The site offers compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Releasing the site from the green belt would not lead to any meaningful reduction in distances between neighbouring towns.

It is inconsistent and unreasonable for Site 62 to be assessed as 'red' with severe impacts in the Landscape Character Assessment, as proposed allocated sites within the same Assessment area are assessed as 'green'.

Stratford Road is no longer an appropriate boundary for the Green Belt. Properties on the northern side of Creynolds Lane should not be designated in the Green Belt.

Change suggested by respondent:

The Site Selection should include an allocation of land west of Stratford Road.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11154

Object

Policy P17 Countryside and Green Belt**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

Policy P17 makes no reference to safeguarding land within the Green Belt. The Plan should be safeguarding land in order to ensure there is a degree of permanence to the boundaries proposed within this Plan in accordance with the National Planning Policy Framework.

Change suggested by respondent:

The Plan should be amended to include safeguarded land to accommodate longer term development needs.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11155

Object

Policy P17 Countryside and Green Belt**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Solihull Strategic Green Belt Assessment does not make recommendations for amendments to the Green Belt boundary but that it forms the basis for more detailed assessment. There is no evidence of any more detailed assessment. The Assessment was prepared in 2016 and therefore pre-dates the current version of the National Planning Policy Framework.

There are inaccuracies in relation to the assessment of Site 62 (Parcel RP62). Development of the site would not result in the gap between Solihull and Cheswick Green being any smaller than exists at present.

The Strategic Green Belt Assessment takes no account of any compensatory improvements to the remaining Green Belt that may arise from the release of land. Any release of the land from the Green Belt at Site 62 would give an injection of resources that would enable investment in improving facilities.

Change suggested by respondent:

The Strategic Green Belt Assessment should be updated and corrected in relation to its Assessment of RP62 (land west of Stratford Road). The Assessment should take into consideration any compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11156

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

Policy P3 fails to match the spatial strategy of the Plan and has no regard to the evidence of the HEDNA in relation to supply and demand along the A34 corridor.

It is unsound for the Council to suggest that an early review of the Plan is an appropriate response in addressing unmet needs- deferring cross-boundary strategic matters.

Other factors need to be taken into consideration in informing the employment land requirement- the existing stock available, pattern of supply, and evidence of market demand.

The land currently available on the five existing allocations is less than what is stated within the Plan. The existing supply amounts to 6.4ha of employment land on three sites, but soon to fall to 3.4ha on two sites.

The delivery of two large employment allocations is uncertain and their trajectory is likely to be much later in the plan period.

Change suggested by respondent:

The employment requirement should be set out within a strategic policy within the Plan.

The employment requirement should be increased to reflect past performance, the market evidence of supply and demand, the Local Industrial Strategy for the West Midlands Combined Authority and the unmet needs of the Black Country Authorities.

Evidence should be provided as to the availability and deliverability of the proposed allocations and the trajectory for their delivery.

Additional employment sites should be allocated to address the additional employment land requirement to ensure a continuous supply. Site 62 (Land west of Stratford Road) should be allocated as a mixed use allocation comprising residential and employment.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

11157

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Council need to consider the Government' stated intention to change the method for calculating Local Housing Need.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11158

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Local Plan is more likely to be adopted in 2022, and therefore the housing requirement and the Plan should be extended to 2037.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption (2022).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11159

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The employment uplift on the Local Housing Need, to take account of the job growth at UK Central, is based on the assumption that only 25% of the jobs will be filled by people residing in Solihull. The Plan is not sound on the basis of accepting such high levels of inward commuting.

Change suggested by respondent:

The housing requirement should be increased to take account of the employment uplift, particularly in the absence of any evidence that neighbouring areas are intending to accommodate higher housing numbers as a consequence.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11160

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

If all of the Local Housing Need contributed 40% affordable housing it would not meet the identified affordable housing need in the HEDNA (578 homes per annum).

Change suggested by respondent:

The housing requirement should be increased to take account of affordability within the Borough.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11161

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

The Plan does not fully address unmet housing needs. There is no evidence why the contribution is only 2,105 homes to Birmingham's unmet needs, if this level is agreed with Birmingham/other neighbouring authorities, or that the unmet needs that remain are to be addressed elsewhere. The Council has suggested the unmet needs of Black County Authorities can be dealt with as part of the next review of the Local Plan. With an early review the proposed Green Belt boundaries within this Plan will need to be altered at the end of the Plan period and therefore consideration must be given in this Plan to safeguarding land.

Change suggested by respondent:

The housing requirement should be amended to take account of unmet housing needs

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11162

Object

Policy P5 – Provision of Land for Housing**Respondent:** IM Properties - Land west of Stratford Road**Agent:** Marrons Planning**Summary:**

There are a number of objections to how the Council has calculated supply over the plan period;

- The UK Central site is unlikely to see any completions for several years post plan adoption. There are substantial infrastructure requirements and these have not been robustly assessed/costed meaning the Plan is not justified.
- No evidence in relation to housing trajectories for the proposed allocations means the figure of 5,270 homes to be delivered by 2036 is not justified.
- No evidence on the delivery of 861 units at the Solihull Town Centre (Site 8).
- The estimated level of windfalls completed over 14 years is not justified.
- In the SHELAA there are Existing Sites and Communal Dwellings where it appears there may be calculation errors.

The Plan will not provide for a five year housing land supply upon adoption. Three years' worth of windfalls are included within the supply rather than two and there is 350 homes on allocated sites without clear evidence on delivery.

Change suggested by respondent:

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended.

The housing requirement should be expressed as a minimum figure.

The housing supply should contain a buffer of 10% over the housing requirement.

Policy P5 and the table of allocated sites should be amended to include Site 62 for mixed use development.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14375

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Enriko Iskhakov**Summary:**

Relocating HWRC to site UK2 would imply bringing it closer to a larger residential area and add more congestion to a Key Route road (A45) which is already experiencing air pollution level increase due to Jaguar Land Rover's current and future activities, Birmingham International Airport, and other expected development activities of UK2.

Change suggested by respondent:

HWRC relocation can be done within the local area PC-01-049 of HS2 development. The best suitable place is a plot to the east of HS2 route, restricted by HS2 line, A45, and A452.

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

10672

Object

Balsall Common**Respondent:** Berkswell Church of England Voluntary Aided Primary School**Summary:**

Berkswell Church of England (VA) Primary School should be identified by name in Paragraph 516

Change suggested by respondent:

Berkswell Church of England (VA) Primary School should be identified by name in Paragraph 516

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10673

Object

Balsall Common**Respondent:** Berkswell Church of England Voluntary Aided Primary School**Summary:**

Independent advice indicates that the growth in Balsall Common will generate demand for a 420 place (2 form entry) primary school and 30 place nursery. The Borough has a shortfall of provision for children with Special Education Needs and Disability (SEND), which should be addressed by the new school. The timing of the Barrett's Farm development late in the Plan period means that interim arrangements will need to be made for new pupils requiring places. Berkswell Church of England (VA) Primary School request participation in pupil forecast modelling exercises to ensure the new school is introduced at the optimum time.

Change suggested by respondent:

Paragraph 531 should be expanded to reflect to need for the nursery, SEND provision and to indicate interim arrangements before the new school is provided

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11237

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ms Kelsey Jackson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14521

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mary Jackson**Summary:**

Building on the sports fields will affect our children (and adults) who play rugby and football on these fields.

The land is high grade GREEN BELT

Detrimental to wildlife

Would add to congestion and worsen flood risk

Doesn't think the mitigation measures are achievable

The character and setting of the Village will be adversely affected

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10611

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Ross Jackson**Summary:**

This area is already blighted by traffic congestion due to the JLR plant, and that is before the new site is in operation.

That in turn has affected air quality, litter strewn along the verges and road safety. So the news that a further 15 acres of green space is to be lost for a new waste centre (on top of 22 acres lost to JLR) is devastating! creating even more congestion and pollution. Developing Moat Lane depot for housing will also create further congestion and further strain on a overstretched infrastructure.

Change suggested by respondent:

To protect what is left of precious greenfield land and find the space for the waste centre within the HS2 development triangle. To curtail any future JLR expansion by making more efficient use of the existing site.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10712

Object

Policy S01 - East of Solihull

Respondent: Mr Ramasamy Jaganathan

Summary:

It is within green belt area. new 700 homes will increase traffic. lack of school facility for the children in these homes.
potential 1400 cars causin congeston around parkway hospital

Change suggested by respondent:

widening the road of Damson Parkway; reducing house numbers by half

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

13997

Object

Policy UK2 - Land at Damson Parkway

Respondent: Jaguar Land Rover

Agent: WSP

Summary:

JLR has serious and grave concerns in relation to the addition of a an option for the provision of a relocated Household Waste and Recycling Centre and

Council Depot within the land allocation at Damson Parkway. JLR does not support this amendment due to

* the potential impact on the future site expansion of

Jaguar Land Rover's Solihull manufacturing facility;

* The potential impact on the future aspirations of creating direct access to the new M42

Junction 6 road link; and

* the non-compliance with adopted Policy P3 Provision of Land for General Business and Premises,

The site is largely constrained on the north, south and

west by the neighbouring urban form and protected Elmdon Park. It is therefore essential that this land is protected for the future expansion needs of Jaguar Land Rover.

Site UK2 identifies the only area available for the

Lode Lane facility's expansion, to the north/east of the existing site.

The development of a Household Waste and Recycling Centre and Council depot in this location would result in the total enclosure of Jaguar Land Rover's Lode Lane facility, developing the last area of land available as a natural extension to the existing facility's footprint.

Further details would also be needed to understand the security provisions of any facility which bounds our site. There is a potential to weaken defensible boundaries and pose additional security risks

Highways England has recently obtained consent for a series of works between Junction 5 and Junction 6 of the M42, resulting in the creation of a 2.4km dual carriageway link road aligned to the A45 and access via Junction 5A.. This will increase capacity at Junction 6, reduce congestion, improve access to key business areas in the region, and improved local cycle and pedestrian routes.

There is a future aspiration to connect Damson Parkway directly with this new dual carriageway.

Such a link road would create a more direct route between the UK2 allocation and the M42, directing traffic away from the existing routes and improving capacity on the local and strategic road network. This could also allow for further economic development opportunities in the local area in the future. The allocation should be sufficiently flexible to accommodate this during the plan period.

The policy should also protect the aspiration to have rail freight connectivity serving the allocation to ensure future logistic capability for all parties

Change suggested by respondent:

Removal of potential proposal for the Household waste and recycling plant to be relocated within the allocation.

Flexibility within the policy to accommodate the new dual carriageway proposal to improve accessibility and congestion at junction 6 and future plans to join to the allocation. Allow flexibility for future rail freight capability.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments:

13998

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Jaguar Land Rover**Agent:** WSP**Summary:**

According to the five criteria for the assessment of alternative uses in policy P3 a waste management centre or council depot would not be deemed appropriate.

The site does not lack prospects for its future development, nor does it require extensive marketing to identify potential interest, as this exists in the form of Jaguar Land Rover, as identified in Policies P1, P3, UK2 and the Council's objectives to support its continued growth.

Finally, the provision of a waste management facility that would severely constrain the continued growth of an existing, prosperous and beneficial employer does not constitute the best use of land, contrary to the NPPF.

A waste management facility and depot, however, would not provide employment densities of the same level of the operations of JLR based on the site's function and use of space, nor does it support the continued large-scale growth of an existing large employer.

Change suggested by respondent:

Objects to the addition of the proposal for the waste and recycling centre and Council depot to be relocated within the UK2 allocation through policy UK2.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10728

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Robert James**Summary:**

Insufficient regard to traffic flows in and around Knowle, particularly the central area, and the limited amount of parking provision for the increased number of shoppers.

Change suggested by respondent:

Road junctions must be clearly laid out.

Plans for increased parking provision must be included.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10904

Object

Blythe**Respondent:** Stephanie James**Summary:**

The Cheswick Green area has already been subjected to extensive development, which has heavily impacted our public services and ability to use them. To further add to this, when it is already impossible to see your GP or drive safely past the school, is utter madness. Development in this area appears to be extremely disproportionate to other areas. Reassurances and provisions given for previous approved developments regarding public services and flooding proved to be pointless and our concerns were proved to be completely valid. Further development of the area will decimate even more of our precious green space

Change suggested by respondent:

Brownfield sites should be used before decimating even more precious green space. The huge concerns of every single Cheswick Green resident I have spoken to should be heard, acknowledged and answered. We have already been adversely affected by the recent and ongoing developments in our area, which as I mentioned seem to be highly disproportionate to other areas. From what I understand, it is intended that an artificial boundary is created by building a road as part of the proposed development? I believe this is at odds with the intentions of national planning policy and opens the area up for even further development.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14574

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tara Jennings**Summary:**

The land is high grade green belt.
 The development will be detrimental to wildlife.
 The narrow rural road network cannot take further development.
 Concerned that flooding will increase.
 Reduces access to activities that keep people fit physically and mentally.
 The mitigation measures included in the plan are not achievable
 The character and setting of the village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14420

Object

Policy BL1 - West of Dickens Heath**Respondent:** Karen Jephcott**Summary:**

- > Traffic concerns on rural roads(especially Tythe Barn Lane) and concerns over traffic during school pick-up/drop-off times.
- > Against site being on the greenbelt, brownfield site should be used instead.
- > Concern over the loss of sports facilities.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14097

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Rebecca Jessup**Summary:**

- > Worried about the amount of housing proposed close to their home and the impact on wildlife, nature, and wildlife.
- > Feels traffic from developers/residents will have a detrimental impact on the road structure as well as the environment due to increased volumes of traffic. Believes the plans are not clear as to where the traffic entrance/exits will be.
- > Keen to support in sourcing alternative brownfield sites.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11074

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Warwickshire Wildlife Trust**Summary:**

Allocation BS1 [sic] Balsall common Barratt's Farm, is adjoining a linear Local Wildlife Site (LWS), Kenilworth Greenway, any proposals should ensure that development doesn't impact on any biodiversity, including protected species, particularly though increased activity, noise and light pollution.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11075

Object

Policy BL1 - West of Dickens Heath**Respondent:** Warwickshire Wildlife Trust**Summary:**

Site BL1 is directly adjacent to three designated LWS's and adjacent to designated Ancient Woodland and in the green belt. We have had a number of concerns from a vast majority of our members regarding this site.

The policy wording is also not considered to be strong enough stating 'potential for enhancement and appropriate buffer to Tythe Barn Coppice ancient woodland'. The word 'potential' should be modified out of the plan text, appropriate buffers should also be included on all of the Local Wildlife Site edges. The Landscape Assessment (2016) states also that the Blythe area has a high overall sensitivity to new development.

Change suggested by respondent:

The word 'potential' should be modified out of the plan text, appropriate buffers should also be included on all of the Local Wildlife Site edges.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11076

Object

Blythe**Respondent:** Warwickshire Wildlife Trust**Summary:**

Allocation BVP Blythe valley park, for between 59,000 and 99,000 sqm Mixed B use, this allocation is directly covering and would destroy part of LWS Blythe Valley County Park, and adjoin other LWS's, with no proposals for buffers on the edge of the employment allocation. The site is also green belt and the proposed employment need is vague varying by 40,000sqm, in line with these tests of soundness this figure should be based on an employment need for the area and to support housing need. An allocation for the lower figure would have less of an environmental impact and could include an area not designated as a Local Wildlife Site.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11077

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Warwickshire Wildlife Trust**Summary:**

Birmingham business park allocation is directly adjacent a designated Local Wildlife Site, with no mention of a buffer in the policy wording, or consideration of impact on the amenity of the neighbouring site.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11078

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Warwickshire Wildlife Trust**Summary:**

South of Knowle (Arden Triangle) for 600 dwellings is directly on a number of LWS's and would include the loss of semi-improved grassland. Whilst the WWT is pleased to see the retention of the LWS, the site would be effectively surrounded by build development, noise, light pollution etc, which would affect species including protected species using the site, habitats and biodiversity. Whilst we are also pleased to see the inclusion of biodiversity offsetting this is just for semi improved grassland and should only be considered as a last resort, the policy requirements in 4 are also very vague and therefore would be hard to effectively enforce on a meaningful level.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11079

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Warwickshire Wildlife Trust**Summary:**

Site is adjoining a designated Local Wildlife Site which could impact the important wildlife site, although we are pleased to see retention the LWS and provision of an appropriate buffer onto Purnells Brook Woodland Local Wildlife Site, although there is no obvious detail regarding the scale and make up of the buffer.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11080

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Warwickshire Wildlife Trust**Summary:**

Site UK2 to potentially accommodate a relocated Household Waste and Recycling Facility- serious concerns as proposal is adjoining Elmdone Grange wood LWS and Elmdone Wood Nature Park and concerning part of Caste Hill Meadows LWS, and adjoining Hampton and Elmdone Coppice. Such facility would have a serious disruptive and noise impact, light pollution, impact on breeding species and on the biodiversity and protected species on these designated sites.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11081

Object

Policy S01 - East of Solihull**Respondent:** Warwickshire Wildlife Trust**Summary:**

Site is adjoining a LWS – Hampton and Elmdone Coppice which would impact on the biodiversity and protected species on the site. there is also no requirement to provide a buffer between the site and the Local Wildlife Site. 4i 'Biodiversity enhancement' is also too vague.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11082

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Warwickshire Wildlife Trust**Summary:**

JLR Jaguar Landowner allocation [UK2], covers directly over a LWS and directly adjoins, with no mention in the Policy wording of preservation of the Local Wildlife Site or consideration of the biodiversity in line with the NPPF and NERC Act.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11083

Object

Policy P10 Natural Environment**Respondent:** Warwickshire Wildlife Trust**Summary:**

See recommendations below.

Change suggested by respondent:

Sub-section 2: "The Council will seek to conserve, enhance and restore biodiversity MOD ADD 'and important habitats' and geodiversity across the Borough."

Sub-section 3: "Protection of designated sites, ancient woodland, ADD: Local Wildlife and potential local wildlife sites, and priority habitats shall ALSO include the establishment of buffers to any new development so that they connect with existing and created green infrastructure assets.

Sub-section 5: "Developers will be expected to take full account of MOD- not strong enough wording protect and maintain as a key nature capital in the borough. the nature conservation or geological value, and the existence of any protected, rare, endangered or priority

habitats or species included in the Local Biodiversity Action Plan..."

Sub-section 15: "...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 MOD –how would this be demonstrated not clear."

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11084

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Warwickshire Wildlife Trust**Summary:**

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common section of the plan states that '558. Whilst the site does not perform well in the Sustainability Appraisal, with twice as many negative effects as positive, including one significant negative effect due to the distance to the key economic assets, much of the adverse effects relating to ecology, landscape, green infrastructure, historic assets and amenity can be mitigated with the more modest capacity now proposed'.

There is no detailed information or assessment of how this impact could be mitigated in the section of the plan. The policy proposes 'creation of a significant corridor of public open space between the development and the Relief Road. However public open space would most likely not provide suitable land for ecology and flora and fauna to thrive.

There is concern that the analysis in the Sustainability appraisal has not informed the plan making. As negative results have been discarded and sites seem to have been allocated without exploring alternative sites with less of an environmental assessment in detail.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11085

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Warwickshire Wildlife Trust**Summary:**

Concerns that the Sustainability Appraisal has not been taken into account:

Policy HA1 - Meriden Road, Hampton in Arden justification states Para 643' Whilst the site performs relatively poorly in the sustainability appraisal'. Again ignoring the results of the detailed SA work.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11086

Object

Foreword**Respondent:** Warwickshire Wildlife Trust**Summary:**

Proposals Map -

We would also request that Nature Reserves and Potential Local Wildlife Sites are included on the proposals map.

Change suggested by respondent:

the Warwickshire Wildlife Trust would also request that Nature Reserves and Potential Local Wildlife Sites are included on the Policies Map.

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11087

Object

Spatial Strategy**Respondent:** Warwickshire Wildlife Trust**Summary:**

Warwickshire Wildlife Trust supports the work that has been into the plan up until this stage but has a number of remaining concerns.

Overall WWT support the identification of LWS's on the proposals map, however are extremely concerned about number of site allocations which are designated Local Wildlife Sites, near to ancient woodland and in the green belt. It is considered that these site allocations are not in line with the test of soundness. Reference is made to Sites BC1, BL1, BVP, BBP, KN1, KN2, SO1, UK2.

Concerned whether the SA, particularly environmental issues, has fully informed site selection and allocation, in particular Sites BC3 and HA1.

Modifications proposed for Policy P10.

Submission refers to Para. 174 of the NPPF, Section 40 of the NERC Act and Defra's 25-year Environment Plan.

Change suggested by respondent:

See separate representations.

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

11252

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Lionel Johnson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness. Despite local opposition, alternative sites in Brownfield and National Pledges from the Conservatives to not build on Greenbelt. Concerned by the loss of natural habitat, the influx of traffic onto Windmill Lane and impact on facilities. Concerned as doctors fails to provide appointments for the current population, the roads are congested, and the infrastructure cannot cope. Amount of housing proposed will make Balsall common unable to function.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14432

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Paula Johnston**Summary:**

Wishes for site BC3 to be removed.

The plan has not been positively prepared in that it is not practical to deliver the unmet need of the HMA (2105 units)

The allocation of site BC3 has not been justified.

There are inconsistencies with the NPPF.

Change suggested by respondent:

Remove site BC3

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10686

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Leighton Jones**Summary:**

The proposal to move the football club to the edge of the built-up area would be reasonable ONLY if floodlighting were to be permanently banned, otherwise it would have a severe impact on the surrounding countryside, especially as it is on a high part of the site.

Change suggested by respondent:

There is no justification to move the football club. It should be developed where it is.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10687

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Leighton Jones**Summary:**

The Master Plans are sorely lacking in vital detail; provision of public transport is patchy at best, so car usage would inevitably increase.

Change suggested by respondent:

The Master plans should have much more detail to justify the proposals and to demonstrate that they would be deliverable.

A full transport assessment should be published, with detailed proposals for dealing with the impact of the proposed developments

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10688

Object

Policy P19 Range and Quality of Local Services**Respondent:** Leighton Jones**Summary:**

The proposals relating to local shopping facilities should be stronger and positively set out to support and enhance these facilities. The current pandemic has shown a major change in shopping habits with fewer people shopping in large towns and more in local centres.

Change suggested by respondent:

Definite policies to enhance the offering of local shopping should be included.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10746

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Leighton Jones**Summary:**

The site currently occupied by Knowle Football club is listed as ' identified as a potential site for the development of a care village or retirement complex' in the Plan. However there is no further information on the size or type of accommodation that could be provide, or justification for such a development.

Also, there should be at least some indication of number of additional 'households' that this could/would provide. As a result the impact on Knowle, which would be additional to the other sites, is unknown.

Change suggested by respondent:

There should be a clear statement of the number of units that could be provided in order to include them in the overall figures for Knowle and the Borough. This would enable to TRUE impact to be assessed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14716

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Peter Jones**Summary:**

This constitutes a further take of green belt in the borough and the erosion of open space.

This is not acceptable.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10801

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Mr Richard Jones**Summary:**

This proposal is ill conceived and inappropriate. The area where these proposed houses are to be built are not served well by public transport, poor road connections and are over a mile away from the Balsall common centre. All this will do is increase car use (which is in conflict with national strategy and with the West Midlands Mayors view). If it was restricted to existing brownfield footprint that would be acceptable if public transport and road quality and junctions were improved. However this proposal takes out the same size of greenbelt land again which is not sustainable or justified

Change suggested by respondent:

1. Improve public transport.
2. Build houses on the brownfield area only.
3. Improve road quality and junctions.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10803

Support

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Richard Jones**Summary:**

This seems sensible.

However I disagree with the proposed bypass route

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10804

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Richard Jones**Summary:**

The proposed Balsall common bypass is ill conceived and goes against the national strategy of reducing car use. It has been 'plucked' out of the air to support the proposed new house building without thinking strategically what Balsall common/Berkswell will need after other road and rail projects have been completed. If it does go ahead the route needs to be moved as the present proposal is unacceptable.

Change suggested by respondent:

Balsall common bypass needs to move much further out and not cross Hob lane as that will be dangerous. It needs to be integrated into the existing network and improve and develop as the impact of house building, hs2 and a46 improvements become apparent!

Legally compliant: Yes**Sound:** No**Comply with duty:** No**Attachments:** None

13801

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Russell Jones**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10769

Object

Blythe**Respondent:** Mr Stephen Jones**Summary:**

traffic congestion

no school or doctors provision

Change suggested by respondent:

should not be built

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10971

Object

Foreword**Respondent:** Mr Neill Jongman**Summary:**

I believe that the plans are being pushed through with haste, undercover of a global pandemic. I believe that the Shirley region has an unfair number of the allocation of houses. There is also a considerable number of retirement properties. I would like a priority to be placed on affordable houses - so the young people of the area can continue to live where they grew up. An increasing elderly population can put pressure on local services. There are also major environmental concerns with these plans.

I worry that the major beneficiary of this plan appears to be the developers.

Change suggested by respondent:

I would like to see these proposals incorporated into the plan.

The Regeneration of Chelmsley Wood

Making good use of the HS2 interchange site for housing

Prioritise the Solihull Town Centre Masterplan.

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10610

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr Philip Jordan**Summary:**

A 12% increase in homes in a small village is excessive especially as it breaches the Green Belt. I note plans to address traffic along School Road and regular flooding but given past inaction on these issues, why should these be trusted now? There is no reference to any plans by Warwickshire Council - new houses have recently been built along Aylesbury Road and those residents undoubtedly use Hockley Heath facilities. There are persistent rumours locally of further developments off that Road.

Change suggested by respondent:

Priority must be given to redeveloping brownfield sites in the Borough over breaches of the Green Belt. Solihull Council should be seeking the plans of Warwickshire to ensure a holistic approach to the area.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

11053

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Anya Joshi**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13851

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Vikash Joshi**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11187

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Georgina Joyce**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13858

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided to demonstrate Site KN2 is deliverable or developable, contrary to the National Planning Policy Framework. It is unclear whether there is an agreement by all landowners to the site being brought forward. There appears to be a lack of a comprehensive agreed approach with the Concept Masterplan document including three concept plans produced by different companies.

There are also unresolved issues relating to the loss of playing pitches. A fully developed masterplan strategy with appropriate playing pitch replacement strategy is required.

There are significant concerns about the feasibility of delivering the necessary infrastructure to facilitate development within 5 to 10 years.

Change suggested by respondent:

Paragraphs 225 and 226 should be amended to remove the estimated contribution of KN2 from Delivery Phases I and II.

Policy KN2 should be amended in light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13860

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

There is insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School. There is no mention of any need for expansion at secondary school level in Knowle/Dorridge in the 'Infrastructure Delivery Plan'.

The cost of the school proposals may be significantly more than upgrading and extending existing facilities. Arden Academy has had recent upgrades and extensions, which undermines any need and cost justification. There would be potentially larger financial contributions available towards other essential infrastructure needs if the contributions required towards the school proposal were minimised.

Change suggested by respondent:

Robust evidence is required to demonstrate Arden Academy proposals are the most appropriate strategy having regard to reasonable alternatives.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

13861

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided on the relocation of the existing sports provision south of Tythe Barn Lane, with multiple complex land assembly issues to overcome. This is contrary to the deliverability and developability requirements set out in National Planning Policy Framework.

The 'Developer Site Proposal' plan included in the Concept Masterplan Document shows the re-placement playing pitches on a 'Local Wildlife Site'. This would be contrary to Policy BL1 criteria v and Policy P10.

There are significant time implications for the outstanding work necessary relating to the replacement playing pitches. BL1 is undeliverable and potentially unviable in the short to medium term.

There are suitable alternative options to BL1 including allocating more small and medium sized sites; allocating brownfield land; additional small-scale development to larger village boundaries; and ensuring development densities make efficient use of land.

Change suggested by respondent:

If issues of soundness cannot be overcome- paragraphs 225 and 226 should be amended to remove BL1 from Delivery Phases I and II.

Policy BL1 should be amended in light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

13862

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient evidence has been provided on cross-boundary collaboration in respect of the housing land supply shortfall. A Statement of Common Ground has not been published, contrary to Paragraph 27 of the National Planning Policy Framework.

It is unsound for the council to make no policy provision to address the expected need arising from outside the administrative area within the current plan period.

Change suggested by respondent:

A Statement of Common Ground should be published which addresses the cross- boundary land supply shortfall. Housing delivery target number should be modified if/as appropriate.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13865

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The plan does not sufficiently take into account anticipated growth over the plan period and beyond.

The standard method for assessing housing need would increase the housing requirement to 1011 dwellings per annum.

It is unsound to propose phasing delivery of the housing requirement. If the requirement is not delivered effectively/timely, house prices could escalate reducing affordability.

It is unsound that there are no 'safeguarded' sites proposed which is inconsistent with national policy. This would speed up the Local Plan review process and ensure a deliverable supply of housing land.

Change suggested by respondent:

Small and medium sized sites for residential development should be allocated.

The phased housing delivery target table at paragraph 224 should be removed.

Policy P5 should be modified to state '1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...'

Two new paragraphs beneath paragraph 4 of Policy P5 should be included-

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances: • To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area; • To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.'

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

13908

Object

Hampton-in-Arden**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The proposed inset Green Belt boundaries for Catherine-de-Barnes (Policies Map) fail to exclude 'land to north of Lugtrout Lane/northwest, Catherine-de-Barnes' from the Green Belt.

The significant need for housing and the housing land supply shortage satisfies the 'exceptional circumstances' test for removing land from the green belt (as detailed in the NPPF).

The Plan should make provision for 'safeguarded' land in order to meet longer-term development needs beyond the Plan period.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13909

Object

Hampton-in-Arden**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

'Land at Lugtrout Lane, Catherine-de-Barnes' represents a 'gap' on the north side of Lugtrout Lane between existing development to the west and east. It is in a sustainable location, within walking distance of the village centre and there is a regular bus service providing access to Solihull Town centre.

The site represents a logical, limited and proportionate area for removal from the Green Belt. The land performs very low in Green Belt terms and is considered unnecessary to keep permanently open, and has strong physical boundaries.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13910

Support

Hampton-in-Arden**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Land (SHELAA site references 2, 21 and 96) forms a logical, limited and proportionate area for inclusion within the inset to Catherine- de-Barnes.

The site has a low Green Belt Assessment score (2016 Green Belt Assessment). The land is partly brownfield and makes a very limited contribution towards the purposes of including land within the Green Belt. Development would not lead to 'coalescence' and the site would have very clear physical and defensible boundaries. The site compares favourably than HA2 'Oak Farm, Catherine de Barnes'.

There are no physical or legal constraints restricting development. Many of the landowners have promoted land for development along Lugtrout Lane.

The Plan should make provision to safeguard land.

Change suggested by respondent:

A new paragraph below paragraph 639 should be included:

'In addition to the proposed site allocation HA2 'Oak Farm, Catherine-de-Barnes' that would fall within the settlement boundary, if the Green Belt boundary is amended as proposed, there is also land to the northwest of Catherine-de-Barnes (as shown on Enclosure 2 Plan number 2009910(M)-103) that would be considered appropriate for development as it would then fall outside the Green Belt. This area has been promoted for development by landowners and if the Green Belt boundary is changed the area would no longer be subject to Green Belt policy. Following the proposed amendments as defined on the Policies Plan Map, proposals in this location will be considered appropriate for residential development subject to development proposals satisfying local and national planning policy requirements.'

Or:

'In addition to the proposed site allocation HA2 'Oak Farm, Catherine-de-Barnes' that would fall within the settlement boundary, if the Green Belt boundary is amended as proposed, there is also land to the northwest of Catherine-de-Barnes (as shown on Enclosure 2 Plan number 2009910(M)-103) identified as safeguarded land for future development.'

The Policies Plan Map should be amended to exclude the area of land adjacent to and northwest of the settlement of Catherine-de-Barnes from the Green Belt or it should be identified as safeguarded land as shown on plan number 2009910(M)-103; with an approximate SHELAA capacity of up to 64 dwellings.'

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

13911

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Policy P5 has not undertaken the necessary steps regarding the legal Duty to Cooperate and is unsound. The deliverability and developability of the proposed residential land supply has not been robustly demonstrated. There is an immediate need to identify additional and/or alternative sites.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13947

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Insufficient 'deliverable' sites, 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or accommodate the scale of growth projected up to 2036. There are significant doubts over the deliverability and suitability of several proposed site allocations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13948

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The number of new dwellings proposed in Solihull Town Centre is not achievable. The Council are relying on outdated historic figures from the 2016 draft Solihull Town Centre Masterplan.

The 'Areas of Change' set out in the 2020 Solihull Town Centre Masterplan covers a physically smaller area than the 2016 draft. However the proposed housing numbers are largely maintained, which will result in an increased density of development which is unlikely to be acceptable.

The Plan only sets out the total number of dwellings to be delivered within the town centre as a whole. Policy P5 should identify specific sites.

No detailed work on concept masterplans for the proposed development sites in Solihull Town Centre has been undertaken, implying it does not have the same level of confidence as the 'Allocated Sites'.

No accurate capacity testing has been undertaken with inconsistencies to the 2019 Brownfield Land Register.

The proposed provision of largely apartments in Solihull Town Centre would seem unrealistic, in light of the clear need for family housing in the Borough.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13949

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

There have been/are issues that are preventing deliverability of dwellings in Solihull Town Centre, with only 10 dwellings approved in the last 7 years. There are current infrastructure requirements on which new development is dependent.

There are multiple landowners and multiple existing land uses on the proposed housing redevelopment sites. Land assembly may also be required to ensure sites can be developed comprehensively. 'Deliverability' and 'developability' has not been demonstrated with evidence.

There is a reliance on larger site redevelopments in Solihull Town Centre, contrary to the NPPF paragraph 68.

Change suggested by respondent:

-

Legally compliant: No

Sound: Yes

Comply with duty: No

Attachments:

13950

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The capacity of Solihull Town Centre's redevelopment sites has been overestimated, due to heritage considerations, the need for family housing and compliance with spacing standards. The absence of detailed Concept Masterplan work has failed to justify the densities of development.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13951

Object

UK Central Hub**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The definition of the 'UK Central Hub Area' is imprecise and inconsistently applied within the Plan and supporting evidence. Some definitions include land at Blythe Valley Park, North Solihull, Solihull Town Centre which are areas not included within the UK Central Solihull Hub documents provided as evidence. It is unclear as to where the proposed 2,740 dwellings are being provided.

The housing contribution from the 'UK Central Hub Area' is not clearly defined and there is a reliance on documents provided in evidence (but not to be adopted) which are subject to change.

The quantum of dwellings and delivery timeframe is inconsistent within the Plan and supporting evidence.

Change suggested by respondent:

The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.

A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.

The quantum of dwellings and timeframe for delivery as quoted within the Plan and supporting evidence should be consistent.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13952

Object

UK Central Hub**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Delivery of The UK Central Hub requires co-ordination of landowners and implementation of necessary social, transport, utilities and flood risk management infrastructure. Without a clear Policy and/or Concept Masterplan there is uncertainty on delivery within the Plan period. There is no evidence of a legally binding Memorandum of Understanding/agreement amongst landowners.

Change suggested by respondent:

The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13953

Object

Policy UK1 - HS2 Interchange**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Development of Arden Cross requires the removal of land from the Green Belt with no compensatory measures being identified which is in conflict with national and local planning policy. There is no local plan policy requirement, Concept Masterplan or supporting evidence setting out any Green Belt compensatory measures.

Change suggested by respondent:

The development of Arden Cross requires Green Belt compensation.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13954

Object

UK Central Hub**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

In respect of the proposals at the NEC, there is no site-specific policy, no Concept Masterplan and no allocation within the Policies Map to identify the location or quantum of housing contribution.

There is uncertainty as to the evidence demonstrating suitability or deliverability as it does not appear to have been appraised. It appears that the NEC housing area was not subject to a Sustainability Appraisal, and it would likely have scored low against objectives SA1, S14 and SA17.

The NEC proposals will be delivered as apartments, with no opportunity for future growth and limited housing types likely to appeal to a narrow demographic. Locating residential development amongst "... an unrivalled 24-hour entertainment and leisure destination" would be contrary to Policy P14.

Change suggested by respondent:

That NEC site should be fully assessed for its suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13955

Object

Policy UK1 - HS2 Interchange**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

In respect of Arden Cross there is no site-specific policy, no Concept Masterplan and no allocation within the Policies Map to identify the location or quantum of housing contribution. That site scored badly within the Sustainability Appraisal- matters on social infrastructure and achieving a satisfactory solution with regards heritage need to be considered.

The Green Belt Assessment identifies a refined area (reference RP13). If the site had been considered as part of the wider area, its performance against the purposes of the Green Belt would have been assessed differently.

The Archaeological Assessment states that the proposals will likely have a significant negative archaeological impact. There does not appear to have been an ecological assessment.

Delivering the necessary infrastructure will be a challenge. There are major constraints to development, including managing the construction land-take and impacts of construction works. There are issues with provision of social infrastructure such as schools and health care facilities which would place residents at a disadvantage if occupation precedes infrastructure delivery.

Change suggested by respondent:

The Arden Cross site should be fully assessed for its suitability for development

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

13956

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The housing capacity of some of the proposed allocations will be reduced to fully meet the minimum public open space requirement set out in Policy P20. The POS requirement in the Policy and concept masterplan document is incorrect (for sites BL1, BL3, HA1, HH1) when compared to the actual requirement set out in the Open Space Topic Paper dated October 2020.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13958

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs M Joyce**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The table at paragraph 225 'Maintaining Housing Land Supply' is unsound as there is a lack of robust evidence to demonstrate there has been no double counting across the sources or to demonstrate the deliverability of the capacity numbers.

There is no evidence to demonstrate Brownfield Land Register sites will come forward for development. Stage 2 has not been undertaken and none of the sites have permission in principle. There is no evidence on how the windfall allowance has been calculated to demonstrate that historic rates excluded sites identified in the SHELAA and Brownfield Land Register (ensuring no double counting).

There are concerns in relation to the developability of SHELAA site 245 Former Rugby Club, Sharmans Cross Road. There is no mechanism for replacement of the sports pitches which would be lost- as required by Policy P20.

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, Brownfield Land Register and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all Brownfield Land Register sites, SHELAA sites, and proposed housing allocations.

If justification cannot be provided, those site allocations, SHELAA sites, Brownfield Land Register sites and planning permissions should be deleted from the Plan and housing land supply information.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

13846

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Stephen Joyce**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10813

Object

Balsall Common**Respondent:** Mr Paul Joyner**Summary:**

The plan for Balsall Common is an invasion of our green belt environment. Earlier consultations and discussions with the local population made it clear that the residents were in favour of some development, and a number of brown field alternatives were suggested. As a result of this Solihull plan now includes those brown field sites with NO reduction in Green Belt development, a clear disregard of local democracy.

Residents have also made it clear that the infrastructure of the village centre is unsuited to an additional 1000+ homes

Change suggested by respondent:

The plan needs to recognise that green belt land should only be used when absolutely necessary, and only after all brown field alternatives have been developed

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10814

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Paul Joyner**Summary:**

I object to the Barratts Farm development for the following reasons:

- 1) Removal of a countryside amenity, used by residents, providing health benefits and environmental benefits
- 2) Increased amount of traffic, on Station Road, Sunnyside Lane (narrow pinch point) Meeting House Lane creating pollution, noise and inconvenience
- 3) Addition of a primary school at the end of Station Road, near station, will exacerbate unacceptable traffic congestion issue, particularly during HS2 construction period, where Hall Meadow will be used as Haul route
- 4) The years of disruption and noise to residents adjacent to the site, due to HS" and Residential construction

Change suggested by respondent:

Any development should only have access via the new by pass road, to stop additional traffic in the centre of the village and on Station Road.

If a primary school is included in the plan, it should be located amongst the new home, with access off the by pass route only, to prevent traffic issues on station road.

Reduce the amount of built land, reducing the number of houses to 500 max

No residential development until HS2 construction is finished.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10984

Object

Hockley Heath**Respondent:** Mrs Sarah Jukes**Summary:**

Additional housing is not required in hockley heath. There is a good range of affordable housing already available.

School road in particular struggles with the volume of traffic around school time and is heavily congested already.

The plan is not justified as the land opposite school road is flood land and home to many species of wildlife including bats. The animals currently on the land provide much joy to the village.

The little green belt left in the village itself is rapidly being selected to be built on leaving almost no open green land in the village.

Change suggested by respondent:

Remove the land opposite school road from the plan.

Please keep some open green land within the village.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11006

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Mr Jagdish Kalaar**Summary:**

I feel the housing plan in particular at lugtrout lane is against the environmental and will lead to huge congestion. More green belt damaged and more non environmental friendly policies.

Change suggested by respondent:

I feel the proposal of 700 homes needs to be cancelled.

If homes are to be built at lug trout lane a maximum of 200 should be allowed.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10593

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Leslie Kaye**Summary:**

I believe that the plan for housing on greenbelt exceeds government targets because of the failure to take into account the additional housing planned for the HS2 Interchange White Elephant.

Change suggested by respondent:

Deduct at least 2,000 greenbelt homes.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10684

Object

Blythe**Respondent:** Mr Robert Kay**Summary:**

Due to the rural nature of the area, the small country lanes can not accommodate any more traffic. The loss of green belt and sports playing fields is a loss of facility that will not be compensated. Previous housing developments had conditions attached to them that have not been followed through.

Change suggested by respondent:

Ideally the provision of residential areas should be targeted at brownfield sites and sustainable reuse of existing buildings. This was a policy of the West Midlands mayor,

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

14823

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr H Keene**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14822

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs L Keene**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10751

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Adam KELLY**Summary:**

Extra flooding in the area,schools and GPS will be too overwhelmed and the road infrastructure will not cope especially at peak times for going to and from work

Change suggested by respondent:

There are too many retirement homes i solihull some of these should of been turned i to flats.

The surrounding roads leading to and from solihull from dog kennel should be increased , there are too many choke points currently for traffic

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15225

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Plan fails to adequately address future need for specialist housing for older people. Whilst specialist housing or care bed spaces is required on sites over 300 units, there is no mechanism for delivery.

Depending on larger sites to deliver specialist housing will not address the current need and is likely to exacerbate need going forward, due to lead in times, build out rates, and complex land ownership issues.

Specific suitable sites should be allocated rather than relying on larger sites address provision. These additional sites should be in addition to the allocations and numbers already identified within the Plan.

Change suggested by respondent:

Allocation of specific sites for specialist housing in addition to the current allocations.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15226

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Minimum housing need should be increased to account for UK Central job growth and 'acute' need for affordable housing.

Uncertainty and wide variation of figures about HMA shortfall. No evidence that Solihull's contribution has been agreed or that it meets duty to cooperate obligations. No Statement of Common Ground so no real commitment to resolving the shortfall within the GBBC HMA.

Numbers from the Brownfield Land Register are unreliable given no part 2 register and no guarantee that sites will yield the capacity identified.

Past trends are not compelling evidence that windfall is a reliable source of supply.

Change suggested by respondent:

Increase in Housing figures of between 1,036 and 1,248 dpa.

Reduction in windfall allocations from 200 dpa to 150 dpa as per the tried and tested number set out in the adopted Plan.

Reduction in BFLR allocations by 29 – from 77 to 48.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15227

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Land to the west of this site was allocated for housing in the adopted Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available, an alternative development solution delivering open space was forthcoming. This situation still exists and calls into question the allocation of HA1.

No evidence regarding viability of the site and how this may be affected by any potential contamination issues as a consequence of the former use of the site.

The site cannot be said to be available, achievable and deliverable and should be removed from the plan.

Change suggested by respondent:

Remove allocation HA1 from the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15228

Support

Hockley Heath**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

The potential development of the two areas either side of School Road would appear to fulfil the Council's criteria for limited and proportionate expansion of the settlement.

Removing land to the north of School Road from the Green Belt would conform with the Council's intention to address anomalies in Green Belt boundaries across the Borough (Paragraph 420 of the DSP).

This is also applicable to Jacobean Lane in Knowle.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15229

Object

Policy S02 - Moat Lane Depot**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Concerns over relocation of the current uses on the site and the timing of such a relocation is an issue.

No site has been identified for the relocation of the depot or referred to in the DSP, which merely states that the site is expected to become available during the Plan period. There are also particular issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.

The site cannot be said to be available, achievable and deliverable and should be deleted from the plan.

Change suggested by respondent:

Delete allocation S02 from the Plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15230

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Solihull Town Centre was identified as a location for housing in the adopted Plan. Identified locations within the town centre and subsequent Masterplans have yet to come to fruition.

From the conclusions which can be drawn from the adopted Plan and the experience and complexities of town centre redevelopment the housing figure proposed is over ambitious and unachievable within the Plan period.

To ensure the delivery of the appropriate number of dwellings within the Plan period additional allocations within the Plan should be provided.

Change suggested by respondent:

Additional allocations in the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15231

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

Uncertainty about site allocations in the Plan supports the inclusion of an additional site at Jacobean Lane (site 526). Whilst currently in the Green Belt, the boundary around Knowle is inconsistent, denoted by fences and vegetation. The site is part of and well related to the village, rather than surrounding countryside. A strong, defensible Green Belt Boundary can be established and there are excellent access arrangements. Accessibility is excellent, the site is Brownfield and the reasons for excluding the site are not justified. Same approach as is being applied to School Road in Hockley Heath should be applied in this case.

Change suggested by respondent:

Include site 526 at Jacobean Lane as an allocation.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15232

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

- Proposed allocation does not conform to statement in introduction to Blythe Chapter, that villages in Blythe have a distinct nature within and separated by attractive countryside and Green Belt giving villages a sense of remoteness.
- Development would result in coalescence of Dickens Heath with Whitlocks End and Majors Green.
- Intrinsic character of Dickens Heath village would be lost through an ill-thought out addition to the west of village. Insensitive treatment for an award-winning settlement.
- Concept masterplan does not reference how it would complement or enhance village of Dickens Heath.
- BL1 has been dismissed as an allocation at number of previous Local Plan/UDP Inquiries.
- Impact of BL1 considerably more devastating coalescence effect than de-allocated former Site 13.
- Despite reduction in capacity on site, the perception of coalescence persists.
- Lack of alternative sports pitches provision is cause of concern.
- Should have been resolved before got to DSP stage.
- Residual traffic concerns, particularly route to Shirley on narrow and winding roads & junctions.
- No contextual thought gone into allocating BL1, site cannot be considered available, achievable or deliverable, and should be deleted from the plan.

Change suggested by respondent:

Delete Site BL1 from plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15233

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr S Kelly**Agent:** DS Planning**Summary:**

- Accept Council's strategy of urban expansion
- Site raises concerns over compliance with government policy, 'essential characteristics of Green Belts are their openness and their permanence': land to south of Dog Kennel Lane clearly exhibits openness. Development would extend built development into open countryside.
- Site raises concerns over Council's own site selection methodology
- Concern is raised on Green Belt grounds: Para.'s 600 and 609 conflict, as site boundary not following a pre-existing feature, but to be formed by new road. Not conform with Government policy.
- Cannot be demonstrated that coalescence with Cheswick Green will be avoided.
- Concern is raised on Landscape Character Assessment grounds: substantial and detrimental impact on landscape character. Site located within area of high landscape sensitivity.

Change suggested by respondent:

- Delete Site BL2 from Plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14575

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kendrick Homes Ltd**Agent:** Tyler Parkes Partnership Ltd

Summary:**Summary**

Paragraphs: 222, 225 & 226

An objection is submitted to Policy P5 'Provision of Land for Housing', paragraph 222 'Solihull Housing Land Supply 2020-2036', Paragraph 225 'Maintaining Housing Land Supply' and Paragraph 226 'Allocated Sites'. It is contended that insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

There is also an undue reliance on larger site allocations. The smallest of the allocations being for 50 units. This is contrary to the recommendations in NPPF paragraph 68

In order to ensure deliverability, our Client contends that the small and medium size SHELAA sites with an estimated 'major' development capacity of 10 units or more, should be specifically allocated in the SLP This would be a mechanism to provide greater certainty of deliverability and speed up delivery.

There is no evidence to demonstrate that there is a reasonable prospect of all the sites identified in the BLR coming forward for development

Our Client questions the basis on which the windfall allowance has been calculated without evidence to demonstrate that the historic rates. There is no commentary in the evidence documentation to explain if/how an allowance has been made in the historic windfall rates to remove a proportion, which would have come forward through the more recent SHELAA and BLR site identification mechanisms

It is also important to note that the proposed delivery on SHELAA sites, proposed in the Publication version of the SLP, paragraph 225 table, anticipates 200 dwellings to be delivered on SHELAA sites in 5-years from April 2020. This would effectively double the 5-year housing land supply delivery rate proposed in the 2013 SLP's first 5 years.

Change suggested by respondent:

Evidence is required to:

demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.

extrapolate the windfall, BLR and SHLAA site completions.

robustly demonstrate the deliverability and developability of all BLR sites, SHELAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHELAA sites, BFR sites and planning permissions should be deleted from the SLP and housing land supply information (paragraphs 222 and 225).

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14576

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kendrick Homes Ltd**Agent:** Tyler Parkes Partnership Ltd**Summary:**

On behalf of our Clients Kendrick Homes Ltd, who have an interest in the site adjacent 84 School Road, Hockley Heath, to make representations to the Solihull Local Plan Review 2020. It is submitted that Policy P5 is unsound on the basis that insufficient policy weight has been given to encouraging the development of suitable sites within settlements for housing enabling villages to grow and thrive, especially where this will support local services, at densities in keeping with national and local strategic policies in Neighbourhood Areas – contrary to NPPF paragraphs 65, 122 and 123.

To comply with NPPF paragraph 65, it is important that the Neighbourhood Area housing requirement is included within Policy P5 as a strategic policy requirement, rather than as part of the supporting text explaining and justifying the approach set out in the policy. Currently, Policy P5 makes no reference to the housing requirement being partly attributed to specific Neighbourhood Areas.

Given that there is unlikely to be an opportunity to test the housing requirement at the Neighbourhood Plan stage, it is important to ensure that the proposed Neighbourhood Area housing requirements and supporting text are not overly restrictive jeopardising the NPPF and local plan objective of meeting the minimum housing requirement over the plan period.

Change suggested by respondent:

A modification is sought to Policy P5 as shown below:

Insert a new paragraph below paragraph 2 of Policy P5, as follows:

'A proportion of the Borough's housing requirement will be expected to be delivered in designated Neighbourhood Areas as detailed in the table below. These housing requirement figures are indicative minimum numbers and may be exceeded once detailed permissions have been considered for the sites identified in the land availability assessment, Brownfield Land Register, site allocations within this plan and saved from the 2013 Local plan and any suitable additional sites which come forward within the settlement boundaries as defined on the Policies Map.'

It is submitted that paragraph 234 should be deleted and replaced by a table of Neighbourhood Areas with the minimum housing requirement listed for each area.

The minimum housing requirement figures currently shown at paragraph 234 should be critically reviewed to reflect the deliverability of the housing land supply sources more realistically. As a minimum, our client submits that an addition of 21% to the numbers proposed at paragraph 234 should be incorporated, to reflect the windfall delivery expectation.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14579

Object

Hockley Heath**Respondent:** Kendrick Homes Ltd**Agent:** Tyler Parkes Partnership Ltd**Summary:**

site 49

Whilst our Client supports the proposed removal of Site No. 49 (Land adjacent 84 School Road, Hockley Heath) from the Green Belt and the proposed settlement boundary amendment at Hockley Heath (as shown on the Policies Map), our Client specifically objects to Paragraph 671 as currently worded and we make the case that the site 49 (Land adjacent 84 School Road, Hockley Heath) should be formally allocated for housing development or at the very least the current uncertainty that the wording of paragraph 671 should be amended.

The land is available now, offers a suitable location for development now, and has a realistic prospect that housing will be delivered on the site within five years.

Paragraph 674 of the SLP accepts the case for the existing ribbon of development on the north side of School Road, which is without any significant gaps warrants removal from the Green Belt, which would include our Client's site.

Change suggested by respondent:

Paragraphs 671 should be amended as detailed below:

'In addition to the site south of School Road that would then fall within the settlement boundary, if the Green Belt boundary were amended as described above, there are also two smaller sites that will be considered appropriate for development as they would then also be within the settlement boundary. These sites are not being allocated as part of this plan but are being highlighted as they have been promoted for development by the landowner/developer and if the Green Belt boundary is changed as proposed on the Policies Map they would no longer be subject to Green Belt policy. The details of the scale of development would be established through the planning application process. These are as follows (using the call for site references and the SHELAA for potential indicative capacity):

49 Land adjacent to 84 School Road (capacity 21)

328 land at and to the rear of 84, 86 & 90 School Road (capacity 30)

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

11244

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Plan fails to adequately address future need for specialist housing for older people. Whilst specialist housing or care bed spaces is required on sites over 300 units, there is no mechanism for delivery.

Depending on larger sites to deliver specialist housing will not address the current need and is likely to exacerbate need going forward, due to lead in times, build out rates, and complex land ownership issues.

Specific suitable sites should be allocated rather than relying on larger sites address provision. These additional sites should be in addition to the allocations and numbers already identified within the Plan.

Change suggested by respondent:

Allocation of specific sites for specialist housing in addition to the current allocations.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11246

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Minimum housing need should be increased to account for UK Central job growth and 'acute' need for affordable housing.

Uncertainty and wide variation of figures about HMA shortfall. No evidence that Solihull's contribution has been agreed or that it meets duty to cooperate obligations. No Statement of Common Ground so no real commitment to resolving the shortfall within the GBBC HMA.

Numbers from the Brownfield Land Register are unreliable given no part 2 register and no guarantee that sites will yield the capacity identified.

Past trends are not compelling evidence that windfall is a reliable source of supply.

Change suggested by respondent:

Increase in Housing figures of between 1,036 and 1,248 dpa.

Reduction in windfall allocations from 200 dpa to 150 dpa as per the tried and tested number set out in the adopted Plan.

Reduction in BFLR allocations by 29 – from 77 to 48.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11247

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Land to the west of this site was allocated for housing in the adopted Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available, an alternative development solution delivering open space was forthcoming. This situation still exists and calls into question the allocation of HA1.

No evidence regarding viability of the site and how this may be affected by any potential contamination issues as a consequence of the former use of the site.

The site cannot be said to be available, achievable and deliverable and should be removed from the plan.

Change suggested by respondent:

Remove allocation HA1 from the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11248

Support

Hockley Heath**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

The potential development of the two areas either side of School Road would appear to fulfil the Council's criteria for limited and proportionate expansion of the settlement.

Removing land to the north of School Road from the Green Belt would conform with the Council's intention to address anomalies in Green Belt boundaries across the Borough (Paragraph 420 of the DSP).

This is also applicable to Jacobean Lane in Knowle.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11249

Object

Policy S02 - Moat Lane Depot**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Concerns over relocation of the current uses on the site and the timing of such a relocation is an issue. No site has been identified for the relocation of the depot or referred to in the DSP, which merely states that the site is expected to become available during the Plan period. There are also particular issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.

The site cannot be said to be available, achievable and deliverable and should be deleted from the plan.

Change suggested by respondent:

Delete allocation S02 from the Plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11250

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Solihull Town Centre was identified as a location for housing in the adopted Plan. Identified locations within the town centre and subsequent Masterplans have yet to come to fruition.

From the conclusions which can be drawn from the adopted Plan and the experience and complexities of town centre redevelopment the housing figure proposed is over ambitious and unachievable within the Plan period.

To ensure the delivery of the appropriate number of dwellings within the Plan period additional allocations within the Plan should be provided.

Change suggested by respondent:

Additional allocations in the Plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11251

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

Uncertainty about site allocations in the Plan supports the inclusion of an additional site at Jacobean Lane (site 526). Whilst currently in the Green Belt, the boundary around Knowle is inconsistent, denoted by fences and vegetation. The site is part of and well related to the village, rather than surrounding countryside. A strong, defensible Green Belt Boundary can be established and there are excellent access arrangements. Accessibility is excellent, the site is Brownfield and the reasons for excluding the site are not justified. Same approach as is being applied to School Road in Hockley Heath should be applied in this case.

Change suggested by respondent:

Include site 526 at Jacobean Lane as an allocation.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15058

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

- Proposed allocation does not conform to statement in introduction to Blythe Chapter, that villages in Blythe have a distinct nature within and separated by attractive countryside and Green Belt giving villages a sense of remoteness.
- Development would result in coalescence of Dickens Heath with Whitlocks End and Majors Green.
- Intrinsic character of Dickens Heath village would be lost through an ill-thought out addition to the west of village. Insensitive treatment for an award-winning settlement.
- Concept masterplan does not reference how it would complement or enhance village of Dickens Heath.
- BL1 has been dismissed as an allocation at number of previous Local Plan/UDP Inquiries.
- Impact of BL1 considerably more devastating coalescence effect than de-allocated former Site 13.
- Despite reduction in capacity on site, the perception of coalescence persists.
- Lack of alternative sports pitches provision is cause of concern.
- Should have been resolved before got to DSP stage.
- Residual traffic concerns, particularly route to Shirley on narrow and winding roads & junctions.
- No contextual thought gone into allocating BL1, site cannot be considered available, achievable or deliverable, and should be deleted from the plan.

Change suggested by respondent:

Delete Site BL1 from plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15059

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr T Khan**Agent:** DS Planning**Summary:**

- Accept Council's strategy of urban expansion
- Site raises concerns over compliance with government policy, 'essential characteristics of Green Belts are their openness and their permanence': land to south of Dog Kennel Lane clearly exhibits openness. Development would extend built development into open countryside.
- Site raises concerns over Council's own site selection methodology
- Concern is raised on Green Belt grounds: Para.'s 600 and 609 conflict, as site boundary not following a pre-existing feature, but to be formed by new road. Not conform with Government policy.
- Cannot be demonstrated that coalescence with Cheswick Green will be avoided.
- Concern is raised on Landscape Character Assessment grounds: substantial and detrimental impact on landscape character. Site located within area of high landscape sensitivity.

Change suggested by respondent:

- Delete Site BL2 from Plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10677

Object

Policy S01 - East of Solihull**Respondent:** Mr Munish Khurmi**Summary:**

I understand homes are needed but I fail to see an evidence that addresses the current challenges in the area. Demand on schools & local services is too high. As a resident of 15 years, I've struggled to place my children at local schools (long waiting lists and competition). Seeing a doctor is difficult, so much so that I self-diagnose via NHS website. The roads struggle, Hampton Lane has traffic queuing up at peak times, these queues extend down so far along Hampton Lane/Damson Pkway.

Change suggested by respondent:

I strongly feel this side of Solihull is already massively congested, Hampton Lane is already used as a cut through from A45/Airport traffic/NEC ect, this will be compounded by adding more homes off the back of Hampton Lane (Ludgate Lane). COVID has taught us that having access to open green spaces has a real positive impact on people, why is there an unnecessary need to repurpose these 'Green' spaces what allow the community to live in a balance environment supporting local nature. This development will only add to more pollution and congestion having a negative impact on the environment.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10821

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Christopher Kiddle Morris**Summary:**

Para 724 - the suggestion that the relocation of the school will reduce traffic along Station Road needs to be robustly justified.

It has been assumed that the high density housing off Station Road will reduce car use within the village. How, what of the existing users and the 600 new families going to other larger more diverse local shopping centres.

Change suggested by respondent:

A more detailed and robust traffic flow study needs to be undertaken mapping the probable car user behaviour as a result of the new housing and relocation of the school prior to the grant of planning permission.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

15017

Object

North of the Borough**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Alternative Site to be considered, CFS 193:

Performs well in accordance with Council's evidence base:

SHELAA - Site performs well except for achievability. Can confirm that site owned by national Housebuilder, Kier Living, who have delivered housing immediately to west. Site achievable and available at earliest opportunity.

SA - Site identified as Ref. 341 for SA. Scores well against SA objectives, achieves 8 positives (2 of which are significant), 10 neutrals and 1 negative.

Green Belt Assessment - Concludes site only contributes to one of GB purposes, therefore has negligible contribution to GB.

Site Assessment Document - Only negative raised is site's development would narrow the gap between Marston Green and Chelmsley Wood, contrary to conclusions in GBA. No robust reasoning for site to be excluded from Step 2 in site selection process.

Following sites have much greater constraints and deliverability concerns than CFS 193: BL2, BC1, BC3, BC4, KN2, SO1.

Change suggested by respondent:

Further housing sites, including CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15018

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- Performs moderately in Green Belt terms, scoring highly in relation to purpose 2 'to prevent neighbouring towns merging into one another'.
- Does not have a clear contiguous defensible Green Belt boundary to the south (paragraph 609).
- SA concludes that there are several constraints for this allocation including:
 - i. > 20ha of best and most versatile agricultural land;
 - ii. up to 50% of the site lies within flood zones 2 or 3,
 - iii. within an area of high landscape sensitivity to change;
 - iv. a heritage asset on site; and
 - v. sources of noise adjacent to the site that could affect the amenity of future occupiers.

As site is heavily constrained, in particular by Flood Zones 2&3, and due to site's landscape sensitivity, doubtful whether it can deliver its full capacity at an appropriate density.

SHELAA indicates that there are numerous land ownerships of this site, which is likely to delay delivery.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15019

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- Performs moderately in the Green Belt, with the eastern part falling within a highly performing area of the Green Belt Assessment.
- GB severance: DSP states that as this parcel will be cut off from the main part of the land by the line of HS2, thus will reduce the sites contribution to Green Belt purposes.
- SA concludes that there are several constraints for this allocation including:
 - i. > 20ha of best and most versatile agricultural land;
 - ii. up to 50% of the site lies within flood zones 2 or 3
 - iii. within an area of medium landscape sensitivity to change;
 - iv. a heritage asset on site
 - v. within a mineral safeguarding area;
 - vi. sources of noise adjacent to the site that could affect the amenity of future occupiers; and
 - vii. separated from key economic assets.

Doubtful whether it can deliver its full capacity; unclear impact of Flood Zones on site's ability to come forward. Unclear extent of impact of heritage sites on deliverability. Doubt over ability to deliver 875 homes within plan period.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15020

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- Located in lower performing parcel in the Green Belt and a mineral safeguarding area.
- Whilst this site is located within Balsall Common, a settlement identified for significant growth, it is preferable for development to be on land that is more highly accessible.
- Site Assessment document concludes that this site has a low level of accessibility.

SA - 4 positive effects and 6 negative with the most significant negative effect being the distance to key economic assets.

Developability:

Council's own evidence base identifies that there are a number of constraints, including ecology and heritage, to overcome, which raises significant doubts regarding the suitability of this site for housing.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15021

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- Western part of the site is located within a lower performing parcel of the Green Belt and the eastern part is within a higher performing area.
 - SA identifies 3 positive and 6 negative effects with a significant effect being the distance to key economic assets and convenience store or supermarket. - Negative effects include the site having a low level of accessibility, in an area of medium visual sensitivity with low capacity for change.
 - Site Assessment document state site has low accessibility and does not provide a strong defensible GB boundary.
- As such, we have strong reservations regarding site's suitability.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15022

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- SA states that there are several constraints for this allocation including:

- i. local wildlife site;
- ii. protected trees and other valued landscape features;
- iii. > 20ha of best and most versatile agricultural land,
- iv. impact on the townscape and local distinctiveness due to the site being unscreened and visually prominent.

Developability compromised by numerous constraints on site, inc. LWS and trees, infrastructure delivery and complex ownership.

Site expected to deliver new through school.

SHELAA identify 9 different landowners.

Unrealistic that site will deliver 400 homes in first 5 years of new local plan period as indicated in SHELAA.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15023

Object

Policy S01 - East of Solihull**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Site has several constraints that will compromise deliverability and capacity as set out in DSP:

- Site Assessment document concludes

that development on this site would result in an indefensible GB boundary to the east.

- SA states that there are several constraints including:

i. loss of more than 20 ha of agricultural land;

ii. proximity to a listed building;

iii. within a medium landscape sensitivity area with low capacity for change;

iv. overlaps a local wildlife site.

Developability of site constrained by heritage assets and local wildlife site and multiple site owners.

Consider unrealistic that site can 400 homes in first five years of new local plan period is indicated in SHELAA.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15024

Object

Spatial Strategy**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Council's own evidence base raises significant issues with a number of the sites that are allocated in the Emerging Plan, and their development would therefore conflict with the Framework. As such, the site selection process is not based on proportionate evidence and the Emerging Plan is consequently not justified as it fails to propose an appropriate strategy.

Sites include: BL2, BC1, BC3, BC4, KN2, SO1.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15025

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:****Housing Supply:**

Do not expect that all sites can deliver number of houses set out in Plan.

Significant proportion of housing supply from small number of large sites – notwithstanding site-specific developability issues, inherent deliverability concerns with infrastructure, or complex site ownership etc.

Supply vulnerable is only one of sites failed or is delayed.

To address this Plan should allocate wider range of sites, inc. CFS 193.

Change suggested by respondent:

Further housing sites, such as the CFS 193, must be allocated to provide assurances that the minimum housing requirement can be met.

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:**

15026

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Housing Supply - lack of buffer

The total buffer (taking into account the 10% lapse rate) above the minimum housing requirement is only 1.9%, providing insufficient flexibility, should sites not reach full capacity, delayed/deleted, or windfall delivery rate falls.

Conflicts with NPPF Para. 11.

Insufficient buffer could result in DSP unable to meet its minimum housing requirement, contrary to NPPF Para. 35a and 59.

See recent examples:

- Rugby Local Plan (June 2019) include 17.5% buffer (which includes unmet needs);
- Nuneaton and Bedworth Local Plan (June 2019) include 5.5% buffer, which Inspector called 'very modest' but cautiously considered acceptable in report.

Change suggested by respondent:

- An increased buffer above the minimum housing requirement must be provided;
- A more realistic windfall delivery rate should be assumed, having regard to fact that the supply will have diminished based on recent high delivery rates;
- Additional housing allocations are required, including smaller sites such as the CFS 193, to boost the supply and offer better resilience.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15027

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Windfall allowance:

- Constitutes 18% of the Emerging Plan's housing supply
- Windfall sites are a finite resource and the high delivery of windfall developments in recent years will have diminished the supply of sites.
- Particularly relevant in Solihull Borough given its Green Belt constraints
- Council keeps separate brownfield land register
- Given NPPF's restrictions, no windfall contributions can come from Green Belt land
- Uncertain whether the past rates of windfall delivery can be sustained up to 2036
- Windfall allowance is based purely on historic trends, not SHELAA delivery trajectory, and this approach is inconsistent with NPPF para. 70
- DSP assumes annual windfall development rates will be required in full during the period 2022-2036 in order to meet minimum housing requirement, given the lack of flexibility in the housing supply.

Change suggested by respondent:

- An increased buffer above the minimum housing requirement must be provided;
- A more realistic windfall delivery rate should be assumed, having regard to fact that the supply will have diminished based on recent high delivery rates;
- Additional housing allocations are required, including smaller sites such as CFS 193, to boost the supply and offer better resilience.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15028

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Build out rates/trajectory:

- Lichfields' 'Start to Finish' assessment concludes that sites of more than 500 dwellings take on average 5 to 8.3 years from the date that an outline application is registered.
- Given that unlikely Plan will be adopted before Spring 2022, and factoring another 12 months to submit an application, sites of 500+ dwellings in Plan may not start delivery until 2031.
- Lichfields' assess that build out rates are:
 - 500-999 dwellings – ca 150 dpa;
 - 1,000-1,499 dwellings – ca 175dpa;
 - 1,500-1,999 – ca 210dpa;
 - 2,000+ dwellings – ca 290dpa.

Therefore even with most ambitious build out rates, some sites will not be completed by end of plan period.

Change suggested by respondent:

- An increased buffer above the minimum housing requirement must be provided;
- A more realistic windfall delivery rate should be assumed, having regard to fact that the supply will have diminished based on recent high delivery rates;
- Additional housing allocations are required, including smaller sites such as CFS 193, to boost the supply and offer better resilience.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15029

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Local Housing Need and Standard Methodology:

- Correct to use SM to calculate housing requirement in accordance with NPPF Para. 60.
- Govt published revised standard method figures for consultation in August 2020. Projects a 25% increase in Solihull's housing need up from 804 to 1,011 dpa, or 12,901 to 16,176 over plan period. Strong likelihood this will be adopted. Therefore DSP unlikely to meet housing need over plan period.
- Would need to review in less than 5 years, further Green Belt would need to be released as Borough 67% GB with little brownfield land available.
- NPPF Para. 146 – GB boundaries should endure beyond plan period. Review so soon would be inconsistent with NPPF, and unsound.
- DSP should release more land, or at very least identify safeguarded land.

Change suggested by respondent:

- Plan needs to release more land from the Green Belt;
- At very least Plan needs to identify safeguarded land, to provide appropriate flexibility.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15030

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kier Living Ltd - Coleshill Road**Agent:** Mr Hywel James**Summary:**

Birmingham City unmet housing need:

- Birmingham Development Plan has shortfall of 37,900 dwellings, and 20,440 shortfall against current SM.
- Para. 227 of DSP acknowledges Birmingham HMA shortfall and contribution of 2,105 dwellings.
- Not considered proportionate given functional relationship between Birmingham and Solihull Metropolitan Borough Council: shared boundary, good public transport and road connectivity.
- 2011 Census data demonstrates 887 net people migrated from Birmingham to Solihull between 2001 and 2011, 28% of Birmingham's net migration.
- DSP should seek to accommodate 28% of HMA's unmet need, not just 2,105.
- Disproportionate accommodation of unmet needs is contrary to NPPF Para. 35(a)
- Solihull clearly most sustainably located authority in the HMA
- Contrary to NPPF Para. 60 and 136.

Change suggested by respondent:

- The housing requirement should be increased to accommodate an appropriate proportion of Birmingham City's unmet needs;
- Additional land, such as the CFS 193, should be released from the Green Belt and identified as housing allocations (or at the very least reserve sites) to ensure that the Emerging Plan's minimum housing need can be met across the Emerging Plan period.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14252

Object

Policy P12 Resource Management**Respondent:** Kilbride Resources Ltd**Agent:** Pegasus Group**Summary:**

Land at Arden Brickworks should be allocated for the co-location of waste recycling and energy generation facilities in an eco-park campus style development.

The Cushman Wakefield 'Assessment of land for potential re-location of a Household Waste Recycling Centre and Depot' (June 2019) provides a significant part of the evidence base for the consideration of such facilities in the Borough with the northern and southern parcels of the former Arden Brickworks site being identified sequentially as the first and third most appropriate sites respectively within the Borough, whilst the allocated Damson Parkway site as the fourth most sequentially preferable site.

Arden Brickworks is identified as a Strategic Waste Management Site, the site proposed is brownfield and mineral extraction area.

Site is suitable, available and deliverable and offers a sequentially preferable potential alternative location to the Damson Parkway site for a new Household Waste Recycling Facility in the Borough, and an opportunity for such a Materials Recycling Facility to be combined with complementary energy storage and generation as part of a comprehensive approach to deliver a Waste and Energy Eco-Park development.

Change suggested by respondent:

Site at former Arden Brickworks should be allocated as a potential Eco-Park for waste management, energy and employment related development in order to provide flexibility in the plan for the delivery of the Council's vision and objectives to provide adequate waste management provision to meet the waste management needs arising in the plan period within the Borough.

The Plan should acknowledge in any potential allocation at the former Arden Brickworks site as shown in red on the accompanying site layout plan that these proposals would assist the Borough in moving towards net zero carbon emissions with the Eco-Park attracting inward investment into the Borough for co-locating waste management and energy generation facilities.

The Local Geological Site designation should be removed from the emerging policies map.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14253

Object

Protecting and Enhancing our Environment**Respondent:** Kilbride Resources Ltd**Agent:** Pegasus Group**Summary:**

The site is not identified as a Local Geological Site on the adopted Solihull Local Plan Proposals Map nor it is listed as a Regional Important Geological Site (RIG) or Local Geological Site in the adopted Solihull Local Plan. The main geological value of the site is for educational purposes. While visits to the site can be arranged for educational purposes, the site is privately owned and not publicly accessible. The mineral extraction permission at the site requires the restoration of the site once extraction is complete, at which point the currently exposed strata would be lost.

Change suggested by respondent:

The Local Geological Site designation should be removed from the emerging policies map.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14886

Support

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Mr J Kimberley**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Fully support the principle of allocation Site ME1. The proposed amendment of the settlement boundary to accommodate Site ME1 is sound.

The site makes a very limited contribution towards the purposes of including land within the Green Belt. There are clear physical defensible boundaries.

There are no known legal or physical constraints and the site is deliverable and developable within the first 5 years of the plan period.

The site (western part of allocation) can be developed in isolation. Redevelopment of land within the first phase would not impact the deliverability and developability of the whole allocation.

The site was preferred by residents for housing development when the local community were consulted as part of the Meriden Neighbourhood Plan process. Development of Site ME1 will assist towards meeting the identified need.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14887

Support

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Mr J Kimberley**Agent:** Tyler Parkes Partnership Ltd**Summary:**

The site includes an area with a Certificate of Lawfulness for use of part of the site for caravan storage. There is also a building on this same part of the site. Prioritising the use of brownfield land in a sustainable location is aligned with the NPPF.

Change suggested by respondent:

The 'Solihull Local Plan Site Allocations – Masterplans' October 2020 should be corrected to reference that part of Site ME1 is brownfield.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11259

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Ailish King**Summary:**

The village cannot sustain the continual development, and lifting of the Green Belt will have adverse effects on the village.

1. Flood risk - The site has always been boggy, building of more houses on School Road will create more surface water and increase the water table resulting in more flooding.
2. Schooling - Hockley Heath school and nearby secondary schools are already at capacity.
3. Sewerage - sewerage in the village is poor, any large development would need replacement of the sewerage, causing disruption to traffic & increase congestion.
4. Pollution - increasing homes in the village will increase the pollution levels, which will be right next to the school
5. Nuisance - construction of new housing would cause noise, pollution and danger (near the school). This would be detrimental to those who live near the site.
6. Poor Public transport links in the village

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14687

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Andrew King**Summary:**

Solihull Council have underestimated the volume of traffic which will be using Damson Parkway if the Bickenhill Tip and Moat Lane Depot is relocated there.

The new site for the Tip will be too close to the sizeable residential area.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10784

Object

Spatial Strategy**Respondent:** Mr & Mrs J King**Agent:** PRW Strategic Advice**Summary:**

The plan fails to consider the reasonable alternative strategy of focusing new development along the Birmingham - Stratford rail corridor and the potential for it to accommodate an additional & strategically significant amount of development in a sustainable way, particularly in the Tidbury Green, Wythall and Earlswood Area.

Change suggested by respondent:

The plan needs to recognise the potential for further development along the Birmingham - Stratford rail corridor and to allocate additional land or provide a mechanism for releasing additional land for development along it, including land Tidbury Green, Wythall and Earlswood Area.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10818

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Richard King**Summary:**

Relocation HWRC contradicts Council's own declared objectives, para 38 (c), (d), (g), (j) and (k), the defined Challenges and associated Objectives, specifically Challenges A, C, E, F, J, M & N.

Paras 293 & 299, Solihull MBC charges itself with development and growth of clean air; improving the health and well-being of residents; creating sense of space, reducing noise impacts. Proposals contained in Para 831 are irreconcilable with these goals.

Para 831 development contains two serious inaccuracies: road infrastructure and new HWRC site being "relatively isolated".

Change suggested by respondent:

Development of remaining green belt between Damson Parkway & A45 should be stopped due already high levels of noise and air pollution. HWRC needs to be relocated to site away from residential areas, not nearer! Look at developments made by Leics (Ashby) and Oxon (Ardley).

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14012

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Ruth Kirby**Summary:**

Supports the policy as it provides more housing,

> This will provide more housing (purpose built) and will meet local educational needs while offering a wider curriculum. More energy efficient.

Change suggested by respondent:

Satisfied that this policy has been sufficiently well developed in collaboration with all parts of the community and fully supports the policy without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14585

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Kirirom**Agent:** Acorn Planning**Summary:**

Whilst Policy BC5 is supported as a sustainable urban extension to the urban area of Balsall Common, the Concept Masterplan illustrates an almost entirely housing driven settlement extension with no provision of employment and community infrastructure, which is unsound.

A request was submitted that the boundary of the Trevallion Stud allocation (Site 22 in Supplementary Consultation Jan 2019) be reviewed to include an adjoining 1.71 ha (4.2 acre) site on the east side of

Wootton Lane to the north west. The proposed extension to the Trevallion Stud allocation would allow for the provision of purpose built local employment and community space and "fix" the current deficiency in local employment and community infrastructure. The site is located beneath a railway line which forms the northern site boundary. A Concept masterplan for the site is submitted

Change suggested by respondent:

Site BC5 should be extended to the north to include land to the east of Wootton Lane for employment and community purposes

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11224

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Jonathan Kirk**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11200

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Henning Kleine**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13836

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

Site 107 - Land at Gentleshaw Lane.

The site should be removed from the Green Belt as it does not perform a Green Belt function. The site reads as forming part of the built up conurbation and does not have an association with the wider countryside beyond or visually reflect its Green Belt designation. The site has urban influences on all boundaries which have increased significantly over time, and serve to reinforce the relationship of the site to the town rather than the rural area. The Green Belt boundary around the site needs to be reviewed and is a distinct exercise from the positive allocation of land.

Change suggested by respondent:

Site 107 does not perform a Green Belt function and should be excluded from the Green Belt in the Local Plan Review. An examination of the evolution of the area supports the case that Gentleshaw Lane would be a logical rounding off of Oldway Drive, Warwick Road, Riverside Drive and Pool Meadow Close - all of which have previously been developed within the Green Belt clearly inconsistent with the Green Belt objective of maintaining openness.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13837

Object

Policy P17 Countryside and Green Belt**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

The Council have explored in detail the changes to Green Belt boundaries in the context of removing land for the purposes of site allocations. However, it has not given due consideration to revisiting Green Belt boundaries where land no longer fulfils a Green Belt function.

One such example is at Gentleshaw Lane, Solihull (site 107), where a process of new development inset within the Green Belt over a period of many decades has taken place. This area no longer fulfils a Green Belt function and as such, Green Belt boundaries should be redrawn to reflect this change in circumstances.

Change suggested by respondent:

The Council should give much greater consideration to Green Belt boundaries and whether these should be redrawn, not solely in relation to the provision of positive allocations of land but instead to reflect the change in circumstances which justifies a review as to the extent land fulfils a Green Belt function. Gentleshaw Lane, Solihull is one such example whereby the lack of any change to Green Belt boundaries undermines the permanence of Green Belt and the robustness of policy seeking to maintain openness.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13838

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

Support the principle of the site being removed from the Green Belt. However, it should be clarified that the masterplan is for indicative purposes with a final masterplan formulated as part of the development management process.

Specific details of how open space is to be provided is still to be explored as is Green Belt mitigation / enhancements.

Infrastructure requirements should refer to the provision of 40% affordable housing in accordance with Policy P4A.

Concerns as to the extent to which evidence supports the re-provision of Arden Academy and whether this is a necessary infrastructure requirement arising from the draft allocation.

Change suggested by respondent:

Clarification that the masterplan is for indicative purposes with a final masterplan formulated as part of the development management process.

The provision of open space and how and where this could be located for example in relation to the Local Wildlife Site is to be explored further.

Infrastructure requirements should refer to the provision of 40% affordable housing in accordance with Policy P4A.

The extent of Green Belt enhancements will need to be considered once further work is concluded in relation to the Concept Master Plan and the position is settled upon in terms of on-site mitigatory measures.

Clarification regarding the reprovision of Arden Academy including evidence to supporting the relocation and whether this is a necessary infrastructure requirement arising from the draft allocation.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13839

Object

Policy P15 Securing Design Quality**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

Criteria 9 provides a degree of overlap in relation to the provisions of paragraph 243.

Our observations in relation to paragraph 243 apply equally in relation to Policy P15(9).

Here we go further, and seek clarification as to what the Council consider amounts to “demonstration” as to how engagement with other relevant landowners or developers with an interest in any given allocation is evidenced.

Change suggested by respondent:

Our suggestions in relation to paragraph 243 apply equally in relation to Policy P15(9).

In addition, we seek clarification as to the Council’s meaning in terms of demonstrating how engagement with other relevant landowners or developers with an interest in any given allocation is evidenced and the bar that is being set in terms of the development management process.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13840

Object

Foreword**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

There is a contradiction in terms in paragraph 243. ‘Piecemeal’ means piece by piece, one piece at a time. However, it is important is that there is a unifying approach to the bringing forward of an allocation and that one piece does not prejudice the delivery of another piece.

The Council recognises that an allocation can come forward in phases indicating an acceptance to a piece by piece approach (which is better characterised as a coordinated phased approach); it is the coordination of the bringing forward of pieces which is critical to the successful delivery of an allocation.

In this context, concept master plans are only one way in which an allocation can be brought forward piece by piece provided that there is a demonstration that they will not prejudice the delivery of the remainder.

Change suggested by respondent:

Paragraph 243 should remove reference to the word ‘piecemeal’.

The paragraph should also be modified to make clear that concept master plans are only one way in which the Council’s objectives in relation to a joint and coordinated approach on the delivery of an allocation can be realised.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13841

Support

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

Support the Council's recognition as to the importance of the historic environment.

However, Criteria 3 sets out a development management policy which refers to a recognised process of assessment, involvement, evaluation and design. It is not clear however what this recognised process is. The policy is imprecise as a result, and requires greater clarity.

The NPPF sets out a clear policy framework for dealing with heritage assets at paragraphs 195, 196 and 197. This hierarchical approach is more precise than the provisions of Policy P16 and provides for more clarity in a development management context.

Change suggested by respondent:

Criteria 3 to Policy P16 should be replaced with the provisions of paragraphs 195, 196 and 197 of the NPPF; alternatively, a simple cross-reference within the policy to the provisions of the NPPF could also be appropriate.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14108

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

The need for affordable housing is agreed and supported. .

Paragraph 158 of the draft Submission Plan makes clear that affordable housing need is exceptionally high in Solihull, particularly in the mature suburbs and rural areas of the Borough.

40% affordable provision on qualifying sites reflects the requirements in the 2013 Local Plan and has historically ensured affordable housing delivery without creating issues in terms of site viability.

Criteria 3(iv) states that in circumstances where the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site, affordable housing will be considered at less than policy compliant 40% provision.

Given the scale of the affordable need in Solihull, and the provisions of the Borough vision which includes Borough residents having access to a range and choice of quality housing accommodation, it is difficult to envisage any circumstances where other planning objectives take precedence over the delivery of affordable housing.

Change suggested by respondent:

Criteria 3(iv) should be deleted from Policy P4A so as not to undermine or prejudice the delivery of much needed affordable housing as evidenced in the draft Submission Plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15078

Object

Policy P5 – Provision of Land for Housing**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

- Plan being brought forward during time of uncertainty in national policy
- SM consultation increases LHN in Solihull from 807 dpa to 1,011 dpa
- Plan likely to be adopted very close to base date, therefore risk of plan not delivering level of growth set out, within timescales
- Although Local Plan should be reviewed every 5 years, and shorter triggers can be included in Plan, this can take up to 10 years to complete as a process
- Could be distant point in future before Council plans for higher SM levels
- Therefore could be a significant period of time when Plan will be under-delivering open market and affordable housing
- Council should therefore commit to identifying reserve sites as Stratford upon Avon have done, to provide greater flexibility, and avoid delays from partial or whole review.

Change suggested by respondent:

- Plan should include reserve/safeguarded land for future or alternative development to provide greater flexibility in delivery or meet higher housing requirement if necessary.
- Alternatively commence Site Allocations DPD within 6 months of adoption of Plan to include reserve sites

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

15079

Object

Policy P10 Natural Environment**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

Criteria 18 refers to local nature reserves, local wildlife sites or geological sites.

Policy text associated with these designations all refer to the policy implications where development has an adverse impact upon such designations.

Policy is silent on the approach to be taken where a proposal has a positive impact on such designations and how this is to be addressed in any planning balance.

E.g. Securing appropriate management of otherwise neglected or unsympathetically managed local wildlife sites.

Therefore policy unbalanced, and not accurate representation of development management process.

Change suggested by respondent:

Amend (18) to make clear that development that secures the enhancement of locally designated sites within the Arden Landscape should be supported.

The Inspector may consider that this approach can also be applied to other designations caught by Policy P10, for example Sites of Special Scientific Interest and

Ancient Woodland.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

15080

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Kler Group - Gentleshaw Lane**Agent:** Cerda Planning Ltd**Summary:**

- Support the provisions of Policy P21 and the need for developer contributions and infrastructure provision in principle.
- However, these provisions can only be promoted where the developer contributions and infrastructure provision meets the three CIL tests, specifically;
 - Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- As drafted, whilst the policy makes passing reference at various points to the provisions of the CIL tests, these are not explicit.
- As a result, the policy is imprecise and it is not clear whether its operation would be discordant and at variation with the CIL provisions.

Change suggested by respondent:

Policy P21 should be modified to expressly refer to the three CIL tests in regulation 122 of the 2010 Regulations as set out above, and furthermore make clear that developer contributions and infrastructure provision will only be required where each of the three tests are demonstrably met.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

11008

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Knowle Streamside Trust**Summary:**

Concern about impact on LWS. Any future application must include appropriate environmental and ecological assessments to ensure no adverse impact as per the Council's own ecological assessment. Adequate buffer zone (extended to include land identified as an area of potential flood risk) should be provided to prevent encroachment and preserve this habitat corridor. Site analysis mapping should extend to northern area of the LWS. No protection given to Purnells Brook Meadow which has been redesignated a LWS. No development to be permitted in the buffer areas. Impact of increase visitors on woodland. Weight given to Masterplans should be clarified.

Change suggested by respondent:

Masterplan to include an adequate buffer to Purnells Brook Woodland LWS. Need to correctly define Purnells Brook Meadow LWS.

Alternative paths to provide alternative routes for visitors could be provided through the public open space and link to Grand Union Canal to divert people away from fragile path within LWS.

Need retention of and improvement to ancient hedgerows to facilitate wildlife corridors. This should be included within the policy KN1 2(iii). All hedgerows should be protected and enhanced.

Weight to be given to masterplans needs to be set out to provide certainty for future planning applications.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13736

Object

Introduction**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

The Introduction needs to be modified to indicate that, following adoption of the Local Plan, neighbourhood plans will still be part of the development plan. In addition, neighbourhood plan policies that provide a more appropriate local expression should be identified in the related settlement chapter / allocation policy and not left to the decision maker.

Change suggested by respondent:

Amend para 20 as suggested in the submission attachment which confirms that neighbourhood plans that are 'made' are still part of the development for the Borough.

Amend para 21 as suggested in the submission attachment which states that Neighbourhood plan policies that provide a more appropriate local expression should be specifically identified in the related settlement chapter / allocation policy.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13737

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Policy P4A does not address occupation by households with a strong local connection. Whilst the local needs of households are covered in Policy P4B, this is only in relation to rural exception sites. There is a failure to recognise the presence of neighbourhood plan policy dealing with local needs affordable housing on allocated housing sites. In addition, differences regarding the tenure split are not acknowledged.

Change suggested by respondent:

Addition of a new paragraph in Policy P4A after paragraph 8 as follows:

The provision of affordable housing on allocated sites to meet the needs of households in that Parish or Neighbourhood will be supported where it is consistent with a neighbourhood plan.

Amend paragraph 175 in the justification to P4A to include the following:

In determining planning applications, regard shall also be paid to relevant neighbourhood plan provisions.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13738

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

The recommended market mix in this policy differs from Policy H3 Market Mix of the Knowle Dorridge and Bentley Heath Neighbourhood Plan. This was 'made' in April 2019 and is up to date and relevant. It is noted that para 187 states that relevant policies in neighbourhood plans will be taken into consideration along with other matters. However, the other matters are also referenced within the policy. In view of the role and status of neighbourhood plans, they should also be included in the policy.

The policy indicates that concept masterplans will include details of the likely required profile of household types. This is missing from the Masterplans.

Change suggested by respondent:

Add to policy P4C, after point 1vi:

1vii any relevant policies in neighbourhood plans.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13739

Object

Policy P5 – Provision of Land for Housing**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Objection relates to Housing Requirement for Designated Neighbourhood Areas - The housing number identified for the Knowle, Dorridge and Bentley Heath Neighbourhood Area (808) is derived from the estimated capacity of the selected sites. The Forum has raised issues around the policies and concept masterplans for these sites which seek modification to that number. The Forum would oppose any further site allocations to compensate for reduced capacities on allocated sites.

Change suggested by respondent:

In the event that the Forum's representations on the Knowle site allocations and concept masterplans lead to a revised housing capacity, a consequential modification will be required to the Knowle, Dorridge and Bentley Heath Neighbourhood Area housing number in Para 234.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13740

Object

Policy P5 – Provision of Land for Housing**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Objection relates to density - The content of the Plan in relation to density is not clear and unambiguous. The application of Policy P5 and the indicative density tables are inconsistent with site allocation policies KN1 and KN2 and their concept masterplans. The provisions do not reflect the Neighbourhood Plan policies nor the published evidence base relating to local character and masterplanning.

The density table at Paragraph 240 indicates that mixed development density should be 40-50 dph for limited or significant extensions at the edge of larger villages. However, proposed densities in Knowle above 40 dph on site allocations would be out of character with the area and its surroundings.

Change suggested by respondent:

None required to the policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13741

Object

Policy P5 – Provision of Land for Housing**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Concept masterplans are discussed in the justification to Policy P5. However, they are not addressed within the policy itself. Given their importance, key provisions should be included within the strategic policy. The provisions also need to be strengthened so as to give confidence to the public and a clear steer to developers. The status of the concept masterplans as part of the Local Plan needs to be confirmed.

Change suggested by respondent:

Policy P5 - additional paragraph (Para 7)

Concept Masterplans

7. Development on allocated housing sites shall be carried out in accordance with the related concept masterplan and the principles set out in the housing allocation policies. The content shall be as prescribed in the Local Plan.

Para 242 – additional text to specifically state that concept masterplans for each site form part of the Local Plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13742

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Representations are made relating to, amongst other things, lack of clarity over application of Neighbourhood Plan policies; the deliverability of the Knowle site allocations, in particular the community facilities; effectiveness of infrastructure mitigation measures; and concerns around concept masterplans, design and densities.

Modifications to the Knowle, Dorridge and Bentley Heath (KDBH) Settlement Chapter are needed regarding public transport; highway improvements; community access; affordable housing; primary health care; and densities.

Change suggested by respondent:

Modifications as proposed in the representations which include:

- Deleting references to the settlement being well served by public transport at para 685 and 690.
- Adding that traffic lights would be inappropriate at para 698
- Additional paragraph after para 700 to read:

"The Neighbourhood Plan has two policies that are particularly relevant. Policy ECF2 requires consideration of dual use, by the community, of school buildings and outdoor recreational facilities. Policy ECF6 provides for the submission of a Community Access Statement and agreement regarding the extent of public access. Both of these policies are applicable to the new education provision in Knowle."

- Para 703 add text to end of paragraph as follows:

"Neighbourhood Plan Policy ECF6 provides for the submission of a Community Access Statement and agreement regarding the extent of public access. This policy will be applicable to the proposed new sports provision."

- Para 707 add text to end of paragraph as follows:

"The Neighbourhood Forum's affordable housing policy (Policy H2) requires 25% of affordable housing to be occupied by household with a strong local connection with KDBH. This is different from the Borough-wide provisions in this Local Plan. However, given its local credentials, Policy H2 is the policy to be applied in KDBH. With regard to the required affordable housing tenure split (Policy P4A 6), regard will be paid to the Neighbourhood Forum's preference for a higher percentage of shared ownership."

- Additional paragraph after paragraph 707 as follows:

"Primary Health Care - The three doctors' surgeries within KDBH are all under stress. As such, proportionate developer contributions will be required towards improvements to the local primary health care system. An appropriate location to meet the need will be identified."

- Additional para after Para 709 as follows:

"The density of future development will need to reflect a number of factors. It will be appropriate to make efficient use of land and exploit proximity to existing services and amenities. At the same time, avoidance of a cramped appearance will be important as will the characteristics and distinctiveness of the area, the landscape setting and proximity to listed buildings."

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

13743

Object

Policy KN1 - Hampton Road, Knowle

Respondent: Knowle, Dorridge & Bentley Heath Neighbourhood Forum

Summary:

There is an 'in principle' concern about the lack of evidence to demonstrate the viability and deliverability of this allocation, including the ability of the football club to relocate. A raft of measures are needed to add to or strengthen policy provisions in relation to the allocation. They concern densities; Grimshaw Hall; trees and hedgerows; footpaths; engineering works; community use; primary health care; highway improvements; and concept masterplans.

Change suggested by respondent:

Modifications as proposed in the representations for Policy KN1 which include:

- Setting out densities specifically.
- Identifying that the area between Hampton Road and the limits of the development shall be landscaped as amenity areas and that mitigation should significantly reduce harm.
- Retention of on-site trees is required.
- Need reference to the sports pavilion when talking about the relocation of Knowle Football Club.
- Retention of public footpath along its current alignment.
- Minimising harmful visual impacts as a result of the engineering works necessary to create the housing and playing fields.
- Need reference to Neighbourhood Plan community access policies in the Policy.
- Need reference to development contributions to local primary care.
- Need reference to specific highway improvement at junction of Arden Vale Road and Warwick Road.
- There should be no departure from the principles set out in the concept masterplan.
- There shall be no commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects. No more than 20% of the housing shall be occupied before the playing fields and sports pavilion are brought into use.
- Additions to paragraph 713 and 714.
- Deletion of paragraph 715
- Correction in paragraph 716 to say that the former hedge line still exists.
- Additional paragraph after paragraph 716:
"Given the need to respect the setting of Grimshaw Hall, and the density characteristics of the surrounding area, low and medium residential densities (up to 35dph) will be appropriate on the northern part of the site. The southern part of the site is closer to the amenities of Knowle village and to higher density development at Wootton Close. Given also the prospect of a care village or retirement complex on the site of the existing football club, a higher density would be acceptable in this location for such a use."
- Amend accessibility commentary in paragraph 718.
- Say that development is consistent with Option F for the limited expansion of rural villages in paragraph 719.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13744

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

These representations address firstly, an objection to the lack of evidence regarding the deliverability of this allocation: and secondly, a raft of measures that are needed to add to or strengthen policy provisions in relation to site KN2: South of Knowle (Arden Triangle). They concern densities; community access; highway access; trees and hedgerows; structure planting; primary health care; bus services; footpaths; and concept masterplans.

Change suggested by respondent:

Modifications as proposed in the representations for Policy KN2 which include:

- Setting out densities specifically.
- Referencing Neighbourhood Plan policies relating to community access to school.
- No vehicular access to the schools off Station Road.
- Important landscape features specifically mentioned.
- Need for a landscaping strategy to include screen planting along Warwick Road
- Developer contributions will be required for related improvements to the local primary health care system;
- Provision shall be made for access to enhanced bus services;
- Retention of exiting rights of way along current alignment
- No departure from the principles and other requirements applying to Site KN2
- No commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects.

- Additional para after Para 720 as follows:

"That part of the site adjacent to Station Road is closer to bus routes and to the amenities of Knowle and Dorridge. Higher densities would be appropriate. Elsewhere, the landscape setting and proximity to the listed Rotten Row Farm dictate a lower density of housing, reducing in a southerly and easterly direction reflecting the transition to countryside."

- Additional para after Para 724 as follows:

"Policy KN2 requires access to enhanced bus services. As a minimum, applicants will be expected to negotiate with providers to achieve a meaningful diversion of existing services into the site. Increased frequency and the provision of new services shall also be considered and addressed where feasible."

- Valued landscape features should be named.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13745

Object

Foreword

Respondent: Knowle, Dorridge & Bentley Heath Neighbourhood Forum

Summary:

Relates to Masterplan Document - The status of the masterplan document is ambiguous. It should be made clear that the concept masterplans are an integral part of the Local Plan and that adherence to key principles will be required; also, that only minor changes are envisaged in the future.

Essential matters and key principles of development should be clearly stated requirements and distinguished from any material that might be illustrative.

Densities differ between what is contained in the MP document and table at para 240 of the LP.

Change suggested by respondent:

Modifications as proposed in the representations for the Concept Masterplan document which include:

- Clarification that the document forms an integral part of the Local Plan, are not illustrative and subject to only minor change.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13746

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Relates to Concept Masterplan - The new Green Belt boundary on the northern part of the site should be formed by retention and strengthening of the existing hedgerow. The outer limit of residential development should be pulled back so as to avoid breaching the ridgeline that crosses the site. This could be compensated for by higher density development on the other (football club) site, but only in the form of a care village or retirement complex. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types and other key principles.

Change suggested by respondent:

- The developers proposal should be deleted as it adds to confusion as to the status of the Masterplan.
- Various modification to the Masterplan as set out in representations including:
- A statement setting out the fundamental aim of the proposals.
 - Revisions to the north easterly extent of development.
 - Removal of reference to the road being the new Green Belt boundary.
 - Reference to Neighbourhood Planning policies.
 - Retention of footpaths along current alignment.
 - Define medium density as 30 – 35 dph.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13747

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Knowle, Dorridge & Bentley Heath Neighbourhood Forum**Summary:**

Relates to Concept Masterplan - To reflect the character of the area, future housing on the Arden Academy site should be no higher than medium density. In addition, and to effect a transition between built development and countryside, the housing along the southern and eastern sides of the site should be low density. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types, landscaping and highway matters.

Change suggested by respondent:

Various modification to the Masterplan as set out in representations including:

- Developer masterplan to be deleted.
- Include the objective for including the site i.e. to build a new through school funded by housing. available for use by the public.
- A planning obligation (or similar binding legal agreement) will be necessary to secure the objectives of the site.
- Inclusion of likely required household types and reference to Neighbourhood Plan policies.
- Include a maximum density of 40dph.
- Clarify the position regarding access onto Grove Road (one access point or two) and required junction works.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

11039

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Amit Kumar**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14387

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Policy P1 should include the amount of residential development to be delivered by the hub and specific reference to where it will be located to provide certainty in terms of the context and justification for the need to deliver additional land for housing

Change suggested by respondent:

Policy P1 should be amended to specify the quantum of growth which the hub will deliver over the plan period, and be linked to clear plans showing where the residential growth will be delivered within the hub boundaries in order to show deliverability.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14390

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Policy P4A should be worded more flexibly to account for any further changes which the Government may make (for example in relation to 'first homes').

The scale of affordable housing required highlights the duty of Solihull in needing to deliver additional housing over and above the standard method baseline and the requirement currently being proposed.

Change suggested by respondent:

Amend paragraph 1 to state that affordable housing is defined by national policy. Including a current list in the policy itself could render the policy out of date if the national definition changes.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14392

Object

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Policy P4B is supported, however as shown through the attached paper on housing (Appendix 2) the scale of the need is much higher than that currently being planned for. Not planning sufficiently for affordable housing as part of an increased housing requirement at the necessary strategic scale will place more pressure upon local communities to allow exceptions sites. 'Exceptions' should be just that: occasional sites to meet a particular local need, not further sites to address deficiencies in a strategic borough-wide plan.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14394

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

The principle of Policy P4C is supported, however this needs to be considered in the context of a greatly increased housing requirement over the plan period, as set out in the response to Policy P5 (Provision of Land for Housing) and the accompanying Housing and Economic Growth Paper (Appendix 2)

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14395

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Taking into account all of the other policy demands upon delivering housing schemes, delivery could be seriously compromised by the requirement of Policy P4D. Given that the current system now generally discourages debate on viability at the decision-taking stage, with such matters expected to be addressed when plan-making, it cannot be assumed that this policy would work in practice. SMBC should not be relying upon developers to provide for all self and custom-build housing in fulfilment of its legal duty and should be exploring other options for delivery. Without evidence of other options having been thoroughly explored, L&Q Estates object to this policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14397

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

It is understood that Policy P4E is based on the recommendations of the HEDNA, and the flexibility in the policy is welcomed in principle to allow case-specific matters to be considered. However, the current system now generally discourages debate on viability at the decision-taking stage, with such matters expected to be addressed when plan-making. Therefore, it cannot necessarily be assumed that this policy would work in practice. Further justification is required to provide the necessarily elaboration.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14408

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Object to quantum of growth in Policy P5, as 2,105 dwellings is insufficient to address the housing market area shortfall. Plan should test the provision of a minimum of 11,500 additional homes to avoid creating unsustainable patterns of growth and commuting across the HMA.

The housing requirement should be expressed as a minimum requirement, inclusive of any cross-boundary provision to provide certainty as set out in NPPF paragraph 65. Proposed approach equating provision with the difference between local housing need and supply is unsound.

SMBC should allocate around 20% more housing land than required to deliver the housing requirement to provide the necessary flexibility for non-delivery of sites/ boost significantly the supply of housing, equating to a further 3,000 dwellings.

Supply is based upon the local housing need and does not factor any uplift necessary to ensure delivery of the cross boundary provision. The 5 year housing land supply should be recalculated on the basis of a housing requirement incorporating any cross-boundary commitment.

The windfall allowance is not supported as not Plan-led, prevents planning for necessary infrastructure, likely to be overestimate and is unsound.

No evidence to justify blanket introduction of nationally described space standards.

Whilst flexibility on densities is supported, the implications of various policy standards is uncertain and no evidence is provided that this has been taken into account

Change suggested by respondent:

Policy P5 of the Plan should be redrafted to:

- explicitly commit the Council to deliver the additional 2,105 homes (or any updated contribution to the unmet needs of the GBBCHMA) through this Local Plan as part of a comprehensive housing requirement
- include cross-boundary provision in the housing requirement
- incorporate uplift to ensure delivery of the cross boundary provision, with the 5 year housing land supply recalculated
- omit windfalls from housing supply
- remove blanket optional nationally described space standards

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14415

Object

Policy P17 Countryside and Green Belt**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Given the significant and unresolved housing need across the housing market area stretching in to the latter years of the plan period, and far reaching consequences in relation to the growth agenda as set out by the White Paper, Policy P17 2 should be amended to safeguard land for future needs by releasing further Green Belt.

Change suggested by respondent:

Plan should identify safeguarded land for longer term needs

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14416

Object

Policy P17A Green Belt Compensation**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Policy P17A should be removed, as it is for the Plan to demonstrate compensatory provision relative to the Green Belt release, not for the developer to undertake this exercise at the planning application stage.

Change suggested by respondent:

Delete Policy P17A

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14418

Object

Providing Homes for All**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Omission Site 195/528 should be allocated for residential development of 9 hectares consisting of a range of dwelling types and sizes including Extra Care residential development and affordable housing, together with public open space and private land. Site is accessible, close to significant employment areas, available, suitable and achievable.

Dispute conclusions of Site Assessment. Green Belt is moderately performing and clear physical boundaries can be provided, with landscape and green infrastructure to provide further containment. Site would have low impact on criteria in SHELAA and Sustainability Appraisal.

As a minimum, site should be safeguarded for future needs, but given urgent unmet needs should be allocated now

Change suggested by respondent:

Site 195/528 east of Damson Parkway should be allocated for housing

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14419

Object

Hampton-in-Arden**Respondent:** L&Q Estates - Damson Parkway**Agent:** Pegasus Group**Summary:**

Omission Site 195/528 should be allocated for residential development of 9 hectares consisting of a range of dwelling types and sizes including Extra Care residential development and affordable housing, together with public open space and private land. Site is accessible, close to significant employment areas, available, suitable and achievable.

Dispute conclusions of Site Assessment. Green Belt is moderately performing and clear physical boundaries can be provided, with landscape and green infrastructure to provide further containment. Site would have low impact on criteria in SHELAA and Sustainability Appraisal.

As a minimum, site should be safeguarded for future needs, but given urgent unmet needs should be allocated now

Change suggested by respondent:

Site 195/528 east of Damson Parkway should be allocated for housing

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14873

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

Solihull has offered up a figure of around 2,000 homes but has provided no links to the evidence nor any rationale behind this offer.

This is welcomed as a starting point, but as the attached Paper (Pegasus Group Housing and Economic Growth Paper Appendix 2) demonstrates, the figure should be far higher than this, with at least 11,500 additional homes being provided for to address the shortfall.

Statements of Common Ground should be readily available showing that partner authorities are in agreement with any approach being undertaken. The apparent lack of these at this present time is a major issue and implies that there is no agreement. The approach taken by Solihull also appears to contradict the approach taken by other LPAs within the HMA who have advanced local plan reviews

Change suggested by respondent:

Land at Berkswell Road, Meriden should be considered as a reasonable alternative to delivering increased growth through a new settlement, as part of a comprehensive programme of exploring a range of additional, smaller sites which would be deliverable during the plan period.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14874

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

The explanatory text to the policy suggests a somewhat confused situation in relation to the delivery of residential development. Paragraph 85 advises that the Hub Framework Plan (2018) could provide 'up to 4,000 homes' to 2047 'with about 1,000 delivered by 2033', but that the Urban Growth Company in its Hub Growth and Infrastructure Vision (2019) estimates 'up to 5,000 new homes'.

However, these figures are only included in the supporting text. There needs to be a commitment in policy to quantifying the amount of residential development to be delivered by the hub, and specific referencing to the detail as to where this should go to ensure that the plan's deliverability is clearly evidenced, and to provide certainty in terms of the context and justification for the need to deliver additional land for housing.

Change suggested by respondent:

It is recommended that the policy is amended to specify the quantum of growth which the hub will deliver over the plan period.

It is recommended that the policy is linked to clear plans showing where the residential growth will be delivered within the hub boundaries in order to show deliverability

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14875

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

The flexible wording of the policy, including references to viability, is welcomed. However, it is recommended that further flexibility is built in the policy to account for any further changes which the Government may make (for example in relation to 'first homes').

Change suggested by respondent:

Amend paragraph 1 to state that affordable housing is defined by national policy. Including a current list in the policy itself could render the policy out of date if the national definition changes.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14876

Support

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

This policy is supported, however as shown through the attached paper on housing (Appendix 2) the scale of the need is much higher than that currently being planned for: not planning sufficiently for affordable housing as part of an increased housing requirement at the necessary strategic scale will place more pressure upon local communities to allow exceptions sites.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14877

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

The principle of the policy is supported, however this needs to be considered in the context of a greatly increased housing requirement over the plan period, as set out in the response to Policy P5 (Provision of Land for Housing) and the accompanying Housing and Economic Growth Paper (Appendix 2)

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14878

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

Taking into account all of the other policy demands upon delivering housing schemes, delivery could be seriously compromised by the requirement to make a 5% contribution to Self and Custom Build Housing (offered for sale with outline planning permission, fully serviced to the boundary, with unconstrained access to the highway. The plots would be offered for sale for a period of 12 months to those registered on Solihull's Self and Custom-build Housing Register)

Taking into account all of the other policy demands upon delivering housing schemes, delivery could be seriously compromised by such a requirement. The flexibility provided within the policy, which enables case by case assessment of matters such as viability and the impact upon other requirements of the scheme (such as the ability to deliver an appropriate housing mix) sounds sensible in principle. However, this approach would only be workable if such detailed consideration on a case by case basis was to be allowed at the planning application state.

Given that the current system now generally discourages debate on viability at the decision-taking stage, with such matters expected to be addressed when plan-making, it cannot be assumed that this policy would work in practice.

There is nothing in the explanatory text to demonstrate how the matter has been considered in more detail at this point.

The Local Authority cannot simply rely upon developers to provide for all self and custom-build housing in fulfilment of its legal duty and should be exploring other options for delivery. Without evidence of other options having been thoroughly explored, L&Q Estates object to this policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14879

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

It is understood that these are the recommendations of the HEDNA, and the flexibility in the policy is welcomed in principle to allow case-specific matters to be considered. However, as with the policy on self and custom-build homes, the current system now generally discourages debate on viability at the decisiontaking stage, with such matters expected to be addressed when plan-making. Therefore, it cannot necessarily be assumed that this policy would work in practice. Further justification is required to provide the necessarily elaboration.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14880

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

In terms of the quantum of growth, L&Q Estates object as the 2,105 home additional contribution, whilst welcomed as a starting point, is simply not sufficient to address the shortfall in the wider Greater Birmingham and Black Country Housing Market Area (the HMA). The Paper (Appendix 2) concludes that the Solihull Local Plan should be, at the very least, testing the provision of a minimum of 11,500 additional homes to address the unmet need across the HMA instead of the circa 2,000 it is currently proposing.

Policy P5 falls short of committing to the delivery of 2,105 dwellings to meet needs arising within the wider HMA – instead this element of the full housing requirement equates to the flexibility in supply proposed. Such an approach is not consistent with national policy and the firm commitment that should be made in order to satisfy the duty-to-cooperate.

Trajectory - The housing land supply position is based upon the LHN and does not factor any uplift necessary to ensure the delivery of the cross boundary provision. The 5 year housing land supply calculation should be recalculated on the basis of a housing requirement incorporating any cross-boundary commitment.

Windfall - The inclusion of a windfall allowance of 200 units per annum in respect of supply is not supported. This equates to nearly 20% of the proposed housing land supply to 2036. If the Council is promoting a fully Plan-led approach to delivering growth, then there is no need to include an allowance in the housing supply from windfall sites. The Council references the increase in windfall supply within the Borough since 1992.

Nationally Described Space Standards - There does not appear to be any evidence to justify a blanket introduction of such standards, and the viability assessment simply states 'applies to all sites' (page 9). The policy is clearly not compliant with national guidance which requires evidence to justify policy.

Density - The flexibility afforded to the section of Policy P5 on density is supported. However, it is not certain how such a policy would be impacted should all of the various standards be implemented, including Nationally Described Space Standards. The Council should be demonstrating how this policy will be implemented in practice, and should be providing evidence to show that it has allocated enough land to deliver the stated number of homes

Change suggested by respondent:

To provide certainty the housing requirement (including cross boundary housing commitment) can be delivered, further housing land supply must be identified.

Nationally Described Space Standards - L&Q Estates object and request removal of this element of the policy.

Trajectory - Further evidence is necessary to justify the proposed stepped trajectory.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14881

Object

POLICY P13 Minerals**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

The MSA boundary extends to the edge of the southernmost part of Meriden, encompassing our client's site off Berkswell Road which is being promoted as an extension to the existing settlement. It is considered inappropriate to allocate a minerals safeguarding area which runs so close to the boundary of an existing settlement. It would not be appropriate for minerals extraction to operate so close to existing residential development, nor would it be appropriate to potentially sterilise land which could provide much needed housing growth in a sustainable location

Change suggested by respondent:

L&Q Estates object to the extent of the identified Minerals Safeguarding Area to the south of Meriden. This should be redrawn so that the boundary is away from the settlement to protect the amenity of the residents (in line with policy P14: Amenity) and to avoid sterilising sites which could provide sustainably located growth.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14882

Object

Policy P17 Countryside and Green Belt**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

Part 2 of this policy references Green Belt designation as identified on the Policies Map. However, this policy must be looked at 'in the round' with the other matters which the plan must address, including the need to release further Green Belt to address unmet residential need over the plan period as set out elsewhere in these representations. The Policies Map would therefore need to reflect this.

As set out in the Housing and Economic Growth Paper at Appendix 2, it is clear that there is a significant and unresolved need across the housing market area stretching in to the latter years of the plan period, and far reaching consequences in relation to the growth agenda as set out by the White Paper. It is clearly necessary for the plan to safeguard land, which could be brought forward as a series of reserve options to provide flexibility and a balanced approach for delivering sustainable development both within and beyond the plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14883

Object

Policy P17A Green Belt Compensation**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

This policy should be removed – Paragraph 138 NPPF.

This is a matter to be tested as part of the justification for providing the Exceptional Circumstances to release sites from the Green Belt at the planmaking stage. The Council needs to demonstrate compensatory provision relative to the Green Belt release, it is not for the developer to undertake this exercise at the planning application stage.

Change suggested by respondent:

This policy should be removed.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14884

Object

Meriden**Respondent:** L&Q Estates - Land at Berkswell Road**Agent:** Pegasus Group**Summary:**

Site ref 197 - Land at Berkswell Road, Meriden

Land at Berkswell Road, Meriden is within the control of L&Q Estates and is developable and would contribute significantly towards meeting housing needs within the Borough, delivering in the region of 50 dwellings.

There are no known constraints that would prevent the site coming forward as proposed. The suitability of the site for development is fully detailed within the Vision Document (Appendix 3).

The evidence provided within the Landscape and Visual Statement and Green Belt Review (Appendix 4) demonstrates that in Green Belt terms the site is suitable for consideration as a 'Green Site' and should be reassessed objectively by the Council and considered as a suitable site for housing development to assist with addressing the significant and ongoing shortfall.

Land at Berkswell Road, Meriden would support the delivery of the Council's preferred approach that focuses development towards the most sustainable locations, including key rural villages.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14218

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The Local Plan Overall Approach Topic Paper does not contain Statements of Common Ground or information on any agreement reached with partner local authorities or key stakeholders.

Solihull has offered 2,000 homes to the wider HMA but has provided no evidence. The figure should be at least 11,500 additional homes.

There is no evidence to show that the Area of Search for South of Birmingham Airport/NEC (Site 21), to be taken forward for future assessment as a New Settlement, is being explored and progressed. Reasonable alternatives must be explored otherwise unsustainable patterns of growth will be created.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14220

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

There needs to be a commitment in Policy P1 to quantifying the amount of residential development to be delivered by the hub.

Change suggested by respondent:

It is recommended that the policy is amended to specify the quantum of growth which the hub will deliver over the plan period.

It is recommended that the policy is linked to clear plans showing where the residential growth will be delivered within the hub boundaries in order to show deliverability.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14221

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

Further flexibility should be built in Policy P4A to account for any further changes which the Government may make (for example in relation to 'first homes'). The sheer scale of the affordable housing need highlights Solihull needing to deliver additional housing over what's currently proposed.

Change suggested by respondent:

Amend paragraph 1 to state that affordable housing is defined by national policy. Including a current list in the policy itself could render the policy out of date if the national definition changes.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14222

Support

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

Policy P4B is supported, however the need is much higher than that currently being planned for which will place more pressure upon local communities to allow exceptions sites.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14223

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The principle of the Policy P4C is supported, however this needs to be considered in the context of a greatly increased housing requirement over the plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14224

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

Considering all the other policy demands, delivery of housing schemes could be compromised by the Self and Custom Housebuilding requirement (Policy P4D). The flexibility provided within the policy, which enables case by case assessment, would only be workable if allowed at planning application stage which is generally discouraged. Evidence on how the matter has been considered in detail and other options should be demonstrated.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14225

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The flexibility in the Policy P4E is welcomed in principle however the current system generally discourages debate on viability at the decision-taking stage. Further justification is required.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14227

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The quantum of growth proposed is simply not sufficient to address the shortfall in the wider HMA. There should be a minimum of 11,500 additional homes to address the unmet need across the HMA.

Policy P5 falls short of committing to the delivery of 2,105 dwellings to meet needs arising within the wider HMA which is not consistent with national policy or to satisfy the duty-to-cooperate.

20% more housing land should be allocated than that required to deliver the housing requirement to provide the necessary flexibility.

The 5- year housing land supply calculation should be recalculated based on a housing requirement incorporating any cross-boundary commitment.

Further evidence is necessary to justify the proposed stepped trajectory.

Change suggested by respondent:

Policy P5 to be redrafted to explicitly commit the Council to deliver a contribution to the unmet needs of the wider HMA.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14228

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The inclusion of a windfall allowance of 200 units per annum in respect of supply is not supported. The Local Plan should allocate sufficient land to meet the requirement without any reliance on windfalls. There is overreliance on windfall sites with overly optimistic completions rates for the larger allocated sites. The average windfall supply in the past cannot be accurately projected forward as plan-led opportunities for development were diminished due to the plan for Solihull being out of date.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14229

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

There does not appear to be any evidence to justify a blanket introduction of nationally described space standards which is contrary to national guidance.

Change suggested by respondent:

Remove this element of the Policy P5.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14230

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The Council should be demonstrating how the section on density in Policy P5 will be implemented in practice and should provide evidence to show enough land has been allocated to deliver the stated number of homes considering all the standards.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14231

Object

Policy P17 Countryside and Green Belt**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

There is the need to release further Green Belt to address unmet residential need over the plan period. It is necessary for the plan to safeguard land as a series of reserve options to provide flexibility and a balanced approach within and beyond the plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14232

Object

Policy P17A Green Belt Compensation**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

The Council needs to demonstrate compensatory provision relative to the Green Belt release, it is not for the developer to undertake this exercise at the planning application stage.

Change suggested by respondent:

Policy P17A should be removed.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14233

Object

North of the Borough**Respondent:** L&Q Estates - Land at Bickenhill Road, Marston Green**Agent:** Pegasus Group**Summary:**

Land at Bickenhill Road, Marston Green is available, developable and would deliver 137 – 176 dwellings depending upon density. There are no known constraints that would prevent development. Evidence demonstrates that in Green Belt terms the site is suitable for consideration as a 'Green Site', development would have a minimal impact upon the Green Belt. The proposals would support the delivery of the Council's preferred approach that focuses development towards the most sustainable locations.

There are exceptional circumstances to justify the release of the site from the Green Belt to deliver housing growth for which there is a need. As a very minimum the site should be safeguarded to provide flexibility for future needs although the unmet need means that it should be brought forward now.

Change suggested by respondent:

The site should be reassessed objectively by the Council and considered as a suitable site for housing development.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14286

Object

Foreword**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Duty to Cooperate Comments - No information on any agreement reached on key strategic matters with partner local authorities or key stakeholders. No Statements of Common Ground are evident. No evidence of why the figure of 2000 has been arrived at.

Statements of Common Ground should be readily available showing that partner authorities are in agreement with any approach being undertaken. The apparent lack of these at this present time is a major issue and implies that there is no agreement. The approach taken by Solihull appears to contradict the approach taken by other LPAs within the HMA who have advanced local plan reviews. This needs to be explored in detail as there are major implications for the plan's legal compliance otherwise.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: No

Attachments:

14287

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Explanatory text suggests a confused situation in relation to the delivery of residential development. Paragraph 85 advises that the Hub Framework Plan (2018) could provide 'up to 4,000 homes' to 2047 'with about 1,000 delivered by 2033', but that the Urban Growth Company in its Hub Growth and Infrastructure Vision (2019) estimates 'up to 5,000 new homes'. There needs to be a commitment in policy to quantifying the amount of residential development to be delivered by the hub, and specific referencing to the detail as to where this should go to ensure that the plan's deliverability.

Change suggested by respondent:

It is recommended that the policy is amended to specify the quantum of growth which the hub will deliver over the plan period.

It is recommended that the policy is linked to clear plans showing where the residential growth will be delivered within the hub boundaries in order to show deliverability.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14288

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

The flexible wording of the policy, including references to viability, is welcomed. However, it is recommended that further flexibility is built in the policy to account for any further changes which the Government may make (for example in relation to 'first homes').

It should be noted that the sheer scale of the affordable housing need highlights the duty of Solihull in needing to deliver additional housing over and above the standard method baseline and the requirement currently being proposed.

Change suggested by respondent:

Amend paragraph 1 to state that affordable housing is defined by national policy. Including a current list in the policy itself could render the policy out of date if the national definition changes.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14289

Support

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

This policy is supported, however the scale of the need is much higher than that currently being planned for: not planning sufficiently for affordable housing as part of an increased housing requirement at the necessary strategic scale will place more pressure upon local communities to allow exceptions sites. 'Exceptions' should be just that: occasional sites to meet a particular local need, not further sites to address deficiencies in a strategic borough-wide plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14290

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

The principle of the policy is supported, however this needs to be considered in the context of a greatly increased housing requirement over the plan period, as set out in the response to Policy P5 (Provision of Land for Housing) and the accompanying Housing and Economic Growth Paper (Appendix 2).

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14291

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Taking into account all of the other policy demands, delivery could be seriously compromised by the requirements of the policy. The flexibility provided sounds sensible in principle. However, this would only be workable detailed considerations were allowed at the planning application state.

As the current system discourages the debate on viability at the decision-taking stage, with such matters expected to be addressed when plan-making, it cannot be assumed that this policy would work in practice.

There is nothing in the explanatory text to demonstrate how the matter has been considered in more detail at this point.

The Local Authority cannot simply rely upon developers to provide for all self and custom-build housing in fulfilment of its legal duty and should be exploring other options for delivery. Without evidence of other options having been thoroughly explored, L&Q Estates object to this policy.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14292

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

The recommendations of the HEDNA are taken forward, and the flexibility in the policy is welcomed in principle to allow case-specific matters to be considered. However, as with the policy on self and custom-build homes, the current system now generally discourages debate on viability at the decision-taking stage, with such matters expected to be addressed when plan-making. Therefore, it cannot necessarily be assumed that this policy would work in practice. Further justification is required to provide the necessarily elaboration.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14294

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

2105 contribution the Housing Market Area shortfall is not sufficient. Significantly more housing land is required to meet needs and provide flexibility for non-delivery of sites (see attached Housing and Economic Growth Paper).
 Trajectory: No uplift included to ensure the delivery of the cross boundary provision. The 5 year housing land supply calculation should be recalculated on the basis of a housing requirement incorporating any cross-boundary commitment. Over-reliance on windfall and no certainty of delivery. A supply strategy based upon a heavy windfall allowance is unsound and does not allow for appropriate planning of infrastructure or form a robust spatial strategy.
 Technical Housing Standards are optional and can only be introduced where justified. Plan provides no evidence.
 Density: Flexibility is supported but uncertainty about how the policy would be impacted should all of the various standards be implemented. Evidence required to show that enough land is allocated to deliver the stated number of homes, taking account the standards.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14295

Object

Policy P17 Countryside and Green Belt**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Policy must be looked at 'in the round' with the other matters which the plan must address (including the need to release further Green Belt to address unmet residential need over the plan period). There is a significant and unresolved need across the housing market area stretching in to the latter years of the plan period. It is clearly necessary for the plan to safeguard land, which could be brought forward as a series of reserve options to provide flexibility and a balanced approach for delivering sustainable development both within and beyond the plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14296

Object

Policy P17A Green Belt Compensation**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Policy should be removed. This is a matter to be tested as part of the justification for providing the Exceptional Circumstances to release sites from the Green Belt at the plan-making stage. The Council needs to demonstrate compensatory provision relative to the Green Belt release, it is not for the developer to undertake this exercise at the planning application stage.

Change suggested by respondent:

Remove policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14297

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

The site faces some significant constraints. The impact of development on Grimshaw Hall should not be left to a planning application to address. Harm can wholly be avoided at the plan preparation stage, by not allocating the site.

Change suggested by respondent:

Policy KN1, Hampton Road, Knowle should be deleted.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14298

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Difficult to see how delivery of 600 across two phases, 0-5 years and 5-10 years will be achieved. The site, is in fragmented ownership. No evidence that the land parcels will come forward within the timescale identified. The concept masterplan shows a complex area, with several different issues to overcome. These need to be addressed in a coordinated way. Difficult to see how required Green Belt enhancements could be achieved given the amount of built development being proposed. Concerns about the development on the southern section of the site given constraints. Capacity of the allocation should therefore be reduced which would allow Green Belt compensation to be provided at source. Further capacity can be found elsewhere in the settlement (e.g. site 199 Land at Four Ashes Road).

Change suggested by respondent:

Policy KN2 and the associated concept masterplan should be revised to reduce the capacity of the site and provide adequate compensation for the loss of Green Belt. Deliverability must also be clearly demonstrated to ensure that the policy is sound.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14299

Object

Knowle, Dorridge & Bentley Heath**Respondent:** L&Q Estates - Land at Four Ashes Road Dorridge**Agent:** Pegasus Group**Summary:**

Site 199 at Four Ashes Road should be included as an allocation. The site has no heritage constraints, it is within flood zone 1 and apart from Green Belt there are no statutory or non- statutory landscape designations covering the site. It is located to the south western side of Dorridge which has a good range of services and is accessible.

Details of proposals in attached Vision document.

The site is in a sustainable location, with good walking, cycling and public transport connections. The site is available, suitable and achievable. The site assessment for this site is incorrect and its findings are disputed.

Change suggested by respondent:

The site should be included as an allocation or at least a safeguarded site.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14261

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

No evidence that higher housing target than minimum has been considered, which is insufficient to meet appropriate contribution to national target. The new version of the Standard Methodology proposed in the White Paper means the methodology used in the Plan will soon be obsolete.

There is no agreement between the Housing Market Area authorities and SMBC has no formal arrangement/ with neighbours notwithstanding Birmingham/Black Country shortfalls. No evidence of rationale to justify testing only 2000. Whilst Sustainability Appraisal of Growth Options identifies greater significant positive and negative effects, but concludes that Option 3 (additional 3000) should not generate further significant effects. Failure to provide Statements of Common Ground with neighbours means Duty to Cooperate not demonstrated.

Failure to safeguard Green Belt land for future development contrary to NPPF.

Change suggested by respondent:

The housing target should be expressed as a minimum, the contribution to meeting HMA needs increased and land safeguarded for future development needs.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14264

Object

Policy P5 – Provision of Land for Housing**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Table at paragraph 225.

Sites with planning permission include sites refused/lapsed meaning 44 dwellings should be discounted. No evidence to show that sites identified in land availability assessments/Brownfield Land Register are deliverable or that these are not double counted with windfalls, so 277 dwellings should be discounted. Evidence for town centre sites not available. No evidence of testing of capacity of Chelmsley Wood town centre or that these are not double counted with windfalls, so 100 dwellings should be discounted. Carrying forward of SLP2013 sites not justified. No evidence to justify why a higher discount percentage than 10% not applied, or to support high reliance on windfalls. No evidence to show that UK Central capacity will be delivered in Plan period, as research into large complex sites indicates maximum of 800 dwellings. If addressed, total supply would be 12,361, 551 dwellings short of meeting local housing need and fail to meet 5 year housing supply

Change suggested by respondent:

Table at paragraph 225 should be re-assessed and additional allocations provided to meet local housing need, contribution to Housing Market Area shortfall and 5 year housing land supply

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14265

Object

Policy P17 Countryside and Green Belt**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

- (i) the need to remove additional land from the Green Belt for allocation for residential development to comply with the requirements of paragraph 136 of the NPPF and to meet local housing need; and
- (ii) the need to identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs beyond the plan period to comply with the requirements of paragraph 139(c) of the NPPF.

Change suggested by respondent:

- (i) additional land be taken out of the Green Belt to support residential development in this plan period (with a specific proposal for the removal of land North of Balsall Street and its allocation for residential development (up to 287 dwellings)); and
- (ii) that Areas of Safeguarded Land be identified to meet needs beyond the plan period, or sooner if required as part of a review of the Local Plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14266

Object

Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Land north of Balsall Street Balsall Common should be allocated for residential development, as demonstrated by technical evidence and application of the Council's site selection methodology. Site performs less well than wider parcel in Green Belt Assessment. Sustainability Appraisal is opposed as site is smaller than AECOM76 and scoring for factors 4a Soils, 10 Landscape and 11 Greenspace should be re-assessed. Performs better in SA than allocated sites, other than Site BC2 Frog Lane. Site has lower impact of Green Belt than others to east, not reliant on by-pass or affected by HS2

Change suggested by respondent:

Land north of Balsall Street Balsall Common should be added to table at paragraph 226

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14267

Object

Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

The Balsall Common chapter of Plan is not considered justified or effective. Land North of Balsall Street (Site 233) should be allocated as performs less well than wider parcel in Green Belt Assessment. Sustainability Appraisal is opposed as site is smaller than AECOM76 and scoring for factors 4a Soils, 10 Landscape and 11 Greenspace should be re-assessed. Performs better in SA than allocated sites, other than Site BC2 Frog Lane. Site has lower impact of Green Belt than others to east, not reliant on by-pass or affected by HS2

Change suggested by respondent:

Removal of land at North of Balsall Street (Site 233) from the Green Belt and its allocation for housing (up to 287 dwellings).

Inclusion of an additional site specific allocation in Balsall Common chapter (consistent with its inclusion in the Summary Table of Residential Allocations at page 65). 'Policy BC7 – Land to the North of Balsall Street' with the site allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14269

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Site BC1 Barratt's Farm (875 dwellings) is not justified or effective. Land is partly higher performing in Green Belt Assessment and should have been 6 blue in site hierarchy criteria. Site performs poorly in Sustainability Appraisal with 3 significant negative effects. Site dependent on 2 major infrastructure projects, Relief Road and HS2 and delivery is uncertain

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14270

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Policy BC2 is not considered justified or effective. Disagree with Green Belt Assessment of refined parcel 59 which performs a highly important role for Purpose 1. Site should have been categorised as 6 blue in site hierarchy. Concept masterplan shows lack of frontage and required habitat buffer, inadequate buffer to existing housing and landscape, ecological, flood risk and heritage constraints have potential to further impact capacity.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14271

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Policy BC3 is not considered justified or effective. Disagree with Green Belt Assessment as refined parcel 57 performs a more important Green Belt role for Purposes 1 and 3. Site should be categorised as 6 blue in site hierarchy. Site performs poorly in Sustainability Appraisal and has significant ecological and heritage constraints which will restrict the area for development in terms of building height, capacity and access.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14272

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Policy BC4 is not considered justified or effective. Site inappropriately designated as brownfield as part agricultural and part greenfield. Site performs important Green Belt role. Incorrectly categorised in site hierarchy and should be at best 7 blue, not 3 green. No strong and defensible Green Belt boundary to east. Performs poorly in Sustainability Appraisal

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14276

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Policy BC5 is not considered justified or effective. Site inappropriately designated as brownfield, as much of land is greenfield. Site performs an important Green Belt role protruding into the countryside and would result in unrestricted sprawl. Inappropriately identified as 3 green in site hierarchy. Site performs poorly in Sustainability Appraisal

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14277

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** L&Q Estates - Land North of Balsall Street, Balsall Common**Agent:** Avison Young**Summary:**

Policy BC6 is not considered justified or effective. Query designation of entire site as brownfield. Site performs important role in relation to Green Belt impact, is highly performing in Green Belt Assessment, and would result in unrestricted sprawl. Incorrectly categorised as 3 green in site hierarchy. Should not rely on HS2 line as this has not yet been built. Performs poorly in Sustainability Appraisal. Remote from settlement with a railway barrier, poor pedestrian links and heritage constraints. If site considered suitable for C2 use then other sites are as well

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11047

Object

Policy P17 Countryside and Green Belt**Respondent:** Mr Steve Lane**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Policy P17 - Tidbury Green should be an Inset Area as inclusion in Green Belt is contrary to NPPF, Plan gives insufficient weight to encouraging development within small settlements, fails to take account of recent large-scale development or findings of Green Belt Assessment, village fails to make important contribution to openness, and lack of priority to brownfield land. An Inset Area would increase opportunities for sustainable windfall sites and robustness of windfall target, ensure land that does not contribute to Green Belt is used in preference to sites with moderate to high contribution. Village is sustainable location with few constraints.

Change suggested by respondent:

1. 'Tidbury Green' should be deleted from paragraph 3 bullet point i. Policy P17 'Countryside and Green Belt'.
2. At Policy P17 paragraph 6 Tidbury Green should be added to the list of small inset settlements in the Green Belt which are not therefore subject to Green Belt policy.
3. Justification paragraph 423 should delete reference to 'Tidbury Green'.
4. Justification paragraph 430 should add 'Tidbury Green' to the list of settlements which are referred to as inset from the Green Belt.
5. The Policies Map should be amended to inset Tidbury Green settlement from the Green Belt as shown on Enclosure 2 below forming part of this representation

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14796

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Steve Lane**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Policy KN2 is unsound. Insufficient evidence to demonstrate deliverability, with 'multiple and potential complex land assembly issues' still to be resolved, as well as replacement playing fields.

Insufficient evidence that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School. ,

No justification for the replacement and upgrade of Arden Academy Secondary School and the development of a new Primary School and no mention in the IDP.

The financial and carbon cost of demolishing the existing structures and constructing new premises may be significantly more than the alternative option of upgrading and extending existing facilities as required.

Minimising the financial contributions required through CIL and S106 developer contributions towards the Policy KN2 relocation and redevelopment of the schools proposal, would potentially enable larger contributions to be made towards other essential infrastructure needs.

Change suggested by respondent:

Insufficient evidence has been provided to justify Policy KN2, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document;
- the demolition of Arden Academy and its relocation to a new site within the proposed KN2 site allocation is the most appropriate strategy having regard to reasonable alternatives; and
- there is a fully developed masterplan strategy with appropriate playing pitch replacement strategy.

Policy KN2 is currently unsound, when assessed against the requirements for policies and proposals to be justified as set out at NPPF paragraph 35 b). Evidence has not been provided to demonstrate that: 600 dwellings could be delivered in the periods 0-5 years and 5 to 10 years from 2020 or that the proposed mixed use development with relocation of Arden Academy is an appropriate strategy, taking into account the reasonable alternatives.

Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

13919

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Catherine Langton**Summary:**

Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review: Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

13710

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** David Langton**Summary:**

Does not consider the Local Plan to be sound for the reason set out in the report submitted by the BARRAGE action group 'Part A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common' dated 29/11/2020

Change suggested by respondent:

Remove site BC3 as a proposed site for allocation

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

13725

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Diane Langton**Summary:**

Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group 'Part A: Objection to the proposed allocation of site BC3 Windmill Lane/Kenilworth Road Balsall Common' 29.11.2020

Change suggested by respondent:

Remove site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14707

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** James Langton**Summary:**

I do not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review:

Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020

As such, I am objecting to the allocation of Site BC3 for housing

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13723

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Myran Larkin**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13729

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Nick Larkin**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10685

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs S Larkin**Summary:**

The new school is absolutely vital to ensure local children and young people have an equitable access to learning in premises that are safe and fit for purpose.

The area also requires more affordable housing to allow younger people to move in.

The current age profile of the area is older, which already is likely to increase the pressure with local services. Therefore no more care homes should be built.

More cycle lanes and promotion of sustainable transport is required

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14142

Object

Policy P5 – Provision of Land for Housing**Respondent:** Lavender Hall Fisheries Ltd**Agent:** Cerda Planning Ltd**Summary:**

The Local Plan Review is being brought forward during an ongoing review of the Government's standard methodology for calculating housing need. In the latest consultation version Solihull is required to deliver 1,011 houses per annum. The Local Plan Review will be falling significantly short of housing need for the Borough.

Change suggested by respondent:

The Council should commit to the inclusion of a series of reserve sites within the Local Plan Review identified to meet housing requirements in the event that the Government's standard methodology continues to indicate that housing need is significantly higher than that set out within the submission draft plan.

The alternative would be to include a policy within the Local Plan Review requiring the commencement of a separate Site Allocations document, such work to be commenced no later than six months after the adoption of the Local Plan Review, to include a series of reserve sites and to be read in conjunction with the Local Plan Review including adherence to the development strategy.

One of the advantages is that the site allocations could deal with any deficiency in five year housing land supply, and where it was felt that Green Belt release was required, land could continue to be safeguarded and Green Belt policies apply until such time as any given site was required.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14143

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Lavender Hall Fisheries Ltd**Agent:** Cerda Planning Ltd**Summary:**

Policy P16 Criteria 3 is imprecise and requires greater clarity as to what the recognised process is. The hierarchical approach set out in the NPPF (paragraphs 195, 196 and 197) is more precise and provides more clarity in a development management context.

Change suggested by respondent:

Criteria 3 to Policy P16 should be replaced with the provisions of paragraphs 195, 196 and 197 of the NPPF; alternatively, a simple cross-reference within the policy to the provisions of the NPPF could also be appropriate.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14144

Object

Policy P17 Countryside and Green Belt**Respondent:** Lavender Hall Fisheries Ltd**Agent:** Cerda Planning Ltd**Summary:**

The Council have not given due consideration to revisiting Green Belt boundaries where land no longer fulfils a Green Belt function.

'Lavender Hall Fisheries, Berkswell' will be separated by HS2 from the wider Green Belt and the adjacent land is proposed as a residential allocation (site BC6).

Change suggested by respondent:

The Council should give much greater consideration to Green Belt boundaries and whether these should be redrawn, not solely in relation to the provision of positive allocations of land but instead to reflect the change in circumstances which justifies a review as to the extent land fulfils a Green Belt function.

Lavender Hall Fisheries, Berkswell is one such example whereby the lack of any change to Green Belt boundaries undermines the permanence of Green Belt and the robustness of policy seeking to maintain openness.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14145

Object

Policy P17A Green Belt Compensation**Respondent:** Lavender Hall Fisheries Ltd**Agent:** Cerda Planning Ltd**Summary:**

Policy P17A Criteria 1 wrongly seeks to place the burden upon individual applicants to set out ways in which the impact of removing land from the Green Belt will be offset. This responsibility should be at the plan making not the decision taking stage. The Local Plan Review allocates housing sites currently within the Green Belt which is then undermined by Policy P17A which removes the in principle support for such sites.

There is reference to Green Infrastructure Opportunities Mapping at 3 (iii) however we can find no such mapping.

Change suggested by respondent:

We consider that Policy P17A is not required and simply undermines the overarching objectives and requirements of the Local Plan Review.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14146

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Lavender Hall Fisheries Ltd**Agent:** Cerda Planning Ltd**Summary:**

The provisions of Policy P21 can only be promoted where the developer contributions and infrastructure provision meet the three CIL tests. As currently drafted the policy is not explicit whether its operation would be discordant and at variation with the CIL provisions.

Change suggested by respondent:

The policy should be modified to expressly refer to the three CIL tests in regulation 122 of the 2010 Regulations, and furthermore make clear that developer contributions and infrastructure provision will only be required where each of the three tests are demonstrably met.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10708

Support

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Tim Ledger**Summary:**

Housing near Pool Orchard to be high quality, low density.

The Master Plan states "Where appropriate development should provide opportunity to view the listed buildings and their settings". My home will be surrounded by open space resulting in a major invasion of privacy as we will be in public view in the middle of a public park

For privacy and noise, Play Areas should be far away from the house.

Barretts Lane should not be used for further traffic as its single track with trees and substandard visibility at Barretts Lane/Sunnyside Lane junction.

My paddock needs removing from the greenbelt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10724

Object

Balsall Common**Respondent:** Miss Joanna Ledington**Summary:**

Not content with the devastation of the semi rural landscape of Balsall Common for white elephant HS2, our so called Conservative council (who traditionally protected greenbelt) is planning to put more than 31% of planned new homes In the borough in Balsall Common. This equates to more devastation and destruction of our green belt. Brownfield sites should urgently be identified - there are empty retail units in the borough which could be converted.

In para 521, the village is not well placed for future growth. It cannot cope with current levels of demand for GP, schooling or parking.

Change suggested by respondent:

Utilise as much brownfield as possible - should be revisited as with Covid there will be more permanently available for development.

Balance the share of building across the borough or phase differently. Balsall Common is being devastated by HS2. There has been excessive building in recent years. This should now pause until HS2 is complete.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

14852

Object

Policy UK2 - Land at Damson Parkway**Respondent:** M J Leech**Summary:**

Objects to Policy UK2:

Amount of land given to Jaguar/Land rover - Concern over increase in traffic - detailed road plan needed .

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

13732

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Louise Lee**Summary:**

- Concerned over number of houses proposed in Cheswick Green area and narrowing of the gap between Cheswick green and Shirley.
- Lack of local hospital, GP's and A&E
- Flooding risk is heightened
- Traffic will be made worse, especially as no local train station

Change suggested by respondent:

- The existing road should be the fixed boundary marking green belt land

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13804

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sandra Letang**Summary:**

- Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.
- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
 - > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
 - > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
 - > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14379

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Geraldine Lewis**Summary:**

- > Building on greenfield rather than brownfield
- > Disproportionate number of houses being built in Cheswick Green in comparison to the rest of the Borough strain on services (doctors, hospitals, Schools)
- > Narrow roads – Able to cope with more traffic/More accidents/Gridlock/Pollution.
- > Dog Kennel lane only boundary separating from other areas of the borough, risk of losing all green belt areas and becoming part of the greater Birmingham.
- > Building on Green belt land could increase risk of flooding.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14785

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Geraldine Lewis**Summary:**

- Object to Policy BL2;
- Shouldn't be building on greenfield sites, should be prioritising brownfield sites in the Birmingham area - Disproportionate amount of building on Cheswick Green - services already under pressure (Schools/Doctors) - Road network struggling with existing traffic - Risk of becoming part of the greater Birmingham area - increased risk of flooding

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11070

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Cathryn Lindsay**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10952

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr Mark Lines**Summary:**

School Rd is not capable of taking any more traffic. It already has a problem with speeding traffic. In places it is almost a single track road. The conjunction and potential for accidents is unacceptable.

Change suggested by respondent:

School Road is not suitable.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11235

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Kathryn Liston**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10623

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr David Lloyd**Summary:**

Inappropriate development for the area which does not have the infrastructure to cope with such expansion.

Destruction of valuable local amenity.

Change suggested by respondent:

I believe that Knowle currently has around 4,000 homes. The current proposals would see this increased by at least a further 1,000 homes. This is an increase of in excess of 25% and considerably more than that anticipated elsewhere in Solihull. It also needs to be considered against the growth in population which the area has seen in the recent past. The local infrastructure is unable to cope with the current volume of use at peak times with the current population. There are a number of road bottlenecks particularly the High Street and Station Road causing considerable traffic congestion. The shopping facilities and related parking provision within Knowle are again sufficient for the current population level but would require considerable enhancement to cope with such an increase in usage. It is difficult to see how this could be accommodated within the current footprint.

There is not a significant pool of employment opportunities within Knowle and most of the residents travel elsewhere for work thus leading to the peak time issues with regard to road congestion. Additionally the capacity at the local railway stations is limited with all available car parking largely full by 8am.

The green belt which surrounds Knowle is a significant local amenity which is used and enjoyed by many residents for activities such as exercise and dog walking. I think many local residents have grown to appreciate these areas during 2020 and they should be safeguarded rather than destroyed. The green belt also serves as a key separation of development and any loss should not be taken lightly. Any reduction in the green belt would be a great loss both to the rural feel of Knowle and to the quality of life of future residents.

We are all encouraged to cut down on consumption of fossil fuels and environmental emissions. It is likely that significant further development of Knowle and surrounding villages will serve to increase such impacts as there would be additional journeys to employment bases. The development of further housing accommodation should be better coordinated with the expected commercial development within the Solihull area.

In conclusion I believe that the green belt and open spaces should be protected in order to prevent urban spread and provide open space for recreational use. Through 2020 such areas have been increasingly used and appreciated by local communities and should be safeguarded for future generations rather than built on. Accordingly I believe that the proposed developments in the Arden Triangle and along Hampton Road are inappropriate and should not be adopted within the final version of the development plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10624

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr David Lloyd**Summary:**

Inappropriate development of the local area.

Change suggested by respondent:

I believe that Knowle currently has around 4,000 homes. The current proposals would see this increased by at least a further 1,000 homes. This is an increase of in excess of 25% and considerably more than that anticipated elsewhere in Solihull. It also needs to be considered against the growth in population which the area has seen in the recent past. The local infrastructure is unable to cope with the current volume of use at peak times with the current population. There are a number of road bottlenecks particularly the High Street and Station Road causing considerable traffic congestion. The shopping facilities and related parking provision within Knowle are again sufficient for the current population level but would require considerable enhancement to cope with such an increase in usage. It is difficult to see how this could be accommodated within the current footprint.

There is not a significant pool of employment opportunities within Knowle and most of the residents travel elsewhere for work thus leading to the peak time issues with regard to road congestion. Additionally the capacity at the local railway stations is limited with all available car parking largely full by 8am.

The green belt which surrounds Knowle is a significant local amenity which is used and enjoyed by many residents for activities such as exercise and dog walking. I think many local residents have grown to appreciate these areas during 2020 and they should be safeguarded rather than destroyed. The green belt also serves as a key separation of development and any loss should not be taken lightly. Any reduction in the green belt would be a great loss both to the rural feel of Knowle and to the quality of life of future residents.

We are all encouraged to cut down on consumption of fossil fuels and environmental emissions. It is likely that significant further development of Knowle and surrounding villages will serve to increase such impacts as there would be additional journeys to employment bases. The development of further housing accommodation should be better coordinated with the expected commercial development within the Solihull area.

In conclusion I believe that the green belt and open spaces should be protected in order to prevent urban spread and provide open space for recreational use. Through 2020 such areas have been increasingly used and appreciated by local communities and should be safeguarded for future generations rather than built on. Accordingly I believe that the proposed developments in the Arden Triangle and along Hampton Road are inappropriate and should not be adopted within the final version of the development plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10625

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr David Lloyd**Summary:**

Inappropriate development of local open space which should be appreciated rather than destroyed.

Change suggested by respondent:

I believe that Knowle currently has around 4,000 homes. The current proposals would see this increased by at least a further 1,000 homes. This is an increase of in excess of 25% and considerably more than that anticipated elsewhere in Solihull. It also needs to be considered against the growth in population which the area has seen in the recent past. The local infrastructure is unable to cope with the current volume of use at peak times with the current population. There are a number of road bottlenecks particularly the High Street and Station Road causing considerable traffic congestion. The shopping facilities and related parking provision within Knowle are again sufficient for the current population level but would require considerable enhancement to cope with such an increase in usage. It is difficult to see how this could be accommodated within the current footprint.

There is not a significant pool of employment opportunities within Knowle and most of the residents travel elsewhere for work thus leading to the peak time issues with regard to road congestion. Additionally the capacity at the local railway stations is limited with all available car parking largely full by 8am.

The green belt which surrounds Knowle is a significant local amenity which is used and enjoyed by many residents for activities such as exercise and dog walking. I think many local residents have grown to appreciate these areas during 2020 and they should be safeguarded rather than destroyed. The green belt also serves as a key separation of development and any loss should not be taken lightly. Any reduction in the green belt would be a great loss both to the rural feel of Knowle and to the quality of life of future residents.

We are all encouraged to cut down on consumption of fossil fuels and environmental emissions. It is likely that significant further development of Knowle and surrounding villages will serve to increase such impacts as there would be additional journeys to employment bases. The development of further housing accommodation should be better coordinated with the expected commercial development within the Solihull area.

In conclusion I believe that the green belt and open spaces should be protected in order to prevent urban spread and provide open space for recreational use. Through 2020 such areas have been increasingly used and appreciated by local communities and should be safeguarded for future generations rather than built on. Accordingly I believe that the proposed developments in the Arden Triangle and along Hampton Road are inappropriate and should not be adopted within the final version of the development plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10717

Object

Foreword**Respondent:** Mr John Lloyd**Summary:**

- Lack of consultation by Solihull MBC with local residents
- Planned developments will result in overcrowding in an already densely populated area
- There will be increased air, noise and collateral pollution from traffic, houses and people at a time when the world is trying to reduce pollution
- There will be no enhancements to infrastructure nor provision for medical services, schools etc
- We are already over-burdened with supermarkets, superstores and garages and Shirley will become grid-locked as more and more people visit these sites

Change suggested by respondent:

- Cancel all future housing development in Shirley
- Enhance transport facilities and increase road capacity in the area so as to reduce traffic congestion and pollution (e.g. around Dickens Heath)
- Prevent all further development of retail outlets in Shirley (e.g. the catastrophic Marks & Spencer's development) so as to reduce pollution and encourage local businesses
- Provide enhanced facilities to meet social demand (e.g. medical and educational)
- The centre of Solihull is dying due to the reckless development of retail outlets on the Stratford Road. This must be stopped
- Utilise 'brown-field' sites in central areas so as to redevelop retail outlets that are destined to close (e.g. M&S and Rackhams)

Legally Yes**compliant:****Sound:** No**Comply with** No**duty:****Attachments:** None

14792

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Richard Lloyd**Summary:**

The Plan is unsound because the requirements of Policy P7 have been downgraded to the extent the policy fails to meet the objectives of Part 9 of the NPPF 2019 Promoting sustainable transport, and of the Public Sector Equality Duty. P7 lacks detail.

Unfortunately, the application of the study criteria was patchy.

It is unrealistic to expect major infrastructure changes through Policy P7, but there is sufficient flexibility in the provision of bus services for improvements to be sought through Section 106 agreements with developers

Change suggested by respondent:

Policy P7 should be re-drafted to:

- build-on Part 9 of the NPPF and provide the level of detail envisaged
- oblige site developers to provide funding for improved rural bus services (since there is little ability to improve rail service frequencies in the Plan period)
- discharge the Public Sector Equality Duty by ensuring there is adequate access for those with mobility issues to local facilities.

To meet the aims of the National Planning Policy Framework and the Public Sector Equality Duty, more detail needs to be added to Policy P7.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14793

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Richard Lloyd**Summary:**

Unsound because it does not comply with the NPPF in two respects: the proposed locations of the school and much of the housing are significantly affected by noise from the HS2 railway, and the site does not meet the requirements for sustainable access to facilities and there is no mechanism to achieve compliance.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14794

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Richard Lloyd**Summary:**

Unsound because it does not comply with the NPPF in two respects: the proposed housing is significantly affected by noise from the HS2 railway, and the site does not meet the requirements for sustainable access to facilities and the mechanism to achieve compliance is insufficient.

In addition, the concept plan is unsound because it ignores the two major water mains running across the area designated for medium-density housing.

Change suggested by respondent:

Site BC6 should be removed from the Local Plan

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10836

Object

Policy P12 Resource Management**Respondent:** Mr Michael Lock**Summary:**

Justification for the Damson Lane site has not been substantiated

Change suggested by respondent:

I would like the Council to take into account the impacts on residents who have seen the area change significantly due to JLR developments.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14789

Object

Blythe**Respondent:** Roger Lock**Summary:**

These sites are neither proportionate nor sustainable.
 Would lead to more traffic and more pollution.

Change suggested by respondent:

My suggested modifications, by looking at the map from my office, is to build multi-storey social housing at the NW end of Brueton Park, with access from New Road and in the NE end of Tudor Grange Park with access from Monkspath Hall Road. This will not only provide much needed social housing in the borough but it will be close to the transport hubs of Solihull railway and bus stations and the retail employment prospects in central Solihull

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10887

Object

Policy P12 Resource Management**Respondent:** Mr Richard Long**Summary:**

The identification of site UK2 for the relocation of HWRC is illegal. Its allocation for use as a waste site does not accord with the very special circumstances that led to it being removed from green belt (i.e to support JLR). The review of potential sites by Cushman in June 2019 states that this site should be discounted because of this being contrary to strategic planning policy; 3 other sites were determined as more suitable. It was only retained as a backup option. It appears the current Bickenhill site has only been relegated due to concerns about the lease/purchase costs.

Change suggested by respondent:

The Plan must remove reference to this specific site (UK2) since it was not a preferred solution (with a recommendation in the consultant assessment to discount it). Inclusion in the Plan appears an attempt to reallocate it prior to more detailed site assessment analysis. Moreover, there has been no consultation to date - residents and councillors were not advised.

Instead the plan should state that "relocation options will be subject to further evaluations, which will be subject to consultation and planning considerations".

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10888

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Mr Richard Long**Summary:**

In para 105, there is reference to land on the south eastern side of Damson Parkway/Old Damson Lane having been identified as an option for a relocation of HWRC. Policy is that this land should only be removed from Green Belt for very special circumstances (I.e. support growth of JLR). Relocation of HWRC is not special circumstances- the SMBC commissioned report identified 3 more suitable sites and recommended this site be discounted. Furthermore there has not been the required consultation to allow the specific reference to this site for relocation of the HWRC. A petition has strong strong objections.

Change suggested by respondent:

The 2nd sentence in para 105 must be removed (I.e "Part of this land has also been identified as an option for a relocated Household Waste and Recycling Centre and Council Depot. Further justification for this proposal is included in Policy P12." be deleted).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10890

Object

UK Central Hub**Respondent:** Mr Richard Long**Summary:**

para 831 identifies land at Damson Parkway as an option for a relocation of HWRC. Its removal from green belt was sought only due to very special circumstances that exist to facilitate the expansion of JLR. HWRC on this site would be inconsistent with such very special circumstances justifying the release of land from the Green Belt and would undermine the policy objectives for the site. The SMBC commissioned report by Cushman confirms this and highlights 3 more suitable sites. Moreover there has been no detailed assessments or consultation with Councillors or the public which would justify its specific identification.

Change suggested by respondent:

Reference in para 831 to "a relocated Household Waste and Recycling Centre and Depot" must be removed due to this inconsistency with policy and lack of very special circumstances justifying it's removal from Green Belt for use as a HWRC/depot given the availability of alternative sites. Its inclusion in the Plan appears to seek reallocation without having requisite consultation or detailed analysis of other (more highly commended) sites considered in the Cushman report, but not referred to in the Plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10658

Object

Blythe**Respondent:** Mr Alex Lukeman**Summary:**

My main concerns are:

- 1) the density of development envisaged for Blythe, south Shirley in particular
- 2) the pressure to be placed on local services especially healthcare, doctor surgeries
- 3) seemingly over development of retirement homes
- 4) items 2 and 3 are linked as doctor surgeries tend to operate more on business models and do not wish to be over-burdened with older patients
- 5) the pressure to be placed on the road infrastructure with an already near capacity at peak times on Haslucks Green Road, Bills Lane and Dickens Heath Road.

Change suggested by respondent:

With the coming of HS2 in the north of the borough and development of a significant inter-change at Birmingham International it would make more sense to consider more housing development on the north side. This is not NIMBY approach by someone living in the south but a rational view determining where people likely to be attracted to the borough could take advantage of public transport in its various forms, HS2, other rail connections, air travel. There is going to be a significant "pull" of people moving from London. Why get them dropped off at Birmingham International then expect them to travel across the borough to find housing?

Current trends would suggest that even more office space and even retail space eg in Mell Square could be converted to living space rather than further incursion into Green Belt. The effects of changing work patterns due to Covid 19 need to be reconsidered before our open spaces are lost.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10689

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Alex Lukeman**Summary:**

These comments could cover any of the proposals for Blythe Area but specifically for Whitlock's End Farm:

- * the proposed density of development for the south of the Borough is placing an unequal burden on the area
- * the pressure being placed upon local services especially healthcare including G.P. surgeries. There is increasing development of retirement homes in the area and as GP practices operate as "businesses" there is reluctance to open new surgeries where demand for services will adversely affect financial viability
- * the pressure placed on road infrastructure already near capacity at peak times.

Change suggested by respondent:

Greater consideration needs to be given to the potential changes to housing demand with the advent of HS2. The significant inter-change at Birmingham International will give a "pull" to people wishing to move out of London. There is now evidence of this shift and house prices in the borough are reflecting this demand. We could foresee a situation where commuters are dropped off at International then expected to travel across the Borough for housing.

Current trends suggest there is already a change in working and shopping patterns, which is unlikely to be reversed, hastened by the current pandemic. This means more empty office spaces and retail units. M and S are leaving Mell Square and could be followed by House of Fraser. Both retailers suffering from being outside Touchwood. If this decline in Mell Square continues there will be plenty of space that could be utilised for housing. Currently, former office space is being re-developed as apartment living and this is likely to continue. This rebirth of buildings will help prevent the continual incursion into valuable green belt. Amenities such as shops, public transport, entertainment, restaurants, local authority services exist in Solihull centre.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11040

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Andrea Lutzy**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14541

Object

Policy BL1 - West of Dickens Heath**Respondent:** Paul Lynch**Summary:**

I object to planning 350 more houses in Dickens Heath site BL1 for the following reasons:

- the area floods every single year, and the drains in the area cannot cope. The whole foul sewerage system will have to be upgraded
- The area is a habitat for natural wildlife with foxes, deer, badgers, and bats
- will put added pressure on Solihull Health Partnership
- Extra strain on local schools
- Dickens Heath Road is overflowing with traffic during rush hour
- the fields help with physical and mental help issues.
- The character will be adversely affected
- not within a recognized walking distance from the Village Centre facilities

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14700

Support

Balsall Common**Respondent:** Warwickshire County Council**Summary:**

Paragraph 527

Support the principle of the Balsall Common Relief Road and the objectives it is seeking to deliver locally within the Balsall Common area.

Seek to work with SMBC to understand the implications of the relief road for the A452 & A4177 corridors, in particular within Kenilworth town centre and between Kenilworth and Leamington Spa.

The County Council (in conjunction with Coventry CC & Warwick DC) is currently consulting on proposals for a new link road between the A46 Stoneleigh junction and the University of Warwick/Westwood Heath. Initial feedback from stakeholders has highlighted some concerns around the impact that this scheme could have on parts of Solihull Borough, particularly Berkswell, Balsall Common and routes such as B4101. The County Council is keen to work with Solihull MBC to better understand and assess these impacts, including implications for the A452 corridor and proposed Balsall Common Relief Road.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14701

Support

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Warwickshire County Council**Summary:**

Seeks to continue to work with Solihull MBC to further strengthen sustainable transport provision. In relation to rail, the County Council would like to work jointly in order to develop a number of key projects including (1) Stratford-upon-Avon – Birmingham rail corridor (2) maximise the potential of a potential new Birmingham – Oxford service and (3) Coleshill Parkway.

Given the significant housing development at Balsall Common, the County Council wishes to better understand the impact this may have on demand for rail travel. In addition to a likely increase in demand at Berkswell station (resulting in a need for parking expansion) there may be further demand placed on Warwick Parkway station given its proximity, accessibility and frequent rail service to London.

Measures to provide better sustainable access to Dorridge station to serve housing growth in the Knowle/Dorridge area are supported.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14702

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Warwickshire County Council**Summary:**

The County Council commissioned a piece of work in 2018 to develop a UK Central Plus Connectivity Strategy, in order to identify the key transport infrastructure and service improvements within Warwickshire which will be needed to ensure the sub-region is well connected to the employment and other opportunities that will arise from the HS2 Interchange Station and wider growth across the UK Central area.

The County Council is keen to work with Solihull MBC to develop a joint UKC Surface Access Strategy and associated programme of investment priorities so that the benefits of these proposals are maximised across our respective areas for residents, businesses and their supply chains.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14703

Support

Policy P12 Resource Management**Respondent:** Warwickshire County Council**Summary:**

In regard to Policies P12 (Resources) and P13 (Minerals) WCC is supportive of the policies which appear to be in conformity with national minerals and waste policy guidance.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14704

Support

POLICY P13 Minerals**Respondent:** Warwickshire County Council**Summary:**

In regard to Policies P12 (Resources) and P13 (Minerals) WCC is supportive of the policies which appear to be in conformity with national minerals and waste policy guidance.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14021

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Objection to Policy P2 as it fails to sufficiently recognise the potential opportunity for new residential development in ensuring the vitality of Shirley town centre.

Change suggested by respondent:

P2 should be modified to say "Development of residential uses will be supported within the town centre".

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14039

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Objection to Policy P4A it fails to differentiate between different types of housing, specifically between C2 and C3 developments, as well as establishing a difference between self-contained housing units and institutional facilities such as care homes. Including C2 Use Class makes it in conflict with NFPPF and PPG.

Change suggested by respondent:

Amend to say

'The Council will require developers of allocated and windfall sites to make a contribution to affordable housing on residential sites of major development delivering self-contained (Use Class C3) dwellings, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more to meet the housing needs of the Borough'.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14048

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Policy P4C is not considered to be positively prepared or justified, and is therefore considered not to be sound. Clause 3 of this policy provides requirements for housing mix, which across the Borough this may represent an appropriate housing mix, it is considered unlikely that this will be appropriate in all locations and for all types of development. The HEDNA 2020 (paragraph 47) and the Housing Topic Paper (paragraph 117), both support a 'flexible approach' when applying housing mix. This should have regard to factors.

Change suggested by respondent:

Clause 3 of Policy P4C should be deleted and instead should seek to negotiate housing mix on a site by site basis.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14049

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Policy P4D as set out makes no differentiation is for flatted schemes, where this is unlikely to be feasible. There should be an additional clause of exemption (vii) where the type of development proposed makes this unfeasible, for example whether flatted development, or specialist housing proposals.

Change suggested by respondent:

Addition of clause (vii): The type of development proposed, for example whether flatted development or traditional housing, or specialist housing proposals.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14053

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Policy P4E suggests that new housing developments will be expected to provide a mix of dwelling size and type to meet the identified needs of older people and those with disabilities and special needs, this is unlikely to be feasible on many sites, where site size or constraints mean that only one model of care accommodation is possible to be provided. The Policy requires all developments greater than 300 dwellings to provide specialist housing, instead, the Council should focus on providing care specific developments in appropriate locations. It is considered that this policy as currently drafted will be ineffective at ensuring the appropriate level of provision of specialist accommodation is achieved in the Borough across the plan period.

This policy also requires applications for specialist housing and care homes to demonstrate that Primary Health Care services will be accessible to serve residents. Whilst this is important for certain types of specialist housing such as sheltered housing, for proposals such as Care Homes it is anticipated that care will be provided by the operator, and will often work alongside rather than utilising the local Primary Care services and can often support Primary Care services by reducing the level of care required for an individual. Where operators are intending to provide Primary Care services within the development, this should be taken into consideration. It is considered that this policy as currently drafted will be ineffective at ensuring the appropriate level of provision of specialist accommodation is achieved in the Borough across the plan period.

Change suggested by respondent:

It is suggested that clause 1 should be deleted, or otherwise modified in order to acknowledge that provision of a range of housing types may not always be feasible.

Clause 4 should be modified to the following:

'4. All developments of 300 dwellings or more, where feasible and appropriate, should must provide specialist housing or care bedspaces in accordance with the Council's most up to date statement of need on older person's accommodation'.

Within Clause 6 and 7 of the policy relating to specialist housing and care homes respectively, references to access to Primary Health Care services sub-clauses should be modified to recognise the potential for on-site provision.

6 (ii) It can be demonstrated that satisfactory Primary Health Care services will be accessible to serve the residents of the development unless on-site provision is proposed;

7 (iii) There are satisfactory Primary Health Care services to serve the residents of the development within reasonable proximity unless on-site provision is proposed;

(NB, The numbering within Policy P4E appears to be incorrect with two clause 5s.

Clause 7 referred to above is the clause relating to Care Homes.)

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14061

Object

Policy P5 – Provision of Land for Housing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Policy P5 as currently drafted is not considered to be consistent with national policy, in that it is not striving to significantly boost the supply of housing. This is particularly relevant to windfall sites, where the policy suggests that proposals will only be supported where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness. It is considered that this seeks to conflate two issues of delivering housing and ensuring design quality.

Clause 6 of this policy relates to density, confirming that it will be informed by a number of factors, including the need to maximise the efficient use of land, an appropriate housing mix, responding to local character and distinctiveness, and scale, type and location of development. There is the potential for some of these factors to conflict, notably the need to efficiently use land in accessible locations, whilst responding to local character and distinctiveness.

The Framework at Paragraph 123 requires plans to contain policies that optimise the use of land and meet as much of the identified need for housing as possible. In a Borough with high levels of housing need and that is constrained by the Green Belt, it is particularly important that the Council is aspirational and encourages proposals that comprise higher density developments in order to maximise housing delivery.

Change suggested by respondent:

'3. New housing will be supported on windfall sites in accessible locations where they contribute towards meeting borough-wide housing needs particularly where proposals involve the redevelopment of suitable brownfield sites. Unless there are exceptional circumstances, new housing will not be permitted in locations where accessibility to employment, centres and a range of services and facilities is poor'.

'Density

6. The Council will seek to make most effective use of land, by seeking to ensure an appropriate density of new housing that will be based on a number of factors, and measured on the developable area of a site'.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14065

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

P4E - The Council's requirement in Paragraph 216 for care homes and specialist housing to be provided in accessible locations is supported, as it is important that such developments are sustainably located. However, it is noted that this may conflict with the requirement for specialist housing or care bedspaces to be provided on all sites over 300 dwellings, as this may result in such developments being provided on the edge of developments isolated from any form of local facilities, public transport and other services.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14067

Support

Policy P5 – Provision of Land for Housing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

P5 - MACC Group supports the Council's assertions in the supporting text that where proposals fall significantly below 'indicative densities' justification must be provided through the supporting information. This demonstrates a commitment to achieving high density schemes, particularly in town centre and urban redevelopment locations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14068

Support

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Policy P9 is highly aspirational in seeking to ensure development is mitigating and adapting to the effects of climate change, however, in order to be fully consistent with national policy, the policy should identify that exemptions will apply where meeting these standards is not viable or feasible. The requirement for one electric vehicle charging point per residential dwelling, is not appropriate in all circumstances.

Change suggested by respondent:

Amend Policy P9 as follows:

'3. At a site level, where feasible and viable, development must apply the 'energy hierarchy'

to reduce energy demand for heating, lighting and cooling and minimise carbon dioxide emissions as follows:

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 or where less than one space per dwelling is provided, a contribution will be made to the Council's Charging Infrastructure Fund and/or provision to be made through a commercial rapid charging point.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14069

Object

Policy P14 Amenity**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

It is considered that the policy as currently drafted is not considered to be justified or consistent with national policy. Whilst the Framework strongly encourages good design and creating high quality buildings and places, Paragraph 130 provides that permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions. This does not mean that only development that secures high quality design should be permitted, but rather that good design should be encouraged. Furthermore, Policy P15 seeks to deliver high quality design, and so it is not considered necessary to include this requirement in P14, with clause I of this policy instead restricted to dealing with issues of amenity to ensure the emerging Plan is effective.

Change suggested by respondent:

'1. (i) Permit development that respects the amenity of existing and future occupiers; and the character of the surrounding area;'

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14070

Object

Policy P15 Securing Design Quality**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy

Summary:

P15 - As currently drafted it is not consistent with the provisions of national policy. Paragraph 125 of the Framework requires Plans to set a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable.

It goes on to state that policies should reflect local aspirations and be grounded in an understanding of each area's defining characteristics.

The policy requires proposals to be 'sympathetic to the surrounding natural, built and historic environment', and it is concerned that this requirement could be used to curtail proposals of a modern design that are seeking to positively enhance and improve the built environment in more run down parts of the Borough. This should be recognised in the wording of the policy.

When considering matters such as scale, massing and density, matters of design should be balanced with other factors such as securing the viable reuse of brownfield sites and delivering housing, which are significant issues for the Borough. This is addressed in Paragraph 127 of the Framework, which identifies that as part of design considerations, policies and decisions should 'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development'. Scale and massing should not be restricted due to the scale of development surrounding the site, if it can be demonstrated that increasing height and density can be achieved in a high quality manner, leading to an appropriate residential environment, and maximising housing delivery in a sustainable location.

The policy proposes a requirement for usable private outdoor amenity space as well as public and private open spaces to be provided. It is considered that this requirement is not feasible on all sites, for example town centre sites that primarily comprise flat developments. Rather than simply requiring such provision, when considering schemes, the Council should consider the availability and quality of open space nearby. There is no requirement in the Framework for all developments to provide private outdoor amenity space, instead Paragraph 96 emphasises the importance of access to a network of high quality open spaces and opportunities for sport and physical activity. Furthermore, development is required to enable and support healthy lifestyles, with access to green infrastructure, local shops, healthier food and layouts that encourage walking and cycling. The policy should therefore recognise that private outdoor amenity space provision is not always feasible, and where that is the case seek contributions towards nearby areas of public open space and green infrastructure.

The proposed content of clause 6 of the policy is however strongly supported, as in order to meet housing needs in the borough it is imperative that proposals make efficient use of land and seek to optimise densities in appropriate locations.

Change suggested by respondent:

2. (i) Conserve and contribute positively to local character, distinctiveness and streetscape quality and ensure that the scale, massing, density, layout, territory (including space between buildings), materials and landscape of the development is sympathetic to and seeks to enhance the surrounding natural, built and historic environment.

(ii) Ensure new developments, where feasible, include usable 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. Where the provision of private outdoor amenity space, contributions towards nearby public open space should be secured.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14083

Support

Policy P18 Health and Wellbeing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

Our client supports the Council's recognition that the numbers of old age residents within the Borough of Solihull is increasing as this is a key challenge that must be addressed by the emerging Local Plan Review.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14084

Object

Policy P18 Health and Wellbeing**Respondent:** MACC Group**Agent:** Claremont Planning Consultancy**Summary:**

The policy, as currently drafted, fails to acknowledge the importance of housing in delivering improved health outcomes, despite the recognition of this in Paragraph 454 in the Supporting Text. This is particularly the case in relation to housing for older people, with the text suggesting that developments that address such issues and mitigate health impacts for an ageing population will be supported. It is imperative that this is acknowledged within the policy itself, in order to give weight to this statement and emphasise support for such proposals that deliver specialist housing and care accommodation.

Change suggested by respondent:

Modify Policy P18 to include support for specialist housing and care accommodation:

'2. (vii) Delivering new and improved health services and facilities, or specialist housing and care accommodation for older people or those with disabilities, in areas accessed by sustainable transport modes (facilities for primary medical care should be identified and planned for);

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14605

Object

Policy BL1 - West of Dickens Heath

Respondent: Matthew Macdonald

Summary:

The loss of the pitches will affect our children (and adults).
 The land is high grade GREEN BELT.
 This site will be detrimental to wildlife.
 Road network cannot take further development.
 These fields flood every winter.
 Mitigation measures not achievable.
 The character of the village will be adversely affected.

Change suggested by respondent:

-

Legally Not specified
 compliant:

Sound: Not specified

Comply with Not specified
 duty:

Attachments: None

14003

Support

Policy KN2 : South of Knowle (Arden Triangle)

Respondent: Mr Ian Mackay

Summary:

> The existing school is tired and many renovations are required to bring it up to scratch. The local community should look to the future and hopefully accept that there are many more pros than cons in the Arden Local Plan.
 > Makes comment on weekday congestion in Knowle.

Change suggested by respondent:

None

Legally Yes
 compliant:

Sound: Yes

Comply with Yes
 duty:

Attachments:

14284

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mrs Melanie MacSkimming**Summary:**

Concept Masterplan for Site BC1. Disagree with the current configuration (number 3 on the concept map). What significant ecological interest there is in this particular field, as we currently use this field just for grazing sheep and our pet pony. The only possible significant point I can think of is the small pond by the current gate. On what grounds have the council identified this particular field as having significant ecological interest?

Change suggested by respondent:

Unless viable ecological evidence has been found and is presented for the area discussed (number 3 on the map), the only part of that land that has possible ecological value is the pond and should be marked on the concept Master Plan accordingly

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

14363

Object

Policy BL1 - West of Dickens Heath**Respondent:** Adam Madeley**Summary:**

Reasons for objection are:

- > The loss of key habitats and ancient woodlands
- > The loss of significant greenbelt land, hedgerows and key habitats which fall under the wildlife and countryside act 1981. Brown belt Should be first used and greenbelt at the last resort.
- > The lack of infrastructure, schools and increase in traffic around the area.
- > Increase in air pollution, flooding, car dependencies, loss of natural beauty which will impact of human physical and mental health.

Pure greed development and not required.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

13687

Support

Policy S01 - East of Solihull**Respondent:** John and Mary Maguire**Agent:** DS Planning**Summary:**

Allocation S01 is supported. All landowners and their representatives have agreed a masterplan for the allocation. Technical reports have been undertaken with issues and constraints identified and addressed in the masterplan. There is agreement in principle to have a memorandum of understanding.

The site is available, achievable and could deliver a higher number of dwellings than the proposed allocation (more than 700 dwellings). Land north of Lugtrout can be brought forward at an early stage, with no major infrastructure requirements. The site is in a sustainable location, close to local services and facilities.

Change suggested by respondent:

The red line boundary of S01 should be amended to be consistent with the masterplan. In relation to 'land north of Lugtrout Lane' it should include land up to the Grand Union Canal, Damson Parkway, land to the rear of 237 Lugtrout Lane and the existing residential properties on Lugtrout Lane and Hampton Lane.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

14027

Support

Policy S01 - East of Solihull**Respondent:** John Patrick and Mary Patricia Maguire**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14035

Support

Challenges**Respondent:** John Patrick and Mary Patricia Maguire**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14044

Support

Policy S01 - East of Solihull**Respondent:** John Patrick and Mary Patricia Maguire**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

11049

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ayaz Mahmood**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

13913

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ayaz Mahmood**Summary:**

> Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review:

Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11100

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Diane Mahmood**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10849

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Greg March**Summary:**

This site, if approved would only exasperate existing traffic and congestion in this area with comments around the use of rail services from Whitlocks End Station ill thought out and at odds with the reality of what happens today on a typical daily basis.

It is also not clear about the capability of Secondary Schools such as Light Hall to be able to cater for future demands based on an increase in housing in this area.

Change suggested by respondent:

Put simply the road system can't currently cope at times with existing demand on Dog Kennel Lane and so if this scheme is to go ahead it will need a significant re-think about traffic flows and the use of sustainable transport because at present both rail and road are too far away from this site to be considered 'close'. My preference would be for this site not to be developed at all.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10850

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Greg March**Summary:**

The BL3 development represents the spoiling of natural green spaces that have been enjoyed by generations of local and non-local people; natural green space that in part makes this area what it is. This development risks changing the character of the area significantly particularly when combined with BL2.

Furthermore, Bills Lane/Hall Green Road are already heavily congested a peak times, something this development will only add to.

Change suggested by respondent:

My preference would be for the development not to proceed or if it is for a significant reduction in the number of proposed dwellings with greater natural green space as it is today.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10652

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Andrew Markou**Summary:**

Cheswick Green cannot cope with more developments, 1000 homes will change the character and topography of the area, more problems with traffic, transport and access to already over burden local services.

The impact on the environment and there is extreme concern (as already witnessed) that there is potential of good likelihood of further extensive development and total loss of green belt.

Change suggested by respondent:

Retain the well established, well defined and recognisable physical boundaries of Dog Kennel Lane and Creynolds Lane and Tamworth lane, between the village and the built up areas of Deakens Heath and Shirley.

Maintain and support keeping of the greenbelt lands between Cheswick and Shirley.

1000 homes will out grow the rest of the area and impact on the environment and the topography of the area.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

14808

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Pam Marsden**Summary:**

Does not believe the local plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan review: Wilson, W McGarry, j. Wilson, J. "Part A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common" 29/11/202.

As such is objecting to the allocation of site BC3 for housing

Change suggested by respondent:

Remove site BC3 as proposed site for allocation

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10705

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Nick Martin**Summary:**

The plan currently consumes quite a large area of formally agricultural (nursery) land which until this year was developing into a mosaic of scrub and rough grassland. In this state it was occupied by a wide variety of wildlife including invertebrates, mammals and birds. The loss of this area to clearance and subsequent development should not be understated. While I understand the need for development and this site has many logistical values for this plan I do not see on the plan any compensation or mitigation for the loss of a valuable wildlife habitat adjacent to the brook and woodland.

Change suggested by respondent:

I would like to see the loss of this area compensated locally with much more ambitious habitat creation. The plan shows no additional provision for wildlife which could surely be created by the succession of current arable land to habitat creation. The arable land that is currently between the development and the Hall could be simply allowed to develop into scrub and woodland providing a valuable wildlife corridor for species with a light touch management regime or grazing to retain open features. In addition I would love to see some of the current intensive arable land elsewhere in the area allowed to develop into rough grassland succeeding into scrub and woodland. This would help compensate nature for the loss to these developments.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

10706

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Nick Martin**Summary:**

I am disappointed that this plan whilst providing required housing and education provision has not taken the opportunity to adequately compensate or mitigate lost wildlife habitats in the area. This large area would have been home to a wide range of wildlife and would have been a refuge for some species in an area of housing and arable farming. The loss of this area from the green belt could have been compensated by utilising some of the land or adjacent farmland to create habitats of high wildlife value and provide at least biodiversity parity or even gain.

Change suggested by respondent:

I would like to see the loss of this area compensated locally with much more ambitious habitat creation. Just retaining some existing features doesn't go far enough and I would like to see the developers and planners exercise some real ambition within the planning. Some of the current intensive arable land in the area could be allowed to develop into rough grassland succeeding into scrub and woodland. This would help compensate nature for the loss to these developments.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

15166

Object

Vision**Respondent:** Stuart Mason**Summary:**

There will be a requirement for more schools - already a shortage of teachers/ won't be enough to support school age Children.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10586

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Stuart Mason**Summary:**

The proposal to erect a waste disposal site in Damson Parkway is flawed. The local residents whose lives will be affected by the proposals have not been satisfactorily informed of these proposals. Furthermore the placing of a waste disposal site at this location will create severe traffic problems with the potential of long traffic queues of people in vehicles queueing to use the site (as recently encountered during the current pandemic). Damson Parkway is also well used by local residents and Land Rover traffic and any queueing traffic will cause traffic congestion.

Change suggested by respondent:

Scrap these plans and consider elsewhere where local residents lives will not be severely affected by these proposals and traffic flow will not be affected

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14476

Object

Policy P17 Countryside and Green Belt**Respondent:** Mr Stuart Mason**Summary:**

No Brexit deal will make food expensive so use the greenbelt to grow crops. this will save resources too.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11073

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Claire Massey**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Yes

Comply with duty: Not specified

Attachments: None

10612

Object

Hockley Heath**Respondent:** Mrs Sophie Mathieson**Summary:**

I think that the proposal for 90 homes to be built on the land opposite my house is extreme. Aside from the obvious objection to the loss of green belt, School Road already has issues with congestion around the school and the narrow lane further up is hazardous, particularly where two cars struggle to pass. Such an influx of traffic would be dangerous.

Change suggested by respondent:

A different site should be considered.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14680

Object

Policy P5 – Provision of Land for Housing**Respondent:** Lichfield District Council**Summary:****PARAGRAPH 228**

Lichfield District Council is concerned that given the approach taken within the Draft Submission Plan, Solihull Council is not committed to fully addressing the GBHMA shortfall and this is particularly significant given the geographic context and transport links between Solihull Borough and Birmingham.

Whilst the approach towards calculating the Borough's own local housing requirement and the site selection process is noted and appears to be soundly based, Lichfield District Council is conscious that the contribution of 2,105 dwellings towards the GBHMA shortfall is lower than the contribution proposed by neighbouring authorities such as Lichfield District and North Warwickshire. Therefore, further sites may need to be identified and released from the Green Belt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

13842

Support

UK Central Hub**Respondent:** The NEC group**Agent:** NCL Developments Ltd**Summary:**

NEC supports the Hub Area to become globally renowned as the best-connected business, leisure and entertainment destination in Europe and a major driver of the UK economy, along with the creation of a sense of place that draws upon a modern interpretation of 'garden village' principles. The focus on supporting the aspirations of the economic assets in the Hub, including significant employment based and housing growth, is essential if the Borough is to meet its overall objectives and targets.

The Plan's recognition at both Policy P1 and P5 of the NEC's role in the housing land supply of the Borough is important and welcomed.

Notwithstanding the overall support for the Plan there are opportunities to further strengthen its content and ensure that the scale of the opportunity at the NEC site is fully realised, including for residential development. It is also essential that the Plan incorporates sufficient flexibility to enable the economic role of the NEC site to evolve in response to changing global and national circumstances.

The NEC Group would therefore welcome continued dialogue with Solihull MBC on the Local Plan. It is suggested that a Statement of Common Ground is produced to establish the areas of agreement and areas where further changes may be required to ensure that the Local Plan fully supports and enables the development potential of the NEC site to be realised and in turn support the delivery of the overall strategy for the Borough

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10681

Object

Hockley Heath**Respondent:** Mrs Pamela May**Summary:**

From 16.30 -18.30 there is a line of traffic outside my property waiting to turn onto the Stratford Road. This road cannot cope with the traffic levels at present. Extra housing = extra cars = more congestion. What measures have Solihull Council put in place for extra capacity on local roadways, for extra capacity in Schools, extra capacity in Doctors and health care? for extra Police and other service do we as Solihull council taxpayers and resident of Hockley Heath have to accept substandard services? This removal of green belt is an atrocious lack of care for local community and environment.

Change suggested by respondent:

We wish to formally oppose and strongly disagree with the Draft Local Plan to remove the green belt in the area on School Road, Hockley Heath B94 6RA to provide a site for housing development. We also formally oppose and strongly disagree with the washed over green belt on School Road, Hockley Heath B94 6RA being removed which may result in two further plots being developed for dwellings in the future.

Mr Saqib Bhatti tweeted on twitter 2 weeks ago

"Today I asked the Prime Minister to commit to doing everything he can to protect our precious Green Belt which is so important to me and my constituents.

We must make sure we are building on brownfield sites first to protect our beautiful countryside. ☹"

- As of 12th. October 2020.there are 102 sites on Brownfield Land Register (solihull.gov.uk)

Why are these sites not being utilized for development?

- As of 12th. October 2020. There are 42 properties for sale At Blythe Gate, Blythe Valley Park (a new build development in the local area) (ref – https://www.zoopla.co.uk/for-sale/property/blythe-valley-park/?identifier=blythe-valley-park&page_size=25&q=Blythe%20valley%20park%20b90&search_source=refine&radius=0.25&view_type=list&pn=3 Plus, other various properties are for sale in the local area.

Do we really need more housing in the area?

- Due to over building and loss of green belt in the area water displacement is a real and dangerous problem

Watch: Amazing moment man goes for a swim on the Stratford Road

<https://www.birminghammail.co.uk/news/midlands-news/watch-amazing-moment-man-goes-14715705>

- This does not just happen now and again but every time it rains.
- The impact on the local enviroment is plain to see.
- What wildlife will be lost due to a lack of natural habitat.
- A few extra planted trees will not cover all the green belt due to be lost.
- Once this area is built on there is no going back.

Explaining how now is the time for businesses and governments to look at how they do things; making the world a greener place, the duke said: "Someone has to put their head above the parapet and say, I care about this. To have the belief that if we all work together, we can make a difference."

- From approximately 16.30 until 18.30 every day there is a line of traffic outside my property waiting to turning onto the Stratford Road. The main Stratford Road cannot cope with the traffic levels at present. Extra housing = extra cars = more congestion. What is in place to combat this very worrying situation?
- What measures have Solihull Council put in place for extra capacity on local roadways
- What measures have Solihull Council put in place for extra capacity in Schools in the area?
- What measures have Solihull Council put in place for extra capacity in Doctors and health care?
- What measures have Solihull Council put in place for extra Police and other service?
- Or do we as Solihull council taxpayers and resident of Hockley Heath have to accept substandard services?

- This removal of green belt is an atrocious lack of care for local community and environment.
- It is purely for profit.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14705

Object

Hockley Heath**Respondent:** Mr James Mc Bride**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Paragraph 669 & 671:

The proposed settlement boundary amendment at Hockley Heath (as shown on the Policies Map) is unsound as it does not include any amendment to the boundary south of the settlement, contrary to national planning policy.

Land which is unnecessary to keep open has been retained within the Green Belt – contrary to National Planning Policy Framework (NPPF) paragraph 139b);

- Insufficient policy weight has been given to encouraging the development of all suitable land adjacent to the 2013 adopted settlement boundary for housing to avoid the need to adjust Green Belt boundaries beyond the plan period – contrary to NPPF paragraph 139 e); and

Insufficient account has been taken of the Hockley Heath Neighbourhood Plan Resident Survey Results Report (2018), which showed significantly less opposition to any new development being directed south of the settlement boundary, along Stratford Road – contrary to NPPF paragraphs 15 and 16 c).

Change suggested by respondent:

Paragraphs 669 and 671 should be amended as detailed below:

62. Paragraph 669:

'The Green Belt boundary around Hockley Heath will need to be amended to accommodate the level of growth proposed for the settlement. To provide a logical, strong and defensible new southern boundary to the north west of the settlement it is proposed to use the Stratford-upon-Avon Canal and to use the existing and strengthened vegetation boundary line to the south along Stratford Road.'

63. Paragraph 671:

'In addition to the site south of School Road that would then fall within the settlement boundary, if the Green Belt boundary were amended as described above, there are also three smaller sites that will be considered appropriate for development as they would then also be within the settlement boundary. These sites are not being allocated as part of this plan but are being highlighted as they have been promoted for development by the landowner/developer and if the Green Belt boundary is changed as proposed on the Policies Map they would no longer be subject to Green Belt policy. The details of the scale of development would be established through the planning application process. These are as follows (using the call for site references and the SHELAA for potential indicative capacity):

- 49 Land adjacent to 84 School Road (capacity 21)
- 328 land at and to the rear of 84, 86 & 90 School Road (capacity 30)
- 14 Land at 2440, Stratford Road (capacity 8 to 15)

An amendment to the Policies Map is proposed as shown on enclosed Plan 201207 (or to follow the boundary line of land in our Client's ownership if agreement is reached under the Duty to Cooperate with Stratford-on-Avon Council).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14710

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr James Mc Bride**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Policy BL1 is unsound on the basis that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythe Barn Lane to a suitable site in the vicinity and thereby facilitate development on the site, contrary to the deliverability and developability requirements for site allocations set out in National Planning Policy Framework (NPPF) Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

The 'Developer Site Proposal' plan included on page 48 of the Concept Masterplan Document, suggests the replacement pitches could be accommodated to the north and east of Shirley Town football club (including on land currently occupied by Akamba Garden Centre and shown retained on the SMBC illustrative concept masterplan). However, the developer's proposal shows the replacement playing pitches on a 'Local Wildlife Site'. This would not be suitable, achievable or deliverable as it would be contrary to Policy BL1.

The proposal to use a LWS for playing pitches would also be contrary to the requirements of Policy P10 'Natural Environment' part 18

It is contended that there are suitable alternative options to the proposal to allocate BL1 land West of Dickens Heath for 350 dwellings, for example: allocating more small and medium sized sites; allocating brownfield land; making more minor amendments to larger village boundaries to facilitate additional small-scale development; and ensuring densities of development on sites brought forward for development (including those removed from the Green Belt and included in the urban area) are developed at densities which make the most efficient use of land.

Change suggested by respondent:

Our Client, Mr Mc Bride, contends that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythe Barn Lane to a suitable site in the vicinity and thereby facilitate development on the site. This proposed allocation is, therefore, contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

Our Client contends that evidence is required to justify Policy BL1 West of Dickens Heath, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document; and
- there is a fully developed strategy with mechanisms in place to ensure playing pitches are replaced to release the land for residential development.

If these issues of soundness cannot be overcome our Client recommends that paragraphs 225 and 226 should be amended to remove the estimated contribution of proposed site allocation BL1 from Delivery Phases I and II and Policy BL1 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14712

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr James Mc Bride**Agent:** Tyler Parkes Partnership Ltd**Summary:**

Policy KN2 is unsound on the basis that insufficient evidence has been provided to demonstrate the site is deliverable with 'multiple and potential complex land assembly issues' (paragraph 709) still remaining to be resolved, as well as replacement playing fields. There is also insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School, to justify that it is an appropriate strategy. This is contrary to the deliverability and developability requirements for site allocations and the requirement to justify a strategy as

set out in National Planning Policy Framework (NPPF) Appendix 2: Glossary and paragraphs 35, 67 and 72.

The need to demonstrate deliverability and developability has not been evidenced. The Concept Masterplan document appears to reinforce the lack of a comprehensive agreed approach with three concept plans included in addition to the SMBC Illustrative Concept Masterplan.

There is concern that there is no detailed evidence to justify the need for the replacement and upgrade of Arden Academy Secondary School and the development of a new Primary School.

Change suggested by respondent:

Our Client contends that insufficient evidence has been provided to justify Policy KN2, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document;
- the demolition of Arden Academy and its relocation to a new site within the proposed KN2 site allocation is the most appropriate strategy having regard to reasonable alternatives; and
- there is a fully developed masterplan strategy with appropriate playing pitch replacement strategy.

19. Policy KN2 is currently unsound, when assessed against the requirements for policies and proposals to be justified as set out at NPPF paragraph 35 b).

Evidence has not been provided to demonstrate that: 600 dwellings could be delivered in the periods 0-5 years and 5 to 10 years from 2020 or that the proposed mixed use development with relocation of Arden Academy is an appropriate strategy, taking into account the reasonable alternatives.

20. Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14725

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr James Mc Bride**Agent:** Tyler Parkes Partnership Ltd

Summary:

Policy P5 'Provision of Land for Housing:

Paragraph 222 Solihull Housing Land Supply 2020 – 2036, Paragraph 225 Maintaining Housing Land Supply and Paragraph 226 Allocated Sites

Insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

There is a lack of credible evidence to demonstrate that the 861 dwellings identified for Solihull Town Centre under Policy P5 can be delivered. It is considered that insufficient evidence has been provided to demonstrate that there is a mechanism to facilitate the quantum and timing of development proposed via Policies P2 and P5., contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary. It also fails to satisfy paragraphs 67 and 175 of the NPPF. Our Client therefore contends that Policy P5 is unsound the number of dwelling proposed to be delivered in the Town Centre should be significantly reduced to reflect more realistically its capacity based on the constraints to development.

Insufficient evidence has been provided to demonstrate the ability to deliver the 2,740 dwellings from the UK Central Hub within the Plan period (2020-2036), as set out within Policy P5 (Provision of Land for Housing), contrary to the deliverability and developability requirements for 'site allocations' set out in the NPPF Appendix 2: Glossary. Accordingly, the 'allocation' of the UK Central Hub sites fails to satisfy the NPPF paragraphs 67 and 175.

The definition of the 'UK Central Hub Area' as referenced in Policy P5 (Provision of Land for Housing) is imprecise and inconsistently applied within the SLP and supporting evidence

The housing contribution from within the 'UK Central Hub Area' is not clearly defined within the draft SLP documents (i.e. the SLP, Policies Map or Concept Masterplan Document) There is a reliance on documents provided in evidence (but not to be adopted) which are subject to change. This leads to uncertainty on achieving the housing delivery stated in SLP Policy P5 (Provision of Land for Housing) within the Plan period.

The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence is inconsistent, leading to uncertainty in achieving the housing delivery stated in SLP Policy P5 (Provision of Land for Housing) within the Plan period.

Delivery of The UK Central Hub (including residential elements of Arden Cross and NEC) is extremely complex, requiring the co-ordination of several landowners and implementation of necessary infrastructure; in the absence of a clear Policy and/or Concept Masterplan identifying relevant details, and as noted elsewhere discrepancies in the quantum and timetabling, this raises uncertainty on achieving the housing delivery stated in SLP Policy P5 (Provision of Land for Housing) within the Plan period

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5-and 16-year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, BLR and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all BLR sites, SHLAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHLAA sites, BFL sites and planning permissions should be deleted

from the SLP and housing land supply information (paragraphs 65, 222 and 225).

Where appropriate evidence is forthcoming, additional site allocations should be set out in the SLP and Policies Map which identify deliverable small and medium 'major' development sites.

In particular, it is considered the following modifications are required –

1. The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.
2. A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.
3. The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence should be consistent.
4. The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
5. The development of Arden Cross requires Green Belt compensation.
6. That the NEC and Arden Cross sites are fully assessed for their suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14734

Object

Policy P5 – Provision of Land for Housing

Respondent: Mr James Mc Bride

Agent: Tyler Parkes Partnership Ltd

Summary:

Policy P5 'Provision of Land for Housing' is unsound on the basis that insufficient evidence has been provided to demonstrate cross-boundary collaboration under the legal Duty to Cooperate in respect of the proposed 2,105 dwelling contribution towards the housing land supply shortfall (paragraphs 227 to 228 of the SLP). There is no published statement of common ground to demonstrate effective and on-going joint working – contrary to National Planning Policy Framework (NPPF) paragraphs 11, 24, 26, 27 and 60

Insufficient account has been taken of the need to plan effectively for delivery of the anticipated growth over the plan period and beyond to avoid the need for an early Local Plan with accompanying Green Belt review, and ensure timely delivery of development – contrary to NPPF paragraphs 33 and 139 c).

Change suggested by respondent:

Our client submits that the evidence in support of Policy P5 is deficient and, therefore, the policy is unsound and that the council should:

Publish a statement of common ground, which addresses the HMA crossboundary shortfall of sites to meet the minimum housing requirement to satisfy NPPF requirements.

- Modify the housing delivery target number if/as appropriate following scrutiny of the statement of common ground.
- Allocate small and medium sized sites for residential development; and
- Remove of a phased housing delivery target table at paragraph 224.

In order to ensure that any future housing requirement changes can be accommodated within the plan as efficiently and effectively as practicable, to support the

Government's objective of significantly boosting the supply of homes (NPPF paragraph 59) our clients seek the following proposed modifications to Policy P5 as

shown in 'bold italics' below:

'1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Insert two new paragraphs beneath paragraph 4 of Policy P5, as follows,

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Reserve sites will be released in the following circumstances:

- ***To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area;***
- ***To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.***

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

14750

Object

Policy P5 – Provision of Land for Housing

Respondent: Mr James Mc Bride

Agent: Tyler Parkes Partnership Ltd

Summary:

Policy P5 is unsound on the basis that insufficient policy weight has been given to encouraging the development of suitable sites within settlements for housing enabling villages to grow and thrive, especially where this will support local services, at densities in keeping with national and local strategic policies in Neighbourhood Areas – contrary to National Planning Policy Framework (NPPF) paragraphs 65, 122 and 123.

To comply with NPPF paragraph 65, it is important that the Neighbourhood Area housing requirement is included within Policy P5 as a strategic policy requirement, rather than as part of the supporting text explaining and justifying the approach set out in the policy. Currently, Policy P5 makes no reference to the housing requirement being partly attributed to specific Neighbourhood Areas.

Given that there is unlikely to be an opportunity to test the housing requirement at the Neighbourhood Plan stage, it is important to ensure that the proposed Neighbourhood Area housing requirements and supporting text are not overly restrictive jeopardising the NPPF and local plan objective of meeting the minimum housing requirement over the plan period.

Change suggested by respondent:

Our clients contend that Policy P5 is unsound on the basis that it fails to demonstrate that the housing requirement for designated Neighbourhood Areas is appropriate, proportionate and makes the most effective use of land having regard to local characteristics and national requirements (NPPF paragraphs 122 and 123), our client recommends introduction of a strategic policy (in line with NPPF paragraph 65).

A modification is sought to Policy P5 as shown in 'bold italics' below:

Insert a new paragraph below paragraph 2 of Policy P5, as follows:

'A proportion of the Borough's housing requirement will be expected to be delivered in designated Neighbourhood Areas as detailed in the table below.

These housing requirement figures are indicative minimum numbers and may be exceeded once detailed permissions have been considered for the sites identified in the land availability assessment, Brownfield Land Register, site allocations within this plan and saved from the 2013 Local plan and any suitable additional sites which come forward within the settlement boundaries as defined on the Policies Map.'

It is submitted that paragraph 234 should be deleted and replaced by a table of Neighbourhood Areas with the minimum housing requirement listed for each area.

The minimum housing requirement figures currently shown at paragraph 234 should be critically reviewed to reflect the deliverability of the housing land supply sources more realistically. As a minimum, our client submits that an addition of 21% to the numbers proposed at paragraph 234 should be incorporated, to reflect the windfall delivery expectation.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14787

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Helen McBride**Summary:**

Supports the relocation of Arden School to the new 'Arden Triangle Location'. Not only would the area benefit from a state of the art campus (for all stages of learning) but also it would lead to improved traffic flow along Station Road – which is really terrible around the drop off/pick up time.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11021

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** McCarthy and Stone Retirement Lifestyles Ltd**Agent:** The Planning Bureau**Summary:**

Policy P4E (iv) states All specialist housing must meet the Category 2, Category 3(2a) or Category 3(2b) requirements of the Building Regulations, Approved Document M, Volume 1

This is not clear as it does not stipulate the proportion of each form of accommodation which is required and in any case should only relate to housing where the Council has nomination involvement (see other representations)

Change suggested by respondent:

That Policy P4E be amended to specify the proportion of wheelchair accessible and adaptable housing required and that this is only required where the Council is responsible for allocating or nominating an individual

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11022

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** McCarthy and Stone Retirement Lifestyles Ltd**Agent:** The Planning Bureau**Summary:**

Paragraph 172 states: The (affordable housing) policy applies to all development in the 'C3' use class. The policy will also apply to 'C2' development that provides individual self-contained units that can be counted as part of the Borough's overall housing supply. Such C2 development will be Extra Care developments which are typically 50 units plus and with extensive communal and care facilities, will differ significantly from that form of retirement housing that has been viability tested.

No viability testing of Extra Care housing has been carried out

Change suggested by respondent:

That Paragraph 172 be deleted

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11023

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** McCarthy and Stone Retirement Lifestyles Ltd**Agent:** The Planning Bureau**Summary:**

Paragraph 214 states "Specialist housing will provide fully self-contained homes to people who may need care at the time that they take up occupation, or may develop a need for care over a period" and then goes onto consider how the Council defines such housing referring to levels of care that would be typically found in extra care accommodation. This fails to recognise that there are a wide range of housing types for older people in response to a wide range of varying needs. PPG guidance "housing for older and disabled people" at para 10 states that this extends from simple age restricted accommodation and retirement housing with little or no care, through to care and nursing homes. The benefits of all forms of such accommodation are well recognised and the HEDNA generally recognises a need for many forms of such housing. The paragraph in seeking to define older persons housing therefore takes a far too narrow approach .

Change suggested by respondent:

That Para 214 be amended wholesale to recognise the wide range of specialised housing for older people, that this is not just restricted to housing "with care" and that all forms of such housing brings with it a range of benefits not least in addressing loneliness, isolation and assisting downsizing

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11024

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** McCarthy and Stone Retirement Lifestyles Ltd**Agent:** The Planning Bureau**Summary:**

Paragraph 207 states that: Policy P4E requires 'wheelchair adaptable' as 'wheelchair accessible' only applies where the Council is responsible for allocating or nominating an individual. This is generally the correct approach given PPG/Bregs guidance. However (a) the use of the word "as" does not make statement clear and (b) this is not clearly stated in the policy as inferred by Para 207 and ought to be as the policy is quite wide ranging

Change suggested by respondent:

That Policy P4E be amended to additionally state

Policy P4E requires 'wheelchair adaptable' (M4(3)a) and 'wheelchair accessible' (M4(3)b) only applies where the Council is responsible for allocating or nominating an individual

That Paragraph 207 be amended accordingly

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

10795

Object

Policy P12 Resource Management**Respondent:** Councillor Laura McCarthy**Petition:** 1218 petitioners**Summary:**

- The proposal to move the HWRC to Damson Parkway has not been made public prior to this draft of local plan publication. Local Councillors were not notified or consulted, and neither was the public.
- Environmental Impact and Traffic Assessments have not been shared. I understand they have not been undertaken.
- This development would be close to housing and the Traveller Site. This is already an area of pollution concern and the new JLR development will add to traffic pollution. The HWRC will add more, contrary to national policy.
- Supporting evidence published after consultation started.

Change suggested by respondent:

All references to Damson Parkway need to be removed. No consultation has been undertaken with Councillors or the public and so it is inappropriate to include. Over 1,200 residents have signed a petition in objection. No assessments undertaken or shared. Residents have found it difficult to respond to the consultation and some have been excluded due to not having digital access.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10798

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Councillor Laura McCarthy**Petition:** 1218 petitioners**Summary:**

- The proposal to move the HWRC to Damson Parkway has not been made public prior to this draft of local plan publication. Local Councillors were not notified or consulted, and neither was the public.
- Environmental Impact and Traffic Assessments have not been shared. I understand they have not been undertaken.
- This development would be close to housing and the Traveller Site. This is already an area of pollution concern and the new JLR LOC will add to traffic pollution. The HWRC will add more, contrary to national policy on pollution.
- Supporting evidence published after consultation started.

Change suggested by respondent:

All references to the HWRC being moved to Damson Parkway need to be removed. No consultation with Councillors or the public has taken place and 1,200 residents have signed a petition against plans so far.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

11037

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Adriana McDiarmid**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14111

Object

Policy P18 Health and Wellbeing**Respondent:** McDonald's Restaurants Ltd**Agent:** Planware Ltd**Summary:**

The proposed Policy P18 approach is unsound. It is too restrictive and prevents local planning authorities from pursuing a more positive policy approach.

The underlying assumption is that all Sui Generis uses are inherently harmful to health, which is not supported by evidence. McDonald's offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The policy fails to acknowledge the wider benefits that restaurants can have on the economy and sustainable development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14112

Object

Policy P18 Health and Wellbeing**Respondent:** McDonald's Restaurants Ltd**Agent:** Planware Ltd**Summary:**

Restricting hot food takeaways within a 400m radius from an entrance to a primary or secondary school, youth centre or similar location is in direct conflict with national planning policy. The Policy provides no flexibility in accordance with town centre sites, conflicting with the sequential approach.

The phrasing "or similar location" needs to be defined. A map showing such exclusion zones will highlight the negative land use consequences of Policy P18. The policy is likely to be damaging to the district's economy.

Change suggested by respondent:

Point 5 is unsound and should be deleted from the plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14113

Object

Policy P18 Health and Wellbeing**Respondent:** McDonald's Restaurants Ltd**Agent:** Planware Ltd**Summary:**

Policy P18 takes an inconsistent approach towards new development that sells food and discriminates against operations with a hot food takeaway Sui Generis use. Given the objectives of Policy P18, it should apply equally to all relevant food retailers (A1 and A3 uses).

The policy is wholly disproportionate as it fails to acknowledge that the opportunity for children to access Sui Generis development, as part of a school day, is extremely limited.

Change suggested by respondent:

Point 5 is unsound and should be deleted from the plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14115

Object

Policy P18 Health and Wellbeing**Respondent:** McDonald's Restaurants Ltd**Agent:** Planware Ltd**Summary:**

There is no evidence to indicate over-concentrated areas of hot food takeaway's gives rise to obesity or poor health outcomes. Evidence from the Borough of Waltham Forest, which introduced a school proximity policy, shows there has been no discernible impact on childhood obesity rates. More research and investigation is needed before such a approach can be justified. Similar policies have been found to be unsound by inspectors who have examined other plans such as South Ribble, London Borough of Croydon, Nottingham City, Rotherham and Guilford.

Change suggested by respondent:

Point 5 is unsound and should be deleted from the plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14449

Object

Policy BL1 - West of Dickens Heath**Respondent:** Dr Sophie McDowall**Petition:** 2 petitioners**Summary:**

Object to Policy BL1;

already excessive development in the area - area is greenbelt - Increased traffic/congestion - Over (more suitable) sites have been overlooked - Site will cause coalescence/loss of identity - Village centre can only be accessed by car - Birchy Leasowes too dangerous to use - Loss of wildlife and damage to the environment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11101

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Dominique McGarry**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10868

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Michael McGuinness**Summary:**

This represents further erosion of the green space around Cheswick Green. The significant numbers of new houses have already significantly increased local traffic and increased pressure on GP Services. Flooding is a major concern, these new dwellings will add to the risk to existing dwellings. This development would mean a 300% increase in housing for the local area, a disproportionate number when compared to the rest of the borough. More provision should be made for wildlife, cycle and walking routes connecting the existing developments rather than yet more new houses. Brownfield sites should be used before development of greenfield sites.

Change suggested by respondent:

The proposal for site BL2 should be removed from the plan in its entirety and development opportunities sought in other wards and brownfield sites.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14864

Object

Policy P17 Countryside and Green Belt**Respondent:** Angus McIntyre**Summary:**

Doesnt want further development on Greenbelt.

Change suggested by respondent:

To make the plan sound a proper study needs to be carried out to model the surplus office, retail and manufacturing spaces that will potentially become available over the next 10-15 years as a consequence of retail moving online, Covid-19 and Brexit, particularly if no deal occurs. In fact, you could argue that Brexit is so fundamental to the West Midlands that no plan of this nature should be signed off until the picture becomes clearer.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14865

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Debbie McIntyre**Summary:**

If we are sacrificing never to be replaced green belt land then we should take care that the resources remain under as much democratic control as possible.

Change suggested by respondent:

The taxpayer has invested in new buildings on the Arden site recently. Is it environmentally justified to demolish them or can catering and hall/theatre space be created by expanding the current Arden school site onto some of the land designated for housing. The money could even be spent on teacher salaries and professional development. COVID has also perhaps made this vision of 21st education already look dated.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10772

Object

Blythe**Respondent:** Mrs Heather McLelland**Summary:**

Why build here? We have too many houses built on green and brown belt land already. We have traffic problems already and congestion so why build here? The crime rate has already gone up. This lovely village/area will be ruined!

Change suggested by respondent:

It not to happen - no extension of the school and no additional housing! Go build somewhere else!

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14262

Object

Foreword

Respondent: Councillor Max McLoughlin

Summary:

The Local Plan consultation process has been highly problematic and should have been extended. It has been rushed which has resulted in errors and issues.

- There were grounds for extending the duration of consultation beyond the minimum 6-week period, like other local authorities.
- COVID19 has caused disruptions to the circulation of local newspapers which is the primary means of communication on planning matters.
- Many of the supporting documents were uploaded immediately prior to consultation or afterwards which is not best practice.
- There were errors in the evidence base documentation such as the date of reports and broken links and missing files.
- The administration claimed that “there’s nothing new here” in the Plan which is misleading and jeopardises residents having their say.
- Many respondents have had difficulties using the consultation portal.
- It is poor procedure that the automated response from psp@solihull.gov.uk stated that if respondents didn’t reference page and paragraph numbers their responses would be discarded.
- The dates of when files were uploaded have not been provided which has hampered the ability to respond meaningfully.
- No date of publication was agreed by Full Council or Cabinet after the decision to approve publication.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14273

Object

Foreword**Respondent:** Councillor Max McLoughlin**Summary:**

No sources or dates are stated for the data in the infographic on pg.2

It is incorrect to state 'It wouldn't be a local plan if it didn't have difficult decisions to make' as the plan doesn't make decisions, elected members do.

The plan does not significantly boost the supply of homes for all, it does disproportionately for some, but not for others.

The plan is incompatible with the Climate Emergency and the pledges that the Council has made.

It is untrue to state there were no other options than the loss of Green Belt land. Some alternatives suggested have not been included or discarded.

Materials and construction methods account, disproportionately, for CO2 emissions of housing over the first 50 years of their use. There are no policy requirements on the climate impact of housing, meaning the Council will be unable to refuse applications that cause considerable harm to the environment.

Solihull Council's target to be 'net carbon zero' is 2030. This is the West Midlands Combined Authority target.

Land at Arden Cross is not being maximised for housing, with some benefits not being realised and greater car dependency.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14274

Object

Introduction**Respondent:** Councillor Max McLoughlin**Summary:**

The Plan does not deliver on the purpose of Sustainable Development, as defined by the 1987 Bruntland Commission Report for the United Nations.

This iteration of the plan, in part due to the process the Council has followed, is open to legal challenge like the 2013 legal challenge.

The plan does not accommodate the necessary level of housing for the HS2 Site.

Contrary to para 10, land around the NEC is not well served by local connections/public transport.

Not all aspects of the Climate Change Declaration that can be addressed are being addressed.

No adaptation to the consultation period has been made to account for COVID-19 jeopardising the successful adoption of the plan.

In relation to para 15- more people are working from home and homes are becoming commercial locations which the plan does not account for.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14275

Support

Our Borough**Respondent:** Councillor Max McLoughlin**Summary:**

It is unclear what is meant by the term "aspirational housing" at para 23.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14278

Object

Challenges

Respondent: Councillor Max McLoughlin

Summary:

In relation to Challenge E- there is not equal regard given to the gaps between Shirley and the Blythe villages as others. These are the most at risk of coalescence with Birmingham/Solihull.

In relation to Challenge B- there is currently an over provision of unaffordable housing for older people which has been concentrated in Shirley. The plan does not address this.

Challenge C Objective bullet point 8- the Plan does not set out how this objective relating to the Commonwealth Games and will be achieved/timescales.

Challenge D Objective bullet point 1- maximising capacity of the airport is inconsistent with the Climate Emergency measures, objectives of SMBC, West Midlands Combined Authority and 2016 Paris Agreement. The impact of COVID-19 on the aviation industry and its growth is unclear.

Challenge H bullet point 2- car use is the only form of available transport for some parts of the Mature Suburbs. Urban extension as a policy further compounds this problem, with issues of demand and connecting infrastructure.

Challenge H bullet point 13- the minimal approach to densities will lead to a minimal shift to sustainable travel which is incompatible with both climate and transport objectives in the plan.

Challenge H Objection bullet point 7 - electric vehicles place the same infrastructure demands on the highway.

Challenge J bullet point 2- the wording implies that health is primarily driven by "lifestyle choices", rather than other factors such as income and employment.

Challenge K bullet point 4- there needs to be a commitment to a net-gain of trees otherwise planting trees will not impact CO2.

Challenge L objective bullet point 2- the concentration of development in the Blythe/Shirley area will increase surface water discharge into rivers.

Challenge O objective bullet point 2- there have been past deficiencies on communication. The objectives should state working with "primary care providers" to ensure there is no worsening of an already stretched primary care provision.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14281

Object

Vision**Respondent:** Councillor Max McLoughlin**Summary:**

Para 42 of the plan does not recognise the importance of health for inclusive growth.

Borough Vision Overview – it is unclear how the HS2 Interchange will be integrated into green infrastructure.

Borough Vision Overview – concerns with overdevelopment of retirement living and care homes in Shirley impacting the character and identity of the area.

In relation to para 48 there is a risk of the M42 corridor 'overheating' in terms of economic growth.

At para 48 it is unclear what is meant by undermining the qualities that make the Borough attractive to people and investment. Losing significant Green Belt land as proposed would undermine the qualities, therefore it is inconsistent.

In relation to para 49- the current consultation process does not provide confidence that local communities will have greater involvement.

Para 50 references retaining the strategic Meriden Gap, however this is not fully explained as development is proposed in the Gap.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14283

Support

Spatial Strategy**Respondent:** Councillor Max McLoughlin**Summary:**

Para 55 does not explain the characteristics that make the Borough special and attractive to investment.

In relation to para 59- the extent to which other land is required for green belt release is unclear. Solihull does not put great value in the Green Belt, other options exist for housing at Arden Cross, Solihull Town Centre and Chelmsley Wood Town Centre.

The terminology used at para 64 should be 'unbalanced dispersal' rather than 'balanced dispersal' due to the disproportionate amount of development being located in the Shirley/ Blythe area and Balsall Common/ Berkswell conurbation.

Para 66 bullet point 2- opportunities for achieving accessibility and delivering public transport improvements are less with urban extensions.

Para 70 Spatial Strategy – the locator is inaccurate as Dorridge is not identified for significant expansion

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14285

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Councillor Max McLoughlin**Summary:**

Criteria 3 vii- has the potential to be interpreted to prevent residential development that may contribute more beneficially towards achieving inclusive economic growth.

Criteria 3 viii- 'incorporating' low carbon energy principles could be minimal. The term 'maximising' would improve the quality of the policy.

Arden Cross Criteria ii- The policy should state that residential developments will be prioritised.

Birmingham Airport Criteria ix- a greater number of flights in and out of Birmingham Airport is incompatible with the Climate Emergency targets included in the Plan.

Birmingham Business Park Criteria xvii- it is unclear how a scale is defined for uses that do not compete with existing or planned facilities outside of Birmingham Business Park.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14311

Object

Sustainable Economic Growth**Respondent:** Councillor Max McLoughlin

Summary:

The numbers included at para 85 are inconsistent with the Arden Cross Masterplan, which supersedes the 2018 Hub Framework Plan.

Para 89 states that 500 homes will come forward at Arden Cross in the plan period, which is an inadequate contribution to the Housing Market Area.

No detail is given around the prospectus for a Garden City Approach (2014) referenced at para 92.

Para 94 bullet point 11- the principle of main roads providing strong defensible Green Belt is correct, however this is not applied to other sites (BL2 and BL3).

Para 96- forecasts of 18 million passenger journeys per year are unlikely due to the impact of COVID-19 and the climate emergency. Forecasts for airport activity are unclear.

Para 98- clarity on where the Council has asserted the airport should be supported to maximise the capacity and capability of the existing extended runway, by accommodating such ancillary facilities within Site UK2.

Para 103 - the NEC could contribute to the sustainability goals as it has significant amounts of roof space that would allow for photovoltaic cells.

The Household Waste and Recycling Centre and Council Depot (Policy P12) referenced in para 105 has not been consulted on.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14312

Object

Policy P1A Blythe Valley Business Park**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P1A Criteria 3 is not enforceable as the level of competition, and the geographical extent are not defined. Grammatical issues with the meaning of “particularly designate town centres as appropriate”.

Policy P1A Criteria 4 – for Blythe Valley Business Park to become viable it would need to allow for bus routes to travel through. Development should not be permitted to threaten the Site of Special Scientific Interest directly or indirectly.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14313

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P2 Criteria 10 – Economic activity already exists to the east of the Stratford Road. Defining what is meant by “substantial” would assist future planning determinations.

Policy P2 Criteria 12- Who will be coordinating the promotion of public realm improvements?

Policy P2 Criteria 13- there is potential for mixed residential/commercial development at Chelmsley Wood Town Centre.

Policy P2 Criteria 16– Proposals for main town centre uses in Solihull Town Centre has the potential for detrimentally impacting Hobs Moat.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14314

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Councillor Max McLoughlin**Summary:**

Para 116 bullet point 1- Homer Road and Princes Way are good locations for residential properties. With more "working from home" repurposing existing and planned offices to residential or mixed developments should be encouraged.

Para 120- the train station isn't moving and is no longer incorporated in the new Solihull Town Centre masterplan.

Para 128- the updated masterplan now shows 1,178 new homes in the Town Centre. It is unclear how many of these are deliverable within the plan period.

Para 130- The level of residential development that can be accommodated in the town centre has not been exceeded but has fallen short.

Para 133- social housing is only deliverable on sites in public ownership, whether or not this is intended should be clarified.

Para 138- the A34 Stratford Road has the highest concentration of road traffic accidents in the Borough.

Para 139 bullet point 1- further explanation of objective required.

Para 140- a masterplan is needed for Chelmsley Wood Town Centre to determine viability of level of housing growth proposed.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14316

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P3 Criteria 1- the loss of Green Belt due to the amount of land made available for office space is unnecessary.

Policy P3 Criteria 3- this will open up the process of relocating waste facilities into potentially inappropriate locations.

Policy P3 Criteria 4 iii- clarity required. If a location is viable for housing, it is compatible with home-working.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14317

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Councillor Max McLoughlin**Summary:**

Para 143- there is only a shortfall of B8 uses. Developers will be able to submit applications for B1, B2 or B8 usage. Without protections to ensure needed development is delivered, there will be increased redundancy of older office space which isn't suitable for repurposing as residential.

Para 145- UK2 is not in a good location and does not perform best of the potential sites as a Waste and Recycling Centre.

Para 147- if the relocation of waste facilities to the UK2 site is unsuccessful, other site options should be stated included classifications (B1, B2 etc.).

Para 150- there are no protections against land being developed for other business purposes. This has happened on the A34, with a high concentration of car dealerships.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14318

Object

Providing Homes for All**Respondent:** Councillor Max McLoughlin**Summary:**

Para 153- Health should be included in the list as housing is a key factor in good physical and mental health.

The population projections at para 155 are over 3,367 persons more (by 2036) than the latest ONS figures. The projections are 3,517 households higher than the most recent ONS figures.

Para 157- a growth in a demographic does not necessarily correlate with an equal increase in a specific housing need.

Para 158- The most recent figure for Solihull's median house price is £282,754. Reference should be made on how median earnings have dropped in the last year, whilst house prices have increased, worsening the affordability ratio.

Para 159- providing houses for downsizing only frees up the most unaffordable homes. It could result in more people moving into the borough for the purposes of retirement, increasing lower paid care professional jobs which would worsen the affordability ratio and put greater pressure on the transport infrastructure.

Para 161- a definition of affordability needs to reflect the ratio between house prices and earnings.

Para 162 bullet point 4- there is an overprovision of housing for older people in the borough.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14321

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P4A Criteria 3- the Council does not meet the 40% affordable housing target, currently delivering under 30%. This provision this will remain an ambition unless it is increased.

Policy P4A Criteria 3ii- transparency of financial transactions are required to ensure that developer profits are not exceeding 20%.

Policy P4A Criteria 3iv- the planning objectives need to be detailed fully to prevent misapplication.

Policy P4A Criteria 3v- a more detailed explanation need to be given on the range of house types and sizes.

Policy P4A Criteria 6- further diversification is required in the provision, managed by a Supplementary Planning Document.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14322

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Para 165- the identified need is in excess of the 40% target given in the plan.

Para 171- The more social rent and affordable housing provided in the north of the borough, and the less provided in other parts, will worsen inequalities. There needs to be onsite provision so development reflects the borough

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14329

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P4C Criteria 1 v- The costs will need to be defined to close any loopholes that allow for transfer pricing to diminish the provision of affordable housing.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14330

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P4E Criteria 6 (pg.63)- further considerations need adding to support diverse communities and to not create pressures on other care provision.

•“specialist housing for older people will not be permitted in areas where existing provision is over 25% higher than the borough average”.

The same exception should be included at Policy P4E Criteria 5 (pg.64).

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14334

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Councillor Max McLoughlin**Summary:**

Para 200- amalgamating older people and those with disabilities together is misleading and could lead to worse outcomes. For example households of adults with lifelong disabilities experience greater income inequality.

Para 202- age-restricted general market housing should be governed geographically to prevent concentrations in localities.

Para 203- appropriate housing does not benefit the provision of care to individuals in the housing. Concentration in certain areas can have detrimental impacts for individuals and the wider community.

Para 218- The 2016 consultation grouped “older people” and “those with disabilities”. There is a potential for bias in respondents who were considering one group when answering in relation to the other. The justification for growth in provision for older people is based on an inaccurate measure.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14341

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P5 Criteria 2- AMR is not defined.

Policy P5 Criteria 6- other development requirements should not be excluded as they contribute to density which could lead to inefficient use of land.

Policy P5 Criteria 6 iii- attractive design does not always correlate with local character and distinctiveness. Sustainable housing will often have differences in appearance. The policy could limit the ability to meet climate commitments.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14347

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor Max McLoughlin**Summary:**

The table at para 220 should be amended according to latest ONS figures –

- Households at 2020- 91,050
- Households at 2030- 96,602
- 10 year difference in number of households- 5,552
- Annual average increase in no. of households- 555
- Median house price- £282,754
- Median workplace earnings- £24,493
- Affordability ratio- 11.54
- Affordability increase- 47.1%
- Adjusted household projections annual average increase (ie the LHN)- 817
- Plan period- 2020-36
- No. of years in plan period- 16
- No. of dwellings required during plan period – Minimum LHN- 13,072

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14356

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Para 221- commuter patterns for employment and employment rates have recently changed therefore is unclear whether or not it is appropriate to adjust the figure (UK Central Hib Area).

Para 222 table-

- The town centre sites figure is lower than what is deliverable within the plan period. The potential for converted office space will allow for an increase in delivery. A modest estimate would put the potential increase at between 200-300 additional dwellings.
- The figure for the UK Central Hub Area to 2036 is based on lower land efficiency than is beneficial. A 10% increase in land efficiency would deliver 3,014 dwellings in the plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14362

Object

Policy P5 – Provision of Land for Housing**Respondent:** Councillor Max McLoughlin**Summary:**

Para 226 Table of allocations-

- BC3 is not deliverable due to the heritage impact on the Berkswell Windmill, unsustainable location, protected species on the site. There is a disproportionate amount of housing located in the Balsall Common/Berkswell area.
- BL1 is unsustainable due to its proximity close to ancient woodland, would reduce the gap between Shirley and Dickens Heath.
- BL2 has no defensible boundaries and leaves a tiny gap between Monkspath and Cheswick Green. The designated public open space threatens the setting of the listed Light Hall Farm, encroaches upon housing in Blackford Road and Tanworth Lane and is prone to flooding.
- BL3 is the highest scoring land on the Green Belt Assessment Report. It provides a necessary gap between Shirley and Dickens Heath. It's current usage offers significant carbon sequestration.

There is a disproportionate amount of growth proposed (sites BL1-3, site 11 and windfall development in Shirley). The pressure on local health services is unsustainable.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14364

Object

Policy P6 – Provision of Accommodation for Gypsies and Travellers**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P6 Criteria 4- The number of Gypsy and Traveller Caravans is relatively stable. The plans need to account for diversity of sites, not only pitches.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14365

Object

Policy P7 Accessibility and Ease of Access

Respondent: Councillor Max McLoughlin

Summary:

BL3 does not accord with Policy P7 Criteria 2 ii- access to a high frequency bus service within 400m of the site; and/or 800m of a rail station providing high frequency services.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14377

Object

Policy P8 Managing Travel Demand and Reducing Congestion

Respondent: Councillor Max McLoughlin

Summary:

Policy P8 Criteria 1i- a clearer definition is required. Safe and practical access to a site by sustainable forms of transport is integral to promoting sustainable travel.

Policy P8 Criteria 1iii- an unacceptable impact on public highway safety needs quantifying.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14381

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Councillor Max McLoughlin**Summary:**

Para 278- significant windfall development has taken place at the A34 in the recent past. Traffic assessments should consider the impact on health, well-being and safety of the associated traffic.

Para 279- standards in parking need to be developed. Weight should be given to evidence from not only applicants but residents and interested parties.

Para 287- new road building is incompatible with the climate commitments. In addition increased road building reduces available land for housing placing greater pressure on the Green Belt.

Para 291 Challenge/Objective A- a policy section that includes road building cannot be described as mitigating, nor adapting to climate change.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14382

Object

Policy P10 Natural Environment**Respondent:** Councillor Max McLoughlin**Summary:**

Para 299- is misleading and needs to recognise that Solihull only contributes 6% of land to nature's recovery.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14384

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P9 Criteria 3 ii- 'net zero carbon' needs defining. The materials and carbon embedded in the construction of buildings is what the policy needs to include. A greater commitment to tree planting is required to absorb the amount of carbon from the construction of the homes proposed.

Policy P9 Criteria 5- Carbon offsetting schemes need to be heavily regulated and a last resort.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14389

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Councillor Max McLoughlin**Summary:**

Para 308- energy standard Band C is acceptable for older properties but inadequate for new homes which need to be Band A or higher.

Para 313- There are often economic cases for using open space for PV cells. For example, land may be unviable for agricultural usage.

Para 314- why proposals for low carbon design are only 'given substantial weight'? Energy performance should be required from developers.

Para 315- stronger commitment required as merely "giving consideration" will not address climate commitments.

Para 319- the Council's Climate Change SPD does not exist.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14393

Object

Policy P10 Natural Environment**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P10 Criteria 17- development cannot be allowed to have adverse effects on SSSIs. River SSSIs are vital as wildlife corridors, so must be given greatest protection possible.

Policy P10 Criteria 18- it is not detailed how the weighting of wildlife is counted against benefits of housing.

Policy P10 Criteria 19- it is considered unacceptable for development to have adverse impact on ancient woodland/veteran trees in almost every instance.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14398

Object

Policy P11 Water and Flood Risk Management**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P11 Criteria 1- if the installation of drainage systems makes a site unviable the developer should have the choice to proceed or not.

Policy P11 Criteria 5- the River Cole will be impacted by surface water from both sites BL1 and BL3. Liability from this should rest with the developer.

Policy P11 Criteria 12- development that risks other people's properties, from a flooding perspective, cannot be permitted. There are flooding risks posed to properties in Nethercote Gardens, which could be exacerbated by development of sites BL1 and BL3.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14400

Object

Policy P11 Water and Flood Risk Management**Respondent:** Councillor Max McLoughlin**Summary:**

Para 334- policies within the plan will allow further deterioration to watercourses that are already below required standards.

Para 336- the revision to the original Water Cycle Study is not provided as supporting evidence. The water and flood risk documents contain no maps so the impact of new/amended sites on flood risk is not visible.

Para 345- the concentration of BL1,2 and 3 in an area with flooding risks compound effects.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14403

Object

Policy P12 Resource Management**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P12 Criteria 7- this policy should have been included for prior consultation. Many residents in neighbouring areas will have no idea of the potential facility at Site UK2 Land at Damson Parkway.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14405

Object

Policy P14 Amenity**Respondent:** Councillor Max McLoughlin**Summary:**

Para 371- noise from HMOs where walls are adjoining other properties must be considered and sound proofing should be fitted where necessary.

Para 375- the impacts of noise and vibration should be investigated on site as desktop modelling or surveys can often be inadequate.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14434

Object

Policy P14A Digital Infrastructure and Telecommunications**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P14A Criteria 2- the potential for sharing telecommunications sites should be given additional weighting to encourage cooperation and reduce amenity impact.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14436

Object

Policy P15 Securing Design Quality**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P15 Criteria 2 ii- the required size/quality of these spaces should be detailed. The current wording of the policy is inadequate as it may result in spaces which conform to the policy but are not functional.

Policy P15 Criteria 2 iii- this needs to be more robust to ensure carbon reductions in design.

Policy P15 Criteria 2 vi- this needs to be more robust. A truly independent assessment of tree stock is needed, as well as stronger protections to the existing stock. In the event of any loss of trees, carbon sequestration should exceed the previous tree stock on site, prior to any removal of trees, within 3 years.

Policy P15 Criteria 6- clarity required on the objective of optimising densities. Emphasis should be given towards promoting more efficient use of land.

Policy P15 Criteria 7- developers being 'proactive' to responding to climate change is not robust enough and too open to interpretation.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14437

Object

Policy P15 Securing Design Quality**Respondent:** Councillor Max McLoughlin**Summary:**

Para 399- the impact of non-permeable driveways on run off, and the loss of vegetation are not sufficiently addressed. Design codes should be included to promote sustainability in both.

Para 400- low carbon design approaches to reduce energy consumption in buildings AND in their materials and construction.

Para 404- the concept masterplans are unclear, often contradictory and in the case of BL1-3 the footprints and concentrations of housing is hard to determine.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14438

Object

Policy P16 Conservation of Heritage Assets and Local Distinctiveness**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P16 Criteria 4- This principle of conserving heritage is contradicted by the inclusion of development around Whitlocks End Farm, Light Hall Farm and Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14439

Object

Policy P17 Countryside and Green Belt**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P17 Criteria 1- This should state that the Council will safeguard the highest performing Green Belt.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14441

Object

Policy P17 Countryside and Green Belt**Respondent:** Councillor Max McLoughlin**Summary:**

Para 417- urban sites like Solihull Town Centre and Chelmsley Wood have much greater capacity per hectare than Green Belt land. Site UK1 should have the housing capacity maximised.

Para 419- The Green Belt Assessment demonstrates that BL3, BL1 and BL2 have a high impact on loss of Green Belt land. Concerns that the selection of sites is not entirely evidence led with high volumes of Green Belt loss concentrated next to wards of opposition group members.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14443

Object

Policy P17A Green Belt Compensation**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P17A Criteria 1 and 3 i- compensatory improvements are not possible where gaps between distinct settlements are reduced to minimal distances such as with land between sites BL3 and BL1/Dickens Heath, and site BL2 and Cheswick Green.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14444

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Councillor Max McLoughlin**Summary:**

Policy P20 -Requirements for the size and quality of children play areas should be detailed.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14447

Object

Balsall Common**Respondent:** Councillor Max McLoughlin**Summary:**

Para 516- an increase of 1,615 houses in a town/village with fewer than 3,500 is excessive.

Para 527- the Balsall Common Relief Road is incompatible with climate commitments.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14448

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Councillor Max McLoughlin**Summary:**

Policy BC3- the site is the least sustainable of the Balsall Common sites, as it is located furthest away from the train station. The requirement of 3 train services per hour, is only met in 1 hour of the day at the station at Berkswell.

Policy BC3 Criteria 2 i- protection of the setting of heritage assets adjacent to the site is not possible with development on any portion of the site.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14451

Object

Blythe**Respondent:** Councillor Max McLoughlin**Summary:**

Para 575- this chapter ignores Shirley itself. The impacts of the developments including sites BL2 and BL3 will be felt most keenly within Shirley.

Para 593- consultation has been poor through this process with GP practices who are the primary care providers in this setting. There is a dominance of retirement living in new developments coming forward. This presents unique challenges to GPs and poses infrastructure problems.

Para 598- no local contribution will go to any of the Shirley Wards that will be impacted by development at BL1-3. CIL should go to the neighbourhood most affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14453

Object

Policy BL1 - West of Dickens Heath**Respondent:** Councillor Max McLoughlin**Summary:**

Policy BL1- the site is not justified based on the impact to Green Belt and Ancient Woodland.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14455

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Councillor Max McLoughlin**Summary:**

Policy BL2- the site lacks defensible boundaries and encroaches upon Cheswick Green.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14458

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Councillor Max McLoughlin**Summary:**

Policy BL3- the site should be removed. It has the highest Green Belt combined score of any of the allocations. The site would have no defensible boundary leading to the merging of two settlements. The net loss of trees will be irreplaceable and there will be an impact of the setting of the listed Whitlock End Farm site. Alternative provision can be found from vacant office provisions in the Solihull Town Centre.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14460

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Councillor Max McLoughlin**Summary:**

This section should be called "Knowle" as the entirety of provision is in Knowle. Dorridge is the more sustainable location with a train station. Sustainable travel is not being promoted, fostering car dependency.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14461

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Councillor Max McLoughlin**Summary:**

Policy KN2- the provision of social and affordable housing should be prioritised as the Council has some ownership.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14463

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Councillor Max McLoughlin**Summary:**

Para 787- change 'many' to 'all'... of the schools suffer from traffic congestion at opening and closing times.

Para 795- the application for over 200 dwellings, including more retirement living and a care home, on the former Morrisons site should have been acknowledged in the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14464

Object

Policy UK1 - HS2 Interchange**Respondent:** Councillor Max McLoughlin**Summary:**

Policy UK1- too few homes are planned on this allocation in total and are being within the plan period. It is strategically right to focus additional housing here and it is one of the most sustainable locations. The capacity could be 1,000 homes higher.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14465

Object

Foreword**Respondent:** Councillor Max McLoughlin**Summary:**

Spelling/Grammar Errors-

- Repetition at para 10 as it states- 'capitalise on maximising'.
- Spelling error at para 18- should be brought not bought.
- Spelling error at pg.16 bullet point 3 – should be from not for.
- Para 44 (first sentence) does not make grammatical sense. Changing "will" to "aims to be" would be appropriate.
- For clarity Para 71 should refer to 'Information Communication Technology' not 'ICT'.
- Policy P2 Criteria 3 iii – change 'forecast' to 'forecasted'.
- Policy P2 Criteria 3 iv- change 'mode' to 'modal'.
- Policy P2 Criteria 3 v- change 'street' to 'streets'.
- Policy P2 Criteria 3 v- commas required 'attractive active frontages which encourage vibrant and active street life and create'.
- Policy P2 Criteria 3 vi- change 'creating legible' to 'creating a legible'.
- Policy P2 Criteria 10- remove erroneous 'f'.
- Para 116 bullet point 2- change 'competitive socialising' to 'Leisure and entertainment'.
- Policy P3 Criteria 3- missing bracket. Additional bracket to be added after the addition of "where appropriate, waste management".
- Policy P10 Criteria 14- errant full stop.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15219

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Councillor Max McLoughlin**Summary:**

There is no consideration to the carbon impact of building homes or mitigation. There is little detail on preventing the need for offsetting or why it is less desirable.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10627

Object

Policy S01 - East of Solihull**Respondent:** John & Sue McMahon**Petition:** 2 petitioners**Summary:**

We would like to have objections noted to the proposed development site 16 on Lugtrout lane and the land North of Lugtrout Lane and Oak Farm site 24.

This is GREEN BELT land known as the the Catney Gap and would if built on lead to the loss of the rural gap between Solihull and rural Catherine de Barnes. It will leave no real defensible boundries to protect our precious green belt or to the wild life that absolutely needs protecting.

Lugtrout Lane is a country lane with no footpath lighting or proper drainage and is susceptible to flooding as the water table is high. There is already considerable usage of the lane by workers at the Land Rover Plant, This, at times can lead to traffic jams and speeding. It is extremely dangerous to walk at anytime in the Lane.

Much of the said land is presently used agricultural farm land. The sports fields at the other end of the site will become unsustainable.

There are at times, problems caused by cars being parked in Lugtrout lane when there are football matches on.This can only compound the problem with traffic from the housing development.

The plans do not include any new infrastructure to cope with the obvious extra traffic. No new Doctors surgery or schools!!!

Yew Tree lane Doctors surgery is already at capacity and no plans for new local schools.

Catherine de Barnes is now part of Hampton in Arden Parish. There are multiple threats from HS2 and the M42 junction 6 and the MSA. Together with the proposed high density housing on Oak Farm we can only assume there is to be multi-storey housing or packed in terraced property. There is insufficient parking spaces and as we all know the public transport is extremely in adequate. This land was originally proposed for use as a home for the elderly. This would be an option and would cause less impact on the local infrastructure.

Please consider these proposals very carefully. Once the GREEN BELT is built on its lost forever along with natures habitat.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10646

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** John & Sue McMahon**Petition:** 2 petitioners**Summary:**

Object to building on Green belt land, loss of the Green belt and loss of wildlife and habitats. Development will leave no defensible boundaries.

Plans do not include new infrastructure including doctors or schools.

Multiple threats from HS2, M42 and MSA, together with high density proposed for HA2, which shows insufficient parking.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10647

Object

Policy S01 - East of Solihull**Respondent:** John & Sue McMahon**Petition:** 2 petitioners**Summary:**

Loss of the Green belt and wildlife habitats would lead to no defensible boundaries.

Lugtrout Lane has no footpath or adequate lighting and susceptible to flooding. Dangerous to walk along due to traffic and speeding on country lane.

Land is currently agricultural land and sports fields will become unsustainable. Increased housing together with existing parking problems from football matches will lead to further issues. Plans do not include any infrastructure to cope with extra traffic, no extra doctors or schools.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13853

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Society for the Protection of Ancient Buildings**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14589

Object

Balsall Common**Respondent:** Society for the Protection of Ancient Buildings**Summary:**

Object to Site BC3.

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

There are omission sites both within Balsall Common and in the wider borough which either should have been allocated, based on merit, or for which the omission has not been justified. The findings from the final version of the Solihull Town Centre Masterplan are not incorporated.

There are inconsistencies with the NPPF, specifically paragraphs 11; 94; 108; 109; 122; 138; 185 and 194 are not complied with. As such, the enabling of sustainable development will not be delivered should Site BC3 remain in the Draft Local Plan. The biodiversity and setting and character of the Grade II * Listed Berkswell Windmill should be protected

Change suggested by respondent:

Site BC3 should be removed from the Plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15158

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Society for the Protection of Ancient Buildings**Summary:**

Objection to Site BC3;

Any building between 200 and 250 degrees from Berkswell Mill will damage the sustainability and operation of the Windmill - Housing will reduce the amount available to the windmill and increase turbulence to which it will be subjected - reduced attraction to visitors/increase in maintenance costs

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14242

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Meriden Parish Council**Summary:**

The header in Policy ME1 should refer to Maxstoke Lane instead of Maxstoke Road.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14243

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Meriden Parish Council**Summary:**

Policy P3 compromises established businesses and the community with the vast amount of traffic and pushing out smaller community businesses. Planning policy should encourage small independent businesses rather than large chains.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14244

Support

Policy P6 – Provision of Accommodation for Gypsies and Travellers**Respondent:** Meriden Parish Council**Summary:**

We acknowledge the provision of traveller sites in Policy P6 but the provision of safe houses are also needed.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14245

Support

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Meriden Parish Council**Summary:**

Will park and ride be phased out now? Is there enough room for the provision of Metro Sprint and does it cover rural areas?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14246

Object

Policy P12 Resource Management**Respondent:** Meriden Parish Council**Summary:**

Meriden should not be used as landfill as it already has so much recycling and quarry operations. Routing agreements should not be through Meriden Centre or Hampton Lane.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14247

Object

POLICY P13 Minerals**Respondent:** Meriden Parish Council**Summary:**

Hours of Mineral operation should be 7am to 6pm Monday to Friday and Saturday 7am to 1pm. Mineral planning authorities should assess the cumulative impact from quarry developments.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14248

Object

Policy P18 Health and Wellbeing**Respondent:** Meriden Parish Council**Summary:**

Policy P18 should include that access to leisure schemes for people with disabilities who can't easily access facilities through either their disability or income should be considered so their health and well being is being met by the same resources.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14249

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Meriden Parish Council**Summary:**

The 5% requirement of new build provision for wheelchair access set out in Policy P4E should be higher.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14250

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Meriden Parish Council**Summary:**

What monitoring is in place after new development has been adopted and when problems arise?

Can existing school capacities cope with a higher number of school children arising from development.

Electric not gas night storage heaters should be requested in new properties through the planning process.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14251

Object

Meriden**Respondent:** Meriden Parish Council**Summary:**

We would not consider the local bus service as frequent.

Large HGVs pass through the village despite routing agreements affecting several protected monuments by vibration and fumes.

Where will the children and families access health services locally? When social housing at Leys Lane and Meriden Gate was allocated there were no resources allocated to either the GPs or Meriden school.

Clarification on para 73 as to where in the village centre this refers to.

Temporary road closures and temporary traffic management must match the routing agreements with other HGVs and diversion routes. The cumulative impact on traffic and parking has not been considered.

There is limited development growth opportunity in Meriden.

In relation to para 748 - this is not "significant" funding from a CIL source.

It should be recognised that older and younger people can be first time buyers.

Maintenance of SuDS is a significant issue in Meriden as previous systems have not been maintained.

Compensatory improvements, which will be required for the loss of greenbelt land, can be discussed with the Parish Council.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14571

Object

Policy BL1 - West of Dickens Heath**Respondent:** Daniel Merrington**Summary:**

The land is high grade green belt.
 The development will be detrimental to wildlife.
 The narrow rural road network cannot take further development.
 Concerned that flooding will increase.
 Reduces access to activities that keep people fit physically and mentally.
 The mitigation measures included in the plan are not achievable
 The character and setting of the village will be adversely affected.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

11088

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Craig Middleton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.
 > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
 > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
 >Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
 >Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

13923

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Amanda Miller**Summary:**

Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review: Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13722

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** David Miller**Summary:**

Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group 'Part A:Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common' 29/11/2020

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14841

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr K Millican**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10733

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Anthony Millner**Summary:**

Proposed development of 600 dwellings is inconsistent with SMBC spatial strategy. The scale is inconsistent with stated size necessary for the original development planned for 450 dwellings, which is itself still to be proved.

With this size of development there could easily be an extra 1100 cars causing pollution and congestion along Station road/ Stripes Hill , into Knowle village, and into Milverton road from the existing footpath access . The proposed site is within the immediate vicinity of our back garden and this will affect the health of my severely asthmatic son.

Change suggested by respondent:

The density of the development should be reduced to no more than 450 dwellings. This would give more room for green areas, parkland and walking/cycling routes to reduce the environmental impact and improve the mental and physical health of the residents and neighbours.

The access beside our house into Arden school should be blocked to road traffic to avoid congestion in Milverton Road, whilst the pedestrian access of the same should be retained as this is a recognised footpath.

The dwellings should also not exceed 2 stories in height within the immediate vicinity of our back garden , and be sufficiently away from our boundary so as not to otherwise block out the light and affect the enjoyment of our property.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

11025

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Minton (CdeB) Ltd**Agent:** DS Planning**Summary:**

Do not support the requirement in Para 172 that 40% of C2 schemes should be affordable. Consider the policy to be unsound and can find no evidence of viability testing. We further consider the policy will thwart delivery of good quality care schemes.

Change suggested by respondent:

Change paragraph 172 to say that policy 4A will allow certain C2 schemes with community facilities to be exempt.

Amend paragraph 172 to read as follows:

'Dwelling units classified as C2 will be exempt from the policy where the units directly benefit from communal facilities comprising 5% or more of the total gross floor space.'

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10812

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Luke Moise**Summary:**

Particularly supportive of the Arden Academy rebuilt to bring it up to date and assist in ensuring that it remains a strong, vibrant academic centre in the southern part of the borough. In part such that the area remains an attractive destination (coupled to the primaries) for younger families. Also supportive of most of the residential building provided the plans as laid out are not compromised by corner cutting of common services (eg. green spaces) and the nominated builders are builders who will build to a high construction and amenity standard.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15098

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Mr Patrick Montague**Summary:**

The official analyses ignore the regular situation in which primary education is split into two sectors - pre-School/Infants and Junior.

The distance to fresh food shops is not measured from the nearest new house or the middle of the estate but from a point nearly 200 yards from the nearest front door on the nearest existing road. Again this appears irrational because the distance involved for house owners is supposed to be 10 minutes walk/ 880 yards. Just taking the nearest front door changes the assessment accessibility.

When you buy a house and the plot is one fifth of an acre and the other houses around are broadly the same, the density is 5 to the acre. No one would add into the site area part of the road or amenities in the area.

Change suggested by respondent:

There are 2 central area that do not appear to have been considered.

The site on the main roundabout at the start of Station Road across to Homer Road, and backing onto Waitrose.

This site has planning permission for Offices but the site could provide for at least 150/200 apartments.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10986

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Andrew Moore**Summary:**

1. Breach of the Government National Planning Policy Framework Document Section 13 'Protecting Green Belt Land'.
2. Further breach of NPPF the Council have not adequately demonstrated, investigated and exhausted the use of Brownfield sites available in the borough as per their 2019 Register <https://www.solihull.gov.uk/blr>
3. Knowle Transport Study dated October 2020 inadequate to justify development.
4. 6 week consultation period too short and refusal to grant extension due to 4 week lockdown and take into account Global Pandemic.
5. Awaiting responses to enquiries but not enough time due to Global Pandemic.
6. Possible Conflict of interest etc.

Change suggested by respondent:

1. Removal of site from Plan pending further investigation for alternative brownfield sites .
2. Extension of time for enquiries, investigation and reports.

Legally No
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10989

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Andrew Moore**Summary:**

1. Breach of the Government National Planning Policy Framework Document Section 13 'Protecting Green Belt Land'.
2. Further breach of NPPF the Council have not adequately demonstrated, investigated and exhausted the use of Brownfield sites available in the borough as per their 2019 Register <https://www.solihull.gov.uk/blr>
3. Knowle Transport Study dated October 2020 inadequate to justify development.
4. 6 week consultation period too short and refusal to grant extension due to 4 week lockdown and take into account Global Pandemic.
5. Awaiting responses to enquiries but not enough time due to Global Pandemic.

Change suggested by respondent:

1. Delay local Plan submission
2. Removal of site from Plan pending further investigation for alternative brownfield sites .
3. Extension of time for enquiries, investigation and reports.

Legally No
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10964

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Miss Joanne Moore**Summary:**

Excessive traffic
 Dangerous amount of cars
 Danger to wildlife
 Character of the village
 Council blind to issues at house on Stripes Hill.

Change suggested by respondent:

Less housing as the strain of more cars from these new homes plus making the school entrance less accessible will lead to accidents.
 The character and environment matter.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

13694

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Jonathan Moore**Summary:**

- Concern over infrastructure and facilities within the village being overstretched
 - Suggests access would be better from Frog Lane, which could be widened without impacting any properties, avoiding Balsall Common all together
 - Localised flooding would be worsened. Incident: 200617-000101 as an example.
 - Road safety concern - the possibility of a vehicle overshooting the end of the access road.
 - Tree loss would displace buzzards

Change suggested by respondent:

- Suggests access would be better from Frog Lane, which could be widened without impacting any properties, avoiding Balsall Common all together

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14799

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Sarah Moore**Summary:**

Objects to Policy BC2;

Access should be made from Frogs lane - increased risk of flooding for property and surrounding properties - drainage plans for proposed developments needs confirmed - reps properties facing new entrance of property (protection from headlights) - trees' to rear of property nesting Buzzards, impact by development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10622

Object

Blythe**Respondent:** Michael Moran**Summary:**

Having lived in Shirley South for 36 years I object strongly to the disproportionate amount of new homes planned for the Blythe area. Already significant expansion has taken place in the Dickens Heath/Tidbury Green area. Further expansion of housing at sites 26, 4 and 12 will impact adversely on increased traffic flow, congestion, and air pollution as well as the reduction of green space and natural habitat. Moreover building on Whitlocks End Farm will create excessive traffic flow on Bills Lane already a nightmare for local residents including pedestrians who have to walk the narrow path near the railway bridge

Change suggested by respondent:

1. Remove Whitlocks End Farm from planned new housing and significantly reduce the remainder of new homes in the Blythe area.
2. Share the planned housing equitably around the borough. It is remarkable how some Borough areas are marginally affected and there is a sense of a grievous imbalance in this political process
3. Listen more to local residents living in the affected areas and address current unacceptable levels of traffic, air pollution, and reduction in adjacent green space
4. Make better use of existing brown field sites/vacant premises within the Borough to build affordable starter homes and stop the saturation of expensive new build homes for the elderly

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10923

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Sandra Moris**Summary:**

Cheswick Green cannot cope with any more developments and is completely overwhelmed. The number of houses in Cheswick Green has doubled from 1000 to 2000 homes in 5 years times. By the time Blythe Valley is complete there will be 3000 dwellings. If this development goes ahead there will be 4000+ dwellings.

- Accessing local services will be even more difficult.
- Creynolds Lane will be even more gridlocked at peak times.
- Strong likelihood of more flooding.
- Green belt should be defined by permanent features, not by creating an artificial boundary (no new surgery proposed)

Change suggested by respondent:

There is insufficient focus on building on brownfield sites which should be a top priority.

I agree with the Cheswick Green Parish Council that Dog Kennel Lane is an established and permanent boundary feature. It provides a distinct separation between the built-up area and the Green Belt.

The existing Green Belt boundary is consistent with NPPF policy but, the creation of a false boundary within site BL2 is not and the site does not have the permanent features that are required to define a Green Belt boundary, so there is no guarantee, that development will stop at that point. In fact I can guarantee that the boundary will moved even further. If this development goes ahead, Solihull MBC therefore has a duty to guarantee that no further development will take place between site BL2 and Cheswick Green within the next 10-15 years.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11190

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Heather Morris**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14424

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr mike mosedale**Summary:**

We strongly object to the proposed siting of the household recycling centre on the basis that this predominantly housing area has been massively overdeveloped over the last ten years by industrial projects.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14851

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr mike mosedale**Petition:** 2 petitioners**Summary:**

Object to policy UK2 on the basis that the area is predominately housing and has been overdeveloped in recent times - environmental fallout of Birmingham airport expansion - site better used for housing -

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14427

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Rosinda Mosedale**Summary:**

We strongly object to the proposed siting of the household recycling centre on the basis that this predominantly housing area has been massively overdeveloped over the last ten years by industrial projects.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11095

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** David Munton**Summary:**

ction (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11261

Support

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr Robert Muntz**Agent:** Sworders**Summary:**

Write in support of the site HH1.

- The site has strong defensible boundaries, which are clear, physical and permanent boundaries. They would define the limit of development on the site.
- HH1 is in a sustainable location, and pedestrian access to the village would be improved as part of the development.
- Community engagement has ensured that to ensure that policy HH1 provides for the retention of trees and hedgerows, the management of flood risk and the provision of enhancements to pedestrian safety in the vicinity of the site.
- Development of the site is achievable and housing could be delivered on the site within two years of the adoption of the Local Plan.

Change suggested by respondent:

No modifications are required.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

10592

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Martin Murphy**Summary:**

I fully support this policy. It will provide much needed community wide facilities and opportunities for all ages. The new facilities for learning are much needed since the present infrastructure is over 60 years old.

This policy will to add to the regeneration of the local community and business and is a once in a life time opportunity.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

10822

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mrs Wendy Murphy**Summary:**

I am concerned about building proposal for site BL3. I have lived close to this site on Bills Lane for 27 years and the volume of traffic has increased due to building Dickens Heath Village and the Retail Park. I note access roads are proposed from this site onto Bills Lane if a new housing development were built. There is a problem here with traffic jam between 08.15-08.45 a.m Mon-Fri during the school run. Woods Farm would be lost to the community and a natural habitat for wildlife lost forever. Shirley is turning into a "concrete jungle".

Change suggested by respondent:

Site BL3 should be removed from the plan as it is inappropriate for the area.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11127

Support

Foreword**Respondent:** Natural England**Summary:**

We welcome reference to the importance of and need for quality 'blue and green infrastructure' up front. Now more than ever, in light of climate change targets and the aspirations of Defra's 25 Year Environment Plan (25YEP), the need for improved biodiversity protection and enhancement needs to take its place at the heart of a strategic plan and indeed, embedded throughout relevant themes to secure its delivery.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11128

Support

Introduction**Respondent:** Natural England**Summary:**

(p.5) NE wholly welcomes the reference to the Meriden Gap at para 11 and its 'strategic importance' in separating Solihull and Birmingham from Coventry. The Meriden Gap is also an important N-S ecological corridor recognised by Natural England and we would resist development within the area which compromised this function. This evidence will be drawn out via the emerging LNRS / wider NRN .

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11129

Object

Our Borough**Respondent:** Natural England**Summary:**

RECOMMENDATION:

Overview of the Borough (p.8)

NE are disappointed to see no reference to natural assets in the description of the borough.

Change suggested by respondent:

NE recommends reference to natural assets in the description of the Borough.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11130

Support

Challenges**Respondent:** Natural England**Summary:**

■ Para. 38 - Challenges identified are generally supported.

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11131

Support

Challenges**Respondent:** Natural England**Summary:**

■ Challenge K - NE support. No further comments.

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11132

Support

Challenges**Respondent:** Natural England**Summary:**

■ Challenge L (water quality etc) - Welcome the inclusion of a recognised need to protect the water quality of the River Blythe (SSSI).

Change suggested by respondent:

■ -

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11133

Object

Challenges**Respondent:** Natural England**Summary:****RECOMMENDATION**

Challenge N - Disappointed to see no mention of green infrastructure or habitat linkages. This is sizeable development and the importance of securing quality green infrastructure for the needs of nature and people is vitally important. Would recommend inclusion of need to plan for and secure such environmental connections alongside the built form. (Cross ref p24 'Borough Vision – but not simply connect to wider GI but also embed within).

Change suggested by respondent:

NE recommend:

Include reference to green infrastructure and habitat linkages, and cross reference with p.24 - Borough Vision.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments:

11134

Support

Challenges**Respondent:** Natural England**Summary:**

Challenge O (providing infrastructure) - Welcomed and supported. Clear delivery mechanism for GI provision via the IDF and annual IDS.

Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments:

11135

Support

Vision**Respondent:** Natural England**Summary:**

Council Plan 2020-25 (p.23) - We welcome the provision of the summary of the Council Plan (2020-2025). NE welcomes the 3 core outcomes associated with the enhancing of Solihull's environment: the recognition of the need to improve air quality and the overall aspiration an enhanced, well connected natural environment with greater numbers of sustainable travel.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11136

Support

Vision**Respondent:** Natural England**Summary:**

Borough Vision Overview (p.24) - NE welcomes the reference to the need for growth and economic connections associated with HS2 Station Interchange, Birmingham Airport, NEC and JLR to connect to wider green infrastructure. Welcome and support protection of strategically important 'Meriden Gap' going forward
NE welcomes underpinning of Vision by the Council's Climate Change Declaration 2019 – directly responding to the Governments Climate Emergency and aspiration to become zero carbon by 2041. Also reference to WMCA target.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11137

Support

Spatial Strategy**Respondent:** Natural England**Summary:**

pp. 26-28 - NE has no concerns associated with the spatial strategy adopted and/or site selection process.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11138

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Natural England**Summary:**

NE supports Policy P1 section 3iv and 3v as core policy requirements- Favouring of sustainable travel and delivery of a 'high quality strategic green and blue infrastructure network across the Hub area to enhance natural assets'.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11139

Support

Policy P1A Blythe Valley Business Park**Respondent:** Natural England**Summary:**

(p.42) NE support the requirement to protect and enhance natural environment.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11140

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Natural England**Summary:**

N.B. more of a comment on a potential recommendations than objection.

The policy recognises a need for diversification. Consider inclusion of new natural environment provision? - the natural environment can have a role in ensuring these areas remain focus for community interaction .

Change suggested by respondent:

Consider inclusion of new natural environment provision in Town Centres.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11141

Support

Schedule of Allocations**Respondent:** Natural England**Summary:**

RE: Concept Masterplans -

Natural England welcomes the approach taken towards major site development, in the development of concept masterplans supported by policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11142

Support

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Natural England**Summary:**

We welcome the adoption of the principles of Solihull Connected (2016) with regard to increasing sustainable travel. We welcome the councils development of an accompanying Cycling and Walking Strategy for the Borough and (LCWIP). Active travel will need form a major part of achieving sustainable growth – re: climate change targets and air quality improvements for people and wildlife.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11143

Support

Policy P7 Accessibility and Ease of Access**Respondent:** Natural England**Summary:**

Also mention perhaps that walking and cycle routes can also marry up with GI and natural connections? Although this may be covered with cross ref to Solihull Connected 2vi.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11144

Support

Protecting and Enhancing our Environment**Respondent:** Natural England**Summary:**

Introduction (p.89) - We welcome the reference to the Councils' Climate Change Prospectus which has been produced since the SLP was adopted, and its 4 core themes of: Clean Growth, Clean Air, Nature Gain and Communication, Education & Engagement. It is essential to base the plan and its policies around the important commitments around climate change as secured via the Climate Act 2019 and WMCAs commitment to achieve net zero by 2041.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11145

Support

Protecting and Enhancing our Environment**Respondent:** Natural England**Summary:**

Para. 299 (p.90) - Support and welcome the councils acknowledged value of the areas' natural capital, blue and green infrastructure and specific ref to the River Blythe SSSI.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11146

Support

Protecting and Enhancing our Environment

Respondent: Natural England

Summary:

■ Para. 303 - Welcomed recognition of the preparation of a Natural Capital Investment Strategy.

Change suggested by respondent:

■ -

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11147

Support

Policy P9 Mitigating and Adapting to Climate Change

Respondent: Natural England

Summary:

■ Welcome inclusion of both strategic and local sets of measures including of soft measures to assist such as GI (4iii)

Change suggested by respondent:

■ -

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11163

Support

Policy P10 Natural Environment

Respondent: Natural England

Summary:

Structured approach to policy acceptable.

1. Welcome ref to ecosystems services delivery and natural capital
2. Supported – welcome inclusion of ‘measureable’ net gains
3. Buffers explicitly mentioned
4. Broad enough but explicit enough to ensure emerging Nature Recovery evidence is taken into account.
5. National policy explicitly mentioned as a clear requirement for developers
6. Need for up to date ecological assessments
7. Welcome reference to NE’s GI Standards which is considering revision of ANGST. Current timescale 2022.

BNG

8. Minimum requirement of 10% BNG acceptable
9. Supporting of ‘in situ’ provision as preference
10. Alternative assessment required
11. Mitigation and compensation appropriate
12. Alternative strategic provision of enhancements appropriate
13. Metrics specified are appropriate. Confirmation of measured approach. Welcome support of emerging SPD

Arden landscape

- 14, 15 and 16 – welcomed. No further comments

SSSI

- 17 – supported

Local sites

18. Welcome recognition of value of wider nature recovery connections for local sites

Ancient woodland

19. Welcome ref. to NE SA.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11164

Object

Policy P10 Natural Environment

Respondent: Natural England

Summary:**RECOMMENDATION**

Notwithstanding the support shown for the policy above, NE would make the following recommendation:

Soils

Natural England could find no reference to the importance of soils in the SLP.

Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably.

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity.

Advise that Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites.

BMV land is Grades 1, 2 and 3a in the Agricultural Land Classification.

The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.

Change suggested by respondent:

Include reference to the importance of soils, and as a component of the natural environment, it is important that soils are protected and used sustainably.

Plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value should be considered as part of ecological connectivity.

Advise Plan policies refer to Defra Code of Practice for the sustainable use of soils on construction sites.

Include protection of BMV land, i.e. Grades 1, 2 and 3a in the Agricultural Classification.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11165

Support

Policy P10 Natural Environment**Respondent:** Natural England**Summary:**

Policy P10 Supporting Text:

Welcome reference to ongoing partnership work and nature recovery and natural capital evidence. Confirm up to date account.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11166

Support

Policy P11 Water and Flood Risk Management**Respondent:** Natural England**Summary:**

Comment:

Seek to not only mitigate effects of development but seek to enhance water quality of River Blythe SSSI.

Supporting of SuDS and naturalisation of river corridors.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11167

Support

Policy P14 Amenity**Respondent:** Natural England**Summary:**

Welcome reference to importance of safeguarding important trees

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11168

Support

Policy P15 Securing Design Quality**Respondent:** Natural England**Summary:**

NE welcomes the strong underpinning of natural environment needs, including biodiversity and climate change measures. Useful cross reference to P10 and P11 embedded in policy.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

11169

Support

Policy P15 Securing Design Quality**Respondent:** Natural England**Summary:**

Policy P15 - Supporting text

NE welcomes the strong underpinning of natural environment needs, including biodiversity and climate change measures. Useful cross reference to P10 and P11 embedded in policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11170

Support

Policy P17A Green Belt Compensation**Respondent:** Natural England**Summary:**

NE supports inclusion of ref to environmental improvements as part of the Council's Green Infrastructure Opportunity Mapping.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11171

Support

Policy P18 Health and Wellbeing**Respondent:** Natural England**Summary:**

Particularly support sub criterion 2x - Retaining, increasing and enhancing green infrastructure within developments including green spaces, planting, trees, open spaces and soft surfaces, in order to secure a variety of spaces for residents, visitors or employees to use and observe.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11172

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Natural England**Summary:**

NE welcomes consideration of 'stepping stone sites' and habitat fragmentation as part of this policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11173

Support

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Natural England**Summary:**

NE welcomes development of IDP and annual IDS reviews to guide delivery. Welcomes recognition that each development needs to meet its own infrastructure needs and pressures in respect of green infrastructure.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14829

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Terry & Bridget N/A**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14588

Object

Policy BL1 - West of Dickens Heath**Respondent:** Helena Nash**Summary:**

Objects to site BL1;

More housing will increase risk of flooding when it is already an issue, proposed 'urban drainage system highlights the unsustainability of the site' - high performing greenbelt area/ developments impact on wildlife (especially bats) - Impact on already struggling Solihull Heath Partnership - Whitlock's End car park cannot cope with existing population - rural road network/infrastructure cannot cope with existing traffic without additional home/cars - Sports fields should not need to be moved - adverse effect on the identity/ character/sense of community of Dickens Heath - Risk to the defensible boundaries of the Village - Not legal as the proposed development is not within walking distance of Village centre facilities - mitigation efforts unachievable, making the development unsustainable.

Change suggested by respondent:

-

Legally No**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

14236

Object

Policy BL3 - Whitlock's End Farm**Respondent:** David and Ruth Neal**Petition:** 2 petitioners**Summary:**

Concerns raised around:

- Traffic, new traffic generated by the estate emerging onto Bills lane will make it busier and change the character of the road.
- Green space is utilised for walks and enjoy peace and quiet away from traffic. Is well used recreational space for local residents.
- Sprawl from surrounding villages squeezing on green spaces around Shirley
- Proliferation of retirement properties which is disproportionate to the needs of existing residents
- More starter homes needed
- Shirley taken majority of housing
- Pressure on health and traffic infrastructure

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

10995

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Mark Neal**Summary:**

I would like the council when considering the Solihull Local Plan, to take into account and retain the greenway corridor created by the Knowle bypass over the last 60 years. This is essential for wildlife and in line with the councils own stated position.

Reference Page 101 of the Draft Infrastructure Delivery Plan 5.1 Natural & Semi-Natural Green Spaces which deals with these issues specifically: Enhance existing green corridors and Encourage the incorporation of green infrastructure in new developments.

Change suggested by respondent:

It should be made perfectly clear that to comply with the concept master plan that item 2.i should be worded as

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 (to include the existing green corridor created by the old line of Knowle bypass);

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14199

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** David Negus**Summary:**

I do not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group in response to the Local Plan Review: Wilson, W. McGarry, J. Wilson, J. "PART A: Objection to the proposed allocation of Site BC3 Windmill Lane/Kenilworth Road Balsall Common." 29/11/2020 As such, I am objecting to the allocation of Site BC3 for housing

Change suggested by respondent:

Remove Site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14633

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BC5 is supported in principle, subject to modifications.

Capacity should be 300 in interests of efficient use of land.

Green Belt enhancement requirement should either be deleted, or proportionate evidence and justification provided to:

- define 'significant',
- identify public open space 'south of site', and
- provide details of landownership and mechanisms for deliverability given that the landowners do not control any land south of the proposed allocation.

Change suggested by respondent:

It is recommended that Policy BC5 paragraph 1 is amended as follows:

1. The site is allocated for at least 300 dwellings.

Policy paragraph 4.i. 'Creation of a significant area of public open space to the south of the site'

- should be deleted or,
- sufficient evidence, explanation and delivery mechanism should be provided to justify and clarify the policy requirements.

Should there be any uncertainty over the deliverability or developability of housing on the proposed site allocation BC5 in its entirety (as delineated on the Policies Map and shown on the 'Concept Masterplan' document), a minor amendment to the site allocation 'red line' boundary could be made to exclude the Builder's Yard and 'Stoneycroft'.

It would still be entirely appropriate and compliant with national policy to use Wootton Green Lane as the new strong physical defensible Green Belt boundary with the opportunity of windfall development coming forward during the plan period on the land outside our Clients' ownership falling within the new proposed settlement boundary i.e. on the Builder's Yard, Stoneycroft and The Croft.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14642

Object

Policy P17A Green Belt Compensation**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P17A is unsound on the basis that no evidence, methodology, sustainability appraisal or viability assessment has been provided to justify the strategy proposed in the policy and linked site allocation policies. There is no evidence that alternative approaches have been considered. There is no clear link between the size of allocated sites and scale of compensation required.

No mechanism has been set out to demonstrate how the proposed compensation measures sought on Green Belt land outside the ownership of the developer would be delivered – contrary to the requirements of NPPF paragraphs 31 and 35 d) and PPG Paragraph 003 Ref ID: 64-003-20190722.

Change suggested by respondent:

Proportionate, robust evidence needs to be produced for the Green Belt compensation requirements appropriate for each site allocation where Green Belt land would be lost. The evidence should ensure that the most appropriate strategy is adopted, taking into account reasonable alternatives.

The Viability Study and Sustainability Assessment reports should be updated to take into consideration the implication of Policy P17A and associated site allocation policies where Green Belt loss is proposed.

Once the evidence has been provided, Policy P17A and all the site allocation policies which sit beneath this overarching policy, should be amended accordingly.

As a minimum:

- Any reference to Green Belt compensation/ enhancement requirements which fall within the site should be removed – only compensatory improvements to the environmental quality and accessibility can be required in the remaining Green Belt land.
- Any reference to a requirement which is on land outside the control of the site landowners/developer or the council, should be either deleted, or the mechanism for delivery should be set out.
- Details of the Green Belt compensation measures required on the site resulting in the most significant loss of Green Belt, i.e. 140ha at HS2 Inter-change (Site UK1), should be set out in Policy UK1 and on an agreed masterplan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14648

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners

Summary:

Policy P5 is unsound on the basis that insufficient evidence has been provided to demonstrate cross-boundary collaboration under the legal Duty to Cooperate in respect of the proposed 2,105 dwelling contribution towards the housing land supply shortfall (paragraphs 227 to 228 of the SLP).

There is no published statement of common ground to demonstrate effective and on-going joint working – contrary to National Planning Policy Framework (NPPF) paragraphs 11, 24, 26, 27 and 60.

Insufficient account has been taken of the need to plan effectively for delivery of the anticipated growth over the plan period and beyond to avoid the need for an early Plan/ Green Belt review, and ensure timely delivery of development – contrary to NPPF paragraphs 33 and 139 c).

Change suggested by respondent:

The evidence in support of Policy P5 is deficient, requiring

- Publication of a statement of common ground, which addresses the HMA cross-boundary shortfall of sites to meet the minimum housing requirement to satisfy NPPF requirements.
- Modification of the housing delivery target number if/as appropriate following scrutiny of the statement of common ground.
- Allocation of small and medium sized sites for residential development; and
- Removal of a phased housing delivery target table at paragraph 224.

Proposed modifications to Policy P5 as shown below:

'1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Insert two new paragraphs beneath paragraph 4 of Policy P5, as follows,

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances:

- To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area;
- To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

14657

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P5 paragraphs 222 and 225-226. Insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, BLR and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all BLR sites, SHELAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHELAA sites, BFL sites and planning permissions should be deleted from the SLP and housing land supply information (paragraphs 65, 222 and 225).

Where appropriate evidence is forthcoming, additional site allocations should be set out in the SLP and Policies Map which identify deliverable small and medium 'major' development sites.

In particular, it is considered the following modifications are required –

1. The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.
2. A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.
3. The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence should be consistent.
4. The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
5. The development of Arden Cross requires Green Belt compensation.
6. That the NEC and Arden Cross sites are fully assessed for their suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14664

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BL1 is unsound on the basis that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site, contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

Evidence is required to justify Policy BL1 West of Dickens Heath, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document; and
- there is a fully developed strategy with mechanisms in place to ensure playing pitches are replaced to release the land for residential development.

Change suggested by respondent:

Insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site.

Evidence is required to justify Policy BL1 West of Dickens Heath

If these issues of soundness cannot be overcome paragraphs 225 and 226 should be amended to remove the estimated contribution of proposed site allocation BL1 from Delivery Phases I and II and Policy BL1 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14668

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr & Mrs Nelson Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy KN2 is unsound on the basis that insufficient evidence has been provided to demonstrate the site is deliverable with 'multiple and potential complex land assembly issues' (paragraph 709) still remaining to be resolved, as well as replacement playing fields. There is also insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School, to justify that it is an appropriate strategy. This is contrary to the deliverability and developability requirements for site allocations and the requirement to justify a strategy as

set out in NPPF Appendix 2: Glossary and paragraphs 35, 67 and 72.

Change suggested by respondent:

Insufficient evidence has been provided to justify Policy KN2, or to demonstrate delivery.

Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and

Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10702

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Network Rail**Summary:**

Network Rail would comment that we are concerned that 300 dwellings are proposed on site BL3 off Bills Lane near Shirley Railway Station and also Whitlocks End Railway Station. There is a low railway bridge (12 foot 3") on Bills Lane and there may be an increased risk of vehicles striking the bridge if development is permitted.

Before any proposals for this site are brought forward Network Rail MUST be consulted by the council and developers to determine the impacts of the proposal both construction management / residential traffic issues. Any mitigation measures required by Network Rail to protect the railway bridge will need to be fully funded by the developer.

Change suggested by respondent:

Include reference in the Infrastructure Delivery Plan, to the requirement to consult Network Rail to determine the impacts of the proposal both in terms of construction management and residential traffic issues before any proposals are brought forward.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10848

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mrs Sharon Newport**Summary:**

I accept the overall development of Barrett's Farm but please ask that you reconsider the location of the primary school on two grounds. One being the substantial amount of wildlife located on the site currently and the need for a buffer and natural corridor for wildlife, between the current village and the future development. Second, the location of the primary school at what will become a very congested part of the village with the conjunction of the HS2 relief road, Hall Meadow Road and the station.

Change suggested by respondent:

Please locate the primary school more centrally in the proposed development to give the new deployment a heart.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

15138

Object

Balsall Common**Respondent:** Matthew Nightingale**Summary:**

Wishes to have the lands at Grapes Villa Farm, 170 Kenilworth Road, Balsall Common and land adjoining at the rear of 152 Kenilworth Road – known within the Solihull Council call for sites as Site 82 allocated for housing - The site is flat ground, with several existing outbuildings, fully defensible boundaries and runs to over 2 hectares in size.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

13775

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Oliver Novakovic**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

>Object to access via Kenilworth Road and specifically Meer Stones Road to new site as it would create a H&S risk to people and children living in the cul-de-sac due to main road fronting onto houses.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Yes

Comply with Not specified
duty:

Attachments: None

13808

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sarah Novakovic**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14103

Object

Policy P10 Natural Environment**Respondent:** Nurton Developments**Agent:** Chave Planning**Summary:**

Policy P10 refers to a requirement to secure a net gain in biodiversity of 'at least' 10% (paragraph 8) and says that evidence should be provided using the Warwickshire, Coventry and Solihull Biodiversity Impact Calculator or DEFRA equivalent (paragraph 13). These requirements are not in accordance with the emerging Environment Bill and therefore they would not be sound or legally compliant once the bill passes into law, which is anticipated in spring 2021.

It is clear that the Biodiversity Metric to be used will be that published by the Secretary State and not any local metric, this will be set at 10%, not 'at least' 10%. Therefore, the use of the Warwickshire, Coventry and Solihull Biodiversity Impact Calculator is not supported by the emerging Environment Act and the requirement to achieve 'at least' 10% biodiversity gain goes beyond the provisions of the emerging Environment Act.

Change suggested by respondent:

Policy P10 should be modified to remove the words 'at least' from paragraph 8 and so that paragraph 13 refers to the Biodiversity Metric to be published by the Secretary of State and not to the Warwickshire, Coventry and Solihull Biodiversity Impact Calculator.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

14106

Support

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Nurton Developments**Agent:** Chave Planning**Summary:**

Norton Developments (Hockley Heath) Ltd are promoters of the land proposed for allocation under Policy HH1 and have engaged with the preparation of the Local Plan on behalf of the landowners since January 2016.

The Vision document has been subject to community consultation in 2017. Feedback from this consultation was reported back to the LPA, this is reflected in policy HH1. This includes that speed reduction measures and pedestrian safety improvements are implemented along School Road, trees and hedgerows are retained and flood risk management measures are employed.

The evidence base highlights that the site is well contained by physical and permanent features that would provide strong and defensible Green Belt boundaries.

The site would deliver c90 dwellings in a location adjacent to and well related to the built up area of Hockley Heath, within convenient walking distance of a range of village facilities, the site would offer opportunities for walking and use of public transport and thus would minimise car travel.

Due to the scale of the site it would play an important contribution in meeting housing needs in the short to medium term. A development of c90 dwellings is likely to deliver 40-50 dwellings per annum with development being commenced within 2 years of the adoption of the Local Plan.

Change suggested by respondent:

No modifications are required.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

10761

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Ms Celia O'Donovan**Summary:**

All government & independent studies agree that an allocation of new housing is justified and warranted within this area.

It is also clear that:

- (1) recent new housing has contributed little in terms of improvement to local facilities; and
- (2) the long-term viability of quality learning in Arden Academy is unsustainable on the current site, it being long-overdue for re-development but having no means by which to undertake this work.
- (3) proposals align to KDBH NF policies

The proposals outlined in the Concept Masterplan therefore represent a balanced, justified, legally compliant and sound basis on which to meet these needs.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14856

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Ms Celia O'Donovan**Summary:**

Supports Policy KN2;

utilises shared/modern facilities - provide purpose built educational facility - better provide for students and the wider community - safer travelling environment to and from - release of Arden school site for development -

Change suggested by respondent:

We are satisfied that Policy KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a Place Based approach that we can fully support without further modification.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11032

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gerard O'Sullivan**Summary:**

Inappropriate development that directly opposes criteria set out in the Local Plan. Recycling Centre would be in addition to the significant expansion of JLR. Traffic concerns also raised to due to expansion at the airport, solihull moors, elmdon park and the proposed recycling centre.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14386

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gerard O'Sullivan**Summary:**

I am writing to register my objection to the relocation of the Household and Recycling Centre to land within site UK2 at Damson Parkway as it will add to traffic density in the local area.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10874

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mrs Charlotte Oak**Summary:**

Whilst, overall, I do not object to the sentiments & intentions of the proposals for Knowle, Dorridge and Bentley Heath, I do not feel, having studied the information provided here, that all the statements made in this document can be considered sound and legally compliant because I have not found sufficient supporting evidence in the Concept Master Plan, for example, to believe that the vision can be achieved in reality.

I also question whether this Local Plan meets all the development requirements set out in the KDBH Neighbourhood Plan, with regard to housing density and provision of services.

Change suggested by respondent:

1. Transport with reference to Paragraphs 685/690/Concept Master Plan/Knowle Transport Study

a) As a resident, I don't feel the area is currently well served by public transport, as the bus network within KDBH does not encourage me to leave my car at home for my journeys around the settlement particularly between Knowle and Dorridge. I think it would be fairer to say "The area is currently served by a variety of public transport options". I also think it is more appropriate to continue to say " ... it will be VITAL to retain AND improve the public transport offer" as saying 'where possible' is not going to be sufficient to accommodate the needs of 800 additional households.

b) I would also like to comment on the remainder of paragraph 690 relating to the "Opportunities for enhancing existing walking and cycling routes and creating new routes will continue to be explored, particularly where these would provide access to schools, local centres and the railway station"

I agree 100% with this statement, as finding ways to encourage new & residents to leave their cars at home are imperative to the successful integration of new homes to the KDBH community. Unfortunately, I see little concrete evidence in the Concept Master Plan or Knowle Transport Study to believe that this has been given sufficient thought to-date to trust it will become a reality, and hence I am raising my concerns here. I would feel more confident if I saw references, for example, to the provision of bike storage for new properties at KN2 that would not have their own garage or if the concept of 'Quiet Lanes' suggested in the Transport Study featured in the Local Plan itself or if there was specific reference in the Concept Master Plan to where new pedestrian/cycle routes between the new KN2 housing/school and Dorridge Centre may be located, as making it easier/more enjoyable for people to travel between KN2 and Dorridge Station/retail outlets on foot or bike will be critical to the livability of the area once the developments are complete. Improvements in this area would be a HUGE improvement for existing Dorridge residents. For example, showing how 100s of pupils will be able to get to the new Arden Academy from Dorridge using a safer and healthier environment than their current Station Rd journey would give me more confidence in the soundness of the statements in the Plan. Living close to Dorridge Station in 2020 during Lockdown, I have seen so many more people out on foot/bike, so believe there is interest in non-car options, but with 'normal' traffic levels and the current dependence on Station Rd to move efficiently from south to north, the current options aren't desirable. This Plan should be showing what non-car transport will look like to be considered sound and show an improvement on the current situation. Personally, I would be very excited to see how, in future, I could travel to Knowle High Street without having to travel up Station Road from Dorridge. Avenue Rd, for example, could offer a delightful route for foot and cycle traffic, if the route north from the top of the road continued on quiet streets through KN2 to St John's Close. I don't feel the statements of intention documented in the Plan are reflected in the supporting documentation and for this reason I question its soundness.

2. Also, with regard to this Plan's compliance with the KDBH Neighbourhood Plan, I question the proposed Housing density for parts of KN2 and also the lack of additional GP Services being proposed, as, without them, the quality of life of existing residents cannot be retained. For this reason also I question the soundness and legality of the proposed Solihull Local Plan in this area.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

14300

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

In previous versions of the Local Plan Review site 246 (Sharmans Cross Road) was included as an allocation in the Plan. Representation seeks the sites re-inclusion as an allocated site in order to assist in ensuring the plan delivers certainty and ultimately success as a tool for meeting its housing needs.

A concept master plan is included with the representations which demonstrates how the site could be developed to make best and efficient use of the land available in accordance with the council's proposed density aspirations for sustainable sites in urban areas. A technical Transport note is also included.

Change suggested by respondent:

On the basis that the council are evidently relying on the Sharmans Cross site to come forwards in order to deliver the plan as currently proposed, it is submitted that in order to provide the requisite levels of certainty for an Inspector to conclude the plan is sound, this site should receive an allocation within the plan (as was the case previously).

In doing so, the council should have regard to the work which Oakmoor have done (enclosed with these representations) to explore how the site could be feasibly developed to provide a greater quantum of development than the plan indicates the site has capacity for. In doing so, it would assist the council in demonstrating its ability to comply with the requirements of Framework paragraph 137 which in part relates to the testing of underutilised non green belt land to ensure that its development is fully optimised.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

14301

Object

Policy P5 – Provision of Land for Housing**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

Housing target should be a minimum.

As the plan period base date is likely to be close to being the adoption date, the plan period extends some way into the future. This brings into sharp focus the difference between the annual housing target being proposed in the Local Plan Review and the latest figure set out within the Government's standard methodology. Based on the latest emerging position, the Local Plan Review will be falling significantly short of housing need for the Borough.

Should the plan proceed in its current form, there is a significant period where there will be less open market and affordable housing being delivered than the latest evidence would indicate is required for the Borough which has a significant adverse impact in relation to the economic, social and environmental dimensions to sustainability.

Change suggested by respondent:

Re-include the site at Sharmans Cross Road (Site 246) as a formal allocation to meet housing needs.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14302

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

The policy as drafted does not include low-cost market housing. That is housing which is specifically designed to cater for the needs of the significant part of the market whose income excludes them from the traditional affordable tenures but does not enable them to viably enter the open market as a private renter.

Change suggested by respondent:

The definition of affordable under Policy P4A should be widened to specifically include low cost market rental properties under paragraph 1.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14303

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

The policy lacks sufficient flexibility. Imposing a borough wide housing mix on all sites is not appropriate.

The 2020 HEDNA is not the only measure to determine the market mix on sites. The policy should include flexibility to allow developers to provide their own evidence depending on specifics of location.

Criterion 1. ii needs to have regard to the emerging standard methodology which will influence needs assessment.

Criterion 1. iii) may provide unwelcome justification for resisting certain types of development because they do not conform with the prevailing characteristics of a particular area even if the need for that type of development is proven.

Criterion 3. prescribed mix is too rigid and does not allow for development to respond to the specific characteristics.

Change suggested by respondent:

The policy should be redrafted to allow developer evidence to inform housing mix under Criteria 1. Criterion 3 to be redrafted to include provision for a departure from the mix where specific circumstances justify it.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14304

Support

Policy P7 Accessibility and Ease of Access**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

This policy is supported. It is indeed of utmost important to ensure that all new development should be focused in the most accessible locations. This evidently underpins one of the main strategic aims of the plan, which is to ensure that the existing urban area should be the initial focus for accommodating development.

We submit again that the omission as an allocation of the land at Sharman's Cross Road serves to indirectly undermine the credibility of this policy given its obvious alignment with the fundamental aim of both the spatial strategy and this policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14306

Support

Policy P14 Amenity**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

Whilst the general thrust of policy P14 is supported, submit that criterion vii, which seeks to protect, amongst other things, community facilities and open space from the introduction of incompatible development, is too rigidly drafted. It does not for example allow for the loss of such facilities through development where the benefits of that development significantly outweigh the dis-benefits of the loss.

Change suggested by respondent:

Criterion vii to be amended to allow for a balancing exercise to be the determinative factor where development can deliver significant benefits which could include but not limited to including significant housing provision.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14307

Support

Policy P15 Securing Design Quality**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

Thrust of policy generally supported.

However, the policy as drafted lacks the flexibility to encourage and deliver designs which are innovative and bring about change.

Criteria 1 and 2 refers the need to conserve local character. Good design does not need to conserve every facet of what makes a place distinctive or indeed conserve every aspect of local character.

There will be instances where in order to secure high standards of design quality, a departure from obvious local character will be necessary and as drafted, the policy would stifle innovation and ultimately the ability to secure such high design standards.

Change suggested by respondent:

The policy should be redrafted to exclude the word 'conserve' and instead replace it with 'respond' which is more appropriate in urban design terms; given that its use promotes a flexible approach to design which is consistent with the requirements set out at Framework paragraph 127 of not preventing or discouraging innovation or change.

Moreover, there should be explicit recognition that on larger sites (suggest over 50 units) that the type and size of proposed dwellings should not be expected to slavishly mimic the overriding existing property types/ sizes which may be prevalent in that area.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14308

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

Spirit of the policy is supported but as drafted it lacks the flexibility.

In Criterion 3 there is no definition of 'of value to the local community'. This could be used to unduly object to a scheme which results in the loss of a community facility which has little or no value simply because a third-party claims that it is of value to them.

In the exceptions at i – v it is unclear whether all criteria should be met or just one. It is submitted that it should be just one of the five criteria, with the conjunction 'or' after each sub criteria.

Criteria 4 as drafted requires the loss of any existing facility to be replaced by another physical facility. If evidence demonstrates no existing need for that facility, there should be no requirement to provide an alternative one.

It will not always be possible or appropriate to provide alternative provision. It may be more appropriate to make a contribution to an existing or planned new facility.

Change suggested by respondent:

Policy should be redrafted to allow the flexibility set out above and provide a definition of what is meant by 'of value to the local community'. It is submitted that a lack of use for a prescribed period of time should set the basis for a definition of 'of value to the local community'.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14309

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Oakmoor (Sharmans Cross Road) Ltd**Agent:** Cerda Planning Ltd**Summary:**

All obligations need to meet the relevant community infrastructure levy tests set out in CIL regulation 122. That is, the obligation must be necessary to make the development acceptable in planning terms, directly related to development and fairly and reasonably related scale unkind to the development.

Change suggested by respondent:

It is submitted that the policy should make it clear that obligations relate to the relevant CIL Regulation 122 / NPPF tests.

Legally No**compliant:****Sound:** No**Comply with** No**duty:****Attachments:**

11042

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Andrew Ogilvie**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14535

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Tristram Oliver**Summary:**

Objects to site BL1;

High performing greenbelt/brownfield should be developed first - Mitigation efforts aren't achievable therefore site unsustainable - Sport fields should not/don't need to be relocated - initial sustainability appraisal incorrectly carried out - Adverse affect on character/setting of existing village - Impact on surrounding wildlife/ancient woodland - road network/parking infrastructure cannot cope with additional traffic - development not within walking distance of village centre facilities (further increase traffic) - Site located on flood zone 1, construction will worsen this - Tidbury Green Golf Course is more suitable.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13799

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Richard Onions**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Other Brownfield sites put forward more viable.

> BC3 home to array of Wildlife.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

13850

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Victoria Onions**Summary:**

- >Site BC3 is home to an array of wildlife (have photographic evidence)
- >National pledges have been made by the Conservative Party to protect Greenbelt land and alternative Brownfield sites have already been put forward as viable alternatives
- >Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.
- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- >Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- >Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14855

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Open Spaces Society**Summary:**

Lack of clarity and ambition make the plan unsound - need to make path network more practical and popular - negative impact on non-motorised route network - sites for residential development (including BC1, BC3, BC4, BC5, BC6, BL1, and BL3) will have significant affects on existing non-motorised routes, while the population growth will place additional stress on the capacity and quality of the network. - Too much emphasis on making future developments more accessible for motorised users - NPPF/ policy needs to be clearer on how development will bring improvements to public transport and active travel.

Change suggested by respondent:

Strengthen the overall objective by amending section 1 to read:

"1. All new development should be focussed in locations that are well served by public transport and well provided with active travel routes, and should seek to improve the availability and use of public transport and active travel."

Make the Council's expectations of development proposals clearer by amending several parts of section 2:

Amend subsection 2(iv) to read:

"iv. Provide within the development suitable facilities for public transport (where appropriate) and paths for people on foot or cycle that are safe, convenient, pleasant, and well connected to the nearby active travel network;"

Amend subsection 2(v) to read:

"v. Provide or contribute to the enhancement of transport infrastructure and services to achieve the requirements of subsections 2(ii) and 2(iii) above, including, but not limited to, improving the extent, physical condition, amenity, and safety of public footpaths, footways, and cycleways;"

Amend subsection 2(vi) to read:

"vi. Be consistent with, and contribute to, the implementation of the 'Solihull Connected' strategy, the 'Solihull Cycling and Walking Strategy', and the 'Solihull Rights of Way Improvement Plan' (or successor documents);"

Clarify in section 3 what access to all developments will have to demonstrate:

Amend subsection 3(i) to read:

"i. It is safe, attractive and suitable for all people by all modes in all seasons, and compliant with recognised published standards for construction, safety, and accessibility for those with mobility restrictions;"

Amend subsection 3(iii) to read:

"iii. Opportunities have been taken up to improve the quality of the adjacent active travel infrastructure and to bring it into compliance with recognised published standards for construction, safety, and accessibility for those with mobility restrictions, including the review of structures across rights of way to ensure they are the least-restrictive option and the publication of these restrictions to aid route planning;"

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14869

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Ann Oreilly**Summary:**

I fully support KN2, I believe it meets the tests of soundness and is compliant with the relevant legislation. I believe it will benefit local communities. The current school is uneconomical to run. Huge savings could be made with a new build. The area is desperate for additional housing which would help support local businesses.

Change suggested by respondent:

I am satisfied that KN2 has been sufficiently well developed in collaboration with all parts of the community and represents a place based approach that I fully support without further modification.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14867

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Charlotte Oreilly**Summary:**

I fully support KN2, I believe it meets the tests of soundness and is complaint with relevant legislation. I believe it will benefit local communities. My current school is out of date and expensive to run. I would like future arden pupils to have a much better place to learn.

Change suggested by respondent:

I am satisfied that Policy KN2 has been sufficiently well developed with the collaboration with all parts of the community and represents a place based approach that I fully support without modification.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14759

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Kevin O'Reilly**Summary:**

- Support Policy KN2 meets the tests of soundness and compliant with legislation.
- current building not fit for purpose
- more housing needed within the area
- local businesses will benefit.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

14609

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Kimberley Orme**Summary:**

- Unjustified use of green belt land before non-green belt land in the district have been utilised
- Environmental damages to green belt land (nature and wildlife) and removal of the rural feel of the local area
- Increased risk of traffic and foot congestion and accidents on school road, an already very narrow lane, particularly where the new junction will be located. This is of significant concern at school drop off/collection times as we witness already how busy this time is and in relation to lack of safe roadside parking available
- Risk to the limited amenities in Hockey Heath by increasing the site by 12% e.g. school places, medical facilities, local amenities stores and parking
- Lack of specificity of the size of the proposed new properties e.g. how many will be 2 or 3 story (?). Significant concern about further light/sound pollution in the local community.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:** None

14610

Object

Foreword

Respondent: Kimberley Orme

Summary:

- Unfair timing of this consultation, taking place during COVID19 when the district is in Tier 3 local down, resulting in issues attending meetings to discuss such matters

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14554

Object

Policy BL1 - West of Dickens Heath

Respondent: Gail Orton

Summary:

Deeply concerned over loss/moving of sports fields - Sustainability test carried out incorrectly - character and setting of the Village will be adversely affected - Impact on local wildlife and ancient woodland - Village parking/existing road network unable to cope with additional cars - Not within recognised walking distance of the village centre facilities/poor public transport/poor footpaths/will further increase road traffic - Site on flood zone one, even with sustainable urban drainage system it is still not suitable - Infrastructure not in place to support development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10721

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr John Outhwaite**Summary:**

Proposed relocation of the tip is not legally compliant because the proposal hasn't been consulted upon in accordance with the Statement of Community Involvement.

The proposal is not positively prepared or justified because insufficient evidence (options to improve current facility, alternative site information, traffic assessment) has been gathered or provided and consulted upon.

There has been no co-operation with other local authorities to examine alternative solutions.

Change suggested by respondent:

Due to the inadequate information provided and the failure to consult on this proposal then the Plan should be confined to stating /justifying the need for improved waste/recycling facilities and then state what the identified options are, i.e. 1) alter existing site, 2) relocate to Damson Parkway (and identify exactly where) and 3) relocate to the other site the Council have referred to (the not preferred option) and identify where that site is. The plan should state what consultation will be undertaken in order to inform a decision as well as state what evidence base will be published prior to such consultation. No preference as to the solution should be expressed in the plan.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

15178

Object

Policy P12 Resource Management**Respondent:** Mr John Outhwaite**Summary:**

Proposed relocation of the tip is not legally compliant because the proposal hasn't been consulted upon in accordance with the Statement of Community Involvement.

The proposal is not positively prepared or justified because insufficient evidence (options to improve current facility, alternative site information, traffic assessment) has been gathered or provided and consulted upon.

There has been no co-operation with other local authorities to examine alternative solutions

Change suggested by respondent:

Due to the inadequate information provided and the failure to consult on this proposal then the Plan should be confined to stating /justifying the need for improved waste/recycling facilities and then state what the identified options are, i.e. 1) alter existing site, 2) relocate to Damson Parkway (and identify exactly where) and 3) relocate to the other site the Council have referred to (the not preferred option) and identify where that site is. The plan should state what consultation will be undertaken in order to inform a decision as well as state what evidence base will be published prior to such consultation. No preference as to the solution should be expressed in the plan.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10793

Object

Policy P12 Resource Management**Respondent:** Mr John Outhwaite**Summary:**

Proposed relocation of the tip is not legally compliant because the proposal hasn't been consulted upon in accordance with the Statement of Community Involvement.

The proposal is not positively prepared or justified because insufficient evidence (options to improve current facility, alternative site information, traffic assessment) provided or consulted upon.

The "need" for a relocated waste/recycling site has been artificially generated by lumping together improved waste/recycling facilities plus the Moat Lane Depot operation on a single site for ulterior and unstated motives.

Change suggested by respondent:

Due to the inadequate information provided and the failure to consult on this proposal then the Plan should be confined to stating /justifying the need for improved waste/recycling facilities and then state what the identified options are, i.e. 1) alter existing site, 2) relocate to Damson Parkway (and identify exactly where) and 3) relocate to the other site the Council have referred to (the not preferred option) and identify where that site is. The plan should state what consultation will be undertaken in order to inform a decision as well as state what evidence base will be published prior to such consultation. No preference as to the solution should be expressed in the plan.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10797

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr John Outhwaite**Summary:**

The "requirement" for relocated Depot and waste/recycling facility isn't justified, there is a need for improved waste/recycling facilities only. Joining these two together is a tactic to develop a requirement for a relocated waste/recycling facility rather than improve existing facilities. The hidden purpose of this is to t enable a re-location of Depot in order to release/sell Moat Lane site for housing. Relocation of the waste/recycling site to Damson Parkway hasn't been published before, it hasn't been consulted upon. No Information about options considered/alternative sites haven't been provided. Thus the plan is not sound and is not legally compliant

Change suggested by respondent:

References to the relocation of the waste/recycling facility to Damson Parkway should be removed.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10928

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Ms S B Owen**Summary:**

The longstanding, reserved line of Knowle bypass has over a period of 50 plus years created an established green corridor which is vital to wildlife in the area. This should be considered and maintained in any proposed development as supported by the Council's strategy for wildlife ways through the borough.

Reference Page 101 of the Draft Infrastructure Delivery Plan 5.1 Natural & Semi-Natural Green Spaces which deals with these issues specifically: Enhance existing green corridors and Encourage the incorporation of green infrastructure in new developments.

Change suggested by respondent:

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 (to include the existing green corridor created by the old line of Knowle bypass);

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14414

Object

Policy UK2 - Land at Damson Parkway**Respondent:** David Oxley**Summary:**

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14409

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Lynda Oxley**Summary:**

The proposed relocation of the Household Waste Recycling Centre (HWRC) within the UK2 is legally non-compliant as this is the first time that the proposal has been published. This does not comply with Solihull's Statement of Community Involvement.

There is no evidence on how the LPA complied with the duty to "engage constructively, actively and on an ongoing basis with the neighbouring authorities" - the LPA have failed to comply with the duty to cooperate

Test of Soundness have not been met, as no evidence has been provided to justify the location of the HWRC, and that all options have been explored to identify a preferred location.

In paragraph 354, the 3rd bullet point states that the site "accords with the policy on the location of waste management facilities" - yet no policy is referenced. The 5th & 6th bullet point states "with sufficient space for queuing vehicles at peak times" & "the site is relatively isolated from residential use" yet no access/egress or the location of the HWRC have been shown on the UK2 allocation.

There is no evidence of traffic/environmental assessments in relation to the site.

Change suggested by respondent:

Given the apparent lack of community involvement regarding the proposed relocation of the HWRC to a site within the UK2 allocation, the plan should justify the need for improved HWRC facilities, provide the potential options including expanding the existing site. In each option and where applicable the location of the HWRC, including access points, should be identified on the map. The plan should state how the LPA will arrive at a decision and consult on the preferred option, be evidence based and in line with Solihull's Statement of Community Involvement.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14357

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Keith Painter**Petition:** 2 petitioners**Summary:**

- > Proposed development will transform Cheswick Green from a rural development into a continuation of Urban Shirley. Cheswick Green has seen a lot of development in a short time; is there no other suitable sites within the Borough? And is there great enough use being made of Brownfield sites.
- > Existing congestion problems will only become worse, especially; around the local school, access to the A34, and road between the M42 and Shirley.
- > Additional strain on services i.e. Doctor and hospital appointments.
- > Environmental consequences - increased risk of flooding.
- > Area has already had its fair share of development and should be left to adjust to existing changes.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14406

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Jo Paling**Summary:**

- I object to the proposal to move the HWRC to Damson Parkway due to increased traffic, additional pollution and encroachment into the Greenbelt.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

10970

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Andrew parker**Summary:**

reduce the need for students to walk up and down station road. give them a school they deserve. the sustainable design is impressive.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13686

Support

Policy SO1 - East of Solihull**Respondent:** John Parker**Agent:** DS Planning**Summary:**

Allocation SO1 is supported. All landowners and their representatives have agreed a masterplan for the allocation. Technical reports have been undertaken with issues and constraints identified and addressed in the masterplan. There is agreement in principle to have a memorandum of understanding.

The site is available, achievable and could deliver a higher number of dwellings than the proposed allocation (more than 700 dwellings). Land north of Lugtrout can be brought forward at an early stage, with no major infrastructure requirements. The site is in a sustainable location, close to local services and facilities.

Change suggested by respondent:

The red line boundary of SO1 should be amended to be consistent with the masterplan. In relation to land north of Lugtrout Lane it should include land up to the Grand Union Canal, Damson Parkway, land to the rear of 237 Lugtrout Lane and the existing residential properties on Lugtrout Lane and Hampton Lane.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14026

Support

Policy S01 - East of Solihull**Respondent:** John Parker**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14034

Support

Challenges**Respondent:** John Parker**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14043

Support

Policy S01 - East of Solihull

Respondent: John Parker

Agent: Cushman and Wakefield

Summary:

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14024

Support

Policy S01 - East of Solihull**Respondent:** John Ernest and Gillian Parker**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14032

Support

Challenges**Respondent:** John Ernest and Gillian Parker**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14041

Support

Policy S01 - East of Solihull**Respondent:** John Ernest and Gillian Parker**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10966

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs leeanne parker**Summary:**

Fully support this proposal - a new school is much needed. The proposal provides opportunities for the whole community and its legacy will last way beyond the time my children will have at the school (if its done in time)

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14399

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Mr & Mrs Parker**Petition:** 2 petitioners**Summary:**

Concerned about plans to build and continue building homes and over 60's schemes in around Shirley.

The roads are too busy.

There is no A&E in Solihull and the increasing number of residents is concerning.

The most concerning is the effect on the environment, and the animals and trees and land that they sit on. Our eco system is already stretched and to offer planting a few trees when lots of mature ones are slashed down is disgusting

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10979

Object

Blythe**Respondent:** Mrs Rebecca Parker**Summary:**

The pressure is always on this area of South Solihull. This is not reasonable nor compliant. The road network in this area is staggeringly under prepared for an extra 1000 cars. The land around here is continually flooded. This is by way of loss of flood planes and natural drainage. A new school etc added to the development will only encourage yet further housing at a later date...we have already seen that with Dickens Heath. This will be catastrophic to the locality. Why not Knowle, why not Dorridge? The roads are rural. Not designed for this amount of traffic.

Change suggested by respondent:

For it not to go ahead.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10996

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Katrina & John Parkin**Summary:**

The school is no longer fit for purpose, and the increase in population size means this will continue to worsen. We need to be ready for a future with carbon neutral buildings, hopefully this will go a long way to provide it. We need safe cycling routes to school to encourage local parents to support cycle commuting, and biodiverse safe clean areas for the community to enjoy walking. We MUST focus on tree preservation and increase the number of new trees planted- trees were chopped down in Arden academy last week without neighbours' consultation, we expect replacements to be planted.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11000

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Katrina & John Parkin**Summary:**

We support the site as we are realistic about the need for more housing, which is better delivered in a coordinated means with infrastructure to support the provision of the needs of the community in the climate emergency. The number of houses seems excessive however, given the need to retain green space and protect existing trees and biodiversity. Please ensure that the utmost care is taken in the building of the new area with sustainable ideologies (referring to advice from experts such as the Royal Horticultural Society) as well as safe, protected cycle routes to encourage cycling for all ages.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14507

Object

Policy BL1 - West of Dickens Heath**Respondent:** Abbi Parry**Summary:**

Building on the sports clubs would add to the obesity issue.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

11203

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Dr Hollie Patten**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:** None

10835

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Seth Peacock**Summary:**

The main reason for my support is that Arden Academy desperately needs redevelopment to continue providing quality learning.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14161

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Steve Pearse**Summary:**

The building of 780 new homes in the Knowle area makes NO provision for extra community facilities, GP or NHS Dental provision, youth group provision or expansion of voluntary run community facilities to cope with the increased population. Traffic and parking issue need to be properly funded and implemented before any new houses are built Building on Green Belt to the south of Knowle should not take place whilst there exists significant Previously Developed Land in the wider West Midlands area

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14099

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Ms Jennifer Pearson**Summary:**

The plan is not positively prepared: There is no published input from adjoining councils, regarding need.

Ecological assessment & Archaeological assessment for additional sites 2020 highlight unique features of HH1 - this evidence has been ignored when proposing HH1 removal from the Green Belt.

It is not justified: the site is of historical value, inclusion of site will destroy local flora and fauna, any development of HH1 would not conserve & enhance the setting of the canal towpath, proposed GB enhancements would not compensate for the harm that development would cause. Public open space (0.6 ha) would not counteract harm caused on 6ha of land and light and air pollution would be caused

It is not effective: although the development could be delivered, the development would adversely affect nearby infrastructure

The council have not established exceptional circumstances to justify the removal of HH1 from the Green Belt

Legal compliance: The council has failed to pay heed to the objection of the community. No evidence that the authority has engaged with neighbouring authorities on an ongoing basis

Change suggested by respondent:

That HH1 is not removed from the Green Belt and is not allocated for around 90 dwellings owing to the failure to comply with national and local policies, and the failure to correctly assess HH1 as a site of considerable value and importance which precludes development.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10664

Object

Policy SO1 - East of Solihull**Respondent:** Own Your Brand Ltd**Summary:**

The site is precious green belt with no special circumstances to remove it and provides valuable open space to the community. This site is already a problem area due to traffic and cars heading from JLR. No building should take place here and certainly not the size of 700 homes which is completely inappropriate for a historic area on the edge of Catherine- de-barnes.

Change suggested by respondent:

If building was to take place here then the scale should be vastly reduced and be set back from the existing Damson Parkway to avoid future highways safety problems.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

14592

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sam Penasar**Summary:**

The infrastructure can barely cope.

Loss of greenbelt a shame

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14819

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr D Perks**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

14820

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Rita Perks**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

11193

Object

Policy P17A Green Belt Compensation**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Paragraph 138 of the National Planning Policy Framework states 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 environmental quality and accessibility of remaining Green Belt land". The Plan should set out such compensation if required- it's not for a development at a future point to provide for its justification.

Change suggested by respondent:

Policy P17A should be more clear. The plan should set out any compensatory justification for Green Belt release.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11194

Support

Policy BL1 - West of Dickens Heath**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Allocation BL1 is considered suitable, deliverable and is therefore supported. Persimmon's site, Land North of Tythe Barn Lane, can be developed as an early phase of the overall allocated site. The proposals have been refined for this part of the allocation to align to the Council's masterplan.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11195

Object

Policy BL1 - West of Dickens Heath**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Policy BL1 requires the relocation of the existing sports provision south of Tythe Barn Lane. Where the development of any phase of the allocation impacts upon existing sports provision, that phase should provide for its relocation. Each development phase should mitigate its own impacts.

Criterion 3 references Green Belt enhancements in relation to replacement sports provision – this is only relevant to those phases of the development which result in the loss of existing facilities.

Change suggested by respondent:

References within Policy BL1 which require relocation of the existing sports facilities should ensure that these requirements are only for those parts of the development which result in the loss of such existing facilities.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11196

Object

Policy BL1 - West of Dickens Heath**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Criteria 5 of Policy BL1 restricts development of the site until the existing sports facilities south of Tythe Barn Lane are relocated. Mitigation can only reasonably be imposed upon any phase of development of the site which results in the loss of the existing facility- the Persimmon site does not impact on existing facilities.

The plan should seek opportunities for phased delivery to support early housing delivery in the plan period. The current wording of BL1 is restrictive and could potentially prevent early delivery of the Persimmon parcel.

Change suggested by respondent:

Criterion 5 should be amended to the following:

"To support sustainable development within the area, the site should be promoted on a comprehensive basis and where the proposals result in the loss of the existing sports facilities, supporting the positively planned relocation of the existing sports facilities south of Tythe Barn Lane to alternative locations within the surrounding area. Where a phase of the development results in the loss of the existing sports facilities, until such time as these facilities are appropriately relocated or robust plans have been confirmed to secure a timely relocation that would prevent the closure of any associated clubs (either for a short period of time or permanently), development of that phase of the development site will not be supported."

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11197

Object

Policy BL1 - West of Dickens Heath**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Criterion 2 Parts Xiii and iX refer to other policy requirements of the plan relating to self build and elderly accommodation and are not necessary to repeat.

Change suggested by respondent:

Criterion 2, Parts Xiii and iX can be deleted as other policies of the plan address such matters.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11198

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Policy P4A should align with the definition of affordable housing in Annex 2 of the National Planning Policy Framework to include Discount Market properties sold at 20% below local market value.

Change suggested by respondent:

The definition of affordable housing under Criterion 1 should be extended to include Discount Market properties sold at 20% below market value.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11199

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

It is unclear which elements of Policy P4A is expected to change in the updated Meeting Housing Needs SPD. The policy should define what is meant by affordable housing. Criteria 6, 7 and 8 should be more appropriately set out in the SPD.

Change suggested by respondent:

Criteria 6, 7 and 8 should be deleted and should be addressed and included in the future SPD.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11201

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Criteria 3 of Policy P4C which sets out a detailed dwelling mix is overly prescriptive and appears to override Criteria 1. A further Meeting Housing Needs SPD would be a more appropriate tool to define needed provision.

Change suggested by respondent:

Criterion 3 should be deleted and should be addressed in the future Meeting Housing Needs SPD. If retained in the plan, some degree of flexibility should be allowed to ensure future needs can be addressed.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11202

Object

Policy P5 – Provision of Land for Housing**Respondent:** Persimmon Homes Central**Agent:** Planning Prospects**Summary:**

Government policy seeks to boost the supply of housing. The “Planning for the Future” White Paper demonstrates the Government’s commitment to addressing the lack of housing supply. The Plan adopts a stepped trajectory which is contrary to the Governments aims. The priority should be to deliver earlier in the plan period.

Change suggested by respondent:

Policy P5 should be clear as to what the annual requirement is over the plan period. Where a stepped trajectory is adopted, the plan should make it clear that this is a minimum annual requirement and encourage development to be delivered earlier than the trajectory.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14542

Object

Policy P5 – Provision of Land for Housing**Respondent:** St Philips - Land at Stratford Road, Hockley Heath**Agent:** Lichfields**Summary:**

The Council is only proposing to deliver 15,017 dwellings which would meet the minimum requirement for housing including delivery of a small element of cross boundary growth. Additionally, a stepped delivery trajectory is proposed, which would result the delay in delivery of homes to meet needs in the early part of the plan period. As a result the DSP would fail to be “sufficiently flexible to adapt to rapid change” (Para 11) as required by the NPPF. At present, the Council’s proposed growth strategy would only just meet the proposed 15,017- dwelling housing requirement. It does not allow for any flexibility to respond to changing circumstances.

Government intention to review the standard methodology, revising the standard method for assessing housing numbers in strategic plans. This increases the minimum LHN for Solihull to 1,011 dwellings per annum, which is above the Council’s proposed housing requirement of 938 dwellings per annum. Although the Council intends to submit the DSP prior to the transitional arrangements, any delay to the plan-making or submission process means the Council will need to have regard to the revised standard method figure. It would therefore be prudent for the Council to build in a buffer at this stage and seek to begin considering a number of additional sites that could deliver sufficient capacity to meet this increased figure. This should include circa 5-10% headroom in the housing requirement (P5), to facilitate the delivery of between circa 750–1,500 dwellings

Change suggested by respondent:

5-10% headroom should be included in the housing requirement set out under Policy P5(1). In doing so, the Council will need to identify and sites to facilitate the delivery of circa 700–1,500 dwellings.

A detailed, site-specific housing trajectory is prepared, setting out the anticipated delivery rates of the larger strategic allocations and Town Centre Sites proposed pursuant to Policy P5(1). The anticipated delivery rates for large sites including UK Central Hub should be realistically set to reflect the lead in time for the delivery of projects of this scale.

The windfall allowance is decreased from 200 dpa to 150 dpa. At 150 dpa, a resultant capacity of 2,100 dwellings from 2022-2036 would warrant the Council to identify sites to facilitate the delivery of a further 700 dwellings.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14549

Object

Foreword

Respondent: St Philips - Land at Stratford Road, Hockley Heath

Agent: Lichfields

Summary:

HMA/DtC:

It is understood the Council intends to contribute 2,105 dwellings to meet unmet housing from the Greater Birmingham and Black Country Housing Market Area; however, this is not set out in a Statement of Common Ground (SoCG). In the absence of SoCG, St Philips considers that an increase to the proposed housing requirement is necessary to ensure additional flexibility in the event that constituent HMA authorities suggest a need for an increased contribution to the shortfall.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14550

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** St Philips - Land at Stratford Road, Hockley Heath**Agent:** Lichfields**Summary:**

Para 222: The Plan anticipates the delivery of 961 dwellings through 'Town Centre Sites'. Solihull Town Centre sites are allocated through site 8 of the Local Plan (2013),

No site-specific allocations are proposed through the DSP in order to deliver the Solihull Town Centre sites. However paragraphs 126-128 (which support Policy P2) confirm that the Illustrative Town Centre Masterplan (2016) indicates 1,500 new homes could be delivered in Solihull Town Centre, with 861 of these expected to be delivered in the plan period.

Whilst the Council's ambitions to adopt the Masterplan as a Supplementary Planning Document following Local Plan adoption are noted, St Philips questions the specific timing of development coming forward early in the Plan period.

Given that such sites have benefitted from housing allocations in the extant Local Plan, the adoption of the Illustrative Town Centre Masterplan SPD will not in itself result in delivery in the early plan period where housing need is most critical.

Crucially, this further substantiates the need for the Council to undertake detailed, site-specific housing trajectory, setting out the anticipated delivery rates of the Town Centre Sites pursuant to Policy P5(1).

Change suggested by respondent:

A detailed, site-specific housing trajectory is prepared, setting out the anticipated delivery rates of the larger strategic allocations and Town Centre Sites proposed pursuant to Policy P5(1). The anticipated delivery rates for large sites including UK Central Hub should be realistically set to reflect the lead in time for the delivery of projects of this scale.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14552

Object

Hockley Heath**Respondent:** St Philips - Land at Stratford Road, Hockley Heath**Agent:** Lichfields**Summary:**

Site 503:

Firstly, St Philips considers that the scoring of land off Stratford Road with 9 at the Site Selection Step 1 is incorrect on the grounds that whilst its accessibility scores Low/Medium, its low-performance in the Green Belt Assessment warrants its scoring as a 6 at the very least

The site would form a logical extension to the settlement of Hockley Heath. The site is modest in size and is bound by permanent physical features in all directions which would ensure development of the wider site remains contained and has negligible impact on the remaining Green Belt

There is existing development to the south of the site in the form of residential properties that form ribbon development along Aylesbury Road and Stratford Road. The proposed development will not extend beyond the limits of this current development, and will provide visual buffer planting along the northern site edge to create a defensible boundary.

The Vision Document submitted through the Call for Sites process and supporting this representation demonstrates that the release of the site from the Green Belt in Solihull would be logical and would not result in overall harm to the purposes of Green Belt.

Change suggested by respondent:

The land at Stratford Road should be included as an allocation, alongside draft Allocation HH1, which offers the potential to deliver up to 37 dwellings as a logical extension to Hockley Heath.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14553

Object

Policy UK1 - HS2 Interchange**Respondent:** St Philips - Land at Stratford Road, Hockley Heath**Agent:** Lichfields

Summary:

DSP fails to set out a detailed, site-specific housing trajectory outlining the anticipated delivery rates of all the strategic allocations, which fails to demonstrate the rate at which UK Central Hub will deliver.

The proposed growth strategy is largely predicated on the delivery of UK Central Hub - 2,740 units in the plan period up to 2036 (18% of supply).

For clarity, it should be noted that whilst an anticipated housing supply of 2,740 dwellings within the plan period is referenced at paragraph 89 and 222, Policy UK1 does not itself explicitly state the dwelling capacity allowed for by the allocation.

Notably, neither the Hub Framework Plan nor the Arden Cross Masterplan provide an up-to date trajectory for the delivery of housing within the allocation for within the plan period.

The site represents wholly unrealistic delivery rates which not only justifies the need for the Council to present a more detailed, site-specific housing trajectory, but warrants the Council to decrease the 2,740-dwelling figure assumed for supply within the plan period.

Start to Finish (Second Edition) identifies that the average timescale of validation of an outline application to completion of the first dwelling for sites of over 2,000 dwellings is 8.4 years. Notwithstanding that an outline planning application on land at UK Central Hub has yet to be submitted, the research also finds that the average build-out rate for sites of over 2,000 dwellings is 160 dpa. Consequently, even if an outline planning application for the proposals at UK Central Hub were to be submitted to align with the Examination in Public, the build-out rates implied by the Council, as above, are wholly unrealistic. The assumed delivery by the Council of 2,740 dwellings by 2036 should therefore be decreased to a more realistic rate equating to 160 dpa from 2029, or 1,120 dwellings.

Change suggested by respondent:

In order to ensure that the Policy approach taken is sound, it is considered that:

- An indicative housing capacity figure should be explicitly referenced in the Policy text;
- The anticipated housing supply figure of 2,740-dwellings, as referenced at paragraphs 89 and 222 (the housing land supply schedule), should be decreased to a more realistic rate equating to 160 dpa from 2029 to 2036, or 1,120 dwellings.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14711

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** David Phillips**Summary:**

Development not considered to be sound as its a land swap and they do not own the land.

It will cause significant disruption to the community, increases the construction time and traffic, increase danger to children commuting to 5 schools in the area,

Existing School is adequate

LP has identified only the need for one extra primary year group therefore should only extend one of the existing primary schools.

Proposed entrance within a dangerous location.

Cause challenges due to parental parking. On street parking already taken up by train station users.

No bus routes serving the area,

Increased risk to children who commute by foot to all schools in the area.

Change suggested by respondent:

The houses should be built on the unoccupied land with Arden remaining on the existing site as outlined above.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

10764

Object

Policy P12 Resource Management**Respondent:** Mrs Kay Phipps**Summary:**

The proposed move of the Bickenhill Waste Centre closer to the recently built JLR Logistics Centre will undoubtedly add more vehicles to the already excessively high traffic volume A45 and surrounding roads.

It is totally unacceptable to consider moving a Waste Management function closer to the large residential area of Damsonwood and Damson Parkway.

It is yet another planned infringement on existing precious Green Belt land where the Council has already demonstrated its lack of care in its stewardship of local Green Belt land by permitting the hideous development of the JLR Logistics Centre at the Damson Parkway site.

Change suggested by respondent:

The proposed move of the Waste Centre closer to residential housing in the Damson Parkway area needs to be totally reassessed on the grounds of dilution of the quality of the environment and unwarranted use of Green belt land.

Greater effort needs to be expended in identifying a suitable existing Brownfield site, away from a centre of population.

Alternatively, expansion of the current Bickenhill site, which meets existing traffic infrastructure dynamics, should be properly examined.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10765

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Kay Phipps**Summary:**

The proposed move of the Bickenhill Waste Centre closer to the recently built JLR Logistics Centre will undoubtedly add more vehicles to the already excessively high traffic volume A45 and surrounding roads.

It is totally unacceptable to consider moving a Waste Management function closer to the large residential area of Damsonwood and Damson Parkway.

It is yet another planned infringement on existing precious Green Belt land where the Council has already demonstrated its lack of care in its stewardship of local Green Belt land by permitting the hideous development of the JLR Logistics Centre at the Damson Parkway site.

Change suggested by respondent:

The proposed plan to move the Waste Management Centre closer to an area of residential housing needs to be totally reassessed.

The options which should be carefully examined are:

- i) Expanding the current Bickenhill site which already meets existing traffic infrastructure requirements.
- ii) Greater effort needs to be expended in identifying a suitable Brownfield site to prevent further encroachment onto our precious Green Belt land.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13811

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Shona Pickering**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14818

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Alan Pickford**Summary:**

Erosion of Social infrastructure - more needed.

There is extra traffic on School Road, due not only to the School, but also to the road being used as a 'rat run'.

Issue of additional school place requirements.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14615

Object

Policy BL1 - West of Dickens Heath**Respondent:** Neil Pierssene**Petition:** 2 petitioners**Summary:**

Document requires more detailed site locations - Football club affected by site is incorrect (should be the Whychall Wanderers) - does not make sense to move football clubs/sports fields without proper evaluation of all options - Sustainability test carried out incorrectly - character and setting of the Village will be adversely affected - Village parking/existing road network unable to cope with additional cars - Site is in a high performing green belt/ brownfield sites should be prioritised - Analysis of available brownfield sites around Solihull town centre needs to be completed before green belt sites are released

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14617

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Neil Pierssene**Petition:** 2 petitioners**Summary:**

Concerns about the amount of traffic that will be generated by the development in an area already struggling with a huge amount of traffic.

Change suggested by respondent:

site these homes on the other side of Junction 4 of the M42 where the A3400 has the capacity to manage the traffic flow. There is a site at Blythe Valley off Kineton lane and it would make sense to expand this further so that the area can support local shops or Doctor's surgery to make it more sustainable and benefitting residents of the existing development.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14374

Object

Policy S01 - East of Solihull**Respondent:** Mrs Sheila Pittaway**Summary:**

I wish to comment on the proposed development of Lugtrout Lane. To suggest 600/700 dwellings can be accommodated on this site appears to suggest no thought has been given to schools and transport. This is a green lung on a small green belt site and to build on it flies in the face of advice from many other agencies like Woodland Trust who say these green lungs should be maintained and increased where possible. The larger plan increases the building line along Damson Parkway and the small green lung along Lugtrout Lane separates the built up environment of the town centre.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10693

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mrs Patricia Platt**Summary:**

It seems Arden School is being rebuilt because the kitchen and dining facilities are too small!
The entrance is being moved to a Warwick Rd to alleviate congestion on Station Rd, but the High St is already congested and the Warwick Rd is a continuation of the High St . - therefore it will make the main route through Knowle even more congested! It doesn't make sense! When was the most recent traffic survey?
Doctors surgeries are already overbooked and it's difficult to get an appointment- what has been done about this?

Change suggested by respondent:

Build a bigger kitchen and dining hall for Arden, it would make more sense.
Do a traffic survey of the route through Knowle at peak times.
Research health facilities currently and consider all the extra residents and what impact they will have on the facilities.
I don't know how to change the plan but these points need addressing otherwise our lovely village is going to be ruined!!

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11107

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Donna Poole**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14440

Support

Policy P5 – Provision of Land for Housing**Respondent:** Arthur Poolton**Summary:**

Utilise empty office blocks/ buildings to provide more housing.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10925

Object

Hockley Heath**Respondent:** Mrs Jane Porter**Summary:**

Develop brown field and commercial property before greenbelt. Develop in a village with the roads, doctors, schools, post office, public transport before looking at villages with none of these!

The high street is on the massive decline and has been for the last few years...develop that into housing as everything infrastructure wise is there already.

Change suggested by respondent:

Before anymore development and to protect our children's safety!

Please Widen to School Road to be able to withstand the increased traffic from developments and Blythe Valley.

Locate a Doctors Surgery, pharmacy and expand the School in the village before any further development.

Leave the precious Greenbelt land alone, use Brown field and empty properties first.

We have expanded in this village already with Foxes Meadow, the housing association homes on the Stratford Road and the exclusive Aylesbury house hotel development.... we shouldn't expand anymore, we cannot cope with more people without work on the infrastructure.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10851

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Portland Planning Consultants**Summary:**

The Policy fails to take into account potential changing needs over the plan period. Type and size should be in the form of guidance rather than prescription . Furthermore there is policy status give to proposed SPD.

Change suggested by respondent:

Change type and size status to guidance rather than prescription. Remove references to SPD from policy and place in supporting text.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10594

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Do not re locate Bickenhill waste disposal unit to Damson Parkway as this will not improve the waste disposal plant due to lack of space and disruption to local residents who live in Damson parkway.

Change suggested by respondent:

Look to relocate Bickenhill Waste Disposal unit to a more adequate location.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10595

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Do not Relocate Bickenhill Waste Facility to Damson Wood it is an unsuitable site for this facility.

Change suggested by respondent:

Relocate Bickenhill Waste Disposal facility to a more suitable location.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10596

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

I disagree with this policy by destroying Green belt and the monstrosity JLR have built on this land this is not improving the attractiveness of the local community. By moving Bickenhill Waste Facility to Damsonwood this is going to have an impact on climate change for this local community due to the amount of pollution this will generate. This will not be a healthy lifestyle change for the local residents that will have this facility on their doorstep. I do not believe that this policy is protecting the environment when Green Belt is being destroyed. This is contrary to 'Promoting Quality of Place Chapter'

Change suggested by respondent:

Relocate Bickenhill Waste Facility to another location.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10597

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Relocate Bickenhill Waste Facility to another location - contrary to P15

Change suggested by respondent:

Relocate Bickenhill Waste Facility to another location. The Damsonwood Location is not suitable for this facility.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10600

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Relocate Bickenhill Waste Disposal Facility to another location where this is not going to affect our environment and local residents health - contrary to P10

Change suggested by respondent:

Relocate Bickenhill Waste Disposal Facility to another location.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10601

Object

Policy P17A Green Belt Compensation**Respondent:** Miss Amanda Poulton**Summary:**

I disagree with this policy because you have stated that sacrificing green belt land will be to improve environment quality. For the local residents I feel this is not true. Green belt has been destroyed for JLR and possibly for the relocation of Bickenhill Waste Disposal Facility. I do not see how this improving the environment for Damsonwood residents when this will bring more noise and pollution to the area. In the Damsonwood area green belt is not being destroyed to improving housing demands.

Change suggested by respondent:

Relocate Bickenhill Waste Disposal unit to another location this is not going to benefit the local residents.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10602

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

I disagree with this policy how is the movement of Bickenhill Waste Disposal Facility going to benefit the local residents of Damsonwood health and well being. This is going to have quite the adverse affect to peoples health due to the increase in noise and carbon emissions that will be caused by the amount of people that this will bring to the local area. This will also have a negative impact to the local environment as this will increase climate change and destroy the landscape - contrary to 'Health and Supporting Communities' theme.

Change suggested by respondent:

Relocate Bickenhill Waste Disposal Facility to another location

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10603

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Re locate Bickenhill Waste Facility to another location it is not going to support the local residents Damsonwood - state contrary to P18.

Change suggested by respondent:

Relocate Bickenhill Waste Disposal Facility to another location

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10604

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Miss Amanda Poulton**Summary:**

Relocate Bickenhill Waste Disposal Facility to another location this is going to have a negative impact to the local residents - this is contrary to 'Protecting and Enhancing our Environment' theme.

Change suggested by respondent:

Relocate Bickenhill Waste Disposal Facility.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14342

Object

Policy P5 – Provision of Land for Housing**Respondent:** Paula Pountney**Summary:**

- Why have only such a small number of dwellings - in the region of 3000, been designated for the HS2 site, when it could easily accommodate three times that number? It would be a much superior option with great transport links, job opportunities and much less environmental damage.
- Regeneration in Chelmsley Wood - which appears to have little housing allowance being considered for the town, which is classed as an urban renewal area. This would be a much more appropriate area for extra development environmentally and for future sustainability.
- As previously recorded at the Council, the Solihull Town Centre Masterplan should be brought forward including many suggestions made several years ago. Following the very sad demise of Shops such as those in the Arcadia Group and also soon to be closed - House of Fraser, much of the redundant shop and office space could be re-developed for housing accommodation. It's a stark fact that since the pandemic, many more people work from home and much of the structure of people's lives have completely changed and this alone should be a critical reason for the overhaul of the whole plan.
- Why have the Council not agreed to these suggestions, in order to protect the majority of the sites on the greenbelt? More importantly, the kind of homes that are most needed, in locations that promote sustainable travel.
- Solihull should not have to take an extra 2000 houses from the Greater Birmingham area. Andy Street has overseen a lot of development in the centre of Birmingham on derelict and brown field sites and they have brought in an extra £434million to clean up these sites for homes and businesses, easing pressure on Green Belt sites.
- This plan should be considered unsound as due diligence does not appear to have been carried out on analysing sustainability of the individual sites.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14343

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Paula Pountney**Summary:**

- Site BL3 is designated as highest value green belt so why build there, when there are clear alternative options?

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14344

Object

Blythe**Respondent:** Paula Pountney**Summary:**

39% is disproportionately designated to Shirley, with at least 5% being on the green belt.

- There has been a huge amount of development in the Blythe area already in the last 5 – 8 years and a significant amount more than elsewhere, is being planned additionally and this fact seems to have been disregarded.
- National government guidelines state that Natural Wildlife sites should have interconnecting routes, so why is site BL3 and BL2 included in the plan?
- Alternative locations – such as the Tidbury Green Golf Course Site should be strongly considered as it's nearer the Railway Station, and would allow preservation of the gaps between Shirley, Dickens Heath and Cheswick Green, preventing coalescence of areas.
- Roads will be totally gridlocked in Shirley. The traffic is already to utmost capacity, resulting in even more air pollution and noise. This will really exacerbate problems to access the M42. It is also a really terrible idea for additional traffic to be fed through Bills Lane and Haslucks Green Road, which is already highly congested at peak times.
- The Blythe Valley is a well-known flood plain on mainly clay soil, while little or no recognition of this is mentioned in the plan. We are worried about the risk of flooding at the bottom of Bills Lane and Haslucks Green Road, as it is already prone to flood round this area. Will the Council and Developers compensate for any future damage done, as it's a big risk?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14346

Object

Foreword**Respondent:** Paula Pountney**Summary:**

- I do not consider 6 weeks consultation to have been enough time for the public to have had time to adequately study the plan and it has very unfairly been pushed through under the cover of the pandemic. It's almost like a smokescreen and other Councils have given people much longer to state their opinions and this can only be detrimental to Shirley!
- It's really difficult to comprehend why the Developers have so much power over Councils to force development on the Green Belt? Shirley has 3 Green Party Councillors acting on our behalf that are opposed to so much development, particularly on the Green Belt in Shirley. Surely, in a democracy they should have a great deal of influence, after being voted for by the people of Shirley? How can Solihull Council impose this plan and believe it is fair and equitable to the already wonderful town of Shirley?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14349

Object

Policy BL1 - West of Dickens Heath**Respondent:** Paula Pountney**Summary:**

- Site BL1 is not sustainable, with the only advantage being it is near to Whitlocks End Railway Station. It is wholly inappropriate because it is very high grade green belt land around Dickens Heath rated 7 and 8 status and should have been a red site on the very first round of sustainability appraisals. I understand that The Campaign for the Protection of Rural England has stated that in paragraph 11B of the National Policy Framework because the site has very high areas of ecological value, including at least 4 nature reserves very nearby and a high flood risk, the constraints are proven to be so bad, it's justified that this land should not be included for development.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14350

Object

Policy P21 Developer Contributions and Infrastructure Provision**Respondent:** Paula Pountney**Summary:**

- Loss of vast amounts of sports grounds/playing fields with no mention of where all this valuable resource could be re-located? This would result in a loss of health and well-being to the community, which would be a total disgrace!
- The pandemic has had a drastic effect on Doctors Services already completely stretched and failing to keep pace with current demand. This is due partly to the existing retirement and extra care facilities, with more to follow. We know that there is an ageing population and the demographic is 30% higher in this area than the national average. This presents a massive challenge to existing services and should be acknowledged and mitigated by the plan. This has not been addressed, as far as I understand.
- I believe that there has been no extra provision for Hospitals, Dentists and other services featured in the plan. Infrastructure investment has not been clarified and the mechanisms designed to ensure Developers pay fair costs have not been outlined. The consequences of this could be disastrous, as future health and wellbeing have not been addressed. It should be mandatory, in my opinion that Developers are held to scrutiny regarding the protection and enhancement of high quality health and social care Services.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14422

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Warren Powell**Summary:**

- Objects to Policy BL2;
- Disproportionate number of houses being built in Cheswick Green - Strain on local services (Doctors/Hospital appointments) - Increases risk of flooding - Traffic congestion/public transport improvements needed - Artificial Greenbelt boundary (new road) goes against the spirit and intentions of national planning policy - Dog Kennels Lane only remaining boundary between CG and adjoining areas of the borough.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13946

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Miss Anne-marie Power**Summary:**

N/A

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Comply with duty:** Yes**Attachments:**

14573

Object

Blythe**Respondent:** Linda Prentice**Summary:**

Objects to building in Shirley;
 Loss of greenbelt (knock-on effect on pollution and physical effect of residents) - Strain on healthcare services/ increased strain due to the number of retirement homes - Infrastructure cannot cope (road network) - Need to look at regeneration in Chelmsley wood/ Making better use of the HS2 interchange site for housing/bring the Solihull town centre masterplan forward - disappointed the council did not do more to publicise the 'Draft Local Plan Consultation Response.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

10722

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr colin priddey**Summary:**

Over development. Do we really need more housing in an area that has had more than it's fair share.

Why destroy more countryside by building on Green Belt when brownfield should be used first.

Strain on already overstretched services.

Change suggested by respondent:

Cancel this plan to build 1000 homes

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14800

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Malcolm Priest**Summary:**

Objects to Policy KN2;

Concerns that the narrow bridleway that provides access to Station Road could be used by a heavy volume of traffic to access the proposed new school and any other buildings or as a drop off point - support the representations regarding the plans made by KDBH Neighbourhood Forum - overdevelopment in Arden triangle.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14358

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Prologis UK Ltd**Agent:** Delta Planning

Summary:

Supports UK Central concept as offering the greatest potential for economic growth in the Borough. The key objectives for development proposals set out in the policy fully align with our own proposals for Site UK2.

With specific regard to JLR and Site UK2, support the release of this land from the Green Belt to accommodate employment development and generally agree with the exceptional circumstances case set out.

The Concept Masterplan referenced at paragraph 107 is not included in the Draft Submission Plan. As site promoters we have included with these representations a Site Supporting Statement which sets out our vision for the site and contained within this is our Concept Masterplan which we put forward for consideration with the aim of having this agreed with Solihull MBC and included within the final plan.

The following text should be amended to make the policy clearer and support the soundness of the Local Plan.

- The heading 'Jaguar Land Rover' above paragraphs xii-xv of Policy P1, as well as the heading which precedes paragraph 104 in the supporting text to Policy P1, should be amended to make it clearer that this policy and text covers both JLR and Site UK2, given that these sites are distinctly different areas on the Proposals Map and that different policies apply to the two areas. This will help with clarification in reading the plan.
- Paragraphs xii-xv of Policy P1 which provides the details of Site UK2 should be amended to better align with Policy UK2. It would be clearer if there was a clear cross reference to Policy UK2 after the words 'employment development' on line 2, as this would help to define the proposals and by ensuring that it is Policy UK2 that ultimately sets out the site specific policy for Site UK2. It is important also to make clear that uses with links to JLR are not the only employment uses permitted on the site.
- Within paragraph 104 of the supporting text to Policy P1 reference to 'local' should be removed in relation to employment uses. There is no definition of what 'local' means within the plan with reference to economic development and the term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this which will clearly be a highly attractive location for both businesses relocating from within the District but also new inward investment and businesses relocating from within the wider region. The subsequent text should also be amended to cross reference to Policy UK2 as the principal policy for Site UK2.
- We see no need for the first two sentences of Paragraph 105 to make more specific separate reference to land on the south eastern side of Damson Parkway being attractive to the automotive and motorsport industries. There is no reason why this area is any different from the rest of the allocation area. These two sentences should be deleted.
- In the third sentence of Paragraph 105 reference is made to part of the site also being identified for a relocated Household Waste and Recycling Centre (HWRC) and Council Depot. We would suggest that this reference be clarified to reflect the Council's stated position on this matter in Paragraph 353 of the Draft Plan which is that the site has been identified as one 'option' for the HWRC relocation and that no final decision has yet been taken on this proposal. Indeed, it is apparent from the Council's 2019 evidence base assessment report that there are other sites also in contention for this use which have a higher suitability scoring.
- In the fifth bullet point of Paragraph 106 reference to the primary highway infrastructure should also be included in the list of already committed development, together with that fact that this and the other committed development within Site UK2 have now been constructed not just permitted.
- Given there are other possible sites for the Council's HWRC we do not consider that the 8th bullet point of Paragraph 106 adds anything to the special circumstances case for UK2. The case for Green Belt release is compelling without this.

Change suggested by respondent:

The heading for and the text of paragraphs xii-xv of Policy P1 that relates to JLR and Site UK2 should be amended as follows:

“Jaguar Land Rover (JLR)/and Site UK2

xii. The Council will support JLR to compete and further its success in the global vehicles industry. To achieve this, the JLR site will need to continue to evolve and where necessary expand, with the only realistic opportunity for significant expansion being to the north east.

xiii. The Council will support and encourage the development of JLR within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of JLR as a major manufacturer of vehicles.

xiv. Site UK2 on the Policies Map, will be released from the Green Belt to accommodate employment development as set out in Policy UK2. This will include employment development to meet wider identified needs, together with that required to meet the additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport. . The exceptional circumstances justifying the removal of the land from the Green Belt are set out in the justification to this policy.

xv. It will be expected that proposals for the development of Site UK2 will be promoted in a comprehensive and coordinated manner that can make provision for a phased approach, if required”.

2. Paragraphs 104 and 105 and the associated heading should be amended as follows:

“Jaguar Land Rover (JLR)/and Site UK2

104. The Council will continue to support the further development and modernisation of the vehicles plant in order to enable its continued success in the competitive global vehicles market. JLR is constrained in terms of its ability to expand by its location within the main urban area. To reflect this and having regard to the vital importance of JLR to the region’s economy and to job creation, Policy P1 includes proposals to remove land at Damson Parkway from the Green Belt to support this aim. As set out under Policy UK2, in addition to meeting JLR needs, Site UK2 will also provide for wider employment opportunities to meet the needs identified in Policy P3, as well as for potential ancillary requirements for Birmingham Airport.

105. Part of Site UK2 has also been identified as a potential location for a relocated Household Waste and Recycling Centre and Council Depot subject to ongoing options assessment by the Council. Further justification for this proposal is included in Policy P12.”

3. The fifth bullet point of Paragraph 106 should be expanded as follows:

“A significant part of the site already has planning permission and has been constructed for use as a despatch facility and logistics operations centre for Jaguar Land Rover, as well as the associated primary road infrastructure works for the site. These proposals were which was justified with very special circumstances”.

4. The 8th bullet point of Paragraph 106 relating to the Household Waste and Recycling Centre should be removed entirely.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

14372

Object

Policy P3 Provision of Land for General Business and Premises

Respondent: Prologis UK Ltd

Agent: Delta Planning

Summary:

Supports the inclusion of this site within the table of employment site allocations under Policy P3.

The area quoted within the table should however be clarified. Although the gross area is c94 ha, that area includes substantial areas of land that are already committed/built out as well as substantial areas that will form part of the blue/green infrastructure. The actual net available area remaining is approximately 39 ha.

This also applies to Site UK1, the available employment land within that allocation is, according to the Arden Cross Masterplan, only approximately 30ha.

Based on the conclusions of the HEDNA paragraph 142 concludes that there is a shortfall of around 5.2 - 6.6 ha of employment land that the plan should provide for. The employment land need is far more extensive than the identified shortfall derived from the GL Labour Demand and past trends Modelling. There is no allowance for the past trends of JLR expansion itself (including the major LOC facility within Site UK2) or to meet the very strong regional demand for employment space, in particular for logistics warehousing, as referenced at paragraphs 12.57-12.58 of the HEDNA. That wider need is evidenced through the West Midlands Strategic Employment Sites Study (WMSESS), part 2 of which is due to be published shortly.

Part 1 of that study however has already made clear that the M42 corridor is one of three areas within the West Midlands where there is an acute shortage of land supply set against the highest volume of demand, and that the case for allocating strategic employment sites is strong. On the back of this evidence, both Birmingham and North Warwickshire have released some Green Belt for strategic employment uses. It is evident from interim information arising from the Part 2 study that although this additional supply has come forward in recent years, the overall shortage of land remains and this situation further supports the allocation of Site UK2. We would suggest therefore that Paragraph 142 be expanded to provide a fuller picture of employment needs more clearly.

In line with these comments reference to 'local employment' within paragraph 145 should also be removed and just the term 'employment' should be used. This paragraph should also cross reference to Policy UK2. We also see no reason for reference being required to a plan-monitor-manage approach in this case or repeated Green Belt justification which is provided for elsewhere in the plan under Policy P1.

Change suggested by respondent:

Policy P3 Employment Allocations Table should be amended for Sites UK1 and UK2 to reflect the net available areas - Land at HS2 Interchange (UK1) C140 (gross) c30(net available) Land at Damson Parkway (UK2) c94 (gross) c39(net available).

Additional sentences should be added to paragraph 142:

"The HEDNA 2020 also notes that market intelligence shows a very strong demand for warehousing and industrial units across the spectrum which is concentrated along the M42 corridor and forecasts point to a clear need for additional warehousing. This is likely to be reinforced by the West Midlands Strategic Employment Sites Study Part 2. Previous Regional Studies which have consistently shown a shortage of land for strategic employment sites across the West Midlands, with the M42 corridor in particular being an area that has historically had a high volume of demand but a constrained supply. The inclusion of site UK2 can therefore also help towards meeting this wider regional strategic land requirement."

Paragraph 145 should be amended as follows:

"The above table also includes two allocations (Sites UK1 & UK2) which will necessitate land to be removed from the Green Belt. The justification for Policy P1 provides the exceptional circumstances for this approach. Whilst Site UK2 is partly intended to provide for JLR needs, much of this has already been committed in the form of the despatch area and logistics operations centre, approved under very special circumstances. The concept masterplan shows the development areas that are already committed and constructed and a number of phases remaining for development, which can meet wider general local employment needs together with that required to meet any additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport as set out in Policy UK2. The site can also accommodate a potential replacement Household Waste and Recycling Centre and Depot subject to ongoing options assessment by the Council as set out in Policy P12., Evidence indicates that Site UK1 is likely to have a role to play in meeting local employment needs, especially later in the Plan period."

Legally compliant: Yes
 Sound: Yes
 Comply with duty: Yes
 Attachments:

14383

Object

Policy P9 Mitigating and Adapting to Climate Change

Respondent: Prologis UK Ltd

Agent: Delta Planning

Summary:

Acknowledges the plan has a crucial role to play in securing mitigation against and adapting to climate change. Fully in support of the aims and objectives of Policy P9 and the general requirement that proposals for major development be accompanied by a Climate Change Assessment as set out under Paragraph 7 of the Policy.

However, some of the site level requirements within paragraph 3 should be less specific to ensure a holistic approach to sustainable design is taken. In particular concerned by mandatory BREEAM Excellent accreditation and a 15% renewable/low carbon energy source requirement as may not present best sustainability outcomes. Also securing BREEAM Excellent on green field sites can be extremely difficult under the new 2018 BREEAM standards. Other approaches can be just as effective in reducing carbon emissions, and could be set out in the Climate Change Assessment already contained in the policy.

As site promoters of UK2 for example we would approach building design to minimise operational carbon emissions based on a three-step approach of

- Step 1 - Passive Design Measures, including
 - i. high levels of air-tightness and insulation to reduce potential heat loss.
 - ii. rooflights to cover 15% of the warehouse roof area in order to maximise the use of daylight, while optimal orientation takes into account the path of the sun and the prevailing winds.
 - iii. Where possible offices are designed on a narrow floorplate with dual aspect glazing to take advantage of natural daylight and allow for effective passive ventilation.
 - iv. Provision of solar shading to ensure thermal comfort and avoid solar gain.
- Step 2 – Efficient Systems. Where energy use is required this can be specified and installed using the most energy efficient plant systems available. This can include intelligent lighting with low-energy LED fittings, daylight linking and presence-detecting controls. High-efficiency, low-NOX boilers with thermostatically controlled radiators to provide heating to offices, and the sub-metering of buildings to help users track and manage their energy consumption.
- Step 3 – Low or Zero Carbon Technologies. Once the operational energy use in the building has been minimised we then design and install low-or zero-carbon technologies to meet customer’s specific operational needs and, as a result, further reduce operational carbon emissions.

In addition to the above, we can undertake ‘cradle to rave’ Carbon Life Cycle Assessments based on the requirements of BS EN 15978 which show the significance of the embodied carbon emissions associated with the construction process which typically accounts for as much as 70% of lifetime carbon emissions of a warehouse, based on a 30-year assessment period. In this way we can therefore reduce embodied emissions through efficient design, the use of low carbon materials and the focused reduction of construction waste including diverting waste from landfill.

Therefore suggest that a more bespoke approach is taken to consider each site on its merits through the requirement to provide a bespoke Climate Change Assessment.

The policy should be clear as regard to which BREEAM standard it relates to (i.e. BREEAM new Construction 2018’ standard) and that these should be referenced as targets given there is no way to guarantee the outcome of an assessment

It is not realistic to expect minor development to undertake BREEAM Assessments

Change suggested by respondent:

Policy P9 Paragraph 3, criterion iii and iv. should be replaced with the following text:

“iii 'Major non-residential development should target BREEAM Excellent wherever possible using 2018 BREEAM Construction Standard. The approach to achieving this should be set out in the Climate Change Assessment required under paragraph 9.

iv Target at least 15% of energy where possible from renewable and/or low carbon sources for all major housing developments and non-residential developments of 1,000 sq.m of more”.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14402

Object

Policy UK2 - Land at Damson Parkway

Respondent: Prologis UK Ltd

Agent: Delta Planning

Summary:

Support this policy and the accompanying text at Paragraph 857-86. As landowners and developers of the site we have set out our Concept Masterplan which we put forward for consideration with the aim of having this agreed with Solihull MBC and included within the final plan. This Plan fully aligns with the development principles listed in the policy and the infrastructure requirements listed, and also includes a phasing strategy.

There are some aspects of the detailed text we consider should be amended in order to make the policy clearer and which would further support the soundness of this aspect of the Local Plan.

These are as follows:

- The text within the Policy and at paragraph 859 should remove references to 'local' employment needs. As stated elsewhere in our submissions to the Plan, there is no definition of what 'local' means within the plan with reference to economic development and the term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this which will clearly be a highly attractive location for business relocating from within the District but also from new inward investment and businesses relocating from within the wider region.
- The list of acceptable development in the allocation area should generally be set out more clearly.
- References in the Policy and paragraph 859 to the inclusion of a Household Waste and Recycling Centre and Council Depot should be amended to make clear that the Council has not yet made a decision on this issue and other sites are still in consideration as set out in Paragraph 353 of the Submission Draft Plan.
- The opportunity should be taken in the supporting text to clarify the scale of the available allocated land.
- The special circumstances case for Green Belt release are contained in the explanatory text to Policy P1 and cross referenced at Paragraph 863. There is no need for Paragraph 859 to try and summarise this again.

Change suggested by respondent:

The opening sentence of the Policy UK2 should be amended to read:

“This site is allocated for employment development. It provides for general local employment needs together with the needs associated with the key economic assets in the UK Central Solihull Hub Area, and for a potential relocated Household Waste and Recycling Centre and Depot as set in Policy P12”

2. Paragraph 859 should be amended to read as follows:

“This is an employment land release of c94 ha (gross). Allowing for development already committed/built and green/blue infrastructure requirements the allocated area amounts to c39 ha. net. It will provide additional employment land to meet wider identified needs, together with providing for future expansion for JLR and JLR related activities and ancillary development to Birmingham Airport. Part of the site also provides a potential option for a relocated Household Waste and Recycling Centre and Depot as set out in Policy P12.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Attachments:

10741

Object

Policy P17 Countryside and Green Belt

Respondent: PRW Strategic Advice

Summary:

Summary

The approach to limited infill in the Green Belt proposed in Policy P17 has been found to be perverse in recent Appeal Decisions but has been carried forward into the Draft Submission Local Plan. This is not justified and not consistent with national planning policy and law and so renders the Plan unsound as currently drafted.

Please see full text of attached doc.

Change suggested by respondent:

Summary

Amend Policy P17 by way of deletions from para 3(i) of the policy and para 423 of the supporting text.

Please see full text of attached doc

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14361

Object

Policy P12 Resource Management**Respondent:** Bryan Pugh**Summary:**

Objection over the proposal to move the Bickenhill Household Waste Recycling Centre to Damson Parkway due to Greenbelt erosion and potential additional traffic and pollution.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14433

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Graham Pugh**Summary:**

I am pleased to see the sites are replacing existing premises that are no longer required

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14435

Object

Blythe**Respondent:** Graham Pugh**Summary:**

I am concerned with the new proposals to build 15,000 homes which will take up considerable areas in sites (2) and (3) as per the outlined plans.

Dickens Heath is a cramped maze.

Surgeries/health care centres will need to be introduced.

The same principal will apply to new schools.

Our road network is also under pressure.

Planning officers to seek advice from the chief architect etc.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10725

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Matthew Quinn**Summary:**

The plan is not consistent with maintaining the Meriden Gap. It builds over 1000 houses on the narrowest part of this. Whilst the green areas between new and old housing is pleasing it is hard to see how the infrastructure will be built correctly with so many different landowners on this site.

Change suggested by respondent:

The population of the village following the addition of at least 1615 houses is likely to rise to at least 11,500 which would justify 56ha to accord with the local standards – Policy P20/10. So not only has the opportunity to redress the shortage been missed but the situation is worsened. The concept plan also suggests an area of possible future development for 300 more houses on Barratt's Farm post HS2 construction. It does not allocate any POS supporting these houses.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11091

Object

Blythe**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Sustainability Appraisal has not fairly considered reasonable alternatives in respect of levels of housing growth. Higher levels of growth perform equally as well as the Plan's preferred approach- Option 2. The Sustainability Appraisal demonstrates that a higher level of housing growth could be accommodated sustainably.

Only two spatial options (at either Balsall Common or land south of the A4) were put forward by the Council to assess the level of growth associated with Option 4 which could skew the conclusions of the Sustainability Appraisal.

The two spatial options were selected from the GBHMA Strategic Growth Study not the Council's own SHELAA evidence. The Sustainability Appraisal should have assessed options at levels of growth above 16,000 dwellings utilising its own evidence base.

Change suggested by respondent:

The Sustainability Appraisal should be updated to re-consider higher levels of housing growth.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11102

Object

Blythe**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

There are a number of inaccuracies in the specific assessment of Site 404 (TG3 West of Rumbush Lane) in the Sustainability Appraisal, including the distance to the nearest primary school (should be a light green), landscape sensitivity (should be a grey), distance to greenspace (should be a grey) and distance to a heritage asset (should be a light green). The site performs well and there are no significant adverse effects or reasons to not allocate the land.

Change suggested by respondent:

The Sustainability Appraisal of Site 404 should be amended to reflect the updated and correct position.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11103

Object

Spatial Strategy**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Plan should contain strategic policies which set out the overall strategy for development. The absence of a clear Spatial Strategy and settlement hierarchy makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan.

Change suggested by respondent:

The Spatial Strategy should be clearer as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11104

Object

Spatial Strategy**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

Options A to D propose growth around high frequency public transport corridors and hubs. The definition of 'high frequency' in relation to rail stations is unnecessarily strict and not consistent with Paragraph 102 of the National Planning Policy Framework.

Certain sites might fall within Options E to G as well as under Options A to D. It is unclear whether the three further criteria introduced at paragraph 65 which inform the location of growth take precedence over Options A to G.

Change suggested by respondent:

All rail stations should fall within the category of high frequency public transport corridors or hubs (Growth Option A).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11105

Object

Spatial Strategy**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The site selection methodology which is set out in the Topic Paper departs from national policy in relation to Green Belt. It does not first consider previously developed land and land well served by public transport, and it makes no reference to whether the loss of Green Belt can be offset through compensatory improvements to the remaining Green Belt. The implications of the Spatial Strategy and site selection methodology are that Green Belt sites that perform well in relation to national policy were not selected.

Site 404 (Land west of Rumbush Lane, Tidbury Green) is well served by public transport and offers compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. The Site Assessment completely ignores the existence of Wythall Rail Station and Appeal Decision APP/Q4625/A/14/2220892. The Accessibility Study has also incorrectly assessed the site. The site is a lower performing site in Green Belt terms and should therefore be a Priority 5 site and an allocation.

Change suggested by respondent:

The Site Selection methodology should be amended to reflect Paragraph 138 of the Framework. The Site Selection should include an allocation of land west of Rumbush Lane, Tidbury Green.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11106

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

Policy P17 makes no reference to safeguarding land within the Green Belt.

Change suggested by respondent:

The Plan should be amended to include safeguarded land to accommodate longer term development needs.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11108

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Solihull Strategic Green Belt Assessment does not make recommendations for amendments to the Green Belt boundary but that it forms the basis for more detailed assessment. There is no evidence of any more detailed assessment. The Assessment was prepared in 2016 and therefore pre-dates the current version of the National Planning Policy Framework.

There are inaccuracies in relation to the assessment of Site 404 (Parcel RP75). Development of the site would not result in the built form of Tidbury Green being any closer to Dickens Heath than exists at present. The site has strong defensible boundaries and should be viewed as a 'rounding off' of the settlement. The site should be regarded as 'lower performing' in the Assessment.

Change suggested by respondent:

The Strategic Green Belt Assessment should be updated and corrected in relation to its Assessment of Site 404 (Parcel RP75).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11110

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Council need to be mindful of any changes arising from the Government' stated intention to change the method for calculating Local Housing Need prior to submission of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11111

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Local Plan is more likely to be adopted in 2022, and therefore the housing requirement and the Plan should be extended to 2037.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption (2022).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11112

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The employment uplift on the Local Housing Need, to take account of the job growth at UK Central, is based on the assumption that only 25% of the jobs will be filled by people residing in Solihull. The Plan is not sound on the basis of accepting such high levels of inward commuting.

Change suggested by respondent:

The housing requirement should be increased to take account of the employment uplift, particularly in the absence of any evidence that neighbouring areas are intending to accommodate higher housing numbers as a consequence.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11114

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

If all of the Local Housing Need contributed 40% affordable housing it would not meet the identified affordable housing need in the HEDNA (578 homes per annum).

Change suggested by respondent:

The housing requirement should be increased to take account of affordability within the Borough.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11115

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

The Plan does not fully address unmet housing needs. There is no evidence why the contribution is only 2,105 homes to Birmingham's unmet needs, if this level is agreed with Birmingham/other neighbouring authorities, or that the unmet needs that remain are to be addressed elsewhere. The Council has suggested the unmet needs of Black County Authorities can be dealt with as part of the next review of the Local Plan. With an early review the proposed Green Belt boundaries within this Plan will need to be altered at the end of the Plan period and therefore consideration must be given in this Plan to safeguarding land.

Change suggested by respondent:

The housing requirement should be amended to take account of unmet housing needs.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11120

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited**Agent:** Marrons Planning**Summary:**

There are a number of objections to how the Council has calculated supply over the plan period;

- The UK Central site is unlikely to see any completions for several years post plan adoption. There are substantial infrastructure requirements and these have not been robustly assessed/costed meaning the Plan is not justified.
- No evidence in relation to housing trajectories for the proposed allocations means the figure of 5,270 homes to be delivered by 2036 is not justified.
- No evidence on the delivery of 861 units at the Solihull Town Centre (Site 8).
- The estimated level of windfalls completed over 14 years is not justified.
- In the SHELAA there are Existing Sites and Communal Dwellings where it appears there may be calculation errors.

The Plan will not provide for a five year housing land supply upon adoption. Three years' worth of windfalls are included within the supply rather than two and there is 350 homes on allocated sites without clear evidence on delivery.

Discounting these two sources puts the supply under five years.

Change suggested by respondent:

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended.

The housing requirement should be expressed as a minimum figure.

The housing supply should contain a buffer of 10% over the housing requirement.

Policy P5 and the table of allocated sites should be amended to include land west of Rumbush Lane, Tidbury Green.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14688

Object

Foreword**Respondent:** Rainier Developments Limited (School Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

The SA has not fairly considered reasonable alternatives in respect of levels of housing growth. The level of growth was pre-determined prior to undertaking the SA this year and has therefore not been informed by the SA in accordance with the Framework.

Option 2 (15,000 dwellings) is the Plan's preferred approach in light of the SA, and yet higher levels of growth perform equally as well. The only tangible difference between Option 3 (16,000 dwellings) and Option 2 is that Option 3 has a negative effect in relation to resource efficiency (resulting from greater generation of waste) whereas Option 2 is regarded as neutral

Option 4 (19,000 dwellings) is a sizeable jump from Option 3 without any explanation in the SA as to why it was selected over lesser options. Only considering two spatial options for this higher level of growth clearly has the potential to skew the conclusions of the SA.

It is acknowledged that the SA has to be manageable, and cannot consider endless alternatives and permutations. However, given the importance of testing higher levels of housing growth in light of the scale of unmet need arising from the neighbouring authority, the SA should have undertaken a finer grain analysis of options at levels of growth above 16,000 dwellings utilising its own evidence base of available and suitable sites.

The SA does therefore not provide a sound evidence base for not pursuing higher levels of housing growth in order to meet the housing requirement

It is noted that Site 416 (Land north of School Road, Hockley Heath) has not been assessed within the SA even though the site was submitted to the Council in 2018. However, the Site Assessment makes reference to the SA of AECOM 59 (the adjoining site), there are a number of effects identified that can easily be mitigated and avoided

Change suggested by respondent:

The SA should be updated to re-consider higher levels of housing growth using a more refined approach.

The Land north of Stratford Road, Hockley Heath should be assessed within an updated SA.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14689

Object

Spatial Strategy

Respondent: Rainier Developments Limited (School Road Hockley Heath)

Agent: Marrons Planning

Summary:

The Plan should contain strategic policies which set out the overall strategy for development, and therefore the Plan is not sound on this basis.

The absence of a clear Spatial Strategy and indeed settlement hierarchy therefore makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan.

Furthermore, within the evidence base, the Site Selection Topic Paper includes an entirely new set of hierarchy criteria, which has been used to inform the site selection.

Change suggested by respondent:

The Spatial Strategy should be set out as a strategic policy in the Plan.

The Spatial Strategy should be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14690

Object

Hockley Heath

Respondent: Rainier Developments Limited (School Road Hockley Heath)

Agent: Marrons Planning

Summary:

Hockley Heath certainly contains a range of facilities for everyday needs, and includes a primary school. The one key service lacking in the village is a doctors surgery as noted in the Plan8 . However, there are no proposals within the Plan to address the lack of this facility which is a missed opportunity to create a more sustainable pattern of development. In fact, in proposing an allocation of only 90 dwellings and nothing else, the existing problem is only compounded by increasing the population in the settlement.

Based on the Spatial Strategy as drafted, a proportionate addition is supported by the Plan. Again, proportionate is not defined within the Plan. Hockley Heath has a population in excess of 2,000 with circa 800 households, and yet only one allocation is proposed for 90 dwellings and overall only 141 dwellings are expected to be delivered in the Plan period . An increase in the size of the settlement by circa 15% is a relatively small proportionate increase, and it is noted that the proposed increase in the size of Hockley Heath is significantly less than other settlements of similar size (such as Cheswick Green which is proposed to accommodate 1,000 dwellings).

The Spatial Strategy would therefore appear to support a much higher level of growth in Hockley Heath than has been allocated in the sites selected.

It is considered therefore that selecting one site of 90 dwellings in Hockley Heath does not reflect the Spatial Strategy, unnecessarily constrains growth in a sustainable location, and misses an opportunity to enhance the sustainability of the settlement through the delivery of key services in the form of land for a doctors surgery and new two form entry primary school on Site 416. It is in an accessible location, it is a lower performing site in Green Belt terms, and is therefore a Priority 5 site

Change suggested by respondent:

The Site Selection should include an allocation of land north School Road, Hockley Heath

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14691

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Limited (School Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Policy P17 makes no reference to safeguarding land within the Green Belt. There is no reference to any consideration being given to safeguarding land.

It is considered necessary for the Plan to safeguard land in order to meet longer-term development needs. Exceptional circumstances exist in that:

- a. the local authority is significantly constrained by Green Belt with opportunities outside it very limited;
- b. unmet needs within the Housing Market Area already exist (see representations under the housing requirement and the Council propose to deal with them through the next review of the Plan); and,
- c. there are no neighbouring Councils who have expressed a willingness to take any unmet needs arising from Solihull thereby meaning the next review of the Plan will need to release land from the Green Belt.

This Plan should therefore be safeguarding land in order to ensure there is a degree of permanence to the boundaries proposed within this Plan.

Change suggested by respondent:

The Plan should be amended to include safeguarded land to accommodate longer term development needs

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14692

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (School Road Hockley Heath)**Agent:** Marrons Planning

Summary:

The housing requirement is not sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons.

LHN: The minimum Local Housing Need (LHN) has been calculated using the standard method which is well established and is not disputed. However, the Council will need to be mindful of any changes arising from the Government's stated intention to change the method for calculating LHN prior to submission of the Plan.

Plan Period: It is highly unlikely that the Local Plan will be adopted in 2021, thereby providing a plan period of 15 years post adoption as recommended by the Framework. On the basis that it is already December 2020 and the Plan has not been submitted, it is more likely to be adopted in 2022, and therefore the housing requirement and the Plan should be extended to 2037.

Employment uplift: LHN is afforded an employment uplift of nine dwellings per annum to take account of the substantial job growth at UK Central of around 13,000 net additional jobs. This is a figure which could increase as plans crystallise, and it is noted that the Council's Viability Study (2020) predicts up to 77,500 jobs by 2040. The Plan also justifies the small uplift from LHN on the assumption that only 25% of the jobs will be filled by people residing in Solihull, with the remainder in commuting from neighbouring areas. Taking this approach will 'bake-in' inward commuting reflecting an historic pattern of movement rather than shaping growth to be more sustainable by locating homes close to where work is

Affordability uplift: The housing requirement should also be increased to take account of affordability within the Borough, consistent with national guidance. The identified affordable housing need is 578 homes per annum (HEDNA para 35). However, the Council has reached the conclusion that the maximum amount that can be viably sought is 40% on any given scheme. This top line is substantially less than the evidence suggests, and in reality, 322 per annum is unlikely given the sources of supply, despite the Housing Topic paper (Paragraph 73) noting other methods for maximising affordable housing provision. The Housing Topic paper notes at footnote 10 that this reduced to 224dpa if households already in accommodation are excluded, however the HEDNA is clear that the figure is theoretical and should not be seen to minimise the acute housing need in the borough.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14694

Object

Foreword**Respondent:** Rainier Developments Limited (School Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Unmet needs: The Plan does not fully address unmet housing needs and the housing requirement should be increased accordingly. The Plan does not fully address unmet housing needs and the housing requirement should be increased accordingly. Paragraph 227 of the Plan advises that Birmingham has unmet needs (37,900 homes), and paragraph 228 advises that the Plan is proposing a contribution of 2,105 homes towards unmet needs. However, there is no evidence that this level of contribution is agreed with Birmingham or other neighbouring authorities, or that the unmet needs that remain are to be addressed elsewhere. There is no evidence as to why the contribution is only 2,105 homes.

In addition to Birmingham's needs, it is also noted the Black County Authorities estimate unmet housing needs of 29,260 homes and up to 570ha of employment land to 2038, and have written to the Council notifying them. The Council has suggested their unmet needs can be dealt with as part of the next review of the Local Plan. However, that is not evidence of effective joint working, but rather deferring its consideration which is evidence of an unsound Plan in being contrary to paragraph 35 c) of the Framework.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14695

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (School Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Allocated Sites: The absence of any evidence in relation to housing trajectories for the proposed allocated sites means that the figure of 5,270 homes to be delivered by 2036 is not justified.

Windfalls: The estimated level of windfalls at 2,800 homes completed over 14 years is not justified. Firstly, whilst it is stated that windfalls are not included for the first 3 years (to avoid double counting with extant planning permissions) only 2 years have been discounted. Secondly, the annual average level of windfall is substantial for an authority significantly constrained by Green Belt. Reliance is placed on historic trends, but there is no certainty that past sources of supply are likely to continue. The evidence should be so compelling that it is a source of supply that can be relied upon for delivering the housing requirement.

Five Year Supply on adoption: The Plan will not provide for a five year housing land supply upon adoption. The Plan assumes that 1,170 homes will be delivered on allocated sites within the first five years but there is no evidence to support this

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14649

Object

Foreword**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning**Summary:****Sustainability Appraisal:**

The SA has not fairly considered reasonable alternatives in respect of levels of housing growth. The level of growth was pre-determined prior to undertaking the SA this year, and has therefore not been informed by the SA in accordance with the Framework.

Option 2 (15,000 dwellings) is the Plan's preferred approach in light of the SA, and yet higher levels of growth perform equally as well. The only tangible difference between Option 3 (16,000 dwellings) and Option 2 is that Option 3 has a negative effect in relation to resource efficiency (resulting from greater generation of waste) whereas Option 2 is regarded as neutral

Option 4 (19,000 dwellings) is a sizeable jump from Option 3 without any explanation in the SA as to why it was selected over lesser options. Only considering two spatial options for this higher level of growth clearly has the potential to skew the conclusions of the SA.

It is acknowledged that the SA has to be manageable, and cannot consider endless alternatives and permutations. However, given the importance of testing higher levels of housing growth in light of the scale of unmet need arising from the neighbouring authority, the SA should have undertaken a finer grain analysis of options at levels of growth above 16,000 dwellings utilising its own evidence base of available and suitable sites.

The SA does therefore not provide a sound evidence base for not pursuing higher levels of housing growth in order to meet the housing requirement

In relation to the specific assessment of Site 417 (AECOM59a West of Stratford Road, Hockley Heath), there are a number of effects identified that can easily be mitigated and avoided. The SA has indicated a number of significant negative effects for some of the proposed allocations (not least UK Central), but that on-site mitigation has been taken into consideration in the selection of the allocations.

Change suggested by respondent:

The SA should be updated to re-consider higher levels of housing growth using a more refined approach.

The Site 417 (AECOM59a West of Stratford Road, Hockley Heath) should be amended to reflect the updated position.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14650

Object

Spatial Strategy

Respondent: Rainier Developments Limited (Stratford Road Hockley Heath)

Agent: Marrons Planning

Summary:

The Plan should contain strategic policies which set out the overall strategy for development, and therefore the Plan is not sound on this basis.

The absence of a clear Spatial Strategy and indeed settlement hierarchy therefore makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan.

Furthermore, within the evidence base, the Site Selection Topic Paper includes an entirely new set of hierarchy criteria, which has been used to inform the site selection.

Change suggested by respondent:

The Spatial Strategy should be set out as a strategic policy in the Plan.

The Spatial Strategy should be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14652

Object

Hockley Heath

Respondent: Rainier Developments Limited (Stratford Road Hockley Heath)

Agent: Marrons Planning

Summary:

Hockley Heath certainly contains a range of facilities for everyday needs, and includes a primary school. The one key service lacking in the village is a doctors surgery as noted in the Plan8 . However, there are no proposals within the Plan to address the lack of this facility which is a missed opportunity to create a more sustainable pattern of development. In fact, in proposing an allocation of only 90 dwellings and nothing else, the existing problem is only compounded by increasing the population in the settlement.

Based on the Spatial Strategy as drafted, a proportionate addition is supported by the Plan. Again, proportionate is not defined within the Plan. Hockley Heath has a population in excess of 2,000 with circa 800 households, and yet only one allocation is proposed for 90 dwellings and overall only 141 dwellings are expected to be delivered in the Plan period9 . An increase in the size of the settlement by circa 15% is a relatively small proportionate increase, and it is noted that the proposed increase in the size of Hockley Heath is significantly less than other settlements of similar size (such as Cheswick Green which is proposed to accommodate 1,000 dwellings).

The Spatial Strategy would therefore appear to support a much higher level of growth in Hockley Heath than has been allocated in the sites selected.

It is considered therefore that selecting one site of 90 dwellings in Hockley Heath does not reflect the Spatial Strategy, unnecessarily constrains growth in a sustainable location, and misses an opportunity to enhance the sustainability of the settlement through the delivery of key services in the form of land for a doctors surgery and new two form entry primary school on Site 417.

Change suggested by respondent:

The Site Selection should include an allocation of land west of Stratford Road, Hockley Heath

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14653

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Policy P17 makes no reference to safeguarding land within the Green Belt. There is no reference to any consideration being given to safeguarding land.

It is considered necessary for the Plan to safeguard land in order to meet longer-term development needs. Exceptional circumstances exist in that:

- a. the local authority is significantly constrained by Green Belt with opportunities outside it very limited;
- b. unmet needs within the Housing Market Area already exist (see representations under the housing requirement and the Council propose to deal with them through the next review of the Plan); and,
- c. there are no neighbouring Councils who have expressed a willingness to take any unmet needs arising from Solihull thereby meaning the next review of the Plan will need to release land from the Green Belt.

This Plan should therefore be safeguarding land in order to ensure there is a degree of permanence to the boundaries proposed within this Plan.

Change suggested by respondent:

The Plan should be amended to include safeguarded land to accommodate longer term development needs

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14654

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

The housing requirement is not sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons.

LHN: The minimum Local Housing Need (LHN) has been calculated using the standard method which is well established and is not disputed. However, the Council will need to be mindful of any changes arising from the Government's stated intention to change the method for calculating LHN prior to submission of the Plan.

Plan Period: It is highly unlikely that the Local Plan will be adopted in 2021, thereby providing a plan period of 15 years post adoption as recommended by the Framework. On the basis that it is already December 2020 and the Plan has not been submitted, it is more likely to be adopted in 2022, and therefore the housing requirement and the Plan should be extended to 2037.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14656

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Employment uplift: LHN is afforded an employment uplift of nine dwellings per annum to take account of the substantial job growth at UK Central of around 13,000 net additional jobs. This is a figure which could increase as plans crystallise, and it is noted that the Council's Viability Study (2020) predicts up to 77,500 jobs by 2040. The Plan also justifies the small uplift from LHN on the assumption that only 25% of the jobs will be filled by people residing in Solihull, with the remainder in commuting from neighbouring areas. Taking this approach will 'bake-in' inward commuting reflecting an historic pattern of movement rather than shaping growth to be more sustainable by locating homes close to where work is

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14659

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning

Summary:

Affordability uplift: The housing requirement should also be increased to take account of affordability within the Borough, consistent with national guidance. The identified affordable housing need is 578 homes per annum (HEDNA para 35). However, the Council has reached the conclusion that the maximum amount that can be viably sought is 40% on any given scheme. This top line is substantially less than the evidence suggests, and in reality, 322 per annum is unlikely given the sources of supply, despite the Housing Topic paper (Paragraph 73) noting other methods for maximising affordable housing provision. The Housing Topic paper notes at footnote 10 that this reduced to 224dpa if households already in accommodation are excluded, however the HEDNA is clear that the figure is theoretical and should not be seen to minimise the acute housing need in the borough.

Allocated Sites: The absence of any evidence in relation to housing trajectories for the proposed allocated sites means that the figure of 5,270 homes to be delivered by 2036 is not justified.

Windfalls: The estimated level of windfalls at 2,800 homes completed over 14 years is not justified. Firstly, whilst it is stated that windfalls are not included for the first 3 years (to avoid double counting with extant planning permissions) only 2 years have been discounted. Secondly, the annual average level of windfall is substantial for an authority significantly constrained by Green Belt. Reliance is placed on historic trends, but there is no certainty that past sources of supply are likely to continue. The evidence should be so compelling that it is a source of supply that can be relied upon for delivering the housing requirement.

Five Year Supply on adoption: The Plan will not provide for a five year housing land supply upon adoption. The Plan assumes that 1,170 homes will be delivered on allocated sites within the first five years but there is no evidence to support this

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14660

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Limited (Stratford Road Hockley Heath)**Agent:** Marrons Planning**Summary:**

Unmet needs: The Plan does not fully address unmet housing needs and the housing requirement should be increased accordingly. The Plan does not fully address unmet housing needs and the housing requirement should be increased accordingly. Paragraph 227 of the Plan advises that Birmingham has unmet needs (37,900 homes), and paragraph 228 advises that the Plan is proposing a contribution of 2,105 homes towards unmet needs. However, there is no evidence that this level of contribution is agreed with Birmingham or other neighbouring authorities, or that the unmet needs that remain are to be addressed elsewhere. There is no evidence as to why the contribution is only 2,105 homes.

In addition to Birmingham's needs, it is also noted the Black County Authorities estimate unmet housing needs of 29,260 homes and up to 570ha of employment land to 2038, and have written to the Council notifying them. The Council has suggested their unmet needs can be dealt with as part of the next review of the Local Plan. However, that is not evidence of effective joint working, but rather deferring its consideration which is evidence of an unsound Plan in being contrary to paragraph 35 c) of the Framework.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land west of Stratford Road, Hockley Heath.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14769

Object

Foreword

Respondent: Rainier Developments Ltd - Land at Widney Manor Road

Agent: Marrons Planning

Summary:

The SA has not fairly considered reasonable alternatives in respect of levels of housing growth. The level of growth was pre-determined prior to undertaking the SA this year, and has therefore not been informed by the SA in accordance with the Framework.

Very little difference between Options 2 and 3 and the SA conclusions are inconsistent.

The SA demonstrates that a higher level of housing growth than 15,000 dwellings can be accommodated sustainably.

Option 4 (19,000 dwellings) is a sizeable jump from Option 3 without any explanation in the SA as to why it was selected over lesser options.

The SA does not provide a sound evidence base for not pursuing higher levels of housing growth in order to meet the housing requirement.

Change suggested by respondent:

The SA should be updated to re-consider higher levels of housing growth using a more refined approach.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14770

Object

Spatial Strategy**Respondent:** Rainier Developments Ltd - Land at Widney Manor Road**Agent:** Marrons Planning**Summary:**

Ambiguity and confusion within the Options and which Option a site may fall within. For instance, a limited expansion of a rural village/settlement (F) could well be near a high frequency public transport corridor and hub (A).

Paragraph 65 adds confusion by introducing three further criteria which inform the location of growth but don't relate in any way to Options A to G. It is unclear which takes precedence (A to G or Paragraph 65).

No definition of urban edge/ highly or less accessible settlements.

The absence of a clear Spatial Strategy and settlement hierarchy makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan.

Change suggested by respondent:

The Spatial Strategy should be set out as a strategic policy in the Plan.

The Spatial Strategy should be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

The Site Selection should include an allocation of land at Widney Manor Road.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14771

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Ltd - Land at Widney Manor Road**Agent:** Marrons Planning**Summary:**

No reference or consideration given to safeguarding land within the Green Belt. It is considered necessary for the Plan to safeguard land in order to meet longer-term development needs and ensure there is a degree of permanence to the boundaries proposed within this Plan. Exceptional circumstances do exist.

Change suggested by respondent:

The Plan should be amended to include safeguarded land to accommodate longer term development needs.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14772

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Ltd - Land at Widney Manor Road**Agent:** Marrons Planning**Summary:**

Paragraph 419 of the Plan makes reference to the Solihull Strategic Green Belt Assessment, and that its findings have been used to help justify the removal of land from the Green Belt. That statement is inconsistent with the Assessment itself which states on page 2 that it does not make recommendations for amendments to the boundary but that it forms the basis for more detailed assessment. There is no evidence of any more detailed assessment.

Disagree with the results of the Green Belt assessment for RP32. It should be a lower performing parcel.

Change suggested by respondent:

The Strategic Green Belt Assessment should be updated and corrected in relation to its Assessment of RP32 (land west of M42 at Brueton Park).

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14773

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rainier Developments Ltd - Land at Widney Manor Road**Agent:** Marrons Planning**Summary:**

The housing requirement and the Plan should be extended to 2037 based on likely adoption date.

Housing to reflect employment growth at UKC Hub not considered. Assumption that jobs filled by in-commuters is not sustainable. Housing requirement should be increased to account for employment uplift.

Housing requirement should be increased to take account of affordability issues.

Unmet housing needs of HMA not fully addressed. No agreement with other authorities on the approach and no evidence to support the figure proposed.

Unacceptable to propose an early review before a plan is submitted. In any event, additional Green Belt release will be required at this stage so land must be safeguarded.

Housing requirement should be expressed as a minimum.

Objections to how supply has been calculated. No evidence to support timely delivery of residential development at UKC, question deliverability of town centre allocation, issues with windfall assumptions, calculation errors in existing sites, no allocation of small sites.

The Plan will not provide for a five year housing land supply upon adoption. For all sites, there needs to be clear evidence that housing completions will begin within 5 years.

Change suggested by respondent:

The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.

The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.

There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.

Policy P5 and the table of allocated sites should be amended to include land at Widney Manor Road (site 407) for nine dwellings as shown on the illustrative masterplan appended. The site is available for affordable homes, or self-build and custom housing.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

14776

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Rainier Developments Ltd - Land at Widney Manor Road**Agent:** Marrons Planning**Summary:**

Site 407 (Land at Widney Manor Road) -The negative effects identified in the SA can be mitigated for example ecology, amenity and distance to local services. There are no significant adverse effects that would mean the site should not be allocated.

The site clearly falls within the first tier of the Spatial Strategy (Option A), not Option G as in the Site Assessment (yes, may need to revisit this). The site selection has not fairly considered the site and includes no sound reasons for not allocating it.

The Green Belt parcel within which the site is located is wide and does not reflect the site.

The site is suitable for nine dwellings as shown on the illustrative masterplan appended. It is:

- a. is developable, available and achievable;
- b. is low performing in Green Belt terms when correctly assessed
- c. has a low impact in landscape terms due to its enclosed nature;
- d. is sustainable being within walking distance of Widney Manor Rail Station and Solihull Town Centres.

As a site of 1ha, it would make a contribution to addressing the failure of the Plan to identify sufficient small sites.

Change suggested by respondent:

The Land off Widney Manor Road should be re-assessed within an updated SA.

The Plan should include an allocation of land at Widney Manor Road (Site 407).

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14580

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Rainier Developments Ltd - Land Fronting Waste Lane**Agent:** Marrons Planning**Summary:**

Whilst Site BC4 is an appropriate location for residential development, object to the detail of the policy.

Firstly, designation on the Concept Masterplan of part of the site adjacent to Waste Lane (Site 408) as semi-improved grassland-significant habitat value is not justified. The Ecological Assessment identifies the site as 'improved grassland', a habitat of low to negligible nature conservation importance and the Sustainability Appraisal finds no record of priority habitats or species. An ecological assessment review has been prepared which concludes that the land supports species-poor improved grassland of low to negligible ecological value, and should not be protected by the Plan. In design and accessibility terms, the site is a logical infill and key gateway that connects the existing settlement with the proposed development beyond.

Secondly, the status of the concept masterplans is ambiguous

Change suggested by respondent:

The concept masterplan for Site BC4 should be amended to remove reference to semi-improved grassland – significant habitat value, and replaced with a medium density housing designation. The number of dwellings allocated in Policy BC4 should be increased.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14523

Object

Balsall Common**Respondent:** Rainier Developments Ltd - Land South of Park Lane**Agent:** Marrons Planning**Summary:**

The Sustainability Appraisal has not fairly considered reasonable alternatives in respect of levels of employment growth. Fails to appraise alternative levels or locations for employment growth. In fact, the level of growth was pre-determined prior to undertaking the SA this year, and has therefore not been informed by the SA in accordance with the NPPF.

Site 534 has not been assessed other than as part of a broad area

Change suggested by respondent:

The SA should be updated to consider higher levels of employment growth using a more refined approach, and alternative locations of employment.

An SA of Site 534 (land south of Kenilworth Road and south of Park Lane, Balsall Common) for employment uses should be undertaken as part of an update to the SA.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14525

Object

Spatial Strategy**Respondent:** Rainier Developments Ltd - Land South of Park Lane**Agent:** Marrons Planning**Summary:**

The absence of a clear Spatial Strategy and settlement hierarchy makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan. This makes it difficult to understand how the sites selected relate to the Strategy. No sites fall within Options A to D despite these being the 'starting position'. The Site Selection methodology departs from national policy by not first considering previously developed land and land well served by public transport, and not making reference to whether loss of Green Belt can be offset through compensatory improvements.

Site 534 south of Kenilworth Road/Park Lane,

Balsall Common is in part previously developed arising from its use by HS2, is well served by public transport given its proximity to Berkswell Rail Station, and offers compensatory improvements to environmental quality on the balance of land that cannot be developed. Site not assessed through Site Assessments despite only 2 constraints in SHELAA. There is a need for employment land and this area should be an option listed in paragraph 69

Change suggested by respondent:

The Spatial Strategy should be set out as a strategic policy in the Plan and be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

The Site Selection methodology should be amended to reflect NPPF Paragraph 138 and include an allocation of land south of Kenilworth Road/Park Lane as an employment allocation

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14526

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Ltd - Land South of Park Lane**Agent:** Marrons Planning**Summary:**

Policy P17 makes no reference to safeguarding land within the Green Belt, indeed there is no reference to any consideration being given to safeguarding land. The Plan should safeguard land in order to meet longer-term development needs, as Solihull is significantly constrained by Green Belt and there are no neighbouring Councils who have expressed a willingness to take any unmet needs arising from Solihull.

Change suggested by respondent:

Plan should be amended to include safeguarded land to accommodate longer term development needs

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14527

Object

Policy P17 Countryside and Green Belt**Respondent:** Rainier Developments Ltd - Land South of Park Lane**Agent:** Marrons Planning**Summary:**

Paragraph 419 of the Plan makes reference to the Solihull Strategic Green Belt Assessment, and that its findings have been used to help justify the removal of land from the Green Belt. That statement is inconsistent with the Assessment itself which states on page 2 that it does not make recommendations for amendments to the boundary but that it forms the basis for more detailed assessment. There is no evidence of any more detailed assessment, which should have been undertaken for Site 534 (land south of Kenilworth Road and Park Lane, Balsall Common).

Change suggested by respondent:

The Strategic Green Belt Assessment should be updated to include an Assessment of Site 534 (land south of Park Lane, Balsall Common)

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14531

Object

Sustainable Economic Growth**Respondent:** Rainier Developments Ltd - Land South of Park Lane**Agent:** Marrons Planning**Summary:**

Policy P3 fails to make sufficient provision of employment land to meet the needs of the area, including unmet needs of neighbouring areas, is overreliant on two large allocations whose delivery and land availability is uncertain, fails to match the spatial strategy of the Plan and has no regard to supply and demand in the HEDNA.

Policy is not consistent with national planning policy. It fails to provide a choice for businesses who wish to invest and expand, and fails to align with the locations for growth in housing leading to a less sustainable pattern of development.

Plan fails to provide a strategic policy that sets out the overall scale of development for employment. The minimum employment land requirement should be 15,680 jobs. There are limited opportunities for businesses in Balsall Common, existing supply is lower than stated but no reference is made to the shortfall of land for employment.

There is no evidence within the Plan of any contribution being made to meet the needs of neighbouring areas, such as the Black Country Authorities. Dealing with unmet needs through a review is contrary to the NPPF. Land should be safeguarded for future development needs to ensure that Green Belt boundaries endure.

Existing supply of 6.4ha of employment land is wholly inadequate.

The proposed allocations are complex with significant infrastructure requirements (Site UK1), there is no Concept Masterplan (Site UK2) and no trajectory for delivery of either. Neither site has any relationship with Spatial Strategy or housing growth

Change suggested by respondent:

The employment requirement should be set out within a strategic policy within the Plan, and increased to reflect past performance, evidence of supply and demand, the Local Industrial Strategy for the West Midlands Combined Authority and the unmet needs of the Black Country Authorities.

Evidence should be provided as to the availability and deliverability of the proposed allocations and the trajectory for their delivery or the sites should be removed.

Additional employment sites should be allocated to address the additional employment land requirement to ensure a continuous supply including an employment allocation at Balsall Common.

The table of allocated sites should be amended to include land south of Kenilworth Road/Park Lane, Balsall Common as an employment allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

15090

Object

Policy BL1 - West of Dickens Heath**Respondent:** Dejan Randjelovic**Summary:**

Loss of playing pitches.
 Loss of greenbelt will be detrimental to wildlife.
 Road network cannot take further development.
 These fields flood every winter.
 Mitigation measures included in the Plan are not achievable.
 The character and setting of the Village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11071

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Christopher Read**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill. Immediate environment of the windmill in danger, in order to best preserve this unique feature at its best it is necessary to protect the surroundings in order to be able to appreciate its original context as much as possible.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15137

Object

Foreword**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

No statements of common ground have been prepared at the publication stage. It is unclear if effective and joint working has been undertaken, particularly in respect of unmet housing needs from the HMA. There is a significant gap in the Council's evidence base on meeting its legal obligations under the Duty.

The housing need across the HMA beyond 2031 has been overlooked. There could be an emerging unmet need for some 39,605 dwellings for the period 2031 to 2036.

Solihull must engage on how to address the significant shortfall in housing needs of the Black Country. Delaying further consideration does not meet the legal test under the 2011 Act.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15139

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The amount of growth allocated to Meriden is just 1.2% of the overall total allocation in the Plan. The level of growth proposed does not reflect the need for proportionate growth to the settlement consistent with the spatial strategy. The concentration of growth on a small number of strategic sites goes against the 'balanced dispersal' approach.

Change suggested by respondent:

Further consideration should be given to increasing the allocation of land at smaller settlements.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15140

Object

Policy P5 – Provision of Land for Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The current estimate of housing need may be insufficient and will require an upward adjustment. The local housing need figure for Solihull is likely to increase from 807 dwellings to 1,011 dwellings under the emerging methodology published in August 2020. Greater measures should be taken to address the scale of affordable housing need, including setting a requirement in excess of the baseline need figure.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15141

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Disagree with the selection of a single proposed housing allocation in Meriden. The Council has failed to recognise the characteristics of the population and households in Meriden. A higher housing requirement between 187 to 352 new dwellings would support Meriden's continued role and function as a local service centre.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15142

Object

Policy P5 – Provision of Land for Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The contribution to the unmet housing needs from the wider HMA should be specifically set out in policy so the Council can be held accountable.

Very little weight should be attributed to the GBBCHMA Housing Position Statement in relation to Birmingham's housing shortfall until the figures have been properly tested. Reliance should be placed on the current formal position- a base shortfall of 37,900 dwellings.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15143

Object

Policy P5 – Provision of Land for Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

A stepped trajectory would deliver housing at a lower rate for several years from the date of adoption. Greater consideration should be given to finding more small and medium size sites which would deliver early thus negating the need for a stepped trajectory.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15144

Object

Policy P5 – Provision of Land for Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The Council has not built any measure of flexibility in the overall supply. There is no contingency against under-delivery from delays or slower rates of delivery than anticipated.

There are concerns on the reliance of windfall sites. It is not clear whether there is any site size limit and there is a clear risk of double counting against other components in the supply.

Additional contingency measures should be applied in order to cater for currently unforeseen and unknown circumstances.

Change suggested by respondent:

A minimum of an 11% flexibility allowance should be applied to the site allocations, an additional allocation of 650 dwellings.

To ensure that the housing requirement, including the wider HMA contribution, is given the best chance of being delivered, the allowance should be increased by 880 dwellings.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15145

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The Council's own evidence suggests that 'Land off Main Road, Meriden' (RP26 in the Green Belt Assessment report) performs less against the Green Belt purposes than the proposed allocation at Meriden (ME1). The preferred direction of growth at Meriden should be south of the settlement, rather than northwards.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15146

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The Site Assessment Report notes that 'Land off Main Road, Meriden' (site 522) is within a Minerals Safeguarding Area and has a Public Right of Way running through it- neither should prevent consideration for allocation.

The Site Assessment Report gives a negative sustainability score for the Site, with 15 negative effects and only 1 positive effect. This is inconsistent with the finding of the latest Sustainability Appraisal and needs to be amended.

The basis for excluding the site is flawed and not justified.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15147

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

'Land off Main Road, Meriden' falls within a sub-area which covers an extensive area of the Borough in the Landscape Character Assessment. The site should be considered at the margins of the sub-area. The overall findings do not adequately reflect the potential effects on the wider landscape.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15148

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

'Land off Main Road, Meriden' (site 522)' performs well against most of the Sustainability Appraisal Objectives, with no significant negative effects. The site should have not been scored 'neutral' against SA Objective 16, as the call for sites submission was made on behalf of the landowner clearly indicating it could come forward in the next five years.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15149

Object

Meriden**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The Council has concluded that 'Land off Main Road, Meriden' (site 522) should not be included in the plan under Step 2 of the Site Selection Process. This does not represent a fair reflection of the attributes and characteristics of the Site and contradicts the Council's own evidence. Defensible boundaries to the green belt can be achieved and be secured through policy criteria. The merits of the site in landscape terms has not been fairly judged.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15150

Object

UK Central Hub**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

The figure of 2,240 dwellings to be built at the NEC is not justified based on the evidence.

This level of growth will be dependent on the establishment of a new sub-housing market and on the delivery of HS2.

It is unclear whether it's realistic to expect the provision of apartment accommodation proposed to deliver the amount of affordable housing required.

It is assumed that the delivery of 2,500 homes at NEC will cover the entire NEC masterplan period up to 2047. Therefore, the expected delivery over the plan period would indicate a total of up to 1,380 homes could be delivered by 2036 (a reduction of 860 dwellings) based on the assumed level of growth in the masterplan.

Change suggested by respondent:

Additional land should be allocated to accommodate a further 1,740 dwellings (880 dwellings for flexibility buffer to the requirement and 860 dwellings for the revised housing delivery at NEC). 'Land off Main Road, Meriden' should be allocated for housing.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15151

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Disagree with the approach to Policy P4A Criteria 11 in terms of the following sentence 'The cost of the Council's qualified valuer will be met by the applicant'. This could lead the decision-taker to conclude that viability of development is threatened, and that the policy requirement should not be sought based on that evidence. In such cases the costs should be shared fairly between the applicant and the Council.

Policy P4A Criteria 12 is contrary to national policy and practice guidance which clearly define supplementary planning documents as not forming part of the development plan but which provide detail in support of it.

Change suggested by respondent:

Policy P4A Criteria 11 and 12 should be deleted.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15152

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Policy P4C prescribes a specific mix of open market housing on all allocated and other major development sites. This is inflexible, not positively prepared, and therefore not soundly-based.

Change suggested by respondent:

Policy should 'seek or encourage' the provision of a specific mix or a particular housing type to address particular needs where they arise.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15153

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Object to Policy P4D criteria 2. This is overly restrictive and onerous as demand for plots is likely to reflect wider demand for housing and may change over time. The demand for specific plots should be established prior to installing the necessary infrastructure connections.

Change suggested by respondent:

The wording in Policy P4D criteria 2 should be deleted or amended.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15154

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Policy P7 is not consistent with national policy and is not soundly based. The Policy draws no distinction between urban and rural locations in devising the criterion for assessing proposals in terms of accessibility. This results potentially in the unfair treatment of proposals brought to meet the needs of the rural area.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15155

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

There is no reasoned justification for Policy P9 Criteria 3i and 3ii. It does not recognise that not all proposals will be able to achieve these new standards without undermining their viability.

Change suggested by respondent:

Policy P9 Criteria 3i and 3ii should be deleted or amended.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15156

Object

Policy P17 Countryside and Green Belt**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

Policy P17 Criteria 1 seeks to apply a blanket protection to all areas of the countryside regardless of their 'intrinsic' character or 'value'. Any protections must be in response to an identified value or something intrinsically important to that location.

The Council seeks the protection of best and most versatile agricultural land without identifying those areas it considers worthy of safeguarding. National policy does not seek to prevent development on the best and most versatile agricultural land, but states that policies should recognise its economic and other benefits.

Change suggested by respondent:

Policy P17 Criteria 1 should either be deleted or amended to properly reflect national policy and available evidence

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15220

Object

Policy P5 – Provision of Land for Housing**Respondent:** Redrow Homes Ltd**Agent:** RPS Group**Summary:**

No statements of common ground have been prepared at the publication stage. It is unclear if effective and joint working has been undertaken, particularly in respect of unmet housing needs from the HMA. There is a significant gap in the Council's evidence base on meeting its legal obligations under the Duty.

The housing need across the HMA beyond 2031 has been overlooked. There could be an emerging unmet need for some 39,605 dwellings for the period 2031 to 2036.

Solihull must engage on how to address the significant shortfall in housing needs of the Black Country. Delaying further consideration does not meet the legal test under the 2011 Act.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10955

Object

Policy P12 Resource Management**Respondent:** Mr keith reynolds**Summary:**

I object to the plan to move the tip to Damson Parkway because Damson Parkway is a residential road and area already blighted by noise from the airport and from Land Rover. The traffic along Damson Parkway is already too high at peak times due to Rover traffic add to this Tip traffic we can expect to have difficulty even getting out of our road due to queuing traffic.

Not to mention the smell and vermin associated with the tip that will again blight the area.

Change suggested by respondent:

Leave the tip exactly where it is an area which has great road access and a road that queues dont cause any issues to any residents.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10957

Object

Policy UK2 - Land at Damson Parkway

Respondent: Mr keith reynolds

Summary:

Damson Parkway is a residential area and not a suitable place for a tip

Change suggested by respondent:

Tip should remain where it is and be extended at its current site.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10954

Object

Policy P12 Resource Management

Respondent: Mrs Tracey Reynolds

Summary:

The tip should not be put in a housing estate. The travel is far too heavy already with Land Rover. Damson Parkway could not take any more traffic for a tip. The queuing would completely block the area

Change suggested by respondent:

The tip should be relocated somewhere else

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14195

Support

Policy UK1 - HS2 Interchange**Respondent:** Louise Rhind-Tutt**Summary:**

Appreciates the need for new homes in the region.

Supports the new village close to the NEC/HS2 aka UK1 which would give residents access to some of the best transport links in the country.

Has potential of being a 'showcase' village.

Change suggested by respondent:

Supports Jeanette M

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14196

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Louise Rhind-Tutt**Summary:**

Prefers housing to be located at UK1 rather than in the Meriden Gap and Balsall Common with development on Greenbelt land restricted.

Supports Jeanette McGarry's suggestion that BC3 (Windmill Lane/Kenilworth Lane) should be protected from housing and used to create a country park to complement Berkswell's Grade II listed windmill.

Change suggested by respondent:

Creating a country park adjacent to the windmill would be a lovely enhancement for tourists and locals alike to enjoy and I am very excited at the prospect of looking around the windmill myself once it re-opens to the public.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14836

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Idverde UK Limited**Summary:**

Concept Masterplan follows a Placed Based approach.

Concept Masterplan is the outcome of a lengthy collaborative approach involving landowners, Arden Academy, parents, students, and many members of the local community who, alongside the Council, have sought to establish a Place-Based concept masterplan that all parties can support in principle.

Open and collaborative approach.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10780

Object

Foreword**Respondent:** Richard Cobb Planning**Summary:**

The Local Plan has been prepared without consideration of the wider needs of the community in terms of appropriate allocation of land for sustainable employment provision closer to growth communities, provision of adequate land in appropriate locations for religious, cultural and social facilities, adequate positive protection for significant listed buildings and provision of country parks to redress the balance of loss of Green Belt land for housing and employment.

Change suggested by respondent:

Provision of employment land should be made in Knowle and Balsall Common, sites should be allocated in the urban area for expanding religious, social and cultural facilities, and Country Park should be allocated on land around the Berkswell Windmill and around the fringe of Solihull Town Centre at the Berry Hall estate or Council and at Widney Manor Road.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10785

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Richard Cobb Planning**Summary:**

The allocation adds further unjustified pressure on the vital strategically important Meriden Gap.

While there a case could be made for the northern part of the site for around half the number of units to be released ,proposals for the extension into the southern part of the rest of the site into more open countryside is unjustified.

Masterplan fundamentally disregards the impact on the proper setting of historic Berkswell Windmill, it would extend housing development around the village of Balsall Common away from village services and facilities, when there are better and more sustainable sites closer to the village centre

Change suggested by respondent:

Removing either all or sensitive parts of BC3 need not mean that the overall proposed allocation of housing in Balsall Common cannot be fulfilled. In the submissions made in response to the Council's Call for sites many landowners responded and many of those sites are far better placed in relation to the village centre and closer to services than site BC3, so far more sustainable. The site assessment for many of these sites is better or equivalent to the assessment for BC3, The council have not properly considered those sites in terms of sustainability and/or impact on the Green Belt

Amongst those sites are

Site 82 – Land at Kenilworth Road capable to taking around 70 dwellings

Site 422 – Land at Rose Bank Balsall Street capable of taking 20 dwellings

Sile 421 – Land at Silver Tree Farm Balsall Street capable of taking 20 dwellings

Site 1 – Land at Springhill 433 Station Road, Balsall Common - 20 dwellings

Site 43 – Land adjacent to Old Lodge Farm, Kenilworth Road – 40 dwellings

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

10786

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Richard Cobb Planning**Summary:**

Stoney Croft has now been included within the red line for a proposed omission from the Green Belt and release for development. It is right and proper that their land is to be included with the rest of allocation of Trevallion Stud but in the latest masterplan much of their land is shown to be required as public open space.

No approaches were made by the Council to us before allocation of their land for public open space and the objectors as free standing landowners have rights to secure best value for their site.

Change suggested by respondent:

Greater clarity needs to be given as to how the objectors can secure some reasonable low density residential development of their land along with some open green space.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10787

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Richard Cobb Planning**Summary:**

Land is unconnected from main part of Balsall Common,

While much of that is to be welcomed in the two main areas of residential growth – Knowle and Balsall Common – no provision has been made of land for employment purposes to help to create a balanced community rather than commuter villages where the population has to travel usually by car to employment opportunities elsewhere. In both those communities' provision should be made in the Local Plan for a modest amount of employment land.

Change suggested by respondent:

Site should be allocated for employment uses not residential

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10788

Object

Balsall Common**Respondent:** Richard Cobb Planning**Summary:**

While much of that is to be welcomed in the two main areas of residential growth – Knowle and Balsall Common – no provision has been made of land for employment purposes to help to create a balanced community rather than commuter villages where the population has to travel usually by car to employment opportunities elsewhere. In both those communities' provision should be made in the Local Plan for a modest amount of employment land.

Change suggested by respondent:

In Balsall Common sites one or more of the following sites should be allocated for employment purposes. s

- Lavender Hall Farm site BC6
- Call for Sites site 1 – Springhill, 443 Station Road, Balsall Common
- Call for Sites site 43 – Land adjacent to Old Lodge Farm, Kenilworth Road

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

10789

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Richard Cobb Planning**Summary:**

While provision is being made for JLR needs at Damson Parkway and Arden Cross, and much of that is to be welcomed in the two main areas of residential growth – Knowle and Balsall Common – no provision has been made of land for employment purposes to help to create a balanced community rather than commuter villages where the population has to travel usually by car to employment opportunities elsewhere. In both those communities' provision should be made in the Local Plan for a modest amount of employment land.

Change suggested by respondent:

In Balsall Common allocate sites for employment purposes on one or more of the following sites

- Lavender Hall Farm site BC6
- Call for Sites site 1 – Springhill, 443 Station Road, Balsall Common
- Call for Sites site 43 – Land adjacent to Old Lodge Farm, Kenilworth Road

In Knowle an area within the Arden Triangle a suitable site should be allocated for employment uses.

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

10790

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Richard Cobb Planning**Summary:**

While there is clearly a need to make provision for self and custom build most housing allocations will be taken up by volume house builders. There is no mechanism put forward to explain how the Council will definitely ensure that appropriate parts of those sites will be specifically allocated for this purpose. Realistically volume house builders will earnestly resist having to provide sites for self or custom building.

Change suggested by respondent:

Each allocation should include a specific requirement for the developer to allocate land for those purposes and to facilitate those that wish to build houses that way.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10791

Object

Policy P5 – Provision of Land for Housing**Respondent:** Richard Cobb Planning**Summary:**

Paragraph 68 of the NPPF sets out that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.

Change suggested by respondent:

The Council should identify more small sites to cater for small builders who otherwise cannot secure sufficient land to carry them forward.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10792

Object

Policy P5 – Provision of Land for Housing**Respondent:** Richard Cobb Planning**Summary:**

Paragraph 68 of the NPPF sets out that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant planpolicies, that there are strong reasons why this 10% target cannot be achieved

Change suggested by respondent:

Council should include more small and meduim sites for local house builders many of which were submitted for consideration at Call for Sites stage and have been summarily discounted in favour of large sites for volume housbuilders. Each has their place and more small and medium sites should be allocated.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10794

Support

Policy SO1 - East of Solihull**Respondent:** Richard Cobb Planning**Summary:**

Support release of SO 1 from Green Belt for housing. Need to recognise free standing land owners who will cooperate with development as far as they are able.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10796

Object

Policy S02 - Moat Lane Depot**Respondent:** Richard Cobb Planning**Summary:**

Appropriate provision has not been made in the Local Plan for sites for expanding religious, cultural or social clubs that make up a balanced community. Such facilities are being frustrated by the Council in the lack of such provisions which could include part of the Moat Lane depot site which is perhaps the only site in Solihull which is brownfield and close to the community. Such provision could include some housing and retention of some of the employment land in Vulcan Road which this proposal seeks to remove.

Change suggested by respondent:

Allocate part of the site for expansion of the Renewal Church.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10805

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Richard Cobb Planning**Summary:**

Arden Eco Park was submitted under the Call for Sites as an employment site as it is long established as such. However the site never been properly considered by the LPA.

The site is strategically placed in the UK Central Zone and should be considered as a site for a Power from Waste development to service Arden Cross development area directly to the north.

That would be strategically located and make use of this brownfield site.

Change suggested by respondent:

Arden Eco Park should be allocated as a site for a Power from Waste site to service Arden Cross.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10808

Object

Policy P12 Resource Management**Respondent:** Richard Cobb Planning**Summary:**

The Council have not seriously considered proposals submitted for this site as a site for employment purposes which is already well established.

The development of the Arden Cross site directly to the north has emphasised the need to make decisions as to the future development of the site. Arden Eco Park is already recognised as a site for waste management. Developing an Energy from Waste facility on this site would directly meet the needs of Arden Cross.

Change suggested by respondent:

Allocate Arden Eco Park as an employment site and for an Energy from Power facility

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10809

Object

POLICY P13 Minerals**Respondent:** Richard Cobb Planning**Summary:**

Future use of Arden Eco Park for employment purposes and an Energy from Waste facility need to be considered properly and seriously, given the strategic location of this site. The frontage of the site is occupied by a large number of lawful businesses, and should be recognised for future development.

The designation of the Site as RIGS is not realistic in the Plan Period given that the clay extraction and restoration will have been largely completed and no working surface is likely to be visible.

Change suggested by respondent:

Allocate the Arden Eco Park site for employment uses and an Energy from Waste site and delete reference to a RIGS.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10810**Object****Policy P17 Countryside and Green Belt****Respondent:** Richard Cobb Planning**Summary:**

Greater certainty for the four listed infill settlements should be given by properly defining the settlement boundaries

Change suggested by respondent:

Define the settlement boundaries of Chadwick End, Cheswick Green, Millisons Wood and Tidbury Green

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10811**Object****Policy P19 Range and Quality of Local Services****Respondent:** Richard Cobb Planning**Summary:**

Inadequate provision is made in the Local Plan for the growth of religious, social and cultural facilities.

Renewal Church wish to significantly expand but their proposals for adjoining land have been rebuffed by the Council and no reasonable and sensible alternative has been suggested.

Change suggested by respondent:

Provision needs to be made on the Moat Lane depot site or a suitable alternative for Renewal Church to be able to grow.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10911

Support

Introduction**Respondent:** Richard Cobb Planning**Summary:**

I support the principles of the Local Plan in broad terms but do not consider that it addresses all the necessary issues in an objective and sensible way nor does it reflect the proper make up balanced communities.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10912

Object

Challenges**Respondent:** Richard Cobb Planning**Summary:**

Local Plan does not properly recognise the strategically important Meriden Gap in the way that new housing allocations have been substantially located in that segment of the Borough. This is an important area of open countryside possibly destined to be a National Park area which should be generally protected from substantial development other than to meet the needs of the communities within it.

While there may be some merit in the Arden Cross development for economic reasons that should not be the thin end of a wedge to encourage release of so much additional land in the Green Belt.

Change suggested by respondent:

The Local Plan should be prefaced by a Statement about the recognition of the Meriden Gap as a strategically important area that required continued protection from unnecessary development

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10914

Object

Challenges**Respondent:** Richard Cobb Planning**Summary:**

Under Challenge J the Local Plan should also include the need to allocate land to accommodate facilities for the spiritual needs of the Community. Many expanding religious groups are desperate to find suitable sites that can accommodate their needs to serve their congregation and the wider community which they also serve in support of Solihull Council.

Land is not allocated or available in the Local Plan as most land is allocated for housing without proper thought as to what makes up a balanced community.

Change suggested by respondent:

The Local Plan should make provision for land for expanding religious, social and cultural facilities

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10916

Object

Challenges**Respondent:** Richard Cobb Planning**Summary:**

The Local Plan fails properly to consider sites for employment uses in expanding settlements of Balsall Common and Knowle. The emphasis of the Local Plan is largely only on Land Rover needs, some high tech development within Arden Cross . No provision is made for local employment uses which at a modest scale could be accommodated in those growth settlements. While some residents will have to travel distances by car to get to centres of employment, the provision of at least some land in those settlements would serve the needs of those who cannot or will not want to travel.

Change suggested by respondent:

The Council should allocate sites around Balsall Common and in the Arden Triangle for employment uses.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10918

Object

UK Central Hub

Respondent: Richard Cobb Planning

Summary:

The Arden Eco Park site has not been properly considered in the Local Plan process but its direct relationship with HS2 and Arden Cross should afford it as both a site for employment uses and for an Energy from Waste facility to serve the needs of Arden Cross and the rest of the UK Central strategic site in which the lies.

Change suggested by respondent:

Allocate the Arden Eco Park site for employment uses and an Energy from Waste site.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10919

Object

Policy P3 Provision of Land for General Business and Premises

Respondent: Richard Cobb Planning

Summary:

The Local Plan does not properly address the need for provision of land for Local employment uses in Balsall Common and Knowle.

Change suggested by respondent:

Allocate land for employment uses on Balsall Common and Knowle

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10921

Object

Sustainable Economic Growth**Respondent:** Richard Cobb Planning**Summary:**

The Arden Eco Park site has been submitted under the Council's Call for Sites in relation to the Local Plan as land for business and employment uses given into extensive past history. The Local Plan has not recognised that submission and no provision is being made in the plan for the site to contribute positively to needs of the Solihull Economic Gateway which it is well placed to do. This would include employment uses as well as an Energy from Waste facility.

Change suggested by respondent:

The Arden Eco Park site should be allocated as a site for energy from waste and other related development as well as employment uses.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10922

Object

Policy S01 - East of Solihull**Respondent:** Richard Cobb Planning**Summary:**

Site of 147 Lugtrout Lane is a free standing site with the broad allocation of S01. The landowner is prepared to contribute her site to the larger housing site as long as she can develop the land with a few houses and can contribute to some open space provision. versions of the masterplan show her site included as a small development site but others do not show it. the matter needs clarification.

Change suggested by respondent:

Clearly indicate the site of 147 Lugtrout Lane as small housing site within the overall eventual masterplan

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10924

Object

UK Central Hub**Respondent:** Richard Cobb Planning**Summary:**

No opportunity is given in the consultation for making comments about Arden Eco Park which is located within the UK Hub Central corridor

Arden Eco Park is a major land use site which was submitted as an employment site under the call for sites but that request was not properly dealt with by the Council.

The EcoPark is well related to the HS2 Interchange and well placed to serve the Arden Cross Development and the area as whole in terms of employment uses and for an Energy from Waste facility to supply power to Arden Cross.

Change suggested by respondent:

Designated the Arden Eco Park for employment uses and an Energy from Waste Facility.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

13786

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Richard Cobb Planning**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10889

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Richborough Estates**Agent:** Star Planning and Development**Summary:**

Objection is made to Policy 4D on the basis that a more refined approach to the location of self and custom build plots across the Borough, reduce reliance on allocated housing sites delivering plot and specific self and custom build plots across the Borough. The trigger for self and custom build plots being based upon the number of market dwellings not all dwellings on a site. The submission of a 'sales strategy' for self and custom build plots.

Change suggested by respondent:

It is recognised that some of the matters raised in this objection may be suggested by the Council to be included in the proposed Supplementary Planning Document (SPD) but the policy context must be properly established in the Local Plan. Accordingly, the changes sought to make Policy P4D more effective are:

- a) A more refined approach to the location of self and custom build plots across the Borough, reduce reliance on allocated housing sites delivering plot and specific self and custom build plots across the Borough.
- b) The trigger for self and custom build plots being based upon the number of market dwellings not all dwellings on a site
- c) Submission of a 'sales strategy' for self and custom build plots. This would apply to all sites where such housing is provided. The content of what might be in a strategy can be included in the SPD.
- d) Deletion of any valuation requirement in favour of the 'sales strategy'. If the valuation requirement is maintained then the purchaser must pay.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10892

Object

Policy P17 Countryside and Green Belt**Respondent:** Richborough Estates**Agent:** Star Planning and Development**Summary:**

The settlement of Cheswick Green should be inset from the Green Belt. Additional land should be removed from the Green Belt to meet any potential shortfall in the provision of housing land during the plan period. This should include an omission site at Tanworth Lane, Cheswick Green. Additional land should be removed from the Green Belt and identified as safeguarded land.

Change suggested by respondent:

The modifications required are:

- 1) The settlement of Cheswick Green should be inset from the Green Belt.
- 2) Additional land should be removed from the Green Belt to meet any potential shortfall in the provision of housing land during the plan period. This should include an omission site at Tanworth Lane, Cheswick Green.
- 3) Additional land should be removed from the Green Belt and identified as safeguarded land.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

10894

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Richborough Estates**Agent:** Star Planning and Development**Summary:**

Richborough Estates supports the principle of the housing allocation at Frog Lane, Balsall Common (Policy BC2) and the timing of its delivery. It is an available, suitable and deliverable site for housing at one of the larger settlements within Solihull Brough which sits on a public transport corridor and has a range of facilities.

Objections are made to Policy BC2 related to the detailed requirements for the proposal. Alternative wording is proposed to provide some flexibility to ensure the policy is positively prepared, effective and justified.

Change suggested by respondent:

Policy BC2 need to be amended to ensure the Local Plan being positively prepared, effective and justified:

Criterion 1 should be amended to be “approximately” 110 dwellings.

Criteria 2(ii) and (iii) are capable of being combined. A single criterion saying “Subject to other masterplanning considerations, the western field is not proposed for housing but shall be retained and used for biodiversity improvements”

Criterion 2(iv) should be deleted.

Criterion 2(v) should be deleted

Criterion 2(vi) should be deleted

Criterion 2(vii) should be deleted

Criterion 3(iii) should be deleted. If a criterion is required then it should state “As part of any application a SuDS scheme shall be submitted”.

Criterion 4(i) - Justification of Policy BC2 it should be made clear that this off-setting approach is acceptable because the recreation ground is designated as Local Greenspace in the Neighbourhood Development Plan.

Concept Masterplan is broadly acceptable to Richborough Estates. However, Richborough Estates has an alternative access option to the one shown on the Concept Masterplan which cannot be included in this representation for commercial reasons. To avoid any future concerns associated with a “significant departure” then there should be recognition that the access location might change and some flexibility on this specific matter is required.

At Page 22 of the Council’s Concept Masterplan document a modification to text is required to state “Predominantly 2-storey medium density housing is appropriate in this semi-rural location. Approximately of 110 units can be accommodated on the site.”

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10902

Object

Policy BL1 - West of Dickens Heath

Respondent: Richborough Estates

Agent: Star Planning and Development

Summary:

Richborough Estates supports the principle of the housing allocation at land west of Dickens Heath (Policy BL1) and the timing of its delivery. It is an available, suitable and deliverable site for housing at one of the larger settlements within Solihull Brough which sits on a public transport corridor and has a range of facilities.

Objections are made to Policy BL1 related to the detailed requirements for the proposal. Alternative wording is proposed to provide some flexibility to ensure the policy is positively prepared, effective and justified.

The Akamba site should be excluded from the Green Belt

Change suggested by respondent:

Criterion 1 should be amended to be a “approximately” 610 dwellings.

Criterion 2(ii) should refer to “An enhancement to pedestrian connectivity along Tythe Barn Lane is proposed in order to provide a safer route to Whitlocks End Station.” Reference to the link across the canal can be retained.

Criterion 2(ii) should be deleted

Criterion 2(iii) increased to around 3.57 hectares based on 610 dwellings

Criterion 2(iv) should refer to “The potential for sports pitches to be provided on land to the north of Tythe Barn Lane.”

Criterion 2(v) should be amended to “Subject to other masterplanning considerations, the retention of Local Wildlife Sites, with potential for enhancement and an appropriate buffer to Tythe Barn Coppice ancient woodland provided.”

Criterion 2(vi) should be amended to state “As far as reasonably possible the retention of trees and hedgerows within the site and along Tythe Barn Lane to conserve the character of this approach into Dickens Heath”

Criterion 2(viii) a 2½% target for self and custom build plots.

Criterion 3(v) should be deleted. If a criterion is required then it should state “As part of any application a SuDS scheme shall be submitted”.

Under Criterion 6, the Concept Masterplan is objected to by Richborough Estates because it fails to identify the full housing capacity of the land proposed to be excluded from the Green Belt, including because the floodplain is incorrectly identified on the Council’s Concept Master Plan Document. The capacity is approximately 610 dwellings with 470 dwellings on land south of Tythe Barn Lane and some 40 dwellings on the Akamba site.

The Akamba should be removed from the Green Belt to recognise its future potential to be redeveloped for housing.

There would be clear Green Belt boundaries, similar to those proposed for the land to the east, utilising the strong hedgerow which defines the western boundary of Akamba and the Stratford upon Avon Canal to the north.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

10903

Object

Policy P17A Green Belt Compensation

Respondent: Richborough Estates

Agent: Star Planning and Development

Summary:

Richborough Estates Limited is supportive of Policy P17A as a matter of principle. The objection relates to the absence of further details about how a commuted sum might be calculated in accordance with Criterion 4. Richborough Estates proposed that this needs to be set out in a future Supplementary Planning Document referenced in Policy P17A.

Change suggested by respondent:

Reference to a future SPD to calculate the commuted sum.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments: None

10905

Object

Policy P17 Countryside and Green Belt**Respondent:** Richborough Estates**Agent:** Star Planning and Development**Summary:**

Reference to sports hubs in the Green Belt not being inappropriate development.

Change suggested by respondent:

Specific reference in Policy P17 to sports hubs in the Green Belt not being inappropriate development.

Legally compliant: Yes**Sound:** No**Comply with** Yes**duty:****Attachments:** None

10907

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Richborough Estates**Agent:** Star Planning and Development**Summary:**

Richborough Estates Limited is supportive of Policy P20 as a matter of principle. The policy should, however, include specific reference to the provision of sports hubs in the Green Belt of the type referred to in the individual sites requirements elsewhere in the Local Plan.

Change suggested by respondent:

Include specific reference to the provision of sports hubs in the Green Belt.

As a minor drafting point, the text at No. 13 should explicitly refer to "new or improved indoor sports and leisure facilities"

Legally compliant: Yes**Sound:** No**Comply with** Yes**duty:****Attachments:** None

10820

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr simon richmond**Summary:**

As above

Change suggested by respondent:

- 1) Proper consultation should have taken place, which it has not and items 104 to 107 should be taken out of the plan.
- 2) The area should be left in Green Belt
- 3) An alternative site should be found for the refuse facility

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10998

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mrs Mairead Ritchie**Summary:**

The village cannot sustain a development of this size. We have a small school, just lost our post office and no doctors. School Road already suffers from traffic congestion and this would make it worse. This is green belt land which is greatly used by residents and a much needed amenity. We cannot justify lifting it to make a developer rich. There are many brownfield sites in the region which can be used.

Change suggested by respondent:

The plan does not take account the nature of small villages. Their unique community is destroyed by mass development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14293

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Alison Robbins**Summary:**

- ☒ 39% of housing in Solihull borough to be located in Shirley South is unsustainable/disproportionate.
- ☒ Suggests buying larger houses within Solihull and turning them into estates to create higher density living.
- ☒ Revised proposal not suitable as there is a high volume of housing located in once area.
- ☒ Shirley already has huge amounts of congestion and the addition of new housing with only exacerbate the issues beyond control.
- ☒ Local rail not fit for purpose (not large enough to serve the additional requirements of large development). Inadequate parking at Whitlocks End, Shirley, Earlswood and Solihull Station.
- ☒ Doctors already struggling without additional strain from additional population.
- ☒ Site BL3 environmental issues from a flood point of view /wildlife displaced/well-established ponds providing a varied eco system.
- ☒ Needs to be more of a focus on smaller sites across the Borough

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14577

Object

Policy BL3 - Whitlock's End Farm**Respondent:** John Robbins**Summary:**

Object to Policy BL3;
 site is located on green belt land/ area will change from semi-rural to an urban sprawl - proposal is an amendment of the previous site and alternatives have not been considered - developing larger houses with large gardens within Solihull into small estates/flat (smaller footprint than larger houses) - high volume of houses in one area is unsustainable - further (existing) congestion/traffic issues within Shirley area , not enough space for infrastructure to be improved - Public transport poor/not able to cope with additional population - doctors overwhelmed with current population - flood risk generated by clearing site/ impact on ecosystem there - smaller sites across the borough is a better option.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14480

Object

Policy P19 Range and Quality of Local Services**Respondent:** Mr David Roberts**Summary:**

Most of the operational staff have been removed from Solihull town centre and are now based at Chelmsley Wood with policing in the south of the borough suffering as a result (increasing crime is evidence of this).

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14481

Object

Policy P18 Health and Wellbeing**Respondent:** Mr David Roberts**Summary:**

Solihull Hospital is not open for general use by Silhillians and the service provided by Birmingham and Solihull Hospital Trust is at hospitals in Birmingham and only minor injuries and emergencies are serviced from a small unit in Chelmsley Wood, which is difficult to access from south and central Solihull and controlled by the CCG. The service provision is already stretched.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14484

Object

Policy UK1 - HS2 Interchange**Respondent:** Mr David Roberts**Summary:**

■ The impact of this extra traffic in south east solihull will be enormous.

Change suggested by respondent:

■ -

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14486

Object

Blythe**Respondent:** Mr David Roberts**Summary:**

■ Little thought appears to have been given to traffic flow inputs.

Change suggested by respondent:

■ -

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14487

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr David Roberts**Summary:**

■ Little thought appears to have been given to traffic flow inputs.

Change suggested by respondent:

■ -

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14489

Support

Sustainable Economic Growth**Respondent:** Mr David Roberts**Summary:**

the objectives are commendable and can not be challenged although a better understanding of attracting new productive employment would help.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14491

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr David Roberts**Summary:**

Questions the amount of housing to be absorbed by Solihull needed for Birmingham and other surrounding areas.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14492

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Mr David Roberts**Summary:**

Transport policies are not occurring on recent developments.

The car parking capacity to service Dorridge rail station is inadequate now and the talk of a multi deck car park on the overflow carpark has been in the air for many years. This needs to happen now before any new developments on KN2, H1, KN1 as the impact of parking on local roads of station traffic is already a problem.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14493

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr David Roberts**Summary:**

Will all have congestion creating capability.

You can wait for hours in Dog Kennel Lane in the morning to get out on to the A3400.

KN2 housing number needs clarity.

the relocation of the Academy access off Warwick Road A4100 is the narrow pavement up Stripes Hill into Knowle village. This could be more hazardous than the existing narrow pavements on the current access to the school on Station Road.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14504

Support

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Mr David Roberts**Summary:**

Climate Changes are being addressed and that Economic Growth will be sustainable, that Inequality is being dealt with, that Sustainable Travel - bike and electric car - is encouraged and that our Health and Wellbeing is being thoroughly considered and improvements are coming

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10578

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Dr Phillipa Ann Roberts**Summary:**

Para 812 refers to opportunity sites and how the 2016 list is being kept up to date. Significant representations have been made about some of these sights but you do not provide the updated list as part of this LDP document. I consider that this should be provided as part of this consultation.

Specifically Sharmans Cross Road is pivotal in creating the Shirley to Solihull cycle route and yet you do not reference the current position on the inappropriate playing field development and the increased risk to pedestrians and cyclists that would result.

Change suggested by respondent:

To add the update schedule of opportunity development referred to in para 812 Schedule to take account of desirability of not adversely impacting proposed cycle route by inappropriate development of playing field and consequent increased traffic.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

14510

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mr Tom Roberts**Petition:** 2 petitioners**Summary:**

Objects to site BL3;

Concerns over the amount of traffic generated o Bills lane by the building of 300 houses on Woods Farm Lane.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14638

Object

Blythe**Respondent:** Jane Rock**Summary:**

Developments along Stratford road must have attractive frontages/ not too close to main carriageway because of effects of pollution - need to ensure enough greenspace is maintained in surrounding areas/in modern housing units .

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:**

10609

Object

Policy S01 - East of Solihull**Respondent:** Mr Graham Roderick**Summary:**

As a resident of Lugtrout Lane in Catherine-De-Barnes, I wish to voice my concerns and objection over the possible building of 700 new homes according to the SMBC Masterplan S01 East of Solihull. I recognize that SMBC have to provide a solution to the identified housing shortage, but I ask you to review your intention to include this particular site in the plan on the grounds listed below.

Change suggested by respondent:

- 1) Building on Green field land. SMBC should not be encouraging development on green field sites, there are precious few left and I do pose the question have any other brown field sites been considered ?
- 2) Potential loss of prime agricultural land.
- 3) Loss of accessible recreational sports facilities which seems contradictory to improving health and wellbeing for everyone.
- 4) The designated area is within the Meriden Gap, an area that you have recognized is under considerable development threat and should be protected where possible. It is possible to meet your own commitment by not promoting this site for development.
- 5) Whilst you recognize that most of the bordering roads will need upgrading I do not believe this will go anywhere to resolving the ongoing traffic issues that this area is constantly subjected to: widening roads does not reduce traffic. Promoting a site of 700 dwellings will ultimately result in potentially 1400 more vehicles in the immediate area and 6000 + traffic movements per day. The continual expansion of JLR facilities will result in increase in traffic particularly on Damson Parkway and Lugtrout Lane, particularly at shift pattern changing times, which will be exacerbated by the movements to and from dwellings.
- 6) Upgrading two of the roads mentioned namely Lugtrout Lane and Field Lane has the potential of completely changing the character of the rural local area, a feature which SMBC continually promote as a reason why the Borough is so popular. I do pose the question of how will footpaths be installed along the length of Lugtrout Lane.
- 7) The plan also recognizes that certain facilities need increasing, namely schools, public transport and local health services. The plan seems to contain no guarantees that the increased provision will be provided. Schools and local surgeries are already over –subscribed. At present bus services in the area do not meet requirements for new developments in terms of frequency. Currently operators have shown little interest in improving them.
- 8) Policy P19 Range and quality of Local Services promotes developments will need to be sensitive to local character and enhance public realm and suggest that a development of this size in this locality fails to meet this criteria.
- 9) By allocating this site for development SMBC are breaching one of its own objectives namely protecting key gaps between urban areas and rural settlements. The fields you have selected are areas that separate the settlement of Catherine-De Barnes from Solihull.

I do hope you will consider the points raised when you discuss the proposed plan.

Yours faithfully

Graham Roderick

401 Lugtrout Lane, Catherine-De-Barnes, Solihull B91 2TN

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments: None

14355

Object

Policy S02 - Moat Lane Depot**Respondent:** Anthony Rogers**Summary:**

Objection to relocation of Bickenhill tip & Moat lane depot to Damson Parkway due to Increased traffic and lose of greenbelt

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

15174

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Anthony Rogers**Summary:**

Objection to relocation of Bickenhill tip & Moat lane depot to Damson Parkway due to Increased traffic and lose of greenbelt

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14844

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Kate Rogers**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10591

Object

Policy P12 Resource Management**Respondent:** Mr Tony Rogers**Summary:**

There is already severe congestion on Damson Parkway at certain times of the day, which will doubtless become even worse when the new JLR LOC opens. To consider adding to this congestion by re-siting the Household Waste and Recycling Centre, as well as potentially the Moat Lane Depot, to Damson Parkway would be a great mistake, severely impacting the quality of life of local residents and creating more traffic congestion thus adding to air pollution.

Change suggested by respondent:

I would request that alternative sites (or site) are identified for the relocation of the Household Waste and Recycling Centre and Moat Lane Depot. They should not be moved to Damson Parkway. Without residents being informed of the alternative sites available it gives the council an unfair advantage especially when appearing to bulldoze acceptance of any new site.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

14845

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Wayne Rogers**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10802

Object

Blythe**Respondent:** tom rollason**Summary:**

the plan ignores the development potential of the Kidpile Farm site which is no longer suitable for economic agricultural purposes. A redevelopment of the existing site to include domestic dwellings, light commercial and craft units is viable without impact on the amenity of the area with no additional transport requirements. Rumbush Farm and Fulford Hall farm being similar.

Change suggested by respondent:

The plan should acknowledge the viability of small enclaves of quality such as Kidpile Farm and its redevelopment which would enhance the viability of the southern part of Blythe valley without impacting on the Green belt,

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

11245

Support

Policy S01 - East of Solihull**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Allocation S01 is supported. All landowners and their representatives have agreed a masterplan for the allocation. Technical reports have been undertaken with issues and constraints identified and addressed in the masterplan. There is agreement in principle to have a memorandum of understanding.

The site is available, achievable and could deliver a higher number of dwellings than the proposed allocation (more than 700 dwellings). Land north of Lugtrout can be brought forward at an early stage, with no major infrastructure requirements. The site is in a sustainable location, close to local services and facilities.

Change suggested by respondent:

The red line boundary of S01 should be amended to be consistent with the masterplan. In relation to 'land north of Lugtrout Lane' it should include land up to the Grand Union Canal, Damson Parkway, land to the rear of 237 Lugtrout Lane and the existing residential properties on Lugtrout Lane and Hampton Lane.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14323

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

There is no certainty over the provision of either HS2 and the Balsall Common bypass in terms of construction or completion dates. The master plan advises the bypass is a requirement there is no evidence in relation to viability, or that it can be delivered by the quantum of development proposed. This raises doubts over the certainty of a firm eastern Green Belt boundary to the site, without HS2 or the bypass, it would result in an indefensible Green Belt Boundary, which is particularly relevant as the site is highly performing Green Belt.

The Plan does not make clear whether the HS2 or West Coast Mainline will become the Green Belt Boundary.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14324

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The site is of multiple ownership and has complex land assembly

As noted in the Council's most recent site assessment document (October 2020), the site: is part of high performing Green Belt, would result in an indefensible Green Belt boundary to the east, has a low level of accessibility, and could be considered subject to provision of clear firm Green Belt boundaries. The DSP states "Development should preferably be on land that is more highly accessible, and/or performs least well in Green Belt terms and/or provides strong defensible boundaries". These factors weigh heavily against the site as a draft allocation.

BC4 is reliant on the building of the bypass, which appears to have no policy or proposal of this section of the bypass adjacent to BC4. It must be assumed this section would not to be built within the Plan period up to 2036 and there is no certainty over its provision at any stage.

There is no consistency between the DSP and the SLP Concept Masterplans over the precise location of the Revised Green Belt boundary in relation to BC4. The DSP proposes the eastern boundary of the site (paragraph 560) as the defensible boundary, whilst the Masterplan proposes the alignment of the bypass (page 32).

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14325

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The site is of multiple ownership and has complex land assembly

Firm and defensible Green Belt boundaries would only be created when considered in a comprehensive manner, which cannot be assured.

The site is also identified as having high visual sensitivity in the Landscape Character Assessment

The site extends significantly out into open Green Belt, impacting considerably on the openness of the Green Belt. This is contrary to one of the five purposes of the Green Belt, to safeguard from encroachment

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14326

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The site is a later addition to the housing allocations, and it is not clear why the site was considered suitable for allocation.

The site is detached from the settlement, having no contextual link/setting to suggest that the site makes sensible addition to the village, which sets an inappropriate precedent for future development.

The site lies within the highest performing Green Belt Parcel and the Landscape Character Assessment identifies that the site has medium visual sensitivity. The allocation contradicts the Council's own assessment criteria, which states that development should preferably be on highly accessible land/performs well in Green Belt terms/provides defensible boundaries.

The site would be unsuitable for residential development given its position between the West Coast Mainline and possible HS2 line, resulting in an environment with noise, vibration and visual sensitivity.

The site would lie outside the defensible Green Belt boundary (West Coast Mainline), contrary to the principles of Policy BC1 Barrett's Farm, which notes the need for strong defensible boundaries within Balsall Common.

It makes no logical sense to identify a defensible Green Belt boundary to mark the eastern most boundary of Balsall Common and then breach that boundary in endeavouring to justify allocating a further site (BC6) and create a weaker Green Belt boundary around that site.

Change suggested by respondent:

In view of the above comments the site at Lavender Hall Farm should not be allocated and Policy BC6 and the justification deleted from the Plan

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

14333

Object

Balsall Common**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

SLP Site19 Riddings Hill/Hallmeadow Road:

The site was allocated in the adopted Local Plan 2013 and as far as it can be ascertained, there has been no movement on bringing the site forward for development and as such raises doubts over its future delivery and within the proposed Plan period. It has not been demonstrated that this site is available, achievable and deliverable. Its continued inclusion as an allocation in the DSP is unsound.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14335

Object

Policy BL1 - West of Dickens Heath**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Development here would result in the coalescence of Dickens Heath with Whitlocks End and Majors Green.

The intrinsic character of the village would be lost through an illthought out addition to the west of the village, having no relationship with the original concept or masterplan. This is an insensitive treatment for an award winning settlement.

BL1 has previously been dismissed as an allocation at a number of Public Local Inquiries over many years since the Solihull Local Plan has been reviewed. Former site 13 (Solihull Draft Local Plan 2016, which included Three Maypoles Farm) was deallocated as it was deemed too important to keep a gap between any urban extension and Dickens Heath. The impact of BL1 would be considerably more devastating and the perceived coalescence with Dickens Heath, Whitlocks End and Majors Green would be the result.

To attempt to overcome issues of coalescence, master planning has continually reduced the development areas but the latest reduction in developable area has not reduced the site capacity. Irrespective of what the Site Assessment commentary suggests, the perception of coalescence remains.

Relocation of sports pitches on the site have not been identified, local or otherwise. The 3 football pitches on the site have not been relocated due to impact on LWS. This situation has not been addressed at any point in the Local Plan Review process and should have been resolved before the site was allocated within the DSP. This calls the delivery of the site into question either at all or within the plan period.

There is a concern for the impact of development on the highway system.

Change suggested by respondent:

There has been no contextual thought in the process of proposing site BL1 as an allocation. The site cannot be considered available, achievable and deliverable and should be deleted from the Plan.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14348

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Whilst accepting the Council's Strategy of urban expansion, this site raises concerns over compliance with government policy and the Council's own methodology and site selection process, which includes using planning judgement to refine selection. Concern is raised about the proposed allocation on Green Belt grounds and Landscape Character assessment concerns.

Government policy states that the land to the south of Shirley, opposite Dog Kennel Lane clearly exhibits openness. The Landscape Character Assessment identifies the site as lying within a landscape character area of high sensitivity. Development here would extend built development out into open countryside.

Paragraphs 600 and 609 provide conflicting statements and constructing a new road to form the Green Belt boundary does not conform to Government policy. The existing field structure between Dog Kennel Lane and Cheswick Green does not provide a clear contiguous defensible Green Belt boundary for new development, it cannot be demonstrated how coalescence with Cheswick Green would be avoided. In developing out into open countryside there would be a substantial and detrimental impact on landscape character.

Change suggested by respondent:

Site BL2 should be deleted from the Plan

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14351

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Coalescence and potential coalescence with both Dickens Heath and Majors Green and the resulting gaps between settlements have been a major concern since the late introduction of this site as a potential allocation and the deletion of Site 13 in the Draft Local Plan Supplementary Consultation document 2019.

Master planning, quite reasonably, has been used in endeavouring to overcome these concerns, together with carefully worded text to promote the site, a luxury which was seemingly not afforded Site13 and which master planning could have overcome issues raised by the Council. Rosconn submitted a master plan which did just that. A copy of the master plan is attached as Appendix 1.

Site BL3 is no further away from Dickens Heath than the parts of site 13 and Site 340 which are intended to be built development.

Whitlocks End Farm (BL3) lies within the highly performing Green Belt parcel, whereas former allocation Site 13 lies within the moderately performing Green Belt in the Council's Green Belt Assessment document.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14370

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Land to the west of this site was allocated for housing in the adopted Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available, an alternative development solution delivering open space was forthcoming. This situation still exists and so calls into question the allocation of HA1.

The combination of both allocations appears to have resulted in an overall reduction in POS. POS for the previously allocated site has now been pushed into the Green Belt outside either allocation boundary, causing further encroachment and urbanisation. There is no evidence in relation to viability of the site and how this may be affected by any potential contamination issues as a consequence of the former use of the site.

Change suggested by respondent:

The site cannot be said to be available, achievable and deliverable and should be removed from the plan.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14371

Object

Hockley Heath**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

It is agreed that Hockley Heath should be a settlement where limited and proportionate development is accepted. However, it is considered that the site on land r/o 2214 Stratford Road Hockley Heath, submitted originally as part of the Solihull DLP 2016 consultation (site 121) is located in a more central location within the settlement and exhibits equal if not better credentials in respect of Green Belt, accessibility, landscape and deliverability than Site 25, Land off School Road Hockley Heath

Change suggested by respondent:

And the addition of Land r/o Stratford Road Hockley Heath (Site Ref 121).

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14378

Object

Policy S02 - Moat Lane Depot**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Moat Lane Depot was first identified as a housing allocation in the Solihull Local Plan 2006. Concerns over relocation of the current uses on the site and the timing of such a relocation, have remained an ongoing issue and concern ever since. No site has been identified for the relocation of the depot or referred to in the DSP, which merely states that the site is expected to become available during the Plan period.

There are also particular issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.

Change suggested by respondent:

The site cannot be said to be available, achievable and deliverable and should be deleted from the plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14380

Object

Policy P2 Maintain Strong, Competitive Town Centres**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The Draft Submission again refers to the Town Centre as a location to provide for 861 dwellings within the Plan period.

From the conclusions that can be drawn from the adopted Plan and the experience and complexities of town centre redevelopment, it is considered that the housing figure is over ambitious and unachievable within the Plan period.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14454

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The DSP plan fails to set out the current or future need for specialist housing for older people, in the form of either care beds or extra care units required.

Whilst policy P4E requires sites of over 300 units to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older persons accommodation, there is no mechanism for delivery.

Depending on larger sites to deliver specialist housing for the elderly will not address the current need and is likely to only exacerbate the need going forward.

Rosconn support providing a choice of housing for all, however consider delivery of housing for the elderly is a specialist area.

Change suggested by respondent:

The Council should ensure that suitable sites are allocated to meet such need across a wide choice of appropriate locations rather than relying on larger sites to provide a mix that includes such provision. These additional sites should be in addition to the allocations and numbers already identified within the DSP.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

14485

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Windfall:

A total allowance of 600 windfall units is included within the DSP. It is clear that historically there has been a high level of windfall completions. It is unclear however from the Windfall analysis at Appendix H of the 5YHLS position July 2020, whether the windfall allowance relates to both small and large sites, nor is it clear whether this includes garden land.

There appears to be no compelling evidence (as sought by NPPF Para 70) that this is a reliable source of supply.

Change suggested by respondent:

Based on the evidence we do not accept 600 as a realistic windfall allowance. In the absence of any evidence to the contrary, we consider the tried and tested number set out in the adopted Local Plan, of 150 dpa, should be used.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

14490

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Barton Willmore, on behalf of various developers, have carried out a Housing Need Report in response to the DSP, focusing on the calculation of housing need in the DSP 2020-2036 and whether the approach taken in the DSP aligns with the NPPF. The report concluded:

- The minimum need for Solihull (807 dpa) will need to be increased to account for expected job growth from the UK Central Hub, to 1,036 and 1,248 dpa.
- The deficit in unmet housing need from Birmingham City being delivered by HMA Local Plans amounts to a minimum of between 11,294 and 13,101 dwellings up to 2031, a significant increase from the 2,597 dwellings concluded by the 2020 Position Statement. This increases when the unmet need from the Black Country is considered and additional unmet need will be created post 2031.

The DSP indicates a contribution of 2,015 dwellings towards Birmingham's identified shortfall of 37,900 to 2031. However, the recent Greater Birmingham Black Country Housing Market Area ("GBBC HMA") study claims the total Birmingham shortfall has diminished to 2,597 dwellings. This appears somewhat a surprising figure considering the SGS minimum shortfall was identified as 28,000 dwellings in 2018 and is considered to be a highly optimistic prediction. In its conclusions the GBBC HMA study does not state that the scale of the post 2031 shortfall is not yet known and the shortfall for the whole of the combined authorities HMA post 2031 cannot yet be calculated. 2.5 It follows that, for the reasons summarised here the DSP is clearly unsound by reference to all of the tests set out in paragraph 35 of the NPPF.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

14499

Object

Foreword**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

With this uncertainty and wide variation in figures and even accepting that Solihull is confirming that a contribution will be made to the shortfall there appears to be no confirming documentary evidence that Solihull's figures have been agreed by the HMA authorities and that Solihull has met its duty to cooperate either in its evidence base or confirmed within the DSP

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14500

Object

Policy P5 – Provision of Land for Housing**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

The DSP relies on the BFLR to help make up the overall numbers in the plan, equating to 77.

The Council have only completed Part 1 of the BFLR and so any Green Belt sites coming forward could only be delivered under 145(g) of the NPPF. Para 145(g), whilst allowing for redevelopment, does so on the basis there is no additional impact on the openness of the Green Belt.

As the Council does not have Part 2 of the register in place there is no mechanism to deliver the numbers allocated by the BFLR. Only one site has come forward so far, with an application for 49 extra care apartments (the site was not in GB).

Change suggested by respondent:

Therefore 29 units identified need to be discounted.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14868

Object

Blythe**Respondent:** Rosconn Strategic Land**Agent:** DS Planning**Summary:**

Omission site - Site 13/340 Three Maypoles Farm Dickens Heath (in Part)

Rosconn worked with the Council and other

landowners to produce a masterplan that responded positively to issues raised by local residents. The master plan sought to;

- a) Ensure a firm and defensible Green Belt boundary to avoid coalescence of Shirley with Dickens Heath,
- b) Avoid a narrow corridor between Shirley and Dickens Heath and reducing the gap between settlements,
- c) Remove the potential for vehicular access through adjacent residential development on the edge of Shirley,
- d) Avoid any perception of narrowing the gap between Shirley and Dickens Heath along Dickens Heath Road and
- e) Avoid loss of public open space and safeguarding the amenities of adjoining property owners.

In brief, the site is highly accessible, of medium landscape value and

within a moderately performing parcel of Green Belt. It has a recognisable firm and defensible Green Belt Boundary and would accommodate appropriate levels and areas of public open space to satisfy the Council's concerns over coalescence and narrow POS

corridors. The site is marketable, readily available and achievable within the Plan period.

Change suggested by respondent:

Site 13 as modified (which includes part of site 340) should be included as proposed allocation within the DSP. The site could be considered on its own merits or in association with BL3.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14533

Object

Policy BL1 - West of Dickens Heath**Respondent:** Lisa Rosen**Summary:**

The loss of the pitches will affect our children.

The land is high grade GREEN BELT.

loss of this land would be detrimental to wildlife.

The narrow rural road network cannot take further development and is already overloaded.

The character and setting of the Village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14606

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Stephen Rouse**Summary:**

- The reasons for demolishing the existing Arden Academy and loss of so much green belt for housing has been justified by the evidence.
- The Council previously consulted on two options; one to retain the school (option 1) and the other to relocate it (option 2). There was no option to retain the school and improve the facilities.
- no any proper analysis been made available of the pros and cons of options 1 and 2. There is no evidence to demonstrate why the existing buildings cannot be extended and improved.
- If an improvement option were to be thoroughly tested and was shown to be a more viable solution, then there would not be the need for so many houses or such extensive and damaging loss of green belt.
- It has offered no evidence in relation to either the physical or financial viability of improving the Academy in situ. The justification for Policy KN 2, involving the allocation of a large site capable of delivering a new secondary and primary school plus 600 houses, is therefore totally inadequate and the Plan is not sound.

Change suggested by respondent:

Evidence to demonstrate that improvement of the Academy in situ is not viable should be submitted alongside evidence to show how it compares to the viability and delivery of the relocated Academy. Without such evidence, the Plan is unsound and Policy KN2 should be deleted.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14417

Object

Policy BL1 - West of Dickens Heath**Respondent:** Lianne Rudge**Summary:**

- > Loss of sports fields affect on children and adults
- > The land is Greenbelt
- > Site is surrounded by local wildlife and ancient woodland
- > Road network around site is already overloaded
- > Site located in flood zone one
- > Unsustainable as mitigation measures are not achievable.
- > Village character will be adversely affected
- > Village has strong boundaries (woodlands, canal, and hedgerows).

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10660

Support

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Steven Rushton**Summary:**

More detail is required regarding Taylor Wimpy's proposed development around the listed Light Hall Farm (site BL2) to ensure that the setting of this historic building and site has been given appropriate consideration.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14779

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Ian Russell**Summary:**

The A34 a major hub road into Birmingham constantly experiences huge volumes of traffic - and particularly so at peak times.

A significant boundary between the urban sprawl of our nearby neighbour Birmingham must be maintained as it is.

I do not see significant or sufficient reference as to how a major increase in the local population can be supported.

It would deprive future generations of the opportunity to appreciate countryside/wild life.

Inadequate maintenance.

Change suggested by respondent:

investigate alternative brown field sites

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10816

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Sarah Russell**Summary:**

The proposed relocation of the tip is not legally compliant because the local community have been kept largely in the dark until very recently and have had nowhere near enough time to digest the enormity of the proposal.

Insufficient evidence has been provided regarding the necessity to move the tip against improving the current facility which should surely be the more sensible solution. A full traffic assesment which should take into account the JLR traffic has not been provided and there has been no co-operation with other local authorities to examine alternative solutions.

Change suggested by respondent:

Because of the lack of information provided and the failure to consult the local community and trying to approve this behind residents backs, the plan should justify the need for an improved tip and then provide the reasons why this is the preferred site. We still need to be exactly clear on where the site is including, entrance, exit and queuing points. We need to fully understand any alternative site identified and why this was rejected as the preferred site. And we need to fully understand why the existing site can not be improved/expanded. The plan should provide clear and concise information and provide unbiased reasoning behind there findings.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10945

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** West Midlands Urban Community Homes**Summary:**

The omission of specific reference to Community Led Housing (CLH) reduces the soundness of the Local Plan. CLH groups and organisations are extremely well placed to deliver on the aspirations outlined in the introduction to the 'Providing Homes for All' policy chapter and to meet Challenge B identified in the Plan. Namely to provide a broad range of housing of different types, sizes, values and tenures that are responsive to needs, particularly that for affordable housing, creating and maintaining mixed and balanced communities. Examples of reasonable alternative policies are included.

Change suggested by respondent:

wMUCH asks SMBC to consider making explicit reference to Community Led Housing, as a mechanism for Providing Homes for All, within the Local Plan and/or in supplementary policy such as the Meeting Housing Needs Supplementary Planning Document (SPD). This could be either as a dedicated policy, or embedded across other policy topics.

Noting support for community based initiatives within Local Plan policy gives considerable weight to the acceptability of this form of development. In turn this gives confidence to community groups to pursue CLH. Linking community led solutions to delivering sustainable development and creating more resilient communities encourages CLH groups to look at what additional benefits can be delivered through their scheme.

It is good practice to have a coherent suite of planning documents for CLH. This would include policy in the Local Plan, a bespoke SPD or including a CLH section in a housing SPD, and tailored S106 Agreement templates. Together these support transparent and consistent decision making. They also provide clarity to communities of what is expected of them and the parameters within which they need to design a scheme.

wMUCH is in contact with the colleagues in the SMBC Economy & Infrastructure and Places Directorates about ways in which SMBC can enable CLH. We would welcome the opportunity to discuss further supplementary policy and strategy development with SMBC across housing and planning. For instance, we have recently supported another local authority to develop a dedicated community led housing policy, to sit alongside existing housing and planning policy.

About us

West Midlands Urban Community Homes (wMUCH) is a new enabler hub to provide knowledge and expertise to inspire and support a new wave of CLH in the West Midlands. We are the lead dedicated CLH support organisation in the region, funded by the Ministry of Housing, Communities and Local Government and Power to Change as part of a national network of hubs. We provide advice and support to CLH groups and organisations to help them plan and deliver their projects, as well as collaborating with strategic partners such as SMBC to enable CLH.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10670

Object

Blythe**Respondent:** Solihull Windows**Summary:**

I was under the impression that we were supposed to be providing more affordable housing in the area so that the young people don't have to leave as they are being priced out of the area. Instead all we are getting is EXCESS retirement planning in Shirley. Already it is hard to get appointments with Doctors. What will it be like when all the proposed retirement developments are full. Although the fact that retirement developments already constructed aren't full MUST tell you that there is not a requirement for these. Old people don't want to leave their houses!!!!

Change suggested by respondent:

Reduce the retirement planning for this area and introduce more affordable HOUSES for young people so that we can regenerate the area. No one in the UK actively WANTS to live in a flat!! We need to be in a multi-generational area - not an area for old rich people.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14007

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Kulveer Sahota**Summary:**

Supports Policy KN2, however makes some reference to modifications he would like to see from an IT perspective.

Change suggested by respondent:

I would like to see however, from an IT perspective, dedicated server room, which will help IT Teams to greatly reduce downtimes and avoid affecting the classrooms and students work.

Implement fibre optics to and around the building, which will greatly improve the school network.

Current copper wires are degrading, with little room for improvement. Fibre optics will help future proof the network for expansion, functionality, supporting huge number of devices simultaneously.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11205

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Jaki Salisbury**Petition:** 2 petitioners**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10582

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Helen Salt**Summary:**

We are residents of Damson Parkway

Concerns regarding the impact on our health and well-being: increased noise, vibration and pollution levels; vehicle emissions; foul odours; attraction of vermin; visual intrusion

Already we have environmental impact of JLR, A45, airport: noise; pollution; congestion

Disregard of Council's commitment to residents' health and well-being as promised in local plan

Disagreement with Council's views that site is isolated from residential uses and that there is adequate space for queuing vehicles

Disappointment at loss of green belt and industrialisation of our residential area.

Change suggested by respondent:

We would request that the Council looks again to relocate Solihull's Household Waste and Recycling Centre and Depot to a site which does not impact on any person's opportunity to live in an environment which is not subject to high levels of noise and pollution.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10583

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Richard Salt**Summary:**

We are residents of Damson Parkway

Concerns regarding the impact on our health and well-being: increased noise, vibration and pollution levels; vehicle emissions; foul odours; attraction of vermin; visual intrusion

Already we have environmental impact of JLR, A45, airport: noise; pollution; congestion

Disregard of Council's commitment to residents' health and well-being as promised in local plan

Disagreement with Council's views that site is isolated from residential uses and that there is adequate space for queuing vehicles

Disappointment at loss of green belt and industrialisation of our residential area.

Change suggested by respondent:

We would request that the Council looks again to relocate Solihull's Household Waste and Recycling Centre and Depot to a site which does not impact on any person's opportunity to live in an environment which is not subject to high levels of noise and pollution.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11181

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Emma Samuel**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14860

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Mr David Sandall**Summary:**

Objects to building on Greenbelt.

Lack of local services such as GPs, schools and post offices.

Public transport is limited to an hourly bus service.

Traffic flows will greatly increase.

No footpaths on Friday Lane and Hampton Lane.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14861

Object

Policy SO1 - East of Solihull**Respondent:** Mr David Sandall**Summary:**

The plan incorrectly places the proposed site within the Borough of Solihull, namely the Town Centre and urban suburbs. The misrepresentation detracts from the impact the proposed Plan has on Catherine-de- Barnes and the Parish of Hampton-in-Aden.

The application site is within the designated Green Belt Consequently, the proposed development will introduce an urban landscape causing detrimental harm to the openness of the existing Green Belt.

The Application should be rejected on the grounds of the environment impact on the Parish.

There are no local GPs, post office or schools.

The proposed Plan will add to the already increased flow of traffic.

Increase surface run off and flooding.

Would add to current traffic congestion.

The diverse range of plant life in hedges can even help combat climate change by storing carbon in its vegetation

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14713

Object

Policy SO1 - East of Solihull**Respondent:** Mr Jagbir Sanghera**Summary:**

Support views put forward by the Parish Council

Change suggested by respondent:

-

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14366

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Ben Sargeant**Summary:**

Policy UK2 fails to take into account the negative impact on other residents and businesses of the Damson Parkway area caused by increased traffic and pollution.

Change suggested by respondent:

A different location for the waste and recycling centre needs to found

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

14780

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Schools of King Edward VI in Birmingham**Agent:** Avison Young**Summary:**

Site 111 is located immediately adjacent to the Solihull urban area and is well-related to it. The site is accessible to bus and rail which provide access to jobs and facilities. There are a range of education, health and shopping facilities which can be accessed by car and public transport.

The site is almost entirely located in Flood Zone 1 and at low risk of flooding. It does not comprise Best and Most Versatile Agricultural Land. There are no designated heritage assets located on it, or in close proximity to it.

The site occupies a sustainable location that it is suitable for new residential development.

Criticism of how Site 111 has been assessed by SMBC.

Change suggested by respondent:

Site 111 occupies a sustainable location that it is suitable for new residential development.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14781

Object

Policy P5 – Provision of Land for Housing**Respondent:** Schools of King Edward VI in Birmingham**Agent:** Avison Young**Summary:**

The Council's calculation of LHN, which is based on the 2018 SM, will soon be obsolete. Emerging Government policy suggests that Solihull's LHN will increase, leading to a requirement to release more land from the Green Belt.

The Housing Position statement is a summary of the broad direction of travel rather than a definitive assessment of housing land supply. It cannot be relied upon by SMBC to justify its very modest proposed contribution to unmet need in the HMA. SMBC has no formalised arrangement with any of its neighbours and no evidence to justify the figure proposed.

The SA concludes that SMBC could make a contribution of 3,000 dwellings to the shortfall in the HMA, without the impacts being materially more negative.

No statements of common ground to support the approach demonstrates a lack of constructive engagement and failure in the duty to cooperate.

P5 General.

Housing supply has been overestimated. There has been double counting, lack of evidence to demonstrate deliverability, overestimation of windfall, over-reliance on delivery from UCK Hub area.

A revised supply table is provided which demonstrates that the Council is some 551 dwellings short of the identified housing need for the Borough

Policy P5 and its supporting text at Paragraphs 220 to 232, is not positively prepared, because, on a proper assessment of housing supply, it does not meet the housing needs of the Borough.

These deficiencies in supply could be remedied through the Council revisiting its supply of sites and identifying additional land for allocation.

Change suggested by respondent:

The housing target should be expressed as a minimum, the contribution to meeting HMA needs should be increased and additional sites should be included in the 'Summary Table of Residential Allocations' (page 65) with a specific modification to include Site 111 (Land at Widney Manor Road).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14782

Object

Policy P17 Countryside and Green Belt**Respondent:** Schools of King Edward VI in Birmingham**Agent:** Avison Young**Summary:**

LHN is likely to increase as a result of the new standard methodology. There is no agreement over HMA need and no assessment of whether more dwellings could be delivered.

Local Plan should remove additional land from the Green Belt for allocation, as well as safeguard land for residential development at the appropriate time. Failure to do so will inevitably create the need to release more land from the Green Belt when the Local Plan is next reviewed.

The Plan fails the test of soundness in respect of meeting housing needs and ensuring that Green Belt boundaries in the borough will remain beyond the proposed plan period.

Change suggested by respondent:

- (i) Additional land should be taken out of the Green Belt to support residential development in this plan period (with a specific proposal for the removal of land at Widney Manor Road (Site 111)); and
- (ii) areas of safeguarded land be identified to meet needs beyond the plan period, or sooner if required as part of a review of the Local Plan.

Legally compliant: Not specified

Sound: No

Comply with duty: No

Attachments:

14030

Support

Policy S01 - East of Solihull**Respondent:** Stephen Anthony and Annette Maria Scott**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14038

Support

Challenges**Respondent:** Stephen Anthony and Annette Maria Scott**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14047

Support

Policy S01 - East of Solihull**Respondent:** Stephen Anthony and Annette Maria Scott**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14843

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs E A Seal**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10667

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Sandra Sedgley**Summary:**

Dog Kennel Lane provides a permanent boundary to green belt land & by removing this it would seriously impact on the future of Cheswick Green due to extensive development. Very little green space would remain. There would be no need to "enhance the green belt" its already there! Home to many species of wildlife as well as ancient hedgerows and trees - once lost it cannot be replaced.

Change suggested by respondent:

BL2 should be removed from the local plan. A school can be built on the Blythe Valley development - its brownfield. There is room also for more housing there as well as in Hockley Heath

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14586

Object

Policy BL1 - West of Dickens Heath**Respondent:** Jon Sellars**Summary:**

Object to Policy BL1;
Housing should be absorbed with the Greater Birmingham Initiative/better use of Brownfield sites - Impact on the areas; flora, fauna and wildlife, not to mention the quality of life for human inhabitants - effect of increased traffic car usage on rural infrastructure/road networks - Demand on utility infrastructure (Gas, electricity, sewage) - Analysis of available brownfield sites around Solihull town centre needs to be completed before green belt sites are released - Impact on healthcare services.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14369

Object

Blythe**Respondent:** Mr Jon Sellars**Summary:**

- Destruction of Local habitats and wildlife
- Shirely has taken majority of development over past years
- Development should be focused on brownfield and not Green belt

Minor road improvements are the Councils only response and does not address the significant increased levels of traffic. The site is adjacent to Whitlock End/ Dickens Heath and is close to four local wildlife sites.

It is also only one kilometre from a further 6 significant ecological natural sites.

This development is too close to these sensitive sites and will have a catastrophic effect on the areas; flora, fauna and wildlife, not to mention the quality of life for human inhabitants.

These ecological sensitive high grade greenbelt sites perpetually flood and are therefore natural soak ways that mitigate local flood risk. Thoughtless development like this creates flood problems and removes the flood protection from the surrounding area it currently protects.

Area has poor public transport, thereby making it a pedestrian and car dependant area. By increasing residential development this will exponentially increase car usage for each new household;

existing infrastructure is at breaking point

There is constant bolting on of new developments to existing services, which is, essentially on to the original rural setup.

Impact of Covid-19 on the high street - calls for a rethink on how to use redundant shopping units

Impact on Doctors/Services - existing services at breakpoint without the needs of extra population adding to it.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments: None

14104

Support

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** Seventy Four Propco Limited**Summary:**

Seventy Four Propco Limited are a landowner at Barns at Eastcote, Barston Lane and welcome Policy P4B. It is clear that Solihull require more housing within the borough, this is made explicit in the Housing and Economic Development Needs Assessment (2020) and the various legal challenges to the current development plan. Indeed, the Council have recommended a number of sites within the Green Belt are acceptable for development. Policy P4B is further welcomed as it enables development at other locations within the Green Belt outside of these specified locations.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14105

Support

Policy P5 – Provision of Land for Housing**Respondent:** Seventy Four Propco Limited**Summary:**

Policy P5 – Provision of Land for Housing is welcomed and the supporting table Allocated Sites para 226.

Change suggested by respondent:

Summary Table of Residential Allocations (para 226) should be amended to include sites in which housing can be provided such as the Barns at Eastcote on Barston Lane which is a brownfield site suitable for housing.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14098

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr David Sheppard**Summary:**

The plan is not positively prepared: There is no published input from adjoining councils, regarding need.

Ecological assessment & Archaeological assessment for additional sites 2020 highlight unique features of HH1 - this evidence has been ignored when proposing HH1 removal from the Green Belt.

It is not justified: the site is of historical value, inclusion of site will destroy local flora and fauna, any development of HH1 would not conserve & enhance the setting of the canal towpath, proposed GB enhancements would not compensate for the harm that development would cause. Public open space (0.6 ha) would not counteract harm caused on 6ha of land and light and air pollution would be caused

It is not effective: although the development could be delivered, the development would adversely affect nearby infrastructure

The council have not established exceptional circumstances to justify the removal of HH1 from the Green Belt

Legal compliance: The council has failed to pay heed to the objection of the community. No evidence that the authority has engaged with neighbouring authorities on an ongoing basis

Change suggested by respondent:

That HH1 is not removed from the Green Belt and is not allocated for around 90 dwellings owing to the failure to comply with national and local policies, and the failure to correctly assess HH1 as a site of considerable value and importance which precludes development.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14029

Support

Policy S01 - East of Solihull**Respondent:** Jonathan Patrick James and Barnaby Desmond Sheridan**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14037

Support

Challenges**Respondent:** Jonathan Patrick James and Barnaby Desmond Sheridan**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14046

Support

Policy S01 - East of Solihull**Respondent:** Jonathan Patrick James and Barnaby Desmond Sheridan**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14235

Object

Policy BL1 - West of Dickens Heath**Respondent:** David Shute**Summary:**

Plans inadequately address existing infrastructure or required infrastructure for new homes. Impact on local roads, parking and public transport.

Will blur boundaries of village and damage character, road safety and physical environment.

Impact on ancient woodland and LWS is unjustified.

Irresponsible to develop in a flood zone, especially due to failure of previous flood mitigation schemes.

The proposed mitigations across the piece are unachievable which makes the plan far less sustainable than the alternatives which do not have any of the problems outlined here.

The case for destroying high quality green belt in an area with creaking infrastructure above developing brownfield sites which are the government's priority has manifestly not been made.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14234

Object

Policy BL1 - West of Dickens Heath**Respondent:** Helen Shute**Summary:**

Plans inadequately address existing infrastructure or required infrastructure for new homes. Impact on local roads, parking and public transport.

Will blur boundaries of village and damage character, road safety and physical environment.

Impact on ancient woodland and LWS is unjustified.

Irresponsible to develop in a flood zone, especially due to failure of previous flood mitigation schemes.

The proposed mitigations across the piece are unachievable which makes the plan far less sustainable than the alternatives which do not have any of the problems outlined here.

The case for destroying high quality green belt in an area with creaking infrastructure above developing brownfield sites which are the government's priority has manifestly not been made.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14627

Object

Blythe**Respondent:** Mr Harry Siggs**Summary:**

"Unfortunately, brownfield land alone won't provide the solution and, reluctantly, we must release some Green Belt land" This has not been sufficiently explored

National Planning Framework specifies that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans" This has not been done.

Change suggested by respondent:

Explore local options for brownfield in Solihull or other authorities that do not encroach on green belt

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10846

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Stanley Silverman**Summary:**

we object to plans summarised under points 2(v), 3(i), and 4(i)

We feel the plan is not legally compliant as the decision to site the school would pose risk related to traffic on Station Road and also threatens biodiversity due to failure to maintain a green corridor from Meeting House Lane via Barretts Lane onto Station Road. This is essential for the protection of the varied natural wildlife present in this area.

There has been failure of the duty to cooperate as there has been a lack of engagement with local communities regarding the plans especially siting of the school

Change suggested by respondent:

In principle we support the plan and agree that there must be appropriate infrastructure to support this necessary housing development. However, over the past few years there have been at least 4 serious road accidents on Station Road between Brickmakers Close and Sunnyside Lane. Traffic congestion and parking of cars on this stretch for school drop off and pick ups will increase the risk of further accidents. Furthermore siting the school in the field opposite the Brickmakers Arms effectively shuts off a green corridor for wildlife (mainly mammals and amphibians) to transit from the areas of significant ecological value between Meeting House Lane and Barretts Lane to Station Road and the park beyond.

We suggest that the school is sited instead further south east with direct access off the relief road away from the junction between the relief road and Station Road and with sufficient parking space for drop off and pick up. There should also be pedestrian access for pupils and carers from the new housing estate and beyond. These need to come through from Sunnyside Lane or Barretts Lane.

Maintaining at least some of the field opposite the Brickmakers Arms as Public Green Space will preserve a green corridor.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15081

Object

Foreword**Respondent:** Highways England

Summary:

Transport Evidence comments from Highways England:

Strategic Road Network (SRN) within Solihull comprises M42 and M6 motorways, and the A45, A452 and A446 trunk road.

Regard to Para. 16 of DfT Circular 02/2013, NPPF and other relevant policies.

Identified following areas where clarity and further information is required to continue our appraisal of the DSP:

Meeting Housing Need

- Reviewed GBBCHMA Housing Need and Supply Statement published in September 2020, note that greater deficit in delivery of housing than expected in HMA after 2031.
- If housing numbers should increase as a result of consultation process or Examination, then need to fully assessed and modelled, to identify impact on SRN and whether any more additional mitigation will be required.

Transport Evidence base:

- Identified prioritised list of items where we require further information or clarification to help complete our review of Local Plan documents:
 - o Clarity on development quantum proposed/assumed at UK1 and UK2
 - o Flow information from PRISM assessments for base, 2026 and 2036 scenarios; can be used for LinSig models
 - o Base turning counts for SRN junctions if available
 - o Clarity on whether modelling work includes proposed improvements at M42 J6, and any improvements associated with HS2 (M6 J4)
 - o Table of flows with associated plots to show amount of development traffic plus overall traffic expected on M42 and A45 (SLP and DLP scenarios). In addition, V/C plots requested.
 - o Further analysis required to understand whether DSP traffic rat-runs away or displaces any non-development SRN traffic along the M42 and M6.
- Discussed matters at meeting on 7th December – we will continue to work proactively with SMBC on these matters.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

15083

Object

Policy P14 Amenity**Respondent:** Highways England**Summary:**

- Noted that DSP identify increase in number of residents in proximity of SRN. Especially relevant for NEC proposals for 2,200 dwellings and Arden Cross up to 3,000 dwellings.
- Policy P14 – does refer to local air quality and noise pollution, but not directly related to Strategic Road Network and what mitigation may be required.
- o Policy may need to be modified, or add specific policy, which identifies how air quality impacts and noise pollution would be monitored & managed and what interventions may be required.

Change suggested by respondent:

- o Policy P14 may need to be modified, or add specific policy, which identifies how air quality impacts and noise pollution would be monitored & managed and what interventions may be required in relation to the Strategic Road Network.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15085

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Highways England**Summary:**

Based on our assessment and consideration of the site allocations there is greater potential for interaction with the Strategic Road Network (SRN). This is notably where new structures and sustainable transport infrastructure are being proposed over the M42 Corridor.

We consider that a policy should be developed which sets out standards and requirements to enable such infrastructure to be provided safely over our network. This should ensure measures are in place which mitigate any accidents or incidents that could endanger public health and the safe and efficient operation of the SRN at these locations.

Change suggested by respondent:

Consider that a policy should be developed which sets out standards and requirements to enable such infrastructure to be provided safely over our network. This should ensure measures are in place which mitigate any accidents or incidents that could endanger public health and the safe and efficient operation of the SRN at these locations.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15086

Object

Policy P10 Natural Environment**Respondent:** Highways England**Summary:**

Need to consider environmental impact of proposed allocations in DSP on River Blythe Valley and Coleshill and Bannerley Pools SSSI, especially if proposals increase the volume of traffic using the M42 corridor.

Change suggested by respondent:

Consider environmental impact of of proposed allocations in DSP on River Blythe Valley and Coleshill and Bannerley Pools SSSI, especially if proposals increase the volume of traffic using the M42 corridor.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15087

Support

Foreword**Respondent:** Highways England**Summary:**

Highways England is committed to continue to work with the Council in a collaborative and constructive manner to support the progression of the Local Plan. As part of this approach we will work with you to develop a Statement of Common Ground between ourselves.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11189

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Dr Gurpreet Singh**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13728

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Dr Gurpreet Singh**Summary:**

Does not consider the Local Plan to be sound for the reasons set out in the report submitted by the BARRAGE action group 'PART A: Objection to the proposed allocation of the site BC3 Windmill Lane/Kenilworth Road Balsall Common'.
29.11.2020

Change suggested by respondent:

Remove site BC3 as a proposed site for allocation

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14332

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Glenis Slater**Summary:**

In relation to Paragraph 105 - No community engagement about proposed moved of the HWRC. Therefore this goes against the statutory requirement.

Relocation of HWRC would be contrary to P12, large amount of traffic movements to and from the site due to JLR, adding a HWRC would put greater strain on the area and further car fumes.

Be contrary to P12 as it will cause smells, more carbon emission and more time to get to their destination due to the increase in traffic as well as the social cost and devaluation of properties.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14709

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Glenis Slater**Summary:**

I can also see no justification for relocating the HWRC and Council Depot in this area for the following reasons:

It is my opinion that this is contrary to Policy P12.

JLR monopolise the area with hundreds of cars going in and out of the factory.

The fumes from the vehicles already in the area cause high carbon emissions.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11240

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Laura Slaymaker**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14018

Support

Policy S01 - East of Solihull**Respondent:** SMBC - Managed Growth & Communities Directorate**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

13940

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** SMBC - Strategic Land and Property - Site KN2**Agent:** Cushman and Wakefield**Summary:**

Support the allocation and the proposed amendment of the settlement boundary to accommodate housing.

Support that the site has the capacity to deliver at least 600 new dwellings to contribute towards local housing need, the redevelopment of Arden Academy and new primary school to create an 'all through' school.

Policy KN2 should refer to the site's capacity being 'at least' 600 dwellings (to allow for flexibility at the outline planning application stage) which is achievable in line with Policy P5 and the challenges and objectives of the plan.

Reprovision of the Academy will help to achieve wider Council objectives on climate change and sporting provision.

A preferred Concept Masterplan has been submitted that is policy compliant. Technical work has been completed to support this.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

14259

Support

Policy UK2 - Land at Damson Parkway**Respondent:** SMBC Strategic Land and Property**Agent:** Cushman and Wakefield**Summary:**

SMBC supports the policies and associated supporting text contained within the Draft Submission Plan, which set a positive, justified and effective context in which to determine the expansion and potential relocation of the HWRC. The HWRC is at capacity and in its current format is not suitable for enhancing the recycling of materials. An assessment of land for potential relocation of the HWRC and Council Depot was prepared in June 2019, which highlights the potential to relocate the HWRC and Council Depot to Site UK2 Damson Parkway as one of the most suitable options. Site UK2 can accommodate a single, consolidated and efficient facility that will meet the needs of the borough for the Plan period. The new HWRC and Council Depot will require approximately 6 ha which could be accommodated within several of the development parcels shown on the indicative Site UK2 masterplan. The option of relocating the HWRC and Council Depot to Site UK2 Damson Parkway is consistent with the objectives of the Draft Submission plan. SMBC confirm the expansion and potential relocation will be delivered early within the plan period. As highlighted on the indicative masterplan for Site UK2, it is envisaged the facility would be deliverable within phase 2 of the Plan, e.g. 2022-2026.

SMBC Strategic Land and Property endorse the masterplan for Site UK2 Damson Parkway presented by the joint landowners, and is supportive of the principles for site mitigation. Specifically:

- Transportation – a sustainable transport strategy for the site with sufficient capacity designed in to accommodate the needs of the HWRC. It is envisaged that minimal off-site highway work is likely, and a transport assessment will factor in the operation of the HWRC and Council Depot.
- Provision of pedestrian and cycle network within the site.
- Provision of Blue and Green infrastructure and biodiversity net gain.

Change suggested by respondent:

-

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**

11262

Support

Policy S01 - East of Solihull**Respondent:** SMBC Strategic Land and Property - Site S01**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane.

Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11263

Support

Challenges**Respondent:** SMBC Strategic Land and Property - Site S01**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11264

Support

Policy S01 - East of Solihull**Respondent:** SMBC Strategic Land and Property - Site S01**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11256

Support

Policy S02 - Moat Lane Depot**Respondent:** SMBC Strategic Land and Property Team - Site S02**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S02 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, in a sustainable location and will contribute to the Borough's housing land supply.

The Preferred Concept Masterplan demonstrates that the site could deliver 131 new homes in line with the requirements of Policy P5 and other policies within the Draft Plan. The masterplan has been informed by detailed technical assessment and onsite surveys. The site provides a development density of 35-40+ dph. The masterplan proposal is appropriate to the character of the area and its surroundings, based on the following key considerations- connectivity, frontages and scale, residential, open space, highways infrastructure, good design practices and sustainability.

Change suggested by respondent:

Policy S02 Moat Lane (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site's capacity being 'at least' 90 dwellings.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11257

Support

Challenges

Respondent: SMBC Strategic Land and Property Team - Site S02

Agent: Cushman and Wakefield

Summary:

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11258

Support

Policy UK2 - Land at Damson Parkway

Respondent: SMBC Strategic Land and Property Team - Site S02

Agent: Cushman and Wakefield

Summary:

We support the proposed relocation of the existing Council Depot to a combined site with a new Household Waste Recycle Centre (HWRC) at Site UK2 Damson Parkway. The new site will ensure the council can meet its obligation to provide Strategic Environmental Services.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10748

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr David Smith**Summary:**

Cheswick Green will lose a boundary.

Dog Kennel Lane is the appropriate boundary and is being ignored.

A disproportionate number of houses are being built in Cheswick Green.

Put further strain on local services, doctors, NHS etc.

Strain on current infrastructure such as roads and transport causing gridlock at peak times.

There is a strong likelihood of more flooding.

Environmental concerns destroying local habitats etc

Change suggested by respondent:

Other brownfield sites in the borough away from Cheswick Green should be considered.

Greenfield sites should never be considered for developments within the borough.

This plan should be dropped.

Legally compliant: No**Sound:** No**Comply with duty:** No**Attachments:** None

14797

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Francis Smith**Summary:**

Objects to BC3

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

14396

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Ian Smith**Summary:**

I object to the Solihull Local Plan specifically to the relocation of the Bickenhill Household Waste and Recycling Centre (HWRC) and Moat Lane Works Depot both located on brown sites to a new green site located on Damson Parkway. It will only increase pollution, noise and impact on health.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14696

Object

Policy S01 - East of Solihull**Respondent:** James Smith**Summary:**

Development will result in an adverse impact on Catherine-de-Barnes village community.
Adverse impact on wildlife due to increase in traffic
Area is already suffering due to motorway improvements
Adversely impact the historic character of the area.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14401

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Janet Smith**Summary:**

Local Elmdon residents were not aware of the potential relocation of the HWRC.

The plan only shows the UK2 site and no reasonable alternatives.

In reality this implies no other site will be considered.

Other sites should be included.

Flood risk in area.

Would add congestion, noise, fumes and pollution to area.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

11209

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Jennifer Smith**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10776

Object

Blythe**Respondent:** Mrs Jenny Smith**Summary:**

More likelihood of flooding

Not increasing doctors capacity and already with 1000 additional homes it cannot cope

Loss of green belt

Transport will be affected with increased road congestion

Change suggested by respondent:

Not enough homes being built on brownfield sites

Legally compliant: No**Sound:** No**Comply with duty:** Yes**Attachments:** None

14817

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs June E Smith**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

14421

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Martyn Smith**Summary:**

The plan only shows the UK2 site and no reasonable alternatives. In reality this implies no other site will be considered.
Other sites should be included.
Would increase traffic, pollution and flood risk.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14423

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Matt Smith**Summary:**

The plan only shows the UK2 site and no reasonable alternatives. In reality this implies no other site will be considered.
Other sites should be included.
Will add to existing traffic, pollution and flood risk in area.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13719

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Melanie Smith**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10873

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Michelle Smith**Summary:**

This development will take out a precious Boundary line for Cheswick Green.

More green fields lost to housing developments has an enormous impact on flooding which we already have in this area.

We need to protect our green open spaces for future generations, thinking of people's mental health.

Infrastructure cannot cope during peak times as it is.

NHS services in this area are already at breaking point.

Stop using Shirley/Cheswick Green/ Dickens Heath as a getout -

why not use areas in Knowle / Dorridge - or is this because Councillors live in these areas?

Change suggested by respondent:

The council should not build on site 12 because of the reasons above.

Building should be on derelict and brownfield sites.

Leave this area as a natural habitat and respect the boundary.

Legally No

compliant:

Sound: No

Comply with No

duty:

Attachments: None

14814

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Ronald A Smith**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14373

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Rosalind Smith**Summary:**

Regarding the upcoming plans for additional housing in the Cheswick Green /Dog Kennel Lane area I don't doubt there are a lot of people who would like to live in this area but having seen the services that have been put in to accommodate Blythe Valley I do feel the Council should think again before agreeing to this proposal in it's current state. Schooling is inadequate there should have been a facility alongside the housing in the Blythe Valley area before now, I do not think young children should have to come so far to school especially if on foot and as there seems to be no other form of transport currently provided other than car (for which parking is totally inadequate) maybe this should have been addressed from the start. Also Cheswick school whether doubled or not will not accommodate play, parking or any other space for the additional children. Please do not let these plans go ahead until much more research is done and practical measures are sought not just for the children but also for the elderly in the area of which I am one.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14743

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BC5 is supported in principle, subject to modifications.

Capacity should be 300 in interests of efficient use of land.

Green Belt enhancement requirement should either be deleted, or proportionate evidence and justification provided to:

- define 'significant',
- identify public open space 'south of site', and
- provide details of landownership and mechanisms for deliverability given that the landowners do not control any land south of the proposed allocation.

Change suggested by respondent:

It is recommended that Policy BC5 paragraph 1 is amended as follows:

1. The site is allocated for at least 300 dwellings.

Policy paragraph 4.i. 'Creation of a significant area of public open space to the south of the site'

- should be deleted or,
- sufficient evidence, explanation and delivery mechanism should be provided to justify and clarify the policy requirements.

Should there be any uncertainty over the deliverability or developability of housing on the proposed site allocation BC5 in its entirety (as delineated on the Policies Map and shown on the 'Concept Masterplan' document), a minor amendment to the site allocation 'red line' boundary could be made to exclude the Builder's Yard and 'Stoneycroft'.

It would still be entirely appropriate and compliant with national policy to use Wootton Green Lane as the new strong physical defensible Green Belt boundary with the opportunity of windfall development coming forward during the plan period on the land outside our Clients' ownership falling within the new proposed settlement boundary i.e. on the Builder's Yard, Stoneycroft and The Croft.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14744

Object

Policy P17A Green Belt Compensation**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P17A is unsound on the basis that no evidence, methodology, sustainability appraisal or viability assessment has been provided to justify the strategy proposed in the policy and linked site allocation policies. There is no evidence that alternative approaches have been considered. There is no clear link between the size of allocated sites and scale of compensation required.

No mechanism has been set out to demonstrate how the proposed compensation measures sought on Green Belt land outside the ownership of the developer would be delivered – contrary to the requirements of NPPF paragraphs 31 and 35 d) and PPG Paragraph 003 Ref ID: 64-003-20190722.

Change suggested by respondent:

Proportionate, robust evidence needs to be produced for the Green Belt compensation requirements appropriate for each site allocation where Green Belt land would be lost. The evidence should ensure that the most appropriate strategy is adopted, taking into account reasonable alternatives.

The Viability Study and Sustainability Assessment reports should be updated to take into consideration the implication of Policy P17A and associated site allocation policies where Green Belt loss is proposed.

Once the evidence has been provided, Policy P17A and all the site allocation policies which sit beneath this overarching policy, should be amended accordingly.

As a minimum:

- Any reference to Green Belt compensation/ enhancement requirements which fall within the site should be removed – only compensatory improvements to the environmental quality and accessibility can be required in the remaining Green Belt land.
- Any reference to a requirement which is on land outside the control of the site landowners/developer or the council, should be either deleted, or the mechanism for delivery should be set out.
- Details of the Green Belt compensation measures required on the site resulting in the most significant loss of Green Belt, i.e. 140ha at HS2 Inter-change (Site UK1), should be set out in Policy UK1 and on an agreed masterplan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14745

Object

Policy P5 – Provision of Land for Housing**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners

Summary:

Policy P5 is unsound on the basis that insufficient evidence has been provided to demonstrate cross-boundary collaboration under the legal Duty to Cooperate in respect of the proposed 2,105 dwelling contribution towards the housing land supply shortfall (paragraphs 227 to 228 of the SLP).

There is no published statement of common ground to demonstrate effective and on-going joint working – contrary to National Planning Policy Framework (NPPF) paragraphs 11, 24, 26, 27 and 60.

Insufficient account has been taken of the need to plan effectively for delivery of the anticipated growth over the plan period and beyond to avoid the need for an early Plan/ Green Belt review, and ensure timely delivery of development – contrary to NPPF paragraphs 33 and 139 c).

Change suggested by respondent:

The evidence in support of Policy P5 is deficient, requiring

- Publication of a statement of common ground, which addresses the HMA cross-boundary shortfall of sites to meet the minimum housing requirement to satisfy NPPF requirements.
- Modification of the housing delivery target number if/as appropriate following scrutiny of the statement of common ground.
- Allocation of small and medium sized sites for residential development; and
- Removal of a phased housing delivery target table at paragraph 224.

Proposed modifications to Policy P5 as shown below:

'1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Insert two new paragraphs beneath paragraph 4 of Policy P5, as follows,

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances:

- To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area;
- To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

14746

Object

Policy P5 – Provision of Land for Housing**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P5 paragraphs 222 and 225-226. Insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, BLR and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all BLR sites, SHELAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHELAA sites, BFL sites and planning permissions should be deleted from the SLP and housing land supply information (paragraphs 65, 222 and 225).

Where appropriate evidence is forthcoming, additional site allocations should be set out in the SLP and Policies Map which identify deliverable small and medium 'major' development sites.

In particular, it is considered the following modifications are required –

1. The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.
2. A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.
3. The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence should be consistent.
4. The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
5. The development of Arden Cross requires Green Belt compensation.
6. That the NEC and Arden Cross sites are fully assessed for their suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14747

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BL1 is unsound on the basis that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site, contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

Evidence is required to justify Policy BL1 West of Dickens Heath, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document; and
- there is a fully developed strategy with mechanisms in place to ensure playing pitches are replaced to release the land for residential development.

Change suggested by respondent:

Insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site.

Evidence is required to justify Policy BL1 West of Dickens Heath

If these issues of soundness cannot be overcome paragraphs 225 and 226 should be amended to remove the estimated contribution of proposed site allocation BL1 from Delivery Phases I and II and Policy BL1 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14748

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Sonia Smith**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy KN2 is unsound on the basis that insufficient evidence has been provided to demonstrate the site is deliverable with 'multiple and potential complex land assembly issues' (paragraph 709) still remaining to be resolved, as well as replacement playing fields. There is also insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School, to justify that it is an appropriate strategy. This is contrary to the deliverability and developability requirements for site allocations and the requirement to justify a strategy as

set out in NPPF Appendix 2: Glossary and paragraphs 35, 67 and 72.

Change suggested by respondent:

Insufficient evidence has been provided to justify Policy KN2, or to demonstrate delivery.

Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and

Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14862

Support

Foreword**Respondent:** Solihull Ratepayers Association**Summary:**

Feel the Solihull Planning Process by way of providing public community information in considerable detail over the extended Review Period together with the informal non-statutory and statutory consultations has been to a high standard - welcomes amendments made at different stages of the plan -

Change suggested by respondent:

one outstanding key area of concern by the association relates to the omission to provide for a Traveller Stop-Over Site within the Local Plan Review

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14871

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Solihull Tree Wardens**Summary:**

Objects to Policy P9;

Policy P9 (Mitigating and Adapting to Climate Change) is unsound because it is ineffective and inconsistent with national policies concerning climate change. In particular, the zero-net-carbon commitment set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019 and the ambitions of the Council's Climate Change Emergency Declaration (8 October 2019) cannot be achieved without closer integration of development policies with a strategy for the Borough's trees

Tree's make a valuable contribution to many environmental objectives - Require a clear tree strategy.

Change suggested by respondent:

To include some of the benefits of trees, section 2 preamble, "to reduce carbon emissions" should be replaced with "to reduce and mitigate carbon emissions".

To specify trees as a mitigation strategy, new subsection 2 (v) should be added to section 2:

"All developments shall contribute to the meeting of the Tree Canopy Cover target appropriate for the location, assessed by a standardised methodology"

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10826

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Solihull Tree Wardens**Summary:**

The site will destroy Green Belt farmland and could damage, if not destroy, fine mature trees.

It will increase the risk of flooding downstream in the Cheswick Green area.

Many houses are already being built in Cheswick Green parish. This development will add to the excessive pressure on local services, such as transport and medical facilities.

The lack of a proper defined southern boundary to the development could lead to further development in the future, destroying the open space between Shirley and Cheswick Green. The proposed estate roads would probably encourage future development, country park plans notwithstanding.

Change suggested by respondent:

Use brown field sites instead.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14092

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Paul Southall**Summary:**

- BL2 plan shows whole area from Dog Kennel Lane beyond the curtilage of Light Hall to field border below the houses
- Think developers will increase density once building and numbers will be over 1000 homes
- Concerned that little attention has been paid to archaeological report (March 2019), ecological report and the architectural importance of the 1750s Grade II listed building and estate.
- No mention in environmental survey of bird life at Light Hall or other wildlife and flora
- Concerned development will greatly increase threat of flooding.
- Will overhead cables across site be put underground?
- Note wayleave/easement agreement within curtilage of Light Hall Farm
- Surveyors have been impolite and parked without consent

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10759

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Graeme Spencer**Summary:**

Having studied the plans I cannot agree to them. The additional housing proposed will put further strain on an already clogged village. Quite simply, the roads cannot cope with more traffic, the medical facilities cannot cope with more people, and schools cannot cope with more children.

Additionally, the character of Knowle as a village is going to be destroyed by this plan

Change suggested by respondent:

I would like either no properties to be built or simply reduced significantly in number. Consideration must be given to building on sites that are currently unused industrial land.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10770

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Helen Spilsbury**Summary:**

Proposal for 1000 new homes will cause major traffic disruptions to an already over run Stratford Road. With a new houses estate how is the traffic from the new site going to filter onto the Stratford Road without causing major delays to the high traffic flow already in the area Getting in & out of Cheswick Green & Dickens Heath will become almost impossible.

Change suggested by respondent:

Better Road infrastructure is required to ease travel from the local villages to the Straford Road (which currently cannot cope with traffic levels now) before any proposal is considered.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14088

Object

Policy P5 – Provision of Land for Housing**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

The housing need over the plan period has been underestimated, particularly considering the increased need from expected job growth, the wider HMA deficit (which is suggested to be significantly more than the 2020 position statement concludes) and unmet need from the Black Country. Additional unmet need will be created post 2031. Settlements such as Knowle, Dorridge and Bentley Heath which have been identified as being able to accommodate housing growth beyond its own needs should have further land allocated within it to meet housing needs.

Change suggested by respondent:

A robust reassessment of the housing numbers are required to ensure that the Borough can meet its own needs and those unmet needs within the Housing Market Area over the plan period.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14089

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

No objection in principle to the allocation, although the site has recognised complex land ownership issues. Question whether the site can be delivered as expected or whether additional land needs to be included as part of the allocation. In this case a logical extension to this allocation would be Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020).

Change suggested by respondent:

The allocation should be extended to include Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14090

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020) should be included as an allocation. Supporting information provided to demonstrate that there is no reason why this site cannot come forward.

The site is accessible, there are no known constraints which would prevent development. The site is deliverable and could be developed within the next five years providing much needed housing for the Borough. It is considered to be a suitable extension to proposed allocation KN2.

Change suggested by respondent:

The allocation should be extended to include Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14315

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Policy BC1 is unsound. Settlement is identified for significant housing with significant infrastructure improvements, and is able to take additional growth. Site BC1 has been reduced in capacity with heritage, ecology and flood risk constraints and has delivery issues with a number of landowners to collaborate.

Site 102 land at Meeting House Lane provides logical rounding off of site, Site Assessment indicates this site could be considered as part of BC1 as not subject to constraints, and additional land would ensure housing numbers proposed are deliverable. Site can easily be delivered within 5 years

Change suggested by respondent:

In order to make this policy sound, the allocation should be extended to include Land at Meeting House Lane (part of site 102 in the Site Assessment October 2020).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14319

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Policy P20 6i is not legally compliant or sound. Little justification in Plan or Topic Paper, and designation is not supported by NPPF paragraph 100. Site is detached and some distance from Balsall Common, is privately owned, has no special local significance or recreational value, other than the existing footpath. No justification why it is of local character. SMBC is aware site has been promoted for development, which is likely to come forward as land to be removed from Green Belt. LGS designation should not be used to obstruct development. Not allocated in Berkswell Parish NDP so clearly no local significance. SMBC has failed to discuss proposal with landowner as advised in PPG

Change suggested by respondent:

In order to make this policy sound and legally compliant the Land between Old Waste Lane and Waste Lane, Balsall Common should not be designated as Local Green Space

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14320

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Policy BC1 is unsound. Settlement is identified for significant housing with significant infrastructure improvements, and is able to take additional growth. Site BC1 has been reduced in capacity with heritage, ecology and flood risk constraints and has delivery issues with a number of landowners to collaborate.

An Environmental Assessment confirms site makes limited contribution to Green Belt. A Vision Document identifies site as strategic infill and demonstrates sustainable connections within landscape and footpath network.

Site 101 land at Meeting House Lane provides logical rounding off of site, Site Assessment indicates this site could be considered as part of BC1 as not subject to constraints, and additional land would ensure housing numbers proposed are deliverable. Site can easily be delivered within 5 years

Change suggested by respondent:

In order to make this policy sound, the allocation should be extended to include sites identified as Land at Old Waste Lane/ Waste Lane (site 101 in the Site Assessment October 2020).

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14327

Object

Policy P5 – Provision of Land for Housing**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Policy P5 underestimates the housing need and should be expressed as a minimum. Ambitions to maintain competitiveness and provide a framework for growth around HS2/UKC supported, but require appropriate housing. Minimum needs to be increased to between 1,036 and 1,248 dpa. Shortfall in housing land for housing market area is underestimated creating additional need. Settlements such as Balsall Common identified as being able to meet additional growth should have further land allocated.

Land at Oakes Farm (Site 304) should be allocated as has clear boundaries, performs more modestly than Green Belt Assessment suggests and less well than Site BC2, accessible location and opportunity to provide landscape and ecological enhancements. Site is available and deliverable within 5 years and has no known constraints

Change suggested by respondent:

Modifications required to make the plan sound

In order to make this policy sound and legally requirement a robust reassessment of the housing numbers of the housing numbers are required to ensure that the Borough can meet its own needs and those unmet needs within the Housing Market Area over the plan period.

Consideration also needs to be given to the inclusion of Land at Oakes Farm as an allocation within the plan.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14328

Object

Balsall Common**Respondent:** Spitfire Bespoke Homes**Agent:** Ridge and Partners LLP**Summary:**

Land at Oakes Farm (Site 304) should be allocated as has clear boundaries, performs more modestly than Green Belt Assessment suggests and less well than Site BC2, is in an accessible location and opportunity exists to provide landscape and ecological enhancements. Site is available and deliverable within 5 years and has no known constraints

Change suggested by respondent:

Land at Oakes Farm should be allocated within the plan

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13920

Object

Policy P14 Amenity**Respondent:** Sport England**Summary:**

Policy P14 fails to consider circumstances such as a developments adjacent playing field site for example a cricket club, which could be at risk of ball strike. In such circumstances, in line with NPPF paragraph 182, the development would need to provide mitigation through the provision of ball stop netting to ensure the use of the playing field is not prejudiced or that any unreasonable restrictions are placed on the use of the site.

Change suggested by respondent:

An additional criterion should be added to Policy P14 to ensure consistency with national planning policy paragraph 182.
 * Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:** None

13921

Object

Policy P15 Securing Design Quality**Respondent:** Sport England**Summary:**

Policy P15 could be made more effective in promoting health and well-being, in line with NPPF paragraph 127, by referring to Sport England's Active Design Guidance. The Guidance sets out 10 principles which developments should seek to adhere to promote activity, health and stronger communities through design.

Active Design is supported by Public Health England and is part of our collaborative action to promote the principles set out in Public Health England's 'Everybody Active, Every Day', to create active environments that make physical activity the easiest and most practical option in everyday life.

Change suggested by respondent:

Add reference to point Policy P15 point 4 to help achieve Objectives F, H and J -

4. All developments should comply with the urban design principles set out in es-tablished current design guidance, including at present; The National Design Guide (2019), Urban Design Compendium 1 and 2 (2007), Manual for Streets 1 (2007) and 2 (2010), Active Design (20015), Building for Life 12 and Secured by Design principles, or their equivalents.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13922

Object

Policy P18 Health and Wellbeing**Respondent:** Sport England**Summary:**

Support Policy P18 Health and Wellbeing which contains a number of Active Design Principles which help to promote physical activity. The policy could be made more effective by promoting co-location of destinations, allowing users to make only one linked trip to an area for multiple reasons. Co-location assists with reducing the need to travel and social interaction, whilst also creating variety and vitality in town and local centres.

Supporting infrastructure should also be promoted to influence physical activity choices and meet the needs of a range of potential users.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

13924

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Sport England**Summary:**

Policy P20 point 7 sets a standard for open space provision, but it is unclear if it encapsulates playing field provision and if so, how has the figure been justified to identify demand in line with Playing Pitch Strategy and whether it would meet the CIL regulation 122 tests.

It is unclear why the viability caveat included in point 9 particularly given Policy P21 and the Plan's objectives F and J. Points 10 and 13 refer to an Indoor Sports Facilities Strategy 2012, which is not robust or up to date, or consistent with NPPF paragraph 96.

Welcome updated Playing Pitch Strategy which reaffirms current and future shortfalls and need to protect and improve existing sites and provide new sites, and use of Mitigation Strategy to inform site policies.

Change suggested by respondent:

1. The incorporation of the below text within P20 ensures that the demand for playing pitches will be informed/justified by evidence namely the Council's Playing Pitch Strategy in line with NPPF paragraph 96.

Developer contributions will be required to enhance provision of playing pitch-es, based on additional demand generated by the new residential development and the sufficiency of existing provision to meet current and projected need. The Council will have regard to Sport England's strategic planning tools and findings of the Playing Pitch Strategy to determine an appropriate amount and type of contribution or provision within new developments.

Where it is agreed by the Council that on-site pitch provision is appropriate to meet identified demand, the applicant is required to provide the new pitch(es) and make provision for its management and maintenance in perpetuity, and clarify these arrangements within a management plan to be agreed by the Council.

2. To ensure that the policy is effective in achieving its objective and policies considerations are not replicated the following amendment is suggested:

New housing developments will be required to provide or contribute to-wards new open spaces or the improvement of existing provision in the area, unless financial unviability is clearly demonstrated.

3. Indoor Sports Facilities Strategy 2012

The authority should commit to updating its Indoor Sports Facilities Strategy 2012 with works commencing prior to the adoption of the Plan to ensure the Plan is consistent with NPPF paragraph 96.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

13925

Object

Policy BC2 - Frog Lane, Balsall Common

Respondent: Sport England

Summary:

Welcome retention of the existing playing field site in Policy BC2 2v in line with the finding of the Playing Pitch Strategy. However, the concept masterplan appears to display a road abutting the playing field site and the removal of part of a hedgerow which creates a boundary for the playing field site. It is unclear why this has been proposed as it could impact on the use of the site such as it being less secure and balls leaving the playing field site.

Change suggested by respondent:

To ensure that there is reduced impact on the use of playing field the concept masterplan should maintain a strong boundary for the playing field site.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

13926

Object

Policy P5 – Provision of Land for Housing**Respondent:** Sport England**Summary:**

Concept Masterplans paragraphs 242-243. Welcome inclusion of clause in site policies identifying a need to provide a financial contribution towards the provision of new playing pitches and contributions to enhancement of existing recreational facilities. It is unclear as to where the contributions will be directed to with the Plan failing to identify the location or allocation of the new playing pitches/hubs sites. Larger sites fail to make on-site provision for playing pitches or ancillary facilities. This is contrary to NPPF paragraph 96 and Plan objectives F and J.

Change suggested by respondent:

The Concept Masterplans for sites which create the demand for multi playing pitches should clearly display locations for the pitches and ancillary provision. The need to provide for the pitches will rescind upon such time suitable new off site playing field site(s) have been identified to meet the developments demands for playing field provision.

The site policies should be amended to state:

v. Financial contribution to provision of new playing pitches (and supporting ancillary provisions) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13927

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sport England**Summary:**

Paragraph 594 should be reworded to make clear that the replacement provision will be equivalent or better provision in terms quantity and quality to ensure consistency with NPPF paragraph 97. New sports provision would also be required to meet the demand generated from the new developments.

In relation to shortlisted replacement sites further details should be provided to ascertain the sites suitability and further clarification is required as to what part of P20 is an enabling policy for replacement pitches and facilities.

Change suggested by respondent:

For clarity paragraph 594 should be amended as per the below:

Sports and Recreation - Replacement of any lost recreation / sports provision as a result of development will be required to an equivalent or better standard in terms of quantity and quality, including ancillary provision, access and use by the wider community where appropriate. Provision will also be made for playing pitches (and ancillary provision) to meet the demands generated from new developments. 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

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

13928

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sport England**Summary:**

Policy BL1 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated, contrary to NPPF paragraph 96

Change suggested by respondent:

To ensure the sporting needs from the development are met in line with Playing Pitch Strategy the following change is proposed:

-iii Relocation of the existing sports provision. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

13929

Object

Policy BL1 - West of Dickens Heath**Respondent:** Sport England**Summary:**

Paragraph 605 incorrectly sets out the sports club sites to be relocated with Leafield Athletic FC being retained and Wychall Wanderers FC to be replaced.

Change suggested by respondent:

To ensure clarity as to the site's to be replaced the following modification is proposed.

605 The larger site is currently occupied by Highgate United FC, Leafield FC Wychall Wanderers FC and Old Yardleians .Rugby Football Club, and re-provision will be required for these sports pitches.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13930

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Sport England**Summary:**

Policy BL2 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

Provision should be made within Policy BL2 to address the current and future shortfalls identified within the Playing Pitch Strategy.

The following modification is therefore proposed in relation to likely infrastructure requirements to be included within the policy:

3.V. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13931

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Sport England**Summary:**

Policy BL3 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

Provision should be made within the policy to address the current and future shortfalls identified within the Playing Pitch Strategy.

The following modification is therefore proposed in relation to likely infrastructure requirements to be included within the policy:

3.V. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13932

Object

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Sport England**Summary:**

Policy HH1 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

Provision should be made within the policy to address the current and future shortfalls identified within the Playing Pitch Strategy.

The following modification is therefore proposed in relation to likely infrastructure requirements to be included within the policy:

3.V. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13933

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Sport England**Summary:**

Policy KN1 should make clear the replacement entails pitches and ancillary provision (floodlighting, clubhouse and car parking), including a 3G pitch in line with the Council's Playing Pitch Strategy and the Football Foundations Local Facilities Football Plan.

There are some concerns relating to the concept masterplan:

- the introduction of trees within the central areas of the replacement playing field area would reduce the flexibility of the site to be marked out for alternative pitch layouts.
- car parking is detached from the sports pavilion;
- pavilion should be centrally located to the main pitch it seeks to serve
- Pitch orientation should accord with Sport England's Natural Turf for Sport Guidance which is endorsed by national governing bodies.
- Seek to ensure the provision of sports light and the potential for a 3G pitch is not impacted by the LWS, Listed Buildings or proximity to residential dwellings.
- Cricket pitch should be sited in an area which would be impact by ball strike, and policy supported by ball strike assessment.

Change suggested by respondent:

a) To ensure replacement provision is equivalent in terms of quantity and quality the following modification is considered necessary:

viii. Relocation of the existing playing field site (pitches and ancillary provision) sports pitches currently occupied by Knowle Football Club;

b) For consistency and clarity purposes all reference to the reprovision/relocation of the Knowle pitches within the policy and supporting text should be modified to playing field site (pitches and ancillary provision)

c) To ensure that the use of the cricket club is not prejudiced by the introduction of residential development adjacent to it the following design principle in line NPPF paragraph 182 should be incorporated into the Policy:

2.IX The provision and maintenance of ball stop mitigation will be required, if deemed necessary following a ball strike risk assessment, and implemented before any ball strike risk is introduced as a result of the proposed development.

d) To enable an identified need within the Council's Playing Pitch Strategy and Playing Pitch Mitigation Strategy to be met at the site, in accordance with NPPF paragraph 96, provisions within the policy for a 3G pitch should be made within the replacement site.

4.IV The provision for a full sized 3G pitch with sports lighting to be provided at the site.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13936

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Sport England**Summary:**

The playing fields at Arden within Site KN2 are not surplus to requirement and the policy should ensure the playing field site is not lost until replacement provision of equivalent quantity and quality is available for use. Policy KN2 also fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated, contrary to NPPF paragraph 96

Change suggested by respondent:

The following modifications are proposed to policy KN2:

(a) New 2x Development of the Arden Academy Trust playing field site (inclusive of hard court and AGP) and its ancillary facilities shall not commence until the provision of replacement playing field is made available for use. The replacement provision will be at least equivalent or better in terms quantity and quality of that proposed to be lost.

(b) 3v Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13937

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** Sport England**Summary:**

Policy ME1 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

The following modification is therefore proposed in relation to likely infrastructure requirements to be included within the policy:

3.V. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13938

Object

Policy S02 - Moat Lane Depot**Respondent:** Sport England**Summary:**

Policy S02 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

The following modification is therefore proposed in relation to likely infrastructure requirements to be included within the policy:

3.V. Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13941

Object

Policy S01 - East of Solihull**Respondent:** Sport England**Summary:**

The wording of Policy S01 should make clear that the playing field site, not just the pitches is being retained, as the Concept Masterplan shows encroaching onto the playing field site, reducing its capability to accommodate pitches. Policy S01 also fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy. Should the site make no on-site playing field provision nor an off-site contribution, the shortfalls identified within the Playing Pitch Strategy will be exacerbated contrary to NPPF paragraph 96

Change suggested by respondent:

A) The following modification is proposed:

2 iii. Retention of existing sports pitch playing field site.

B) For clarity the Concept Masterplan should clearly set out there is no encroachment on to the playing field site.

C) The following modification is proposed :

3v Financial contribution to provision of new playing pitches (and ancillary facilities) and contributions to enhancement of existing recreational facilities, to accord with the requirements identified in the Playing Pitch Mitigation Strategy.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:** None

13942

Object

UK Central Hub**Respondent:** Sport England**Summary:**

Welcomes the identification of the provision of leisure and community infrastructure though the needs for the site should be informed by a Playing Pitch Strategy and Indoor Needs Assessment.

Change suggested by respondent:

To ensure that the leisure provision and playing pitch demand generated for the site is met the policy/supporting text should make reference to the need to undertake a site specific leisure and playing pitch needs assessment to inform the requirements for the site.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

13944

Support

Policy UK2 - Land at Damson Parkway**Respondent:** Sport England**Summary:**

Support Policy UK2 with it ensuring the retention of the existing sports provision site until a suitable alternative site, agreed with Sport England and national governing bodies, being provided and ready for use.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments: None

14054

Support

Policy S01 - East of Solihull**Respondent:** Spread Trustee Company Limited and BGL Reads Trust Company Limited**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough's housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site's capacity being 'at least' 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane. Reference within the Concept Masterplan Document to 'an ecosite (former Pinfold nurseries)' is not evidenced and should be removed.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14055

Support

Challenges**Respondent:** Spread Trustee Company Limited and BGL Reads Trust Company Limited**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14056

Support

Policy S01 - East of Solihull**Respondent:** Spread Trustee Company Limited and BGL Reads Trust Company Limited**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

11225

Object

Policy S01 - East of Solihull**Respondent:** Mrs Christine Spriggs**Summary:**

The original consultation on S01 (East of Solihull) represented a significantly smaller number of properties and was less invasive upon the local amenities.

Change suggested by respondent:

A smaller amount of properties proposed at S01 would have less physical impact, and therefore the allocation should be amended.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

11226

Object

Policy S01 - East of Solihull**Respondent:** Mrs Christine Spriggs**Summary:**

The plan fails to take account of the accumulated impact of the overall loss of green belt land.

Change suggested by respondent:

A co-ordinated consideration must be given to the environmental impact of the loss of green belt land and nearby allocations.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

11227

Object

Policy S01 - East of Solihull**Respondent:** Mrs Christine Spriggs**Summary:**

The implications of increased traffic and pollution associated with S01 has not been fully considered.

Change suggested by respondent:

-

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

11228

Object

Policy S01 - East of Solihull**Respondent:** Mrs Christine Spriggs**Summary:**

Consultation has been limited to only a few properties, whilst development is going to have a wider significant impact.

Change suggested by respondent:

Much wider consultation needs to take place.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14376

Object

Policy S01 - East of Solihull**Respondent:** Mrs Christine Spriggs**Summary:**

The original consultation represented a significantly smaller number of properties and was much less invasive upon the local amenities. Although each individual piece of Green Belt land may be small, this plan fails to take account of the accumulated impact of the overall representations.

The implications of increased traffic and pollution have not been considered. With the planned increase of land to be given to Jaguar Land Rover and the New Waste site, the increase of 700 houses in this area will lead to a huge amount of vehicular traffic, in particular that of large vehicles, and the increase in pollution, both of air quality and noise, have not been taken into consideration.

Consultation has been minimal and limited to only a few properties, whilst the impact is going to be significant on a much wider basis.

Change suggested by respondent:

Much wider consultation needs to take place.

A co-ordinated consideration must be given to the environmental impact of this and nearby suggestions.

A much smaller number of properties would have less physical impact, and this section of the plan needs to be amended.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

14596

Object

Policy BL1 - West of Dickens Heath**Respondent:** Karen Spriggs**Summary:**

Loss of pitches will affect our children (and adults).
 Loss of Local Wildlife Sites and Ancient Woodland will be so detrimental to wildlife.
 Road network cannot take further development and is already overloaded.
 These fields flood every winter.
 Some mitigation measures not achievable.
 The character will be adversely affected.
 Existing pressures on GP surgeries and schools will be further exasperated.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10929

Object

Policy P18 Health and Wellbeing**Respondent:** SSA Planning**Summary:**

No objectively assessed requirement based on specific problem with HFTs or proliferation, existing or projected numbers, above average or increasing obesity, link with proximity or mechanism (particularly for primary schools), extent of affected area, real walk distances, impacts on sustainable accessibility, footfall or other retail uses nearby. No assessment of impact, therefore no balance. Negative assumptions disincentivise good practice. Impossible to monitor or manage. Other planning and non-planning policies and interventions more effective. National policy seeks to create not restrict choice. Soundness tests not removed by practice guidance but focussed on areas of high incidence and over-concentration.

Change suggested by respondent:

Clarify actual meaning and intent of last sentence in part 3, evidence and re-focus part 4 to achieve objective in last sentence of part 3 and delete part 5 .

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14263

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** St Mowden Developments Ltd**Agent:** JLL

Summary:

JLL considers the approach of the Submission Draft to the provision of industrial and warehouse floor space to be deeply flawed on a number of grounds. These are summarised below.

The principal evidence base to the submission draft, G L Hearn's HEDNA, has under-estimated substantially the local need for development land for industry and warehousing. GL Hearn has mishandled primary recent evidence on increases in industrial floor space and ignored clear market signals which show a significant imbalance between demand and supply.

The supply of sites to meet local need is wholly insufficient, both quantitatively and qualitatively. It provides a very restricted offer to companies looking to expand or invest in Solihull.

The approach to identifying and delivering employment land to meet local needs for industry and warehousing does not accord with the guidance set out in PPG on Economic need. In addition, it is not justified by its principal evidence base.

As such, Policy P3 is unsound in terms of meeting local need for industry and warehousing.

The Submission Draft makes no allowance for large scale logistics. Indeed, the Submission Draft and G L Hearn's HEDNA make no reference to this sector. This is a significant failing given the circumstances: -

- Paragraph 82 of the NPPF requires planning authorities to make provision for logistics operators of a variety of scales and in suitably accessible locations.
- The clear guidance in PPG for strategic authorities to identify the scale of the need for logistics and consider the most appropriate locations to meet those needs.
- The signposting by the 2015 West Midlands Strategic Employment Sites Study of a "severe shortage" in supply, relative to demand, of development land to accommodate this sector.
- Similar conclusions by the successor study to the West Midlands Strategic Employment Sites Study, currently in draft form but with its conclusions well known to the strategic authorities (as part of the commissioning group), which refers to an "urgent need" for additional sites to be brought forward.
- The recognised strength of the logistics market and the growing gap between demand and supply in this location.

The West Midlands Strategic Employment Sites Study 2015 identified Solihull as forming part of the M42 corridor (Area A) and considered this to be an area of high demand for big box logistics, with supply "severely short". It recommended that local studies should be commissioned to identify specific opportunities and assess policy implications.

Unfortunately, no such study has been carried out for Area A. Solihull, as the authority with the greatest access to this stretch of the M42, should have taken a leading role, but has not done so.

Solihull, North Warwickshire, Birmingham and Tamworth – the principal local planning authorities in this area – have simply failed to engage on this issue. This has resulted in very little new land being identified in Local Plans to meet future demand. This is a chronic failure of the Duty to Co-operate.

Similarly, there seems to be a lack of engagement between Birmingham and Solihull – which form part of the same LEP – about how Solihull could take a role in accommodating the significant identified overspill of employment land need for Birmingham.

These omissions are fundamental. They result in the Submission Draft not delivering the scale and quality of employment land required in order for the Borough to meet its economic needs and optimise its assets. This is an abject failing given the uncertain economic and political times ahead.

Change suggested by respondent:

To rectify matters, the Submission Draft should increase its requirement to meet local need for industry and warehousing to 44 hectares (developable, rather than gross).

In addition, the Submission Draft should make an express allowance for the large scale logistics sector. This allowance should be over and above local need and provide a minimum of a further 35 hectares.

In combination, the Submission Draft should provide and plan for at least 80 hectares of employment land for industry and warehousing to provide for both local need and the need for large scale logistics (i.e. big box). Without the allocation of this land, the demand for industrial and warehouse units for Solihull will be further suppressed and opportunities for economic growth, whether organic or inward investment, will be missed.

This will require the release of Green Belt land and the allocation of additional new sites. We consider that the scale of need for new employment land, the reasons for its need, the emphasis placed on meeting this need in the NPPF and PPG, the increasing importance of employment in an uncertain economic outlook and the absence of other alternatives, amount to the exceptional circumstances required by the NPPF to release Green Belt land through the development plan-making process. Releases in similar circumstances have already been previously made within Solihull – Blythe Valley Business Park and Birmingham Business Park – and the wider region – i54, Peddimore and Coventry Gateway.

If it is recognised that more land is required and needs to be identified, then there should be a further consultation and/or Call for Sites. Our client, St Modwen Developments Ltd, would be pleased to provide details of a large site that is well related to a motorway junction of the M42, that is capable of meeting some of the additional need referred to above.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14760

Object

Knowle, Dorridge & Bentley Heath

Respondent: St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road

Agent: Savills

Summary:

The evidence demonstrates that site 207 has limited constraints and is in a very accessible and sustainable location. The allocation of the site could provide additional market and affordable housing to meet Solihull and the Greater Birmingham Housing Market Area's housing needs (see response to Policy P5) as well as providing land for a community use or other community facility and public open space. It is considered that the benefits of allocating this site within the Local Plan Review far outweigh any potential concerns SMBC have relating to the narrowing of the gap between Bentley Heath and Solihull. We therefore consider that this land should be released from the Green Belt and allocated within the Local Plan Review.

Change suggested by respondent:

Allocate site 207 in the Plan.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14761

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

Does not provide developers with enough flexibility to consider the mix of housing at the planning application stage. The HEDNA sets out a range of mixes for each dwelling size. We support the Council providing some guidance on housing mix but this should accord with the mix proposed in the HEDNA.

The HEDNA has identified that there is a need for affordable rent within the Borough but there is no provision in the policy. Request the is amended to refer to both affordable rent and social rent.

Change suggested by respondent:

The HEDNA sets out range for the proposed affordable housing mix which provides flexibility, it is not clear how or why the Council has chosen to apply fixed percentage requirements for social rented and shared ownership. Each application for residential development should be considered on its merits and the type and mix of affordable housing should be discussed with the Council's housing and planning departments at the pre-application stage. We consider that this will make the policy more effective than simply applying a fixed blanket approach across all residential sites in the borough.

Amend Policy P4A to make reference to a requirement for social and affordable rent rather than purely social rent.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14762

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

Point 3 sets out specific requirements for housing mix. This is not effective as it does not provide developers with flexibility. Housing mix should be considered at application stage in accordance with the HEDNA 2020.

The housing mix proposed in the HEDNA provides a range for each dwelling type which reflects the 'latest' evidence in 2020. However, market demand changes so this 'latest' evidence may not be representative of need when planning applications are submitted in the future. As developers and national housebuilders have vested interests in building products that are deliverable and meet market needs, Solihull should not have a fixed size and type guidance, as this could affect development viability, lead to inflexibility and result in obstructing development.

Change suggested by respondent:

Request that the Council remove references to mix (point 3) from Policy P4C and insert indicative housing mix ranges in accordance with the HEDNA within the explanatory text. Developers should be 'encouraged' not required to accord with the mixes set out in the explanatory text. This is the approach the LPA has taken to density requirements (Policy P5) in the Submission Draft and we consider this flexible approach should be used for market housing mix. Market demand at the time of the application should play an important role in determining the mix of dwellings delivered on a site.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14763

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

No evidence to justify the percentage requirement for self and custom build. No requirement in the PPG for such plots to be provided as part of allocations.

Whilst the Self Build register may provide an indication of the level of interest, this needs to be analysed further to uncover the specific requirements of respondents.

The register does not test whether people have the means to acquire the land and privately construct their own property.

Without this exercise having been undertaken and supporting the Council's conclusions, the Policy is not justified.

Practical issues of having multiple individual sites within one development need to be considered.

Change suggested by respondent:

The requirement for allocated sites of 100 units or more to provide 5% of open market dwellings in the form of self or custom build plots should be removed from the Local Plan as this policy is not justified or in accordance with national guidance. The provision of self or custom build plots should be the subject of discussion with those who have expressed an interest, and once the Council has an understanding of the type and range of sites that are sought allocations (for example in the form of clusters) should be identified and allocated as self and custom build opportunities around the Borough.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14764

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

Exceeding minimum building regulation standards is optional and should be justified by evidence.

Requiring all new dwellings to be built to the Category M4(2) standards, will result in larger dwellings and in turn less dwellings being delivered on sites, and inefficient use of land on the Green Belt sites proposed

In terms of flexible application of the policy, none of the criteria in point 5 make reference to the suitability of a site to accommodate accessible dwellings, for example their topography or local demographic.

No justification why 300+ dwellings is threshold for care bedspace provision. No consideration of whether sites may be suitable for such provision or whether providers will be interested.

Change suggested by respondent:

The requirement for all dwellings to be built to Category M4(2) standards should be removed and any proposed requirement should be based on an appropriate assessment of need (including a review of the existing housing stock).

The criteria listed under Point 5 of Policy P4E should be amended to state "Site specific factors which may make step-free access unsuitable or unviable". For example not every site identified is flat and able to accommodate level access in a uniform matter.

The requirement for 300+ dwellings to deliver specialist housing or care bedspaces should be removed from this policy and specific sites for specialist and senior living should be allocated to deliver this specialist provision. This will ensure that the requirements of Point 6 are met.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14765

Object

Policy P5 – Provision of Land for Housing**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

18% of the proposed housing requirement for the Borough is at the UKC Hub. The majority of dwellings delivered will be apartments. No evidence that the amount of apartments proposed at UK Central Hub is needed, especially when there is an existing family demographic.

The UKC Hub will be unlikely to deliver 2,740 dwellings up to 2036 which could leave a shortfall of circa 700 – 1,000 dwellings. Evidence documents also show different housing figures for the sites.

The revised Standard Methodology could increase the Council's minimum housing need by 25%. The range of housing growth options that may be derived from changes to the standard method and wider HMA growth requirements should be tested and planned for.

The proposed contribution towards the HMA shortfall is not a sufficient or justified contribution in light of the identified shortfall post-2031 which should be addressed in the Local Plan Review. Additional sites will be required.

Over-reliance on windfall. Council should identify additional sites and allocate and/or safeguarded for residential development.

Contrary to NPPF, point 6 makes no reference to local market conditions and viability when identifying appropriate density and mix for each site.

Change suggested by respondent:

The UK Central Hub area will not deliver 2,740 dwellings in this plan period, an additional contribution should be made towards the HMA shortfall and the revised standard methodology requirement should be taken into consideration by the Council before submitting the Local Plan for Examination. In light of this the Council need to allocate additional sites that have performed well against the Council's evidence base criteria and are in sustainable locations. The land being promoted by St Philips (Site Reference 207) should be considered for a residential allocation as a high performing site adjacent to the sustainable settlement of Bentley Heath.

Amend Point 6 of Policy P5 to accord with the criteria listed in NPPF Paragraph 122 and amend the indicative densities table on page 76 to set out more realistic densities for the UK Central Hub area if 5,000 dwellings are going to be delivered on the UK Central Site (paragraph 830 of the Submission Draft document).

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14766

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

Additional requirements on development sites in order to reduce energy demand and minimise carbon dioxide emissions are over and above the requirements of PPG. The PPG states that Local Plans can set higher standards "but only up to the equivalent of Level 4 of the Code for Sustainable Homes".

In considering viability, Solihull has not sufficiently justified why a 30% uplift is proposed.

The capital cost and land take to achieve the requirement for at least 15% of energy from renewables, should be considered. There is no evidence of this.

With regard to viability, £6000 per dwelling just to meet energy requirements without any other requirements being taken into account is considered significant.

Change suggested by respondent:

Amend Policy P9 to 'encourage' development to apply the energy hierarchy to reduce energy demand and minimise carbon dioxide emissions. The policy should state that this will be subject to viability and suitability considerations at the application stage. The requirement to reduce energy demand to over and above Building Regulations Part L should be removed as this does not comply with the PPG.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14767

Object

Policy P17 Countryside and Green Belt**Respondent:** St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road**Agent:** Savills**Summary:**

The Council should identify areas of land that could be released from the Green Belt in this Local Plan Review and safeguarded for future development should the Council not be able to meet their housing needs or the housing needs of the HMA during the next plan period.

A significant HMA housing shortfall is expected from 2031 so it is likely that Solihull will need to contribute additional dwellings to assist in addressing this.

When identifying potential sites to release from the Green Belt and safeguard, sites in lower performing Green Belt parcels, which are adjacent to sustainable settlements, accessible and considered suitable, achievable and deliverable in the Council's SHELAA should be chosen, such as Site 207.

Change suggested by respondent:

To provide a plan which is more effective and responsive to these variables we consider that the Council should have tested a number of scenarios and provided appropriate allocations and safeguarded areas to enable them to flexibly respond to the ever changing circumstances. We request that the Council consider identifying areas of land that could be released from the Green Belt in this Local Plan Review and safeguarded for future development should the Council not be able to meet their housing needs or the housing needs of the HMA during the next plan period. Our client's site (Site Reference 207) should be considered for a residential and community facility allocation or be safeguarded for future development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14768

Object

Policy P17A Green Belt Compensation

Respondent: St Philips Land - Land at Smiths Lane Browns Lane & Widney Manor Road

Agent: Savills

Summary:

The Council should set out Green Belt compensation projects which can be paid for through CIL. Communities could then identify projects that compensation could fund.

Where compensation cannot be provided on site or would result a reduced net developable area, there should be an effective strategy to enable off site contributions to be made in other locations e.g. through the identification of donor sites.

No indication of how the level of compensation will be determined. A formula or calculation should be provided to allow developers to plan for this requirement on top of the other contributions sought.

Change suggested by respondent:

Request that the Council amend Policy P17A to refer to the use of CIL as well as S106 agreements to set out the Green Belt compensation projects. We also seek confirmation from the Council as to the level of compensation that will be requested for sites removed from the Green Belt.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14835

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs B Stanley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14834

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr J Stanley**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14237

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Barrie and Elaine Stanyer**Petition:** 2 petitioners**Summary:**

Main concerns is if the entrance/exit to the proposed developed was at this juncture. It is already a very busy stretch of road and the 90° bend is a blackspot, at which cars have left the road on numerous occasions.

Other concerns:

- The site is a well known area of flood risk
- The current driveway follows the line of the public footpath down to the canal from Bills Lane. This is used by numerous local people out walking with children and pets. Changes to this would presumably result in the public right of way being re-routed
- Increase in pollution levels brought about by additional traffic both in the area and on the site
- Decrease in clean air caused by the decimation of thousands of trees to make way for development
- Loss of wildlife. Owls, bats, ducks, foxes and more are all prevalent on this site
- A totally disproportionate amount of development is being proposed in Shirley (39%), in an already highly populated area
- Huge resources would be needed to create a suitable infrastructure to support new road developments and provide additional services such as schools and doctors
- Development should be focused on Brownfield Areas

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10799

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mel Starling**Summary:**

This site was rejected in the 2013 master plan as being unsuitable because of the topography of the land. Nothing has changed make it suitable now.

I dispute the assertion that building on this land would "round off" the settlement in a logical manner , Wychwood Avenue is very separate because of the Nature reserve and stream, and Hampton Road houses finish opposite Grimshaw Hall which already forms a logical border to the village.

There is nothing logical about taking green belt to move a football club far from the centre of the village, next to the tranquil canal.

Change suggested by respondent:

No provision for the impact on the residents of Chantry Heath Crescent i.e planting trees or a green buffer. Grimshaw Hall is barely visible from Hampton Road yet it is afforded a huge buffer from the development.Unfair.

Low density housing should be built behind Chantry Heath Crescent to mirror the existing housing and not adjacent to a football complex.

Will the football complex be for public use and who will maintain it ?.

Legally No
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

10800

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mel Starling**Summary:**

I support development in this location. All the required houses should be built here and not on Hampton Road and Knowle Football Club. KN2 is nearer the centre of the village, the schools, existing bus routes and Dorridge and Widney Manor railway stations. The existing roads and pavements are wide. Children and parents could easily walk from this development to schools. A roundabout could be built at the bottom of Stripes Hill to provide easy access to this development. This development would be screened by the houses in Station Road and Arden School if it is not demolished.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

11059

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Ms Anne Stewart**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14014

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** West Midlands HARP Consortium**Summary:**

Policy P4A - Definition of affordable housing should be changed to that in NPPF. This should be replaced with a sentence which refers readers to the definition set out within the NPPF, and perhaps in this region, the local definition set by the West Midlands Combined Authority.

Pleased to see that a Housing and Economic Development Needs Assessment (HEDNA) and that the HEDNA (2020) does not include the private rented sector in its calculation of affordable housing need even with Local Housing Allowance.

Pleased to see that the Council sets an ambitious threshold of 40% affordable housing on site from qualifying residential developments. This will assist in the Council delivering as much affordable housing as viability allows in order to meet the HEDNA (2020) identified need of 578 affordable homes per annum over the plan period.

Welcomes the inclusion of paragraph 177 which shows support for entry-level exception sites; a policy approach which was introduced by the NPPF revision

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14015

Support

Policy P4B – Meeting Housing Needs – Rural Exceptions**Respondent:** West Midlands HARP Consortium**Summary:**

Policy P4B - Suggest that text should be added to Policy P4(B) or to the supporting text accompanying the policy which allows for the delivery of affordable housing through cross-subsidy where it can be demonstrated that affordable housing development cannot be achieved without an element of open market housing.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14016

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** West Midlands HARP Consortium**Summary:**

Policy P4E – The policy states that all new build housing on major development sites must be built to Category M4(2). It is not clear if the viability study (October 2020) has assessed the impacts of these standards alongside all of the other policy requirements of the Draft Local Plan against affordable thresholds higher than 40%. It is quite common for housing associations to deliver up to 100% of housing on site as affordable and therefore this requirement should be subject to viability. Without these viability studies for these kinds of developments, implementing such technical standards is likely to threaten future delivery of affordable housing on schemes with developers having to negotiate its reduction to achieve viability on schemes.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14017

Object

Policy P5 – Provision of Land for Housing**Respondent:** West Midlands HARP Consortium**Summary:**

Policy P5 - Policy P5 requires all new residential development to adhere to Nationally Described Space Standards (NDSS). The blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many 100% affordable development schemes. Many eligible households in Solihull may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. A blanket application of NDSS should also be demonstrated to be viable across various development scenarios through robust viability testing.

Change suggested by respondent:

Representation recommends that this part of Policy P5 is removed

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10781

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Caroline Stokes**Summary:**

Paragraph 105 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The plan should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10782

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Caroline Stokes**Summary:**

Policy P12-para7 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The policy should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10783

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mrs Caroline Stokes**Summary:**

Paragraph 831 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The plan should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10777

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gareth Stokes**Summary:**

Paragraph 831 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The plan should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15180

Object

Policy P12 Resource Management**Respondent:** Mr Gareth Stokes**Summary:**

Paragraph 831 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The plan should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10778

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Gareth Stokes**Summary:**

Paragraph 105 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The plan should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10779

Object

Protecting and Enhancing our Environment**Respondent:** Mr Gareth Stokes**Summary:**

Policy P12-para7 - Reference to moving the Household Waste and Recycling Centre and Depot from its present Bickenhill site to Damson Parkway is not legally compliant, or sound. A move is not justified on environmental grounds, and does not properly take account of the negative climate change / environmental impacts of an unnecessary move (Planning and Compulsory Purchase Act 2004, s. 19 (1A), nor the requirement for community involvement given the strong objections from the residents nearest to the proposed Damson Parkway site (s. 19 (3)). No evidence of co-operation with other agencies regarding this site move is provided.

Change suggested by respondent:

The policy should remove any reference to the Household Waste and Recycling Centre and Depot being moved from its present Bickenhill Site to Damson Parkway, and instead the plan should concentrate on how the Bickenhill site could be improved (better parking, access booking systems etc.).

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

15089

Object

Policy BL1 - West of Dickens Heath**Respondent:** Miss Charlotte Street**Summary:**

Loss of playing fields.
 The land is high grade GREEN BELT - wildlife will be affected.
 Rural road network cannot take further development.
 These fields flood every winter.
 Mitigation measures not achievable.
 The character and setting of the Village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14603

Object

Policy BL1 - West of Dickens Heath**Respondent:** Christine Street**Summary:**

Loss of pitches will affect our children (and adults).
 The land is high grade GREEN BELT.
 Will be detrimental to wildlife.
 Road network cannot take further development.
 These fields flood every winter.
 Mitigation measures not achievable.
 The character and setting will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14604

Object

Policy BL1 - West of Dickens Heath**Respondent:** Robert Street**Summary:**

If the pitches are removed, this will have an adverse effect on both children and adults.
 The land is high grade green belt.
 The site would be severely detrimental to the current wildlife.
 Road network cannot take further development.
 These fields flood every winter.
 Mitigation measures included not achievable.
 The character of the village will be adversely affected.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14529

Object

Policy BL1 - West of Dickens Heath**Respondent:** R Styles**Summary:**

the sports fields must be located within this area to allow the present users easy access.
 Would add to traffic and parking issues and increase flooding.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

10671

Object

Foreword**Respondent:** Mary Sullivan**Summary:**

Amazed that the Council is submitting such plans in the midst of a Pandemic, which has highlighted

- The necessity of Greenspace for people's well-being and health;
- That the areas with the highest density of COVID 19 are densely populated towns and cities
- That greed should not be put before people's Health.

The people representing us are not and should speak the those they represent and consider our wellbeing.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

15197

Object

Balsall Common**Respondent:** Mary Sullivan**Summary:**

Amazed that the Council is submitting such plans in the midst of a Pandemic, which has highlighted

- The necessity of Greenspace for people's well-being and health;
- That the areas with the highest density of COVID 19 are densely populated towns and cities
- That greed should not be put before people's Health.

The people representing us are not and should speak the those they represent and consider our wellbeing.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13785

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The current approach does not give proper consideration to the strategic role and function of the West Midlands green belt. A further release of land from the Green Belt south of Tidbury Green would be appropriate.

Change suggested by respondent:

The Green Belt proposals should be tested on a regional basis due to the scale of housing need.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13787

Object

Vision**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The Vision and objectives suggest a vague approach to accommodating Solihull's housing needs. The current approach is negative and should be more proactive, ensuring sustainable patterns of growth and capturing as much of the economic benefit within the Borough itself.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13788

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

Land at Fulford Hall Farm scored an overall combined score of 6 (moderately performing) in the Green Belt Assessment. The site scores on par or better than other proposed allocations in the Blythe area (South of Shirley, West of Dickens Heath and South of Dog Kennel Lane).

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13789

Object

Policy P5 – Provision of Land for Housing**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The Council have not provided evidence of the unmet need expected to 2036. It is reasonable to assume that the unmet need to 2036 will be much higher than the 2,600 dwellings to 2031.

Solihull should be seeking to make a higher provision towards the Greater Birmingham Housing Market Area unmet need than the 2,105 currently proposed. Solihull should seek to accommodate at least 6,000 dwellings of the HMA shortfall.

Change suggested by respondent:

The Council should undertake further joint work with adjoining authorities to ensure the duty to co-operate is properly discharged. Evidence of joint working and an indication of how any shortfall in meeting objectively assessed housing needs will be met is required.

The amount of housing to be accommodated within the Borough needs to be increased to a figure significantly higher than the 15,017 for the period 2020-2036. It should accommodate at least 1,200 dwellings on Sustainable Urban Extensions removed from the Green Belt south of Tidbury Green.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13790

Object

Spatial Strategy**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

All reasonable alternatives need to be assessed in the Sustainability Appraisal. Its unclear why Option 2 was selected over Options 3 and 4, given there is little difference between the conclusions of these options.

The Sustainability Appraisal has failed to explain the selection and rejection of the alternative sites, contrary to guidance provided in national planning policy (NPPG 018). Full consideration should have been given to the area south of Birmingham around Hollywood, Whitlock's End and Cheswick Green.

The Sustainability Appraisal has failed to consider mitigation measures. Therefore the assessment used for the selection of the allocations is not accurate or robust and cannot be relied upon.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13791

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

Mitigation measures have not been considered. The potential significant adverse effects associated with large-scale sites can be designed out through the planning process.

Fulford Hall Farm is located within reasonable walking distance of two train stations however as only two services are being offered per hour at both stations it's considered as providing infrequent services. Local studies and strategies identifies aspirations to increase the frequency of services along to two per hour in both directions. Development would generate the demand for increased services. Network Rail is welcoming of funding to enhance the station facilities.

Failure to consider mitigation has skewed the Sustainability Appraisal and site selection process.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13792

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

Fulford Hall Farm (site reference 313) is given a score '9' with regards to Step 1 of the site selection process and therefore considered not suitable for allocation.

We have concerns with the robustness and methodology used for the Green Belt Assessment, the findings of which have been taken forward to inform the Sites Assessment. All Broad Areas are automatically given a score of 3 which is fundamentally flawed and lacks detail. Our assessment demonstrates that there would be a limited impact on purpose 3 of the Green Belt designation but it would not undermine the performance of remaining Green Belt in the safeguarding the countryside from encroachment.

Change suggested by respondent:

The Fulford Hall Farm site should be categorised as priority 6 – “Greenfield in accessible moderately performing Green Belt Location” and not priority level 9.

A reassessment of the Green Belt options needs to be undertaken. A robust long-term Green Belt boundary around Tidbury Green needs to be identified taking account of the exceptional circumstances arising from the Borough's development needs. Land at Fulford Hall Farm should be removed from the Green Belt and allocated for development.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13793

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The Accessibility Assessment indicates that only those Railway Stations which had at least three services per hour in at least one direction during the peak periods were included within the assessment. This criterion therefore excludes Wythall Station and Earlswood Station, both located within 800m of the Fulford Hall Farm site. Tidbury Green is well located to a developed rail network. There are proposals to increase the frequency of service from hourly to bi-hourly. New development in Tidbury Green can provide the additional demand to help support and justify the increase in service frequency.

Change suggested by respondent:

-

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

13794

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

We contest the methodology used to establish visual sensitivity in the Solihull Borough Landscape Character Assessment (2016). The Fulford Hall Farm site is classified within 'LCA2' and the assessment concludes the visual sensitivity to be 'high'. This appears to be principally based on the presence of ancient woodland and the Stratford-upon-Avon canal- which are not within the site. The site is visually well contained, capable of accommodating appropriately designed development and any potential visual impacts that may arise would be limited.

Change suggested by respondent:

-

**Legally No
compliant:**

Sound: No

**Comply with No
duty:**

Attachments:

13795

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The Site Assessment lists a number 'hard and soft constraints' at the Fulford Hall Farm Site. It is considered that these can be overcome with suitable design.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13796

Support

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

The draft Plan is ambitious in its targets for addressing climate change which is welcomed. The proposals at Fulford Hall Farm have evolved to create a new neighbourhood that addresses the zero carbon aspirations.

The land at Fulford Hall Farm could deliver at least 1,200 homes, a primary school, one Primary local centre and two Secondary local centres. Through the principles of zero carbon building design, sustainable transport interventions and extensive tree planting, the development will deliver a zero-carbon masterplan.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13797

Object

Blythe**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

A policy thrust is that all new development should be focussed in the most accessible locations, seek to enhance existing accessibility levels and promote ease of access. Land at Fulford Hall Farm offers travel choice and inclusive mobility for all modes of travel. The proposals have the opportunity to take best advantage of trends that have been accentuated by the COVID 19 pandemic.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

13798

Support

Challenges**Respondent:** Summix (FHS) Developments Ltd**Agent:** Framptons Planning**Summary:**

Support Challenge A - Mitigating and adapting to Climate Change and the associated objectives identified. Do not agree with the final sentence of para 38 "The challenges are not set out in any priority order" - Challenge A should be the highest priority.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

10861

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mrs Elaine Sutton**Summary:**

Site 12

Too many houses are being built in and around Cheswick Green which eventually will mean it will just merge into surrounding area resulting in lost green belt land. Not enough houses being built on brownfield sites.

This development will make it even harder to see GP.

Creynolds lane is already very busy and with additional new housing will be much worse. Local roads will be gridlocked at rush hour.

Traffic already bad in and around cheswick green school an extension to the school will make it unbearable.

More housing will lead to even more flooding in the area.

Change suggested by respondent:

Site 12 should not go ahead. Cheswick Green has already had a disproportionate number of houses being built (with the housing already being built at Blythe valley and dog kennel lane) compared to the rest of the borough

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14431

Object

Policy BL1 - West of Dickens Heath**Respondent:** Patryk Szafranski**Summary:**

Loss of sports fields - Land is on high grade green belt - Impact on local wildlife and ancient woodland - located in a flood zone one - character of the village adversely affected - sense of community/identity compromised.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14336

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mark Taft**Summary:**

- 5 % of green belt to be built on when there are other options
- Only 3000 houses planned for development on Hs2 Site - Could be treble this number.
- Not only helping to mitigate the road traffic congestion, but also saving valuable green belt, providing breathing space in the Blyth valley areas
- Little housing allowance has been considered in Solihull town Centre, where unwanted office accommodation could be repurposed.
- Little housing allowance has been considered in Chemsley wood area, which is classed as an urban renewal area and has better transport links.
- Solihull should not have extra houses from Birmingham – this has not properly been addressed.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14337

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mark Taft**Summary:**

- Site BL3 is designated as green belt of the highest value – why is it being built on?

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14338

Object

Blythe**Respondent:** Mark Taft**Summary:**

- Doctors Services in Shirley are already not coping due to the high number of retirement home projects; indirectly causing doctors surgery's to become unviable business units.
- Roads are already to capacity, making too difficult to get to the M42 for work travel.
- Blyth valley area is a known flood plain on mainly clay soil, while little of no recognition of this is given in the plan.
- National government guidelines state that Natural wildlife sites should have interconnecting routes, so why is site BL3, BL2 allowed to be included.
- On page 180 of the plan, it states it is expecting addition traffic to be feed through Haslucks green road and Bills lane. This is already highly congested already it is difficult to leave the local estates to get to work in the morning.
- Alternate locations such as the Tisbury green golf course should be considered as its nearer the Station, and would allow preservation of the gaps between Shirley , Dickens heath and Cheswick green.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14339

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mark Taft**Summary:**

- Houses are being built close to the Windmill in Balsall Common, a national monument. The outlook and site should be cherished not trashed by excessive building development.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14340

Object

Foreword**Respondent:** Mark Taft**Summary:**

- There seems to be no sustainable assessments contained in the plan.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14802

Object

Foreword**Respondent:** South Solihull Community Group**Summary:**

- Objects to the response time: would question the plans soundness and legality to whether the plan has been positively prepared and justified (being an appropriate strategy based on proportionate evidence), Is effective (deliverable over the plan period), and is consistent with national policy - Plan unsustainable due to the disproportionate amount of greenbelt land used - built up areas not prioritised enough - Lack drop in/ face to face sessions.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14803**Object**

Balsall Common

Respondent: South Solihull Community Group

Summary:

■ Housing allocation disproportionate

Change suggested by respondent:

■ -

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

14804**Object**

Blythe

Respondent: South Solihull Community Group

Summary:

■ Housing allocation disproportionate

Change suggested by respondent:

■ -

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments: None

10655

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mr Edward Tan**Summary:**

Objects to the allocation of Site 4/BL1 for residential development

Dickens Heath should be protected and conserved as a new village, together with its character and setting in the countryside.

The proposed large-scale housing allocations would reduce or remove key gaps between settlements such as Majors Green and Tidbury Green.

Proposed Housing Allocation Site 4/BL1 is not in a sustainable location and would create substantial car traffic.

There would be a major loss of sports grounds and playing fields.

Loss of the Akamba Heritage Centre on Tythe Barn Lane.

There is no prospect of any community benefit from the Site 4/BL1 proposal which could outweigh the loss of it as an existing leisure, cultural and recreation facility.

The majority of the Housing Allocation Site 4/BL1 location would exceed the accepted walking distance of 800 metres to the centre of the Village. Increased traffic would place an unacceptable burden on the road system and the existing Village centre car parking shortage.

The proposals are unsustainable on highway safety grounds, adding to current pressures and the increased through traffic from Tidbury Green and Tythe Barn Lane. Major road improvements cannot be carried out without removal of established hedgerows and mature trees. The internal Village road network cannot be upgraded.

There will be a loss of ecological value as there are two badger setts on the sports fields. Bats, sparrow hawks, greater spotted wood peckers also fly over the site for foraging.

To build houses on Site 4/BL1, there would need to be extensive piling. The cost of developing this site would be unsustainable.

Change suggested by respondent:

Removal of Policy BL1

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10616

Object

Hockley Heath**Respondent:** Ms Sian Tarbuck**Summary:**

This is another erosion of green belt land. Based on the logic applied here then ultimately all dwellings will be continuous. The village does not have amenities for this size of development and there is already increased traffic due to the Blyth Valley development on School Road. It also opens the door to more development by changing the boundary for green

Change suggested by respondent:

To not allow building on green belt land. The unique nature of the village being surrounded by countryside is being eroded

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

14619

Object

Policy P12 Resource Management**Respondent:** Tarmac Building Products Limited**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

Policy P12 relating to Resource Management is not an effective or positively prepared strategy for managing mineral product supply over the Plan period. The policy overlooks objectively assessed need for mineral development and associated infrastructure needs. The existing facilities contribute significantly to local, regional and national need. This goes far beyond only the local requirements within the Borough that are the necessary exception tests for new waste development. The support and retention of minerals associated development should hold equal weight if not greater weight within these areas. Although these facilities are safeguarded under minerals policy, their importance and role should be given elevated status and recognition within the Plan.

Change suggested by respondent:

Consideration should be given within Policy P12 to the need and support for the permanent retention of mineral infrastructure to meet anticipated demand as well as maintaining existing supply.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14620

Object

POLICY P13 Minerals**Respondent:** Tarmac Building Products Limited**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

The existing mineral development and associated infrastructure facilities contribute significantly to local, regional and national need. Although these facilities are safeguarded under Policy P13, their importance and role should be given elevated status and recognition within the Plan. The growth/development plans in Solihull and the West Midlands create such a substantial long-term need for aggregate and aggregate related products that the facilities will be required for the duration of the plan period. These are facilities already in situ and have been for a number of years. They are not new development further encroaching on the Green Belt.

The policy relating to safeguarding of mineral resource should cover the whole Plan area, rather than only the Mineral Safeguarding Areas designated on the policies map.

Policy P13 9 should not limit the life of ancillary activities to the life of reserves, as there are clear exceptional circumstances, including objectively assessed need for mineral development/product.

Change suggested by respondent:

Although mineral development and associated infrastructure facilities are safeguarded under minerals policy, their importance and role should be given elevated status and recognition within the Plan.

The policy relating to safeguarding of mineral resource should cover the whole Plan area.

Remove reference to limiting the life of ancillary activities to the life of reserves in Policy P13 9

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:** None

14621

Object

Policy P17 Countryside and Green Belt**Respondent:** Tarmac Building Products Limited**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

Policy P17 is not an effective or positively prepared strategy for managing mineral product supply over the Plan period. The policy should give consideration to the need and support for the permanent retention of mineral infrastructure to meet anticipated demand as well as maintaining existing supply. It is questioned whether retaining mineral sites as Green Belt is appropriate given the proximity to land being released to accommodate large scale development, historic industrial activity as well as the long term strategy for waste management/industrial uses being accepted in this area.

Change suggested by respondent:

Consider whether retaining mineral sites in the Green Belt is appropriate.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14611

Object

Policy P12 Resource Management**Respondent:** Tarmac Trading (Ltd)**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

Policy P12 relating to Resource Management is not an effective or positively prepared strategy for managing mineral product supply over the Plan period. The policy overlooks objectively assessed need for mineral development and associated infrastructure needs. The existing facilities contribute significantly to local, regional and national need. This goes far beyond only the local requirements within the Borough that are the necessary exception tests for new waste development. The support and retention of minerals associated development should hold equal weight if not greater weight within these areas. Although these facilities are safeguarded under minerals policy, their importance and role should be given elevated status and recognition within the Plan.

Change suggested by respondent:

Consideration should be given within Policy P12 to the need and support for the permanent retention of mineral infrastructure to meet anticipated demand as well as maintaining existing supply.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14612

Object

POLICY P13 Minerals**Respondent:** Tarmac Trading (Ltd)**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

The existing mineral development and associated infrastructure facilities contribute significantly to local, regional and national need. Although these facilities are safeguarded under Policy P13, their importance and role should be given elevated status and recognition within the Plan. The growth/development plans in Solihull and the West Midlands create such a substantial long-term need for aggregate and aggregate related products that the facilities will be required for the duration of the plan period. These are facilities already in situ and have been for a number of years. They are not new development further encroaching on the Green Belt.

The policy relating to safeguarding of mineral resource should cover the whole Plan area, rather than only the Mineral Safeguarding Areas designated on the policies map.

Policy P13 9 should not limit the life of ancillary activities to the life of reserves, as there are clear exceptional circumstances, including objectively assessed need for mineral development/product.

Change suggested by respondent:

Although mineral development and associated infrastructure facilities are safeguarded under minerals policy, their importance and role should be given elevated status and recognition within the Plan.

The policy relating to safeguarding of mineral resource should cover the whole Plan area.

Remove reference to limiting the life of ancillary activities to the life of reserves in Policy P13 9

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14614

Object

Policy P17 Countryside and Green Belt**Respondent:** Tarmac Trading (Ltd)**Agent:** Heaton Planning Limited**Petition:** 2 petitioners**Summary:**

Policy P17 is not an effective or positively prepared strategy for managing mineral product supply over the Plan period. The policy should give consideration to the need and support for the permanent retention of mineral infrastructure to meet anticipated demand as well as maintaining existing supply. It is questioned whether retaining mineral sites as Green Belt is appropriate given the proximity to land being released to accommodate large scale development, historic industrial activity as well as the long term strategy for waste management/industrial uses being accepted in this area.

Change suggested by respondent:

Consider whether retaining mineral sites in the Green Belt is appropriate.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14057

Support

Vision**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Support the vision to provide a range of quality homes across the Borough by 2036 whilst also setting out the opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area.

Vision could be strengthened by identifying the important link between the provision of new employment opportunities and the requirement to deliver new homes within the Borough. The two are intrinsically linked and together will ensure a prosperous future for SMBC. It is in this context that the DSP should be viewed.

Change suggested by respondent:

Vision could be strengthened by identifying the important link between the provision of new employment opportunities and the requirement to deliver new homes within the Borough.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14058

Support

Spatial Strategy**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Support and conforms with the NPPF .

The spatial strategy appears to be based on a settlement hierarchy. The site selection paper (October 2020) also refers to a hierarchy. The plan would benefit from establishing a clear and prescriptive settlement hierarchy, informed by qualitative evidence as to the sustainability of each settlement based on its provision of services and facilities etc. to demonstrate that the spatial strategy is justified.

This approach would also assist in the overall development management and delivery of windfall sites during the plan period, which are expected to deliver 2,800 new homes by 2036.

Change suggested by respondent:

The plan would benefit from establishing a clear and prescriptive settlement hierarchy, informed by qualitative evidence as to the sustainability of each settlement based on its provision of services and facilities etc. to demonstrate that the spatial strategy is justified.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14059

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Support the overall thrust of the policy.

Part 2 could be read as conflicting as it appears to seek to secure a profile of household types, as identified by the latest HEDNA, through the concept masterplans which will form part of the Local Plan.

Part 3 could also be read this way given it appears to prescribe the mix for market housing based on the HEDNA.

Could be resolved by stating that housing mix for any allocated site will be agreed at the Development Management stage and that mix at part 3 are just indicative starting points.

Change suggested by respondent:

Housing mix for any allocated site will be agreed at the development management stage when an application is submitted and that any mix assumed for the concept masterplans and the HEDNA mix at part 3 are just indicative starting points.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14060

Support

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Appreciate the flexibility built into the policy to enable an applicant to negotiate the amount and type of provision of self and custom care homes at the point an application is submitted.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14063

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Welcome flexibility in the policy to take into account site specific factors when applying P4E to any planning application but would welcome an additional factor to be included within the list.

This should include:

'Where the Council's up to date statement on older person's accommodation does not identify a local need in the local area of the proposed development'.

This would prevent the oversupply of older person's accommodation within a specific local area.

Change suggested by respondent:

Additional factor to point 5 of the policy as follows:

'Where the Council's up to date statement on older person's accommodation does not identify a local need in the local area of the proposed development'

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14064

Object

Policy P5 – Provision of Land for Housing**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Policy P5 should refer to the total amount of housing to be delivered on allocations identified by the Plan. Part 1 refers to 5,270 dwellings between 2020 and 2036, but does not include the total number of homes to be delivered at the UK Central Hub area (2,740). If this were to be included the total number to be delivered by allocations would be 8,010. National Space Standards should retain some flexibility.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14066

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Taylor Wimpey**Agent:** Turley**Summary:**

Support in principle but object to the Masterplan as proposed. Concern the masterplan is not based on sound evidence and does not respond appropriately to the site's constraints and opportunities. The western end of the allocation represents the least constrained land, so surprising that the relocated school is where it is. No evidence to support or justify relocation and the reasons given are contested. SMBC need to continue to engage with landowners to reach agreement. A revised masterplan is being prepared which will respond to the site's constraints and opportunities, and ultimately the Council's aspirations and principles for how it should be delivered.

Change suggested by respondent:

Change to concept Masterplan for Site KN2

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10773

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Chris Taylor**Summary:**

There is significant need for a new high school and the project will fund this. Without the project I fear Arden will continue not to be fit for purpose in the years to come.

Additional benefits of a new primary school and leisure facilities will benefit the area.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10763

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Jess Taylor**Summary:**

I understand the need for new housing in the area, but also the desperate need for a new school and premises for Arden Academy. With more families moving to the village there is a huge need for extra community facilities in the area, in order to support the growing population. I support the plans as long as they include the promise of new school buildings for Arden.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10896

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Roger Taylor**Summary:**

Development of precious Greenbelt

Development too close to designated Conservation area

Development too close to Grade 1 Historical building

Negative impact on local nature and birds

Change suggested by respondent:

Both sites are within a stones throw from one of the most important local historical Grade 1 Listed buildings in the borough, more importantly the historic village of Knowle.

Grimshaw hall and its grounds have been made a conservation area by SMBC, as such the greenbelt areas directly connected to them need to be protected to ensure a sustainable habitat for its richly diverse nature such as:

Buzzards

Owls

Swifts

Kingfishers

Other Migratory birds

Bats

Adders and grass snakes

The Greenbelt areas directly bordering the Hall should be preserved as greenbelt. KN1 negatively impacts the views and Historic rural element to residents of the village.

The KN1 development is mostly greenbelt and due to its connection to the hall and connected conservation areas should the KN1 proposal should be scrapped, and alternative site found.

It is my belief that the councils decision is being driven by the landowner looking to create a windfall profit from what is agricultural land.

I do not accept SMBC's justification to develop it, I do not believe the council has exhausted its search for alternative sites.

Alternative areas should be found, such as areas adjacent to Browns Lane in Bentley Heath, this area is more suitable due to it not being in the direct vicinity of Historical gardens and buildings. It is also nearer to the M42 corridor. If this is not suitable, the council should continue its search rather than develop in sensitive green belt next Historic buildings where, Any development can never be reversed.

I do not accept the councils plan to merely move the development a few meters further back so the housing sits downhill and out of site. This does not address the issue of developing in an Historically and Environmentally sensitive area which dates back to the 15th century. No further amendment to this site is acceptable to the residents of Knowle. The site needs to be scrapped and an alternative site found.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

13716

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mark Temple**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10729

Support

POLICY P13 Minerals**Respondent:** The Coal Authority**Summary:**

The Solihull area does not contain any recorded risks from past coal mining activity at shallow depth, nor do Coal Authority records indicate any surface coal resource is present. On this basis we have no specific comments to make in relation to the draft Local Plan.

Change suggested by respondent:

None

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

11055

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** The Dunleavy Family**Agent:** DS Planning**Summary:**

Plan fails to adequately address future need for specialist housing for older people. Whilst specialist housing or care bed spaces is required on sites over 300 units, there is no mechanism for delivery.

Depending on larger sites to deliver specialist housing will not address the current need and is likely to exacerbate need going forward, due to lead in times, build out rates and complex land ownership issues.

Specific suitable sites should be allocated rather than relying on larger sites address provision. These additional sites should be in addition to the allocations and numbers already identified within the Plan.

Change suggested by respondent:

Allocation of specific sites for specialist housing in addition to the current allocations.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11056

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Dunleavy Family**Agent:** DS Planning**Summary:**

Minimum housing need should be increased to account for UK Central job growth and 'acute' need for affordable housing.

Uncertainty and wide variation of figures about HMA shortfall. No evidence that Solihull's contribution has been agreed or that it meets duty to cooperate obligations. No Statement of Common Ground so no real commitment to resolving the shortfall within the GBBC HMA.

Numbers from the Brownfield Land Register are unreliable given no part 2 register and no guarantee that sites will yield the capacity identified.

Past trends are not compelling evidence that windfall is a reliable source of supply.

Change suggested by respondent:

Increase in Housing figures of between 1,036 and 1,248 dpa

Reduction in windfall allocations from 200 dpa to 150 dpa as per the tried and tested number set out in the adopted Plan.

Reduction in BFLR allocations by 29 – from 77 to 48

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

11057

Object

Policy P17 Countryside and Green Belt**Respondent:** The Dunleavy Family**Agent:** DS Planning**Summary:**

Decisions regarding removing land from the Green Belt and addressing minor anomalies in current Green Belt boundaries are illogical.

Properties along Widney Manor Road should be removed from the Green Belt as they are part of the built up area of Solihull. The area does not fulfil the purposes of including land in the Green Belt and its removal will allow windfall housing contribution to be boosted.

Area was considered in previous consultations with some potential justification given. Area is no different to the area north of School Road in Hockley Heath where Green Belt boundary changes are considered appropriate.

Change suggested by respondent:

Land east of Widney Manor Road should be removed from the Green Belt and Widney Manor Road should become the new Green Belt Boundary.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

11207

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** The Friends of the Berkswell Windmill**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

14925

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Para. 227-228

Housing Market Area, DtC:

- Council should identify cross-boundary matters to be addressed and the progress of co-operation in addressing these matters in Statements of Common Ground, to comply with NPPF Para.'s 24-27.
- SoCGs should be publicly available to provide transparency.
- HBF notes no SOCGs accompany the Draft Submission Plan consultation, contrary to PPG. Therefore impossible to assess if Council has satisfied legal requirements of DtC.
- GBBCHMA Position Statement (July 2020) is not a SoCG.
- It is misleading for GBBCHMA Position Statement to conclude that residual HMA shortfall is only 2,597 dwellings. This compares figures against the Strategic Growth Study (Table 5) rather than adopted housing requirements and unmet needs (Table 2).
- Figures do not account for Black Country shortfall
- Figures are not based on standard methodology
- Housing requirement should be 12,598 dpa under revised standard methodology not 10,399 dpa as in Table 5.
- Estimated housing land supply includes allowances from proposed allocation in draft Plan, as yet untested at Examination, plus other sources from non-allocations.
- Lack of agreement on how GBBCHMA housing needs will be met in full, four years after adoption of Birmingham Development Plan.

Change suggested by respondent:

- Before DSP is submitted for Examination, the HBF expects the GBBCHMA authorities to produce an agreed SoCG setting out:
 - o Where unmet housing need will be met
 - o Each authority will meet its own LHN, and a defined amount of unmet LHN. This cumulative figure will be the housing requirement for each respective authority.
 - o Acknowledgement that need additional land supply over and above LHN for flexibility
 - o Agreement that is housing requirement figures materially change due to the Government's standard methodology, a revised SoCG will be agreed within 6 months.
- If strategic matter of meeting full HMA housing needs is not set out in an agreed SoCG, then DtC will not be met, and plan is unsound.
- Council should embark on another stage of public consultation after publication of SoCG, to invite further comments on Council's compliance with DtC. In absence of such an opportunity, HBF will submit further comments either written or orally during Examination.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

14926

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

LHN (Para. 220) & Housing Requirement (Para. 228):

- PPG clearly state standard methodology is the minimum starting point for determining housing need, it does not produce a housing requirement figure.
- The Council has decided to plan for 22,998 jobs growth by 2036 based on Baseline jobs forecast plus UK Central Hub Scenario.
- Other evidence published by the Council (Midlands HS2 Growth Strategy & UKC Hub Growth and Infrastructure Plans quoted in the Viability Study) identifies potential for much higher job numbers. Council should confirm there are no inconsistencies in the evidence, and HEDNA is not under-estimating the additional jobs growth from the UKC Hub.
- HBF query assumptions on commuting patterns for the Borough and UK Central Hub jobs, given Para. 26 of HEDNA also states that commuting ratios are known to have likely changed.
- The derivation of the 2,105 contribution to HMA shortfall is not defined, and not included in a SoCG. Seems to be just difference between LHN and Housing Land Supply.
- Affordable housing need figures for Solihull are significant, PPG states an increase in total housing figures may be considered to help deliver affordable housing.
- Govt has confirmed its intention to review standard methodology, proposed revision would increase LHN to 1,011 dpa.
- Govt committed to ensuring more homes are built, and supports Councils planning for growth. HEDNA has demonstrated that circumstances exist to justify a housing need higher than the standard methodology. PPG does not set any limitations on a higher figure.
- HBF believe Council should be more ambitious and significantly boost housing supply (NPPF Para. 59)
- Housing requirement in Policy P5 not set out as a minimum figure.

Change suggested by respondent:

- Before submission for Examination, Council should reconsider its housing requirement figure upwards of 938dpa due to commuting rates, worsening affordability, as SoCG with GBBCHMA and future changes to standard methodology.
- Housing requirement in Policy P5 should be set out as a minimum figure.

Legally Not specified**compliant:**

Sound: No

Comply with Not specified**duty:****Attachments:**

14927

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Housing Land Supply (and Spatial Strategy):

- Limited information available to assess the robustness of the Council's overall HLS.
- Council should set out in details its assessment of the capacity of SHLAA, Brownfield Register, Town centre and UK Central Hub Area sites.
- Deliverability of these locations will be dependent on viability of PDL and demand for high density urban living post Covid-19.
- HBF not wish to comment on individual sites, but notes the Council has provided no data on a site by site analysis of the deliverability of individual site allocations; critical the Council's housing trajectory is correct and realistic based on lapse rates, lead in times and delivery rates, supported by site promoters.
- Lack of contingency in Council's housing supply, as land supply and requirement are same figure, with only 10% lapse rate.
- HBF advocates as large a contingency as possible, and housing requirement should be treated as a minimum rather than a maximum, to provide optimum flexibility, changing circumstances and flexibility to provide greater choice and competition.
- Overall land supply should include a wide mix of sites, short and long-term supply, strategic and non-strategic allocations; housebuilding companies require widest possible range of products and diversified portfolio of housing sites for range of household types.
- None of proposed allocations are less than 1ha, which is inconsistent with 10% requirement in NPPF.
- Notes the housing delivery phases for sites
- Notes that housing trajectory is stepped
- Surplus in 5YLS is only 329 dwellings, can be easily eroded by changes in circumstances. If Council cannot demonstrate 5YLS on adoption of Local Plan it shall be found unsound.

Change suggested by respondent:

- Council should robustly evidence that the proposed number of dwellings can be accommodated without reverting to an overly ambitious intensification of site densities.
- Council should confirm that there is no overlap between windfalls and SHLAA, Brownfield Register and Town Centre sites.
- Council should provide data on a site by site basis of the deliverability of individual site allocations.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14928

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Deliverability & Viability Study:

- HBF have concerns about Council's standard inputs including (but not exhaustively):

o Using BCIS lower quartile costs. All new build housing is built to a high specification therefore median should be used.

o Blended developer return of 17% may not reflect the risk profile of development

o HBF recommend finance cost of 6.5-7%, not 6%

o Professional fees should be 8-10% for simple sites, and up to 20% for complex sites.

o Sales and marketing costs should be 3-5%

o Concern that not an accurate assessment of cumulative impact of compliance with all policy requirements, including at least:

☒ Policy P4D,

☒ Policy P4E (M4(2) & M4(3) compliant homes

☒ Policy P5 for NDSS

☒ Policy P9 for FHS and EVCPs

☒ Policy P10 (net biodiversity gain)

☒ Policy P11 (water efficiency standard)

- HBF notes that following typologies are unviable:

o North Solihull greenfield and PDL

o Mature Suburbs PDL

o Windfall sites in low value areas (North Solihull)

o Retirement developments

Change suggested by respondent:

Review Viability Study.

Proposed changes to individual policies detailed in further reps.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14929

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4A (Bullet Point 6):

The 2019 NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). The Council's policy approach to affordable housing tenure set out in Bullet Point 6 is inconsistent with national policy. Furthermore, the Government's consultation on Changes to the Current Planning System (ended on 1st October 2020) proposed further changes to deliver First Homes.

Change suggested by respondent:

Policy P4A should be re-considered and modified by the Council. The Council's policy approach to affordable housing tenure set out in Bullet Point 6 is inconsistent with national policy.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14930

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4A (Bullet Point 7):

The Council's policy approach on social rented mix is inflexible and overly prescriptive. The HEDNA 2020 set out a range of housing mixes.

Change suggested by respondent:

Policy P4A (7) should be re-considered and modified by the Council.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14931

Object

Policy P4A Meeting Housing Needs – Affordable Housing

Respondent: The Home Builders Federation Midland Region

Summary:

Policy P4C (Bullet Point 8):

Council's policy approach on shared ownership mix is inflexible and overly prescriptive. HEDNA provides a range of figures.

Inconsistent with national policy.

Change suggested by respondent:

Policy P4A (8) should be re-considered and modified by the Council.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14932

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4D (Bullet Point 1):

- HBF supportive of policies to encourage self & custom build.
- Not supportive of policy requirements for 5% SCB on developments of 100+ dwellings.
- Council should not seek to burden developers with responsibility for delivery of SCB – contrary to national guidance.
- Council role should be to engage with landowners and encourage them to consider SCB, and not go beyond that.
- No rational for 100 dwelling threshold, or 5% provision.
- Could result in mis-match of provision, and oversupply of plots on larger housing sites in urban locations against demand for single plots in rural areas.
- Provision of self & custom build serviced plots must be justified by credible and robust evidence.
- Self build register may indicate a level of expression of interest in SCB but it cannot be reliably translated into actual demand, should such plots be made available.
- Council policy approach should be realistic and deliverable, and not remain unsold.
- Vacant plots could affect Council's HLS.
- SCB serviced plots on larger developments adds complexity and slows delivery and difficult to coordinate different construction logistics.
- Where plots are unsold, policy should be clear these revert to the original developer. Reversion timescale should be as short as possible, 12 months is too long.
- Disagree with the Viability evidence on self-build plots, does not take into account all the cost.
- Policy will cause delay to processing planning applications and slow housing delivery.
- No robust evidence for demand for plots on larger housing sites.

Change suggested by respondent:

Policy P4D should be deleted.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14933

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4C (Bullet Point 3):

- The Council's policy approach is inflexible and overly prescriptive.
- All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed.
- Policy inconsistent with national policy (NPPF Para. 31, 61 and 62)
- The Council's policy approach should acknowledge that not all sites will be able to meet an overly prescribed housing mix requirement because of site size, proposed development typology, site specific circumstances and viability.

Change suggested by respondent:

Policy P4C should be re-considered and modified by the Council. Bullet Point 3 should be amended to be more flexible and less prescriptive by acknowledging that not all sites will be able to meet an overly prescribed housing mix requirement because of site size, proposed development typology, site specific circumstances and viability.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14934

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4E - Bullet Point 2 - M4(2):

- Optional standards for accessible & adaptable dwellings should be done in accordance with NF (Para. 127 (f) & FN 46), and latest PPG criteria for evidence. Council has provided no evidence on accessibility & adaptability of existing housing stock.
- HBF acknowledge Solihull's population will 'age', but this issue not specific to Borough. And not all health issues require adaptations to homes. If Govt had intended that ageing population was sufficient justification then standards would have been made mandatory in Building Regulations.
- Recent research by Savills 'Delivering New Homes Resiliently' (Oct 2020) shows only 7% of over-60s inclined to buy a new home. Adapting existing stock likely to form part of solution as much larger proportion of overall stock.
- M4(1) Building Reg standards already an improvement on older housing stock, so likely to be suitable for most residents.
- Absence of robust evidence, policy approach is inflexible and fails to take account of site-specific circumstances and viability, therefore impeding effectiveness.

Change suggested by respondent:

No justification for 95% of dwellings to be M4(2), therefore should be deleted.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14935

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4E - Bullet Point 3 - M4(3):

- Optional standards for accessible & adaptable dwellings should be done in accordance with NF (Para. 127 (f) & FN 46), and latest PPG criteria for evidence. Council has provided no evidence on accessibility & adaptability of existing housing stock.
- HBF acknowledge Solihull's population will 'age', but this issue not specific to Borough. And not all health issues require adaptations to homes. If Govt had intended that ageing population was sufficient justification then standards would have been made mandatory in Building Regulations.
- Recent research by Savills 'Delivering New Homes Resiliently' (Oct 2020) shows only 7% of over-60s inclined to buy a new home. Adapting existing stock likely to form part of solution as much larger proportion of overall stock.
- M4(1) Building Reg standards already an improvement on older housing stock, so likely to be suitable for most residents.
- Absence of robust evidence, policy approach is inflexible and fails to take account of site-specific circumstances and viability, therefore impeding effectiveness.
- Para. 209:
M3(2a) distinction not included in Policy, only in supporting text.

Change suggested by respondent:

- No justification for at least 5% dwellings M4(3), therefore should be deleted.

Legally Not specified
compliant:

Sound: Yes

Comply with Not specified
duty:

Attachments:

14936

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4E Bullet points 4 & 5:

- HBF recognise that all households should have access to different housing types to meet their housing needs.
- Council should not prescribe housing mix on individual sites above a specified site threshold, should ensure suitable sites available for a wide range of developments across a wide choice of appropriate locations.

Change suggested by respondent:

- Remove Policy P4D bullet points 4 & 5.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14937

Object

Policy P5 – Provision of Land for Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Nationally Described Space Standards (NDSS):

- Council should provide a local assessment evidencing case for Nationally Described Space Standards to accord with NPPF Para. 31, Para 127(f) & FN 46, and PPG.
- No such evidence supplied.
- Must be based on need not 'nice to have' basis, otherwise Government would have made mandatory in Building Regulations.
- Council should recognise customers have different budgets and aspirations; could lead to customers purchasing larger homes in floorspace, but less bedrooms to meet need. Could lead to overcrowding and reducing quality of living environment.
- Inflexible approach will impact on affordability and affect affordable home ownership products such as First Homes.
- Viability Assessment only test one average house type size, not all 16 NDSS compliant house typologies. Not robust approach.
- No assessment on impact on affordability. Council should assess potential adverse impacts on affordable home ownership products such as First Homes.
- Knock on effect to slow or reduce delivery rates.
- If NDSS carried forward, Council should put forward transitional arrangements.

Change suggested by respondent:

In the absence of robust evidence justifying the requirement for NDSS and lack of viability testing, the Council should delete Bullet Point 5 from Policy P5.

If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14938

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P9 (Bullet point 3 (i, ii & iv):

- Commendable that Council seeks to achieve a reduction in energy demand and deliver renewable and low carbon energy.
- Important Council's proposed policy approach does not conflict with or go beyond Govt's proposals for Building Regulations.
- HBF and its Members favour a stepped and incremental approach to achieve Govt's FHS ambitions, because of need for supply chain, infrastructure investment and skills training.
- Consensus of HBF members is to implement Option 1 (-20%) first, with Option 2 (-31%) implemented 2-3 years later.

Change suggested by respondent:

- Bullet point 3 (i, ii & iv) requirements are unnecessary given Government's Building Reg proposals and should be deleted.
- If Bullet point 3 (i, ii & iv) are retained, then should not compromise viability of development.
- Viability Study only incorporate cost of £4,200 - £4,620 per dwelling, and not Govt's estimate of £4,847.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14939

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** The Home Builders Federation Midland Region**Summary:**

- Council should be aware that some decentralised energy supply consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and pay a higher price.
- Currently no sector specific protections for such consumers, unlike gas, electric, water utilities.
- Customers lack same opportunities to switch supplier.
- Consumers should have ready access to information on heat network details.
- Monopolistic nature of heat networks
- Require future price regulations to protect domestic consumers.
- Competition & Markets Authority found a significant proportion of suppliers and managing agents provide none or limited information on pre-transaction documents, ongoing costs, with poor transparency. CMA have concluded a statutory regulatory framework should be set up that underpins regulation of all heat networks.

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14940

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P9 Bullet Point 3 (viii):

- HBF recognise that electric vehicles will be part of solution to transitioning to a low carbon future.
- Given Govt's proposals for Part S of Building Regs, this requirement is unnecessary and should be deleted.
- If retained, HBF consider physical installation of fixed EVCPs is unnecessary; automotive technology is evolving quickly, therefore cable and duct approach is a more sensible & future-proofed solution. Negates potential installation of obsolete technology.
- HBF and Members have serious concerns about capacity of existing electrical network in UK.
- Major network reinforcement will be required across power network to facilitate introduction of EVCPs and the move from gas to electric heating as proposed under FHS.
- Costs can be substantial and drastically affect viability of developments.
- If developers are funding potential future reinforcement of National Grid network, this will come at significant cost and jeopardise future housing delivery.
- Viability assessment does not include costs for upgrading network, just installation. Capped figure of £3,600 should be included in viability assessment.

Change suggested by respondent:

- Given the Government's proposals for Part S of the Building Regulations, the requirement set out in Bullet Point 3 (viii) is unnecessary, which should be deleted.
- If Bullet Point 3 (viii) is retained, references to practical feasibility and viability should be added to provide more flexible and effective policy approach.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14941

Object

Policy P10 Natural Environment**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P10 Bullet Points 8 & 9:

- HBF opine that Council should not deviate from Govt's biodiversity net gain proposals as set out in Environment Bill of a 10% national mandatory requirement.
- Council should not specify above 10%.

Change suggested by respondent:

Policy P10 Bullet Points 8 & 9:

Prefix 'at least' should be deleted from 10% biodiversity net gain.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14942

Object

Policy P10 Natural Environment**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P10 Bullet Point 12:

- Approach is inconsistent with Environment Bill.
- Govt will make provision for statutory biodiversity units in the Environment Bill, purchasable at a standard cost.
- This approach will allow Councils, landowners and organisations to set up local habitat compensation schemes, where they wish to do so; if this is not the case, the Govt will provide a last-resort supply of biodiversity units, which will prevent delays to development.
- Viability assessment should fully account for additional costs associated with biodiversity gain, HBF view that Council's viability evidence significantly underestimates costs.
- Govt has said more work needs to be done to address viability concerns of net gain by the housebuilding industry.
- DEFRA Biodiversity Net Gain and Local Nature Recovery Strategies Impact Assessment (Table 14) sets out costs of £18,527 - £63,725 per hectare of development for the West Midlands region (based on 2017 prices).
- Environment Bill makes provision for a 2 year transition period, and will work with stakeholders on guidance, what will be required and when.

Change suggested by respondent:

Policy P10 Bullet Point 12:

Text should be modified to align with Environment Bill.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14943

Object

Policy P11 Water and Flood Risk Management**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P11 (Bullet Point 3):

- Insufficient evidence to justify adoption of optional standard of 110L pppd. Should follow PPG guidance.
- Council's 2017 Water Cycle Study demonstrates that proposed development can be delivered without significant water and sewerage improvements. Study recommends adoption of optional water efficiency standard because Solihull is identified as an area of moderate water stress.
- Viability assessment explicitly excludes cost of water efficiency standard. Cost may be minimal but it should be included as part of cumulative impact of compliance with all policy requirements.

Change suggested by respondent:

P11 (3) for adoption of optional water efficiency standard should be deleted due to lack of viability testing and robust evidence of need.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14944

Object

Policy P14A Digital Infrastructure and Telecommunications**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P14A (Bullet Point 4):

- Council should not impose new electronic communications requirements beyond provision of infrastructure as set out in statutory Building Regulations.
- March 2020 Budget confirmed future legislation will ensure new build homes are built with gigabit-capable broadband, amending Part R of Building Regs.
- DCMS has outlined its intentions on the practical workings of this policy, which will apply to all new builds.

Change suggested by respondent:

P14A (4) should be deleted. It is unnecessary because of Govt's proposed changes to Building Regs Part R.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14945

Object

Policy P14A Digital Infrastructure and Telecommunications**Respondent:** The Home Builders Federation Midland Region**Summary:**

Para. 384-385:

- Service delivery for broadband connections is the responsibility of service providers. Council should acknowledge these expectations are beyond the control of developers.

Change suggested by respondent:

Para. 384-385:

- Service delivery for broadband connections is the responsibility of service providers. Council should acknowledge these expectations are beyond the control of developers.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14946

Object

Policy P15 Securing Design Quality**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P15 (Bullet Point 3):

- HBF supports use of best practice guidance, but should remain voluntary.
- Council should note that Building for Life 12 had been superseded by Building for a Healthy Life

Change suggested by respondent:

Policy P15 (Bullet Point 3):

- Council should note that Building for Life 12 had been superseded by Building for a Healthy Life

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14947

Object

Policy P15 Securing Design Quality**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P15 (Bullet Point 4):

- Council should be aware that design principles set out in the specified documents are not always compatible
- NPPF Para. 16f confirms Local Plans should avoid unnecessary duplication.

Change suggested by respondent:

P15 (4) is unnecessary and should be deleted.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14948

Object

Foreword**Respondent:** The Home Builders Federation Midland Region**Summary:**

SPDs:

- Number of policies refer to SPDs and other guidance (see separate representations):

- o P4A (2), P4E (4), P9 (1), P15 (5), P18 (10).

- o Such references are inappropriate and non-compliant with the Regulations.

- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMPD) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.

- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.

- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development.

Change suggested by respondent:

Amend relevant policies to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14949

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4A (2):

- References to SPDs and guidance are inappropriate and non-compliant with the Regulations.
- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMP) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.
- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.
- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development.

Change suggested by respondent:

Amend P4A to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14950

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P4E (4):

- o References to SPDs and other guidance are inappropriate and non-compliant with the Regulations.
- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMP) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.
- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.
- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development.

Change suggested by respondent:

Amend P4E to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14951

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** The Home Builders Federation Midland Region**Summary:**

P9 (1):

- o References to SPDs and other guidance are inappropriate and non-compliant with the Regulations.
- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMP) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.
- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.
- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development.

Change suggested by respondent:

Amend Policy P9 (1) to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14952

Object

Policy P15 Securing Design Quality**Respondent:** The Home Builders Federation Midland Region**Summary:**

Policy P15 (5):

- o References to SPDs and other guidance are inappropriate and non-compliant with the Regulations.
- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMP) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.
- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.
- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development

Change suggested by respondent:

Amend P15 (5) to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14953

Object

Policy P18 Health and Wellbeing

Respondent: The Home Builders Federation Midland Region

Summary:

Policy P18 (10):

- o References to SPDs and other guidance are inappropriate and non-compliant with the Regulations.
- o Regulations are clear that development management policies should be set out in Local Plan policies. Council's approach of requiring compliance with adopted SPDs is giving Development Management Plan Document (DMP) status to documents which are not part of the Local Plan, and have not been subject to the same process of preparation, consultation and examination.
- o For policy to be effective should be clearly written and unambiguous, set out in sufficient detail, so it is evident how a decisionmaker should react to development proposals and not reliant on other criteria or guidance set out in a separate SPD.
- o NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development.

Change suggested by respondent:

Amend P18 (10) to remove inappropriate references to SPDs. Reference to guidance provided in SPDs could be inserted into supporting text.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13812

Object

Knowle, Dorridge & Bentley Heath**Respondent:** The Knowle Society**Summary:**

Residents survey undertaken by the Neighbourhood Forum suggests that over half of all respondents are strongly against the site allocations in Knowle.

Additional sites that have not previously been identified are also included (Wychwood Avenue roundabout).

Highway improvements should be carried out prior to development taking place, then repaid.

No identification of additional parking facilities to alleviate impact of additional vehicles in the Conservation Area.

There should be no traffic lights in the Conservation Area.

Unfair and unjustified distribution of development to Knowle.

No mention of any provision being included for relevant community services such as library, health and emergency services.

Change suggested by respondent:

More justification for development in Knowle and for the sites that have been chosen.

Further details of transport impacts and mitigation and improvements being undertaken prior to development.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13813

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** The Knowle Society**Summary:**

Scale of development on the site is not adequately justified.

No mention of need to off-set biodiversity loss.

Question whether the need for a care village / retirement complex. Further work required to justify this. If no need, the site should be made available for a shared market/affordable housing scheme.

No indication of how 'very special circumstances' will be demonstrated for relocation of Knowle Football Club.

Impact of increased traffic not addressed sufficiently and how increased movements will adversely impact on Knowle Conservation Area with no suitable or definitive mitigation identified.

Impact of development on one of the highest points in Knowle will create an unacceptable skyline.

Traffic calming measures required along Hampton Road.

Change suggested by respondent:

The Masterplan should include actual proposed densities of each indicated area. It should indicate road layouts together with their width to ensure there is no repetition of the mistakes made with the layout of the Middlefield development in order to achieve the Council's originally identified number of dwellings which they thought could be achieved. The Neighbourhood Plan makes clear the requirement of satisfactory estate development in Knowle and these requirements should be mandatory as part of this Proposal.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13814

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** The Knowle Society**Summary:**

Relocation of Arden Academy will not alleviate congestion along Station Road. Students will continue to walk along inadequate footways to access bridle path short cut and drop offs will continue.

Masterplan needs specific reference to upgraded footpath link to Middlefield and Dorridge to reduce walking along Station Road.

Unclear if LWS will be included as part of the open space area.

Masterplan should identify how 600 homes will be accommodated.

No details of specific highway improvements.

Care provision should be justified.

Inadequate reflection of Neighbourhood Plan policies including housing mix and densities.

No consideration of the future traffic problems caused by relocating Arden Academy

Improvements to Grove Road / Warwick Road / Norton Green Lane junction likely.

Insufficient evidence to justify the scale of development.

Lack of clarity over access points.

No information on the increased traffic and its impact on Knowle and the Conservation Area.

Change suggested by respondent:

New development must ensure landscape features are retained as far as possible noting veteran – non-protected trees should also be retained to contribute to natural flood mitigation on site.

Reduce densities on site and ensure Neighbourhood Plan policies are reflected.

Masterplan needs specific reference to upgraded footpath link to Middlefield and Dorridge to reduce walking along Station Road.

Plan should recognise that improvements to Grove Road / Warwick Road / Norton Green Lane junction are likely to be required.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13815

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** The Knowle Society**Summary:**

Housing mix for Shared Ownership does not comply with Neighbourhood Plan policy.

The continuing use of Housing Associations as the principal provider of such accommodation should be reduced to avoid the effect of 'stair-casing'. Housing Associations provide their tenants (on a shared-ownership basis) the opportunity of removing the shared ownership by the Tenant's ability to purchase the balance of the Freehold during their Tenancy. This consequently results in a permanent reduction of the availability in the number of affordable homes for ever.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10715

Support

Policy P18 Health and Wellbeing**Respondent:** The Theatres Trust**Summary:**

The Trust is supportive of this policy, although with note to parts 6 and 7 we would suggest there is great merit in also requiring HIA on proposals seeking to lose community and cultural facilities such as community centres and halls, cinemas, pub and theatres as this would also potentially have negative impacts on health and wellbeing.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10716

Support

Policy P19 Range and Quality of Local Services**Respondent:** The Theatres Trust**Summary:**

Whilst the Trust supports the contents of this policy in particular relation to part 5, we would urge that it is amended to make clear it applies to cultural facilities. This will ensure conformity and consistency with the NPPF in particular paragraph 92.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10920

Object

Policy P17 Countryside and Green Belt**Respondent:** Planning Works Ltd**Summary:**

It is not clear if the four "settlements" listed in 3i are the "villages" referred to in 3ii and if these are the only four locations where infilling is permitted. The reference to "redevelopment" alongside infilling is also not clear. The NPPF does not define villages. It would be inappropriate for this Policy to limit what may otherwise be compatible NPPF para. 145e development that could take place elsewhere in the Plan area.

Change suggested by respondent:

If the reference to "redevelopment" refers to NPPF para. 145g development then this should be a separate part of the Policy since this type of development in the Green Belt is not confined to villages or settlements.

The Policy in so far as it relates to NPPF para. 145e infilling should be amended in one of two ways:

1. by deleting the reference to the four "settlements" in 3i and re-wording the section of Policy to read:

"i. Limited infilling may take place in villages without constituting inappropriate development"

or,

2. by adding clarification to the Policy (if there is merit in retaining settlement references) so it reads;

"i. Limited infilling may take place in villages and the following settlements without constituting inappropriate development:

Chadwick End

Cheswick Green

Millison's Wood

Tidbury Green

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10608

Object

Hockley Heath**Respondent:** Mr John L Thomas**Summary:**

The plan is inappropriate because it doesn't safeguard protected species e.g. bats in vicinity. School Road between Blackberry Way and Tutnall Drive floods, as well as does further towards Blythe Valley regularly during wet periods. Unlike other areas of the borough leaves and ditches are not cleared by council. The environment needs the trees/hedgerows to help what will be additional carbon emissions, but they also need to be maintained. Additional 90 houses with up to 2 cars per household will seriously impact on traffic in an already very busy narrow lane.

Change suggested by respondent:

A survey of wildlife needs to be carried out and impact of protected species considered and amenities put in place to support this. Thorough investigation and survey of anti-flooding measures needs to be conducted of the site and impact on surrounding areas before any future planning investment is carried out. There is no health centre in the village so a proposal for a centre should be included in the plan. There is no longer a direct bus service between Hockley Heath and Shirley shopping centre, so improvement to local bus services should be included (X20 service to Stratford-Upon-Avon has been discontinued). A plan for regular road/drain clearing needs to be included for the village. Traffic calming measures for School Road must be included.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10726

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Councillor Kathryn Thomas**Summary:**

A key enabler for effective engagement is community involvement in developing the plan and the planning process includes a commitment to notify interested stakeholders. The relocation of HWRC to Damson Parkway (831) was deliberately buried in the plan with the intent of discouraging community involvement (1218 people have now signed a petition opposing). Opportunities to brief interested stakeholders (i.e. local councillors), at the councillors briefing, were not used. Instead, UK2 was glossed over and this land described as allocated to JLR. There is no connection between HWRC and JLR, so this was deliberate misrepresentation of the intended changes.

Change suggested by respondent:

Removal from the plan of point 831. (As far as I can see, this is the only point mentioning relocating HWRC to Damson Parkway, but if there are any other mentions/references to this move, then these should also be removed).

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10653

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Kevin Thomas**Summary:**

The plan disproportionately utilizes Green Belt land and is unclear as to how a "net gain" in biodiversity is achieved. Public Open Space provision is made, but this is insufficient, lacks permanency and fails to protect the south section of Meeting House Lane. There is a lack of specific detail as to how the significant impact of additional housing on existing infrastructure and village centre will be addressed. The Plan also fails to address climate change as it understates the impact increased vehicular transport will have given existing weak transport infrastructure for travel into Coventry and Solihull.

Change suggested by respondent:

Given the significant impact on the existing village the plan should be explicit as regards to:

1. How the village centre and infrastructure will be upgraded including target dates;
2. How transport links will be upgraded;
3. Exactly how a net gain in bio-diversity is achieved, given the significant loss of green belt.

The Public open space should be permanently designated as a Village Green or equivalent to safeguard its status and should be extended to run the length of Meeting House Lane to provide an interrupted wildlife corridor. Under no circumstances should additional vehicular access be given from the development to Meeting House Lane as this would exacerbate existing traffic problems and render the lane dangerous to pedestrian traffic.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10683

Support

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** Mr T Thomas**Summary:**

As the current owners of the site have proposed the north east end of the site up to Saddlers Wells lane is to be allocated as a nature reserve. Why is this being removed from green belt status. Retaining the nature area as green belt, as indicated in current plans, will prevent any future builder from changing plans and developing on it.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10649

Object

Hockley Heath**Respondent:** Mr Guy Thompson**Summary:**

The draft plan has a subheading entitled Where Wellbeing and the Environment Matter. Serious flooding already occurs on the land in Hockley Heath that has been highlighted, whilst this is acknowledged and suggestions that steps will be taken to combat this, any development will only exacerbate the problem. Climate change will lead to increased frequency of flooding. Furthermore the road is so narrow it does not have the capacity to cope with anymore traffic. A traffic impact assessment has not been carried out. The SMBC concept masterplan show part of the Historic Hedgerow being removed.

Change suggested by respondent:

HH1 needs to be completely reconsidered on many levels. For example local infrastructure is already inadequate with no medical facilities in the location; all other proposed sites do have medical facilities existing. There is no post office and wholly inadequate public transport provision. The village has very recently grown on previously undeveloped land now called Webb Grove (20 houses), a further 14 houses at Ashwood on School Road and the ongoing development of the 750 consented homes at Blythe Valley at the end of School Road, immediately adjacent to the Hockley Heath. This in itself is already causing increased traffic on School Road which due to its narrowness struggles to cope, not to mention the increased noise and environmental pollution, partly additionally caused by vehicle parked on the road. There have also been a further 17 new homes on Aylesbury Road, again on the edge of the village. All these new homes have been completed in the last 2-3 years putting extra strain on the limited facilities.

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments:

10738

Object

Balsall Common**Respondent:** Mrs Irene Thompson**Summary:**

Land at Kenilworth Road submitted as Site 82 should be allocated for housing, as it has defensible boundaries and the only significant negative is distance to jobs, common to other sites in Balsall Common. Site addresses many of the challenges facing the Borough and offers alternative to Site BC3 which has attracted local concern, without extending settlement. Sustainably located closer to centre and services than Sites BC3 and BC5. Unfair to agglomerate with Grange Farm in Sustainability Appraisal and performs well in SHELAA, with access confirmed and acceptable to highway engineer. Provides excellent opportunity for small to medium builders.

Change suggested by respondent:

Include Site 82 Kenilworth Road as housing allocation, possible as alternative to Site BC3.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14996

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Reason for site selection-sustainability:

- Inconsistent application of site methodology
- Main reason for choosing site is proximity to Whitlocks End station
- Does not take into account sustainability objectives, strategic objectives, 2016 Draft LPR 'guiding principles', sequential approach, Policy P7 nor Policy P8
- Inconsistent with national policy on achieving sustainable development
- SA report is inaccurate
- Not in accordance with site selection in Para. 68 in SDLPR
- Number of adverse impacts
- Not within 800m walking distance of services/facilities
- Will not change high car dependency in village
- Footpaths on concept masterplan through Birchy Close will not be possible, therefore walking distances longer from site to Dickens Heath village centre
- Will add to existing parking issues in village (see Motts Parking Study)
- Whitlocks End station has overloaded (pre-Covid) rail service; over 15 mins to Birmingham or Stratford-u-Avon; slow and indirect bus service; no public transport to UK Central; no direct cycle or footway to village centre
- Our own analysis shows that site should have been discounted at Step 1
- Site should not be green in site selection, but red.

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14997

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

- Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:
Disproportionate housing allocation of development in the Blythe and South Shirley area:
- Plan proposes to locate 39% of all new development in South Shirley/Blythe ward
 - Excessive burden on small area
 - Located away from employment areas, therefore more workplace travel emissions and traffic jams, contrary to NPPF Para. 104
 - Considerable development already carried out in Blythe 2011-2018
 - Dickens Heath village already increased in size from original 850 to 1757 dwellings
 - Bromgrove already expressed concerns about lack of local infrastructure to cope with recent and proposed developments.

Change suggested by respondent:

- Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14998

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Green Belt

- Govt consistently committed to protecting Green Belt
- Unmet housing demand unlikely to outweigh harm to GB
- Analysis of GB in Blythe has average score of 7.23, highest for any area in Solihull
- Not accord with NPPF Para. 133-135 as site would not provide sustainable development
- Coalescence with Whitlocks End Farm and Tidbury Green
- Sites in Green Belt Assessment scoring 7 or higher should not be removed from GB
- Council not fully examined infrastructure requirements that would justify & mitigate GB alterations in this area
- Proposal ignores Challenge E 'protect key gaps between urban areas and settlements'
- Even reduced allocation to 350 will have undue impact on integrity of Green Belt & major expansion of Dickens Heath village.
- To protect Tidbury Green from future development pressure, settlement should remain 'washed over Green Belt'.

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14999

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Character of Dickens Heath:

- Original Masterplan approved for 850 dwellings (examined in 1991 UDP Inquiry).

- 4 key elements were:

o Should have clear identity which gives residents a sense of place and belonging

o Echo traditional features of village development

o Provide range of housing

o Create a safe and pleasing environment for pedestrians

- Material consideration that in subsequent UDPs examination (1995 and 2004) additional growth to village was rejected by Inspectors.

- Development would not be within the recognised walking distance (800m) of the village centre, and outside the strong natural boundaries of the village.

- Contrary to Challenges in Para. 79 in DSP.

- Would not accord with Vision in Para. 62 of DSP.

- Site would impact on historic local farmsteads (inc. listed building at Betteridge Farm) and local character

- Dickens Heath should be preserved as a 'new village' of intrinsic character.

- Site contrary to NPPF Para. 127d, as it would be isolated and not contained within village boundaries.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15000

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Flood Risk:

- Likely site should be re-classified as Flood Zone 2 as sports fields flood most years.
- As no properties on land, flooding has not been accurately recorded.
- EA proposed land as Critical Drainage Area
- If site to be developed a large balancing lake would be required
- Considerable amount of fill required on site
- Cost of development may not be sustainable
- LLFA investigated options to reduce flood risk in area after May 2018 severed flood event, and included Site BL1/Site 4
- Sequential test not been carried out to steer development away from flood risk areas.

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

15001

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council

Summary:

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Traffic generation and parking

- Site is not highly accessible as stated in SA;
- In transport terms would only be accessible by rail, and service from Whitlocks End is overloaded and does not go to Solihull town centre
- Traffic would place heavy burden on local roads, which are not A or B class and country lanes
- Site cannot meet objectives of Challenge H (p.18)
- Original village design aimed to reduce traffic flow through village and for 850 dwellings
- Buses cannot pass on some village roads
- Village increased over 1800 dwellings, over 1800 dwellings, and been put under more pressure by recent Lowbrook Farm and Tidbury Green Farm developments; 2,250 dwelling granted PP in Blythe between 2011-2018
- no significant road improvements have accompanied recent developments
- If Site BL1 developed, the proposed highway improvements would require removal of important trees and hegerows, e.g. Dickens Heath Road & Birchy Leasowes Lane junction would involve part removal of ancient woodland
- Tythe Barn Lane is narrow lane, but also commuter route at peak hours, which deters cycling and walking, will only get more congested
- 2016 SHELAA report counted road access to site as poor
- Local Councillor Ken Hawkins has shared concerns about local traffic issues on his blog
- No evidence of traffic assessment carried out for Site BL1
- Mott Macdonald [PRISM] work only for strategic roads

-

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

15002

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Sport and recreation:

- Loss of substantial area of playing fields with no alternative facilities identified
- Contrary to NPFF Para. 97
- 2016 SHELAA comments site's suitability is adversely impacted by need to replace sports pitches
- Contrary to Policy P18
- Significant local objection to loss of sports fields
- Site BL1 has more playing fields than any other site in LPR

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

15003

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Ecological value:

- Development of site would conflict with DSP's natural environment objectives
- Adverse effect on wildlife and ecological connectivity
- 4 Local Wildlife Sites in immediate vicinity, particularly Little Tythebarn coppice ancient woodland and Tythebarn meadows wetlands
- More LWS within 1km of site
- Appropriate assessment evaluation not been carried out, contrary to NPPF Para. 177
- Wildlife Trust strongly oppose site
- Road junction improvements at Dickens Heath Road/Birchy Leasowes Lane would result in loss of ancient woodland, contrary to protections in NPPF Para. 175
- Contrary to Solihull's Sustainable Community Strategy
- Contrary to Government's 25-year Environment Plan
- Many local authorities asking for 20%, not 10% biodiversity net gain on site.
-

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

15004

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Historic Landscapes:

- Site within landscape character area of high sensitivity to development
- Contrary to Policy P10 reference to Arden landscape
- Contrary to Council's Woodland Strategy

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from the plan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

15005

Object

Policy BL1 - West of Dickens Heath**Respondent:** Tidbury Green Parish Council**Summary:**

- Delete part of Site BL1, west of Dickens Heath, from the emerging Local Plan Review for the many reasons given above, and
- Retain the field between Akamba, Tythe Barn Lane and the Stratford Canal as land for a sustainable long-term extension of the existing village.
- Retain the remainder of Tidbury Green as "washed over' Gren Belt status.

Change suggested by respondent:

- Delete part of Site BL1, west of Dickens Heath, from the emerging Local Plan Review for the many reasons given above, and
- Retain part of Site BL1, the field between Akamba, Tythe Barn Lane and the Stratford Canal, as land for a sustainable long-term extension of the existing village.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10897

Object

Balsall Common**Respondent:** Mr Keith Tindall**Summary:**

527. Balsall Common Relief Road. While supporting the proposal for a by-pass there is great concern that it will be built in such a piece meal way that it becomes merely a feeder road/rat run for the large Barratt's Farm development and cause greater congestion in the centre of Balsall Common.

528. Enhanced Centre. Aspirational but without sufficient information on its funding.

531. New Primary School. The present school cannot cope now so this is welcomed, but it must be built at the earliest stage of the Barratt's Farm development not after the houses are built.

Change suggested by respondent:

Para 527. In order to be a meaningful by-pass the Balsall Common Relief Road will be planned and constructed as a single entity not in phases.

Para 528. Delivery of the enhanced centre will be from grant funding opportunities that may be available from such as the West Midlands Combined Authority and/or from a combination of SMBC and Parish Council CIL monies.

Para 531. The building of the new 2 form entry primary school will be at the earliest stage of the Barratt's Lane development to cope with the expected population growth from the large scale housing development across Balsall Common.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments: None

10898

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Mr Keith Tindall**Summary:**

The provision of a new primary school must be phased at the early stage of this large development not at the latter in order to cope with the expected population growth.

The existing primary school is already operating at overcapacity and would be unable to cope with more pupils from the area.

Change suggested by respondent:

3.i. The provision of a new 2 form primary school and nursery to be phased at the early stage of the development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10899

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** Mr Keith Tindall**Summary:**

- i) The housing density fails to comply with the Balsall NDP as the proposed new housing does not reflect existing low density housing in the immediate area.
- ii) The 110 units will require 0.9 hectares of public open space to meet SLP Policy P10 and the concept masterplan for the site fails to meet this policy; furthermore paragraph 4i is incorrect as the school playing field is not public open space.

Change suggested by respondent:

The new housing mix and siting must take account of the Balsall NDP by ensuring that high density housing is not built directly next to existing low density housing.

The public open space must be no less 0.9 hectares and exclude the inclusion of the Heart of England playing field.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10900

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Keith Tindall**Summary:**

The proposed development fails to fully protect habitats and species of conservation importance.

The proposal does not adequately protect the heritage assets adjacent to the site.

Change suggested by respondent:

There needs to be a full re-appraisal of the site with regards to the environmental and ecological damage to ensure that sufficiently large areas of wildlife habitation and corridors are maintained and not over encroached by housing development.

There needs to be greater focus on protecting the Berkswell Windmill as a very important heritage asset, not just in functionality but in its rural aspect and appeal as a tourist attraction.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10901

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Mr Keith Tindall**Summary:**

The area abuts an important area of countryside and greenbelt, with Wootton Green Lane being part of the Heart of England Way route walked by many.

Wootton Green Lane is a narrow country lane lined with ancient hedgerows and mature oak trees, which is unpaved adjacent to site BC5.

The Concept Masterplan for the development shows access onto Wootton Green Lane and for the reasons above, as well as the safety of the many walkers cyclists and horse riders this is unacceptable, and would be in conflict with policy 2 iv relating to facilitating walking and cycling from this site.

Change suggested by respondent:

Change the Concept Masterplan to show and read:-

'Vehicular access will be off the Kenilworth Road A452 in order to preserve the rural aspect of this narrow country lane, and to ensure the safety of its users.'

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

14809

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs G Tomkys**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10980

Object

Blythe**Respondent:** Mrs Helen Tomlinson**Summary:**

The impact on Cheswick green, the infrastructure and local resources as a result of this will be significant.

Change suggested by respondent:

Plans objected and houses built elsewhere.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

10775

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Miss Charlotte Tompkins**Summary:**

The new development will impact on mine and my children's lives with more traffic, increasing the risks of road accidents and safety to the public especially children. It will also affect the local schools as they will need to be extended, changing the ethos of the schools and potentially decline in performance and learning environment.

There will be less resources available at doctors and services which are already pushed.

Travel times to work, school runs etc will be extended due to the higher volume of traffic. There will be more cars parked along roads, making travelling more difficult.

Change suggested by respondent:

Cancel or move the development.

Legally compliant: Yes

Sound: No

Comply with No

duty:

Attachments: None

14583

Object

Policy BL1 - West of Dickens Heath**Respondent:** Helena Tompkins**Summary:**

Green belt should be preserved.

Negatively impact the local nature.

The roads are already experiencing heavy traffic, lots of queues and unwelcome car emissions.

Sports fields are included in the proposals which are essential for health and fitness.

The whole area is prone to flooding.

Some of the mitigation measures are not achievable

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with Not specified

duty:

Attachments: None

11065

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carly Tong**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13914

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carly Tong**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

Site BC3 Windmill Lane/Kenilworth Road is removed from the Solihull Draft Submission Local Plan and Final Local Plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

13847

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Steven Tong**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

11178

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Elizabeth Tozer**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13976

Support

Foreword**Respondent:** Transport for the West Midlands**Summary:**

- Transport for West Midlands (TfWM) – the transport arm of the West Midlands Combined Authority (WMCA) is in support of the Solihull Local Plan (Publication Stage) overall. We feel engagement has been undertaken and overall the plan is in alignment with our overall transport policies.

- TfWM do not object to the Solihull local plan and are very supportive of the plan's vision and key objectives.

- TfWM would like to work closely with SMBC and developers as site progress through planning system.

- However, we feel there are areas where minor modifications could be made, to strengthen the active travel and sustainable transfer offer, to ensure the plan is sound and fully compliant with our wider policy objectives as a Combined Authority.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

13978

Support

Vision**Respondent:** Transport for the West Midlands**Summary:**

- Overall, TfWM is very supportive of the document's vision and associated aims.
- No doubt the proposed housing development sites across Solihull and UK Central will create extra pressure on demand on the Key Route Network as well as on existing public transport. TfWM therefore welcomes acknowledgment of Solihull's transport challenges and in partnership, we will continue to develop solutions to these issues.
- Seek clarity on how such developments, and especially those proposed in the green belt, will be made accessible by sustainable transport modes.
- Propose that transport masterplanning will be imperative to achieving these goals, and should be done at the earliest opportunity.

Change suggested by respondent:

-

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

13980

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** Transport for the West Midlands**Summary:**

- Solihull faces significant challenges for planning for future homes and jobs across the borough, and whilst TfWM considers that the ideal location for new development is concentrated in areas already well served by public transport, such as high-volume corridors (as emphasised in TfWM's 10 year Delivery Plan), we appreciate that other sites will also need to be considered.
- For such sites located in the green belt, sustainable transport should play a major role – with the plan demonstrating good accessibility measures and sustainable transport infrastructure in place. This is especially important for employment sites such as Birmingham Business Park, Blythe Valley Business Park and Damson Parkway, where currently these sites do not reflect sustainable commuting patterns.

Change suggested by respondent:

Policy P1 UK Central Solihull Hub Area UK and P1A Blythe Valley Business Park should demonstrate the importance of transport master plans, with opportunities being demonstrated which can reduce car dependence and fully promote sustainable transport.

Legally Yes
compliant:

Sound: Not specified

Comply with Yes
duty:

Attachments:

13981

Object

Policy P1A Blythe Valley Business Park**Respondent:** Transport for the West Midlands**Summary:**

- Solihull faces significant challenges for planning for future homes and jobs across the borough, and whilst TfWM considers that the ideal location for new development is concentrated in areas already well served by public transport, such as high-volume corridors (as emphasised in TfWM's 10 year Delivery Plan), we appreciate that other sites will also need to be considered.
- For such sites located in the green belt, sustainable transport should play a major role – with the plan demonstrating good accessibility measures and sustainable transport infrastructure in place. This is especially important for employment sites such as Birmingham Business Park, Blythe Valley Business Park and Damson Parkway, where currently these sites do not reflect sustainable commuting patterns.

Change suggested by respondent:**RECOMMENDATION:**

Policy P1 UK Central Solihull Hub Area UK and P1A Blythe Valley Business Park should demonstrate the importance of transport master plans, with opportunities being demonstrated which can reduce car dependence and fully promote sustainable transport.

Legally compliant: Yes

Sound: Not specified

Comply with duty: Yes

Attachments:

13982

Support

Sustainable Economic Growth**Respondent:** Transport for the West Midlands**Summary:**

- The local plan refers to HS2 growth and significant employment opportunities through UK Central. Yet delivering on high levels of employment growth, relies heavily on good accessibility to jobs, especially for those residents without access to a car in the region, including groups such as the unemployed, those living in more deprived areas and young people.
- Add reference to Local Transport Plan in chapter as this highlights good regional and community connectivity to key employment growth areas, with greater emphasis on the importance of traditional bus services which assist more vulnerable communities together with good walking and cycling measures to connect communities to key opportunities.
- Above will support principles of inclusive growth.

Change suggested by respondent:**RECOMMENDATION:**

- Reference to the emerging Local Transport Plan as well as the Delivery Plan for the region should also be made in the chapter.

Legally compliant: Yes

Sound: Not specified

Comply with duty: Yes

Attachments:

13983

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Transport for the West Midlands**Summary:**

Under Policy P1 UK Central Solihull Hub Area, reference should be made to the WMCA's HS2 Connectivity Package, which demonstrates the importance of improved transport connections and accessibility by public transport, cycling and walking, from local neighbourhoods to key employment growth opportunities in this area like UK Central. This will go onto support wider WMCA objectives like inclusive growth – through connecting people to vital opportunities.

Change suggested by respondent:**RECOMMENDATION:**

- Add reference to WMCA's HS2 Connectivity Package under Policy P1 UK Central Solihull Hub Area.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

13984

Object

Policy P5 – Provision of Land for Housing**Respondent:** Transport for the West Midlands**Summary:**

- Transport masterplanning needs to be undertaken in addition to concept masterplans
- This needs to be carried out prior to planning approval, to ensure sites are sustainable, both in terms of environment and infrastructure impacts.
- Should accord with overarching Solihull MBC and WMCA goals (see TfWM Response to Solihull Masterplan Consultation: 16/05/2018).
- This is particularly important as a number of sites are not in existing urban, highly accessible locations.
- New housing sites should be either mixed use or be close to a major source of jobs, education, health facilities and key amenities like shops and services; reducing the need to travel and providing opportunities to work, learn, shop, play and socialise locally.
- Future-proofed digital infrastructure, including superfast fibre broadband, should be provided for all new development
- Transport masterplans (for sites or clusters of sites) should scope out transport network and connectivity with all transport modes; bus corridors & network, rail, walking & cycling links (including LCWIPs), shared spaces, interchanges, stops and shelters, as well as full consideration of transport innovation measures, services and infrastructure.
- TfWM can help with this process.

Change suggested by respondent:**RECOMMENDATION:**

- Transport masterplans should be undertaken for each development site, or where there are clusters of sites in close proximity to one another (with likely cumulative impacts).
- request that the undertaking of transport masterplans be built into policy P5 – and echoed throughout other policy areas within the plan.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

13985

Support

Improving Accessibility & Encouraging Sustainable Travel

Respondent: Transport for the West Midlands

Summary:

- TfWM welcome principles established in this Chapter, and reference to WM Strategic Transport Plan 'Movement for Growth'.
- However we encourage reference to emerging Local Transport Plan for 2021, and TfWM's Delivery Plan. Acknowledge the potential that growth can bring, including opportunities for improved public transport, cycling and walking infrastructure, which benefit new and existing communities.
- Have concerns about predicted traffic increase at many of proposed sites, and will likely result in further congestion and poorer long-term social and environmental outcomes.
- WMCA's #2041 Climate Change Strategy/Action Plan should be noted in this chapter also, especially as transport is the biggest source of carbon emissions.
- Despite improvements to engine technologies, transport emissions have remained high over the last 30 years, largely due to increased car usage related to economic and population growth.
- Important that transport and planning respond to these challenges.

Change suggested by respondent:

RECOMMENDATION:

- Within 'Policy P7 Accessibility and Ease of Access', the ambition for a low carbon economy requires a stronger emphasis on de-carbonisation priorities for transport and how these will significantly contribute to reducing carbon emissions and meeting the regions wider environmental goals and climate emergency.
- There should also be reference made to the WMCA's #2041 Climate Change Strategy/Action Plan and the importance of sustainable transport in responding to the climate emergency.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

14102

Object

Improving Accessibility & Encouraging Sustainable Travel

Respondent: Transport for the West Midlands

Summary:

Need to ensure walking and cycling infrastructure is integral to new development.

Change suggested by respondent:

Include separate Walking and Cycling Policy to state:

- All new development planned and constructed with walking and cycling as primary means of local access;
- Fully integrate new development with existing walking and cycling infrastructure, and public transport network
- State how new site infrastructure will be included in Solihull's LCWIPs
- Walking and cycling routes should be safe, attractive, direct and navigable, with dedicated separate space for pedestrians and cyclists wherever possible
- Green infrastructure such as canals and parkways should be used to enhance opportunities for walking and cycling.

Legally Yes

compliant:

Sound: Not specified

Comply with Yes

duty:

Attachments:

14116

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Transport for the West Midlands**Summary:**

Transport Innovation:

- West Midlands part of Future Transport Zone, benefitting from UK Digital Strategy investment
- In areas where good public transport is less accessible, we recommend transport innovation measures, including flexible on-demand responsive transport, shared services like car clubs, shared taxi's, bike hire facilities, escooters and other micromobility measures, and mobility credits and Mobility as a Service (MaaS).
- Also important that flexible, on-demand transport modes fully connect into more traditional public transport routes and that good interchanges are fully considered in planning policy for new development.

Change suggested by respondent:

Policy P7: Should include section on transport innovation to:

- enhance accessibility
- provide flexible on-demand responsive transport
- include shared transport services, such car clubs, shared taxis, micromobility options, bike hire schemes;
- provide mobility credits, discounted public transport tickets for new residents and Mobility as a Service (MaaS)
- ULEV charging infrastructure should be mandatory to increase use of low- or zero-emission vehicles; to be provided for both private and shared vehicles, as well as electric charging facilities for bikes
- provide Mobility/travel hubs and interchange facilities on all new sites, to connect different modes together.

Innovative transport options are important for enhancing accessibility, covering need for flexible on-demand

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14133

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Transport for the West Midlands**Summary:**

- Support reference to Transport Assessments & Travel Plans for all new development, but should do more than mitigate highway issues, need to also enable walking, cycling & public transport usage & deliver high quality, attractive, liveable and sustainable environments.
- Recommend using and referring to WMCA's Design Charter, which promotes good design initiatives and quality place-making in region.

Change suggested by respondent:

- All Transport Assessment/Transport Statements/Travel Plans should be fully required for all new development; ensuring good walking, cycling and public transport usage and support in the delivery of high quality, attractive, liveable and sustainable environments.
- Policy P8 should note importance of WMCA's Design Charter.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14136

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Transport for the West Midlands**Summary:**

Developer contributions:

- TfWM want to ensure developer contributions fund public transport improvements, inc. stops, shelters, interchanges, information displays & accessible step-free access
- Should be used to subsidise new or amended public transport services to development. e.g. bus diversions/ demand responsive transport.
- Accessibility measures and cycle provision at railway stations
- Contribute to larger scale transport infrastructure improvements, as laid out in the existing and emerging local transport plan.

Change suggested by respondent:

Developer contributions:

- Policy P8 should request developer contributions, covering required/appropriate public transport infrastructure - both within, adjacent and in proximity to development site;
- where a development would otherwise have inadequate public transport access
- Contributions should be sought for larger scale transport infrastructure improvements, as laid out in the existing and emerging local transport plan and delivery plan.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14140

Support

Policy P8A Rapid Transit**Respondent:** Transport for the West Midlands**Summary:**

Policies Map -

- Safeguarding TfWMs future transport aspirations is vital to expand the regional public transport network.
- TfWM asks that Sprint and Metro routes references in Policy P8 be fully safeguarded and referenced in the proposed Policies Map.

Change suggested by respondent:

Proposed Rapid Transit Routes, as highlighted in Policy P8A, should be referenced and safeguarded in the Policies Map.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14141

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Transport for the West Midlands**Summary:****Freight:**

- Growth in online retailing has resulted in increase in smaller scale deliveries across by region, particularly by vans, which contribute to congestion and pollution,
- TfWM seeks reference to minimising freight levels and adverse impacts on communities,
- Include reference to consolidation of deliveries, including use of low- and zero-emission vehicles including electric vehicles, cargo/E-cargo bikes, changing procurement practices, and avoiding the need for repeat delivery attempts should all be policies in the plan, and covered in the master planning process.

Change suggested by respondent:**Policy P8:**

Request additional text on the efficient and sustainable movements of freight. To consider:

- Ensuring provision of consolidation centres/hubs and the use of low- and zero-emission vehicles including electric vehicles, cargo bikes and E-cargo bikes for local and last mile deliveries.
- Ensuring new development provides appropriate provision for deliveries and servicing, with consideration paid to road safety issues, traffic congestion and environmental impacts.
- Consolidation facilities/ Hubs should also be considered in all developments. This could be achieved through the production of Delivery and Servicing Plans by developers from the outset, to ensure freight movements are fully considered.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14147

Support

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Transport for the West Midlands**Summary:****Key Route Network**

- KRN play vital role in supporting public transport, freight and logistic movements
- Several routes within KRN are already heavily congested, including A34, A41, A45 and A452
- Congested KRN is negative for road safety & air quality
- New development and impacts of HS2 construction will put further pressure on key sections and junctions
- Important that proposed development does not place undue pressure on existing KRN
- TfWM will work with SMBC to ensure improvements to KRN.

Change suggested by respondent:**RECOMMENDATION:**

- Policy P8 needs to acknowledge the importance of network resilience, and fully understand how development will impact on the region's wider congestion management of the KRN;
- New development close or along the KRN should follow the principles in the Congestion Management Plan, and KRN Route studies and fully access and mitigate against impacts.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14148

Object

Improving Accessibility & Encouraging Sustainable Travel**Respondent:** Transport for the West Midlands**Summary:**

Construction impacts:

- No mitigation measures references in the local plan for construction traffic, except BC1 and HS2 construction.
- Given planned level of growth, encourage the use of Construction Management Plans for significant development, to mitigate against construction logistics and the environmental impacts on the surrounding area.

Change suggested by respondent:

Introduce as policy:

- Undertaking of Construction Management & Logistics Plans, and Delivery and Servicing Plans, together with
- Adherence to the Construction and Logistics Community Safety Scheme (CLOCS) to minimise against the impacts of HGV's and LGVs on the surrounding highway
- Cycle safety measures should be included for all new development
- Provide safe routes for cyclists during the construction period and beyond
- Consider how freight and servicing may impact on the public realm and local communities

Legally Yes
compliant:

Sound: Not specified

Comply with Yes
duty:

Attachments:

14180

Object

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Transport for the West Midlands**Summary:**

Park & Ride:

- TfWM's Park & Ride policy discourages short car trips to stations (within 2km)
- Park & Ride can provide interception opportunity for traffic going in and out of Shires to metropolitan area
- Whitlocks End and Dorridge stations are good examples of interception locations
- Berkswell would not usually be a priority location for Park & Ride (low service frequency, high proportion of users within 1 mile of station), but delivery of relief road would increase opportunity for interception
- Any plans for Berkswell station should be in accordance with adopted WMCA's Park & Ride policies and principles, and operations ideally transferred to TfWM.

Change suggested by respondent:

Policy P8:

Amend text to state Park and Ride expansion sites should meet conditions within WMCA's Park and Ride Policies and Principles report.

Legally Yes
compliant:

Sound: Not specified

Comply with Yes
duty:

Attachments:

14185

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** Transport for the West Midlands**Summary:**

Transport and Carbon Emissions:

- Welcome ambition for low carbon economy
- Chapter should note WMCA climate emergency declared in 2019, and carbon budgets to decarbonise the region
- As the biggest source of carbon emissions, transport is key to climate emergency response
- Seek stronger emphasis on decarbonisation priorities over and above transport and active travel modes: phasing out of fossil-fuelled private vehicles; replacement with zero emission alternatives; zero-C bus fleets; decarbonise road freight; shift to more rail/water freight alternatives

Change suggested by respondent:

Policy P9:

- Note decarbonisation priorities for transport; how these will contribute to C-emissions, and align with WMCA's #2041 Climate Change Strategy/Action Plan.
- Further reference promotions to zero emission vehicles, bus fleets, decarbonisation of road freight, and increased use of shared mobility.
- Note roll out of Electric Vehicle charging for all new development to support decarbonisation of transport.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14188

Object

Policy P5 – Provision of Land for Housing**Respondent:** Transport for the West Midlands**Summary:**

- Design, density and location of development are critical for encouraging sustainable transport; minimising need for travel and reducing car dependency, and effects of congestion, pollution and poor air quality.
- Providing good digital connectivity also reduce need to travel, as seen in pandemic
- Highlighted in emerging regional Local Transport Plan, teh green paper, and reflect WMCA and Mayoral objectives
- Developments need to located close to existing facilities/be mixed use, with range of community amenities to be truly sustainable, see Para.'s 104-105 of NPPF
- High density design and mixed use opportunities need to be addressed as some of site do not offer good sustainable transport options.
- Should also be far more emphasis on developing new walking, cycling and public transport routes and associated infrastructure, through and around the sites proposed.
- Such routes should consider how they connect to nearby opportunities like employment areas, local amenities and the wider public transport network, beyond red line site, to help improve the overall coverage, quality and integration of the existing infrastructure.

Change suggested by respondent:

See other proposed modifications to Plan to achieve the above aims.

Legally Yes**compliant:****Sound:** Not specified**Comply with** Yes**duty:****Attachments:**

14651

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr M Trentham**Summary:**

The need for a new Primary School, partly arising from the 780 new dwellings on allocated sites and local windfalls is acknowledged, and its proposed location within KN2 is accepted, and also can be accommodated

Change suggested by respondent:

-

Legally Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Attachments:**

14681

Support

Policy P17 Countryside and Green Belt**Respondent:** Mr M Trentham**Summary:**

Wants Cheswick Green, Tidbury Green, Millison's Wood, Whitlock's End, and Widney Manor Road, which do not perform any Green Belt function to be removed from the Greenbelt.

Change suggested by respondent:

I identified an additional similar area of 200 dwellings which I put forward at the time, and described as the Oldway Drive Area. (see Appendix A)

Deletion of P17 3 i

Revision of para 423 to read: ' Limited infilling identified as appropriate development in the Green Belt in the NPPF, will be permitted in Chadwick End.

In the other Green Belt villages and hamlets in the Borough, new building, other than that required for agriculture and forestry, outdoor sport, outdoor recreation and cemeteries, or for extensions and alterations will be considered to be inappropriate development, in order to protect the Green Belt and the character and quality of the settlements.'

Revision of para 420 to read: 'A small number of changes will be made to address anomalies in Green Belt boundaries across the Borough, including the

removal of settlements and areas of existing development which no longer perform any Green Belt function, taking into account an assessment of submissions made during the preparation of this Plan.'

Alteration to the Policies Map to exclude Cheswick Green, Tidbury Green, Millison's Wood, Whitlock's End, Widney Manor Road, and the Oldway Drive area (as defined in my Appendix A) from the Green Belt.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14072

Support

Policy S01 - East of Solihull**Respondent:** Trustees of The Joseph Frederick Harold Wiseman Trust**Agent:** Cushman and Wakefield**Summary:**

The allocation of Site S01 is sound – positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, would represent sustainable development and contribute to the Borough’s housing land supply. It is deliverable within Phases I and II of the Plan period (0-10 years). Technical work including a number of site surveys have been undertaken to inform the masterplan work and confirms the proposed allocation of the site for at least 700 dwellings is achievable. We consider the potential for development to impact upon nearby heritage assets and the potential impact of neighbouring towns merging into one another can be mitigated through the masterplan. The site provides a density of 35-40+ dph.

Change suggested by respondent:

Policy S01 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site’s capacity being ‘at least’ 700 dwellings.

The Proposed Policies Map, Concept Masterplan document, Site Analysis Plan and Landscape Assessment Plan should be consistent with each other and include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane, the Grand Union Canal and Field Lane. Reference within the Concept Masterplan Document to ‘an ecosite (former Pinfold nurseries)’ is not evidenced and should be removed.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14073

Support

Challenges**Respondent:** Trustees of The Joseph Frederick Harold Wiseman Trust**Agent:** Cushman and Wakefield**Summary:**

We agree with the key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14074

Support

Policy S01 - East of Solihull**Respondent:** Trustees of The Joseph Frederick Harold Wiseman Trust**Agent:** Cushman and Wakefield**Summary:**

The landowner group have worked collaboratively to bring forward S01 and have also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

10933

Object

Policy P12 Resource Management**Respondent:** Mr Bradley Tucker**Summary:**

I object to the plan as there has been a lack of consultation in Elmdon ward, neither residents or councillors were informed about the potential relocation of a Household Waste and Recycling Facility to the Site UK2 Land at Damson Parkway. I understand that this land is not in Elmdon ward, but it is immediately adjacent and it will largely be Elmdon residents who will be affected by the relocation. Pollution levels are already unacceptably high in this area and relocating to UK2 Site will only increase them further, which I believe is against national policy.

Change suggested by respondent:

There seems to be little explanation in the plan for why Site UK2 Land at Damson Parkway is specifically mentioned as a location for a relocated Household and Waste Facility. There are no specific mentions of any other alternate sites and this leads to a concern that there are few if any other sites being considered. Also, no surveys have been made publicly available for residents to scrutinise.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10948

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Bradley Tucker**Summary:**

I object to the plan as the Cushman and Wakefield report, the supporting document, says that this land shouldn't be declassified as green belt as it would not meet the criteria for re-zoning. Also, the potential relocation of a Household Waste and Recycling Facility to site UK2 will only further increase pollution in an area that already has unacceptably high pollution levels. I disagree with the refusal to extend the consultation period on the Local Plan as a whole, as well as, the lack of consultation with Elmdon residents and councillors, who will be most affected by the potential relocation.

Change suggested by respondent:

There seems to be very little transparency here on why Site UK2 Land at Damson Parkway is considered a suitable location for a relocated Household and Waste Facility. This combined with a complete lack of publicly available documents noting the details of its specific location within the overall UK2 site, means that residents are unable to effectively scrutinise the proposals for the relocation.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10742

Object

Blythe**Respondent:** Mr Paul Tucker**Summary:**

The expansion of Blythe is in effect enlarging Shirley so that it incorporates Cheswick Green, Tidbury Green, Dickens Heath, Blythe Valley, Ilshaw Heath, etc.

Shirley does not have sufficient infrastructure facilities to support the plan nor do the proposals alleviate my concerns. There is already a massive over capacity of accommodation for older people in this area and no more needs to be planned for in the foreseeable future. There is clearly a need for increased infrastructure to deal with education and healthcare which are already grossly inadequate.

Change suggested by respondent:

Scale down the plan for this area.

Make greater use of brownfield sites

Reduce the planning approval rate for accommodation for older people in this area which appears to be an unnecessary quick fix for Council to gain funds from developers to satisfy infrastructure demands.

Provide the necessary education and healthcare infrastructure that is currently inadequate for current demands.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

11242

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Liam Tuke**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10859

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Karen Turk**Summary:**

I live opposite Arden Academy and I do not want 600 dwellings built on the existing school site.

I fear moving the school, along with the development will devalue my property

There will be considerable disruption and noise during the development and once it is completed thereafter with habitants going about their daily life and accessing their properties.

Change suggested by respondent:

DO NOT BUILD 600 DWELLINGS ON THE EXISTING SCHOOL SITE

I DONT WANT THIS AND STRONGLY OBJECT TO THIS

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10863

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Paul Turk**Summary:**

I live opposite Arden Academy and I do not want 600 dwellings built on the existing school site.

I fear moving the school, along with the development will devalue my property

There will be considerable disruption and noise during the development and once it is completed thereafter with habitants going about their daily life and accessing their properties.

Change suggested by respondent:

I do not believe there has been a long enough consultation period. It makes no sense to demolish a first class school with profit being made by property developers at the expense of the general public, and Solihull ratepayers.

600 new homes will cause traffic chaos and environment destruction of the much needed and precious green belt.

I DO NOT WANT SCHOOL TO BE DEMOLISHED OR 600 new homes to be built.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10744

Object

Balsall Common**Respondent:** Turley**Summary:**

The policies for Balsall Common fail to identify a need for new convenience retail floorspace in the form of a new supermarket in the settlement to meet weekly/fortnightly bulk food shopping needs to reduce expenditure leakage and unnecessary travel.

Change suggested by respondent:

At the end of para 528 add the following " Within the settlement there is a particular deficiency of foodstores capable of meeting the weekly /fortnightly shopping needs of the local population. There is evidence of substantial leakage of expenditure on convenience goods by Balsall Common residents, mostly to large foodstores in Coventry, resulting in unsustainable travel patterns. This deficiency will be exacerbated in future years as a result of planned population growth. There is therefore, a need to attract a new foodstore to Balsall Common capable of meeting bulk food shopping needs. In recognition of the constraints to the location of such a store in the village centre, that new provision may have to be located out of centre, subject to the requirements of Policy P2 in terms of retail impact and the sequential test."

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

14736

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BC5 is supported in principle, subject to modifications.

Capacity should be 300 in interests of efficient use of land.

Green Belt enhancement requirement should either be deleted, or proportionate evidence and justification provided to:

- define 'significant',
- identify public open space 'south of site', and
- provide details of landownership and mechanisms for deliverability given that the landowners do not control any land south of the proposed allocation.

Change suggested by respondent:

It is recommended that Policy BC5 paragraph 1 is amended as follows:

1. The site is allocated for at least 300 dwellings.

Policy paragraph 4.i. 'Creation of a significant area of public open space to the south of the site'

- should be deleted or,
- sufficient evidence, explanation and delivery mechanism should be provided to justify and clarify the policy requirements.

Should there be any uncertainty over the deliverability or developability of housing on the proposed site allocation BC5 in its entirety (as delineated on the Policies Map and shown on the 'Concept Masterplan' document), a minor amendment to the site allocation 'red line' boundary could be made to exclude the Builder's Yard and 'Stoneycroft'.

It would still be entirely appropriate and compliant with national policy to use Wootton Green Lane as the new strong physical defensible Green Belt boundary with the opportunity of windfall development coming forward during the plan period on the land outside our Clients' ownership falling within the new proposed settlement boundary i.e. on the Builder's Yard, Stoneycroft and The Croft.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14737

Object

Policy P17A Green Belt Compensation**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P17A is unsound on the basis that no evidence, methodology, sustainability appraisal or viability assessment has been provided to justify the strategy proposed in the policy and linked site allocation policies. There is no evidence that alternative approaches have been considered. There is no clear link between the size of allocated sites and scale of compensation required.

No mechanism has been set out to demonstrate how the proposed compensation measures sought on Green Belt land outside the ownership of the developer would be delivered – contrary to the requirements of NPPF paragraphs 31 and 35 d) and PPG Paragraph 003 Ref ID: 64-003-20190722.

Change suggested by respondent:

Proportionate, robust evidence needs to be produced for the Green Belt compensation requirements appropriate for each site allocation where Green Belt land would be lost. The evidence should ensure that the most appropriate strategy is adopted, taking into account reasonable alternatives.

The Viability Study and Sustainability Assessment reports should be updated to take into consideration the implication of Policy P17A and associated site allocation policies where Green Belt loss is proposed.

Once the evidence has been provided, Policy P17A and all the site allocation policies which sit beneath this overarching policy, should be amended accordingly.

As a minimum:

- Any reference to Green Belt compensation/ enhancement requirements which fall within the site should be removed – only compensatory improvements to the environmental quality and accessibility can be required in the remaining Green Belt land.
- Any reference to a requirement which is on land outside the control of the site landowners/developer or the council, should be either deleted, or the mechanism for delivery should be set out.
- Details of the Green Belt compensation measures required on the site resulting in the most significant loss of Green Belt, i.e. 140ha at HS2 Inter-change (Site UK1), should be set out in Policy UK1 and on an agreed masterplan.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14738

Object

Policy P5 – Provision of Land for Housing**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners

Summary:

Policy P5 is unsound on the basis that insufficient evidence has been provided to demonstrate cross-boundary collaboration under the legal Duty to Cooperate in respect of the proposed 2,105 dwelling contribution towards the housing land supply shortfall (paragraphs 227 to 228 of the SLP).

There is no published statement of common ground to demonstrate effective and on-going joint working – contrary to National Planning Policy Framework (NPPF) paragraphs 11, 24, 26, 27 and 60.

Insufficient account has been taken of the need to plan effectively for delivery of the anticipated growth over the plan period and beyond to avoid the need for an early Plan/ Green Belt review, and ensure timely delivery of development – contrary to NPPF paragraphs 33 and 139 c).

Change suggested by respondent:

The evidence in support of Policy P5 is deficient, requiring

- Publication of a statement of common ground, which addresses the HMA cross-boundary shortfall of sites to meet the minimum housing requirement to satisfy NPPF requirements.
- Modification of the housing delivery target number if/as appropriate following scrutiny of the statement of common ground.
- Allocation of small and medium sized sites for residential development; and
- Removal of a phased housing delivery target table at paragraph 224.

Proposed modifications to Policy P5 as shown below:

'1. The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver a minimum 15,017 additional homes in the period 2020-2036...

Insert two new paragraphs beneath paragraph 4 of Policy P5, as follows,

'Reserve Housing Sites providing flexibility to ensure that the Borough can meet in full any increase in housing numbers arising from any change to the standard method for assessing housing need, and respond to the need to meet housing need arising from within the HMA. Reserve sites will have the capacity to deliver at least 20% of the total housing requirement to 2036. Re-serve sites will be released in the following circumstances:

- To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Solihull MBC area;
- To contribute to meeting any housing needs arising outside the Borough accepted through co-operation between the relevant councils.

'Land identified on the Policies Map will be removed from the Green Belt and safeguarded for potential future development needs beyond the plan period to ensures that Green Belt boundaries will last beyond the end of the Local Plan period. The status of the safeguarded sites will only change through a review of the local plan.'

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments:

14739

Object

Policy P5 – Provision of Land for Housing**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy P5 paragraphs 222 and 225-226. Insufficient 'deliverable' sites and 'developable' sites and broad locations have been identified to maintain a 5-year housing land supply over the plan period or to accommodate the scale of growth projected up to 2036, undermining the deliverability of P5 – contrary to the requirements of National Planning Policy Framework (NPPF) paragraph 67, 70, and 72 d).

Change suggested by respondent:

Evidence is required to:

- demonstrate which of the SHLAA sites identified as contributing towards the 5 and 16 year housing land supply in the 2013 SLP have been delivered.
- extrapolate the windfall, BLR and SHLAA site completions.
- robustly demonstrate the deliverability and developability of all BLR sites, SHELAA sites, and proposed housing allocations.

Where the necessary justification cannot be provided, those SLP housing site allocations, SHELAA sites, BFL sites and planning permissions should be deleted from the SLP and housing land supply information (paragraphs 65, 222 and 225).

Where appropriate evidence is forthcoming, additional site allocations should be set out in the SLP and Policies Map which identify deliverable small and medium 'major' development sites.

In particular, it is considered the following modifications are required –

1. The terms for the 'UK Central Hub' should be rationalised, clearly defined and used accordingly.
2. A clear policy on the UK Central Hub housing contribution - the housing contribution should be clearly identified within the Policies Map and a Concept Masterplan for each site, in the same manner as other allocated sites.
3. The quantum of dwellings and timeframe for delivery as quoted within the SLP and supporting evidence should be consistent.
4. The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
5. The development of Arden Cross requires Green Belt compensation.
6. That the NEC and Arden Cross sites are fully assessed for their suitability for development.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14740

Object

Policy BL1 - West of Dickens Heath**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy BL1 is unsound on the basis that insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site, contrary to the deliverability and developability requirements for site allocations set out in NPPF Appendix 2: Glossary and it fails to satisfy NPPF paragraphs 67 and 175.

Evidence is required to justify Policy BL1 West of Dickens Heath, to robustly demonstrate that:

- the multiple complex land assembly issues have been overcome and there is agreement by all landowners to the site being brought forward on the development basis set out in the Concept Masterplan document; and
- there is a fully developed strategy with mechanisms in place to ensure playing pitches are replaced to release the land for residential development.

Change suggested by respondent:

Insufficient evidence has been provided to demonstrate there is a mechanism to facilitate relocation of the existing sports provision south of Tythebarn Lane to a suitable site in the vicinity and thereby facilitate development on the site.

Evidence is required to justify Policy BL1 West of Dickens Heath

If these issues of soundness cannot be overcome paragraphs 225 and 226 should be amended to remove the estimated contribution of proposed site allocation BL1 from Delivery Phases I and II and Policy BL1 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners, playing field search and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14741

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Nicolas & Timothy Underwood**Agent:** Tyler Parkes Partnership Ltd**Petition:** 4 petitioners**Summary:**

Policy KN2 is unsound on the basis that insufficient evidence has been provided to demonstrate the site is deliverable with 'multiple and potential complex land assembly issues' (paragraph 709) still remaining to be resolved, as well as replacement playing fields. There is also insufficient evidence to demonstrate that reasonable alternatives have been considered in reaching the decision to relocate and rebuild Arden School, to justify that it is an appropriate strategy. This is contrary to the deliverability and developability requirements for site allocations and the requirement to justify a strategy as

set out in NPPF Appendix 2: Glossary and paragraphs 35, 67 and 72.

Change suggested by respondent:

Insufficient evidence has been provided to justify Policy KN2, or to demonstrate delivery.

Paragraphs 225 and 226 should therefore be amended to remove the estimated contribution of proposed site allocation KN2 from Delivery Phases I and II and

Policy KN2 amended as necessary in the light of the findings of additional evidence gathering, negotiations with landowners and masterplan work.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

13959

Support

Policy P1 UK Central Solihull Hub Area**Respondent:** Urban Growth Company**Agent:** Mott MacDonald

Summary:

The UGC continues to fully support and welcome the Local Plan and corresponding policy and allocation for the UK Central Hub, without which the wider potential economic and social benefits presented by High Speed 2 (HS2) and Interchange Station would fail to be realised. The plan clearly aligns with the Infrastructure Vision , Framework Plan and Arden Cross Masterplan, which reflect the phased growth ambitions for The Hub

UGC supports Policy P1 and the corresponding objectives and welcomes the commitment to high quality design across the UK Central Hub. Policy P1 provides a flexible approach that supports the future development of each of the key assets within the UK Central Hub and facilitates this in a holistic and integrated manner. It provides policy support for development of the Arden Cross site through release of the land from the Green Belt.

The UGC is pleased to see their previous representations reiterating the need to provide high quality place making across The Hub consistent with the overarching place making principles set out in the Framework and the need for a flexible based policy approach are reflected within both Policy P1 and Policy UK1.

UGC supports the evidence based approach to Policy UK1 which will provide for a range of uses to be accommodated, flexibility as to how the site will be developed and resilience to any future changes that may be required throughout the plan period.

An alternative arrangement for car parking in the form of multi storey car parking is being progressed by the UGC that would release land for development to deliver the masterplan for Arden Cross. This alternative design to consolidate surface level car parking associated with Interchange

Station is currently being progressed by the UGC and will be submitted as a planning application in due course.

Significant work has already been undertaken in relation to the design of this. The alternative parking arrangement is an essential enabling element in bringing forward the development at Arden Cross to deliver the associated social, economic and environmental benefits presented by HS2 and Interchange Station.

The UGC is currently in the process of bringing forward a scheme to redevelop Birmingham International Station to accommodate additional passenger movement and increase passenger capacity to meet the forecast growth associated with the UK Central Hub. Birmingham International Station will provide a high quality gateway linking key assets in the area, including Birmingham Airport, the NEC, Interchange Station and Birmingham Business Park. Will encourage a greater modal shift alleviating congestion in the surrounding area. The justification text accompanying Policy P1 confirms that Birmingham International Station should be protected for its important interchange purpose

Change suggested by respondent:

None suggested reiterates earlier points and commitment to bringing forward development. Highlights current developments including work being undertaken to bring forward alternative parking associated with the interchange station and to enhance Birmingham International Station.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

13960

Support

Policy UK1 - HS2 Interchange

Respondent: Urban Growth Company

Agent: Mott MacDonald

Summary:

The UGC continues to fully support and welcome the Local Plan and corresponding policy and allocation for the UK Central Hub, without which the wider potential economic and social benefits presented by High Speed 2 (HS2) and Interchange Station would fail to be realised.

The plan clearly aligns with the Infrastructure Vision , Framework Plan and Arden Cross Masterplan, which reflect the phased growth ambitions for The Hub

UGC supports Policy P1 and the corresponding objectives and welcomes the commitment to high quality design across the UK Central Hub. Policy P1 provides a flexible approach that supports the future development of each of the key assets within the UK Central Hub and facilitates this in a holistic and integrated manner. It provides policy support for development of the Arden Cross site through release of the land from the Green Belt.

The UGC is pleased to see their previous representations reiterating the need to provide high quality place making across The Hub consistent with the overarching place making principles set out in the Framework and the need for a flexible based policy approach are reflected within both Policy P1 and Policy UK1.

UGC supports the evidence based approach to Policy UK1 which will provide for a range of uses to be accommodated, flexibility as to how the site will be developed and resilience to any future changes that may be required throughout the plan period.

An alternative arrangement for car parking in the form of multi storey car parking is being progressed by the UGC that would release land for development to deliver the masterplan for Arden Cross. This alternative design to consolidate surface level car parking associated with Interchange Station is currently being progressed by the UGC and will be submitted as a planning application in due course. Significant work has already been undertaken in relation to the design of this. The alternative parking arrangement is an essential enabling element in bringing forward the development at Arden Cross to deliver the associated social, economic and environmental benefits presented by HS2 and Interchange Station.

The UGC is currently in the process of bringing forward a scheme to redevelop Birmingham International Station to accommodate additional passenger movement and increase passenger capacity to meet the forecast growth associated with the UK Central Hub. Birmingham International Station will provide a high quality gateway linking key assets in the area, including Birmingham Airport, the NEC, Interchange Station and Birmingham Business Park. Will encourage a greater modal shift alleviating congestion in the surrounding area. The justification text accompanying Policy P1 confirms that Birmingham International Station should be protected for its important interchange purpose.

Change suggested by respondent:

None suggested reiterates earlier points and commitment to bringing forward development. Highlights current developments including work being undertaken to bring forward alternative parking associated with the interchange station and to enhance Birmingham International Station

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

13820

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Mrs Joan Vale**Summary:**

The plans to build and continue building homes and over 60's schemes in around Shirley is very concerning. There is a concern for local services, including doctors and dentists.

The increased number of residents raises concern for emergency health provision, as Solihull does not currently have an A&E

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13822

Object

Solihull Town Centre & Mature Suburbs**Respondent:** Mrs Joan Vale**Summary:**

The roads in Shirley are too busy, especially around school pick up times.

Increased housing developments raises concern for the effect on the environment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10872

Object

Balsall Common**Respondent:** David Varley**Summary:**

Ref. BC1 Barratt's Farm Green Belt is not just in the Meriden Gap, it is at the narrowest part of the Gap protecting the merger of Solihull with Coventry. The plan talks about protecting the Meriden gap so why would you choose to build the largest number of homes on one site reducing the gap so significantly at the narrowest point when alternative sites were available.

The site was chosen based on site selection criteria that appeared to need more clarification. Alternative sites in the Borough could have been chosen which would not have reduced the existing Gap.

Change suggested by respondent:

This site must be removed from the plan in favour of alternatives where delivery can be within the plan period.

Barratt's Farm overlooks the Greenway which has taken 50 years to mature and 5 days to destroy for HS2. The Barratt's Farm site is due for new build in the second and third phase of the plan after HS2 has been completed allowing for an access road/by pass to be built. This site must not be taken out of green belt until the site has funding arranged for the By-pass.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

14697

Support

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Victoria Wadsworth**Summary:**

I confirm that I support KN2 and believe that is is legally complaint and sound. The proposed policy is the outcome of length collaborative approach involving landowners, Arden Academy, parents, students and the local community.

Change suggested by respondent:

I am satisfied that KN2 has been sufficiently well development in collaboration with the entire community and represents place based approach that I fully support without the need for modification.

Legally Yes
compliant:

Sound: Yes

Comply with Yes
duty:

Attachments:

14812

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Derrick Walker**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

10825

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** Mr Stephen Walker**Summary:**

Quote 4: The Concept Masterplan document should be read alongside this policy. Whilst the Concept Masterplans 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 HA2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.

Change suggested by respondent:

HA2 Oak Farm is a sensite location. It has been the subject of numerous speculative planning applications in the past. It should be linked to the proposal for S01. Justification for proposed developments of this site have failed to describe how the possible 95 dwellings possibly increased with the development of land adjoining Friday Lane would impact on the community and infrastructure of Catherine de Barnes.

Described as a Brownfield Site, Oak Farm is not derelict and is a place of employment. Its potential as a site for small scale starter light industrial use has not been explored. The balance between additional housing and emploment was not considered sufficiently.

The context of another large Continuing Care Retirement Community needs to be linked to other "Retirement Schemes"
Eg. Eastcote Park.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments: None

10827

Object

Policy SO1 - East of Solihull**Respondent:** Mr Stephen Walker**Summary:**

I object to:

1. Increase in the area to 43ha and the visual impact it will have
2. The strain on existing facilities in the Lode Heath area (plus SO 2) would be considerable (eg schools, already overstretched medical facilities)
3. Local road system/ drainage able to cope.
4. Inadequate social provision, no mention of affordable housing.
5. Failure to acknowledge the extensive use of Lugtrout Lane for recreation and its loss of facility.

While an environmentally sensitive area protection measures are vague and not binding.

The scheme would encourage ribbon development linking Lode Heath with Catherine de Barnes.

Change suggested by respondent:

1. Field Lane preserved as a holloway and closed to through traffic like Ravenshaw Lane. Alternative road access to SO 1 considered not off Field Lane.
2. Reduction in the scale of development from 700 houses
3. Consideration of creation of a public footpath adjacent to Lugtrout Lane.
4. Landscaping to maintain the semi-rural ambience of Lugtrout Lane with housing pushed back further from the Lugtrout Lane boundary.
5. The parcel of land adjoining the Canal to be considered for public open space and enhanced access to the canal. Housing too near 237 Lugtrout Lane.
6. Strict limitations to prevent "creeping ribbon development towards Catherine de Barnes village"

It is regrettable that one of the last green areas close to the Town Centre needs to be developed as so many other areas have been lost. However the visual impact can be mitigated by enhanced environmental work, screening and a lower proposed housing development.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments: None

14130

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Tom Walls**Summary:**

- > Tennis courts of our property at 262 Station Road are identified as development land. This is incorrect and must be corrected immediately.
- > Vehicular access has been permitted through Barretts Farm for generations to maintain trees and ponds. There is no allowance for this permitted access.
- > Land abutting property is a wildlife haven and a green nature reserve must be retained in the plans between the existing village and the new development.
- > Narrows Green Belt divide between village and Coventry.
- > Object to the location of the relief road. There are no environmental plans provided for this road and as such this proposal is not sound.
- > A lack of coastal winds in this area results in a very high incidence of hay fever and asthma sufferers. This will be further exacerbated by traffic pollutants.
- > No study on impact of noise and vibration being built by HS2.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14138

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** Tom Walls**Summary:**

- > Strongly objects to location of the primary school on station road as the area is of significant interest and ecologically important.
- > School should be positioned more centrally within the housing development or on Waste lane as originally planned. In it's current form it is unsafe and poses a threat to the lives of children and the wider community.
- >Lack of traffic surveys

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14139

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Tom Walls**Summary:**

> Against the proposal to have a retail park on the edge of the village as it has been done without an assessment of what the community needs and wants. Local community is more in need of greenspace, parks, trees, a decent playground for children and a leisure centre (Frog lane) would be an ideal location.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

10745

Object

Blythe**Respondent:** Mr Gordon Walters**Summary:**

should have been considered as a red not a green site in terms of the initial sustainability appraisal (SA) - roads and infrastructure have not been designed or improved to accommodate this increase in housing - Site BL1a is a high performing Green Belt site - significant amount of mitigation, some of which are unachievable, in an attempt to make the Site sustainable - should therefore be removed from the proposed allocation for development.

Change suggested by respondent:

see attached

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10756

Object

Blythe

Respondent: Mrs Jean Walters

Summary:

█ Please see separate email

Change suggested by respondent:

█ Please see separate email

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

10757

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

BL1 is in a high performing Green Belt area (7 &8).

The Sustainability Appraisal is inaccurate.

The sports fields should be retained.

There are other more sustainable sites in a sequential test.

The character and setting of the Village will be adversely affected.

Many Local Wildlife Sites and Ancient Woodland and their connectivity compromised.

Traffic congestion exacerbated. Narrow, rural roads.

Village Centre parking problem cannot be solved just by controlling some on-street parking.

Site not within a recognised walking distance (800m) from the Village Centre facilities.

Flooding

A more detailed report is contained in Appendix 1

Change suggested by respondent:

Part of site BL1, land west of Dickens Heath and south of Tythe Barn Lane should be deleted from the Plan.

The land for approx. 100 dwellings north of Tythe Barn Lane has fewer constraints so could be allocated but only at the end of the Plan period when other lesser grade Green Belt land has been developed.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

14972

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mrs Jean Walters**Summary:**

- BC3 Windmill Lane, Balsall Common is unsustainable
- Significant harm to natural environment
- Adversely affect a listed building of national importance.

Change suggested by respondent:

- Remove Site BC3 from plan

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14973

Object

Challenges**Respondent:** Mrs Jean Walters**Summary:**

- Challenge B:
- Apparent that Solihull cannot deliver 15,270 homes without significant adverse harm to the Green Belt and the environment.
- Standard Methodology is not a suitable basis for housing need as it assumes there is no constraint to meeting full requirement.
- Commuting in and out of Borough has not been taken into account in Standard Methodology.

Change suggested by respondent:

- Therefore, the NPPF Para 11.b should be invoked which the Council has not done.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14974

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mrs Jean Walters**Summary:**

Land capacity:

Covid 19 consequences not been taken into account.

Likely there will be less need for offices, and an increase in windfall sites as offices become redundant.

Additional capacity in Solihull Town Centre for residential use and at Arden Cross is likely above that in Plan.

These sites should be considered ahead of destroying sensitive Green Belt, in conformity with Para. 68 of the NPPF.

Quoting Professor Wenban-Smith: "Over provision can never be corrected; under provision can be corrected later when needs are better defined."

Change suggested by respondent:

Increase capacities for Solihull Town Centre sites and Arden Cross

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

14975

Object

Spatial Strategy**Respondent:** Mrs Jean Walters**Summary:**

Disagree with site selection process, and certain sites considered 'green'. Credibility and robustness of process is undermined.

Site BL1 should be 'red' site, doesn't accord with spatial strategy.

Change suggested by respondent:

Review site selection process

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:**

14976

Object

Foreword**Respondent:** Mrs Jean Walters**Summary:****Sustainability Appraisal:**

Sustainability Appraisal excludes a number of smaller sites, Strategy continues to focus on large scale Green Belt release. Smaller sites could contribute to housing growth in a more sensitive way with less overall impact on Green Belt, local character, and are more deliverable.

Change suggested by respondent:

SA to review smaller sites

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14977

Support

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Caveated support for Part of Site BL1 (parcel north of Tythe Barn Lane):

- considered acceptable – reserved support.
- Understand very special circumstances of housing need.
- SA should have assessed parcel separately
- Will still increase parking and congestion issues in village
- Should be developed in later stages of Plan when lower performing Green Belt sites have been developed first
- Welcome retention of Akamba site
- Welcome retention of wetlands to west

Change suggested by respondent:

Retain for later stages of delivery.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14978

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Green Belt:

- Land within highly performing Green Belt
- Green Belt Assessment not been taken into account
- Government has consistently committed to protecting the Green Belt, and unmet housing demand is unlikely to outweigh harm to Green Belt.
- Green Belt should only be released as last resort.
- Site BL1 does not accord with Government policy on Green Belt, in particular Para.'s 133, 134 (b), 135 (c).
- Site BL1 would be contrary to Challenge E, in particular safeguarding 'the key gaps between settlements such as the Meriden Gap and the countryside.'
- Green Belt sites with score of 6 or lower should be prioritised for release in the site selection process.
- Council not fully examined the infrastructure requirements that would justify and mitigate altering the Green Belt in this location.

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the Plan

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14979

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Contrary to original Dickens Heath masterplan:

- 4 key elements of original Masterplan:

o Should have clear identity which gives residents a sense of place and belonging

o Echo traditional features of village development

o Provide range of housing

o Create a safe and pleasing environment for pedestrians

- Dickens Heath new village was originally conceived for 850 dwellings, is now 1,757 units and this development will increase to ca. 2100 dwellings.

- Emphasis of original village design was that majority of residents would be only 800m/ 5 mins walking distance from the centre.

- See Para. 62 of Vision – accurate description of village, but proposed Site BL1 would not be in accordance with Challenges in Para. 79.

- Proposals conflict with Para. 87 of DSP – would undermine principle of village.

- John Simpson's original concept will be eroded.

- Strong boundaries of canal to east and north, and line of woodland to north-west will be undermined by proposal.

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from plan

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14980

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Traffic, congestion and parking:

- Roads and infrastructure not originally designed to accommodate this increase
- Number of new housing estates (2,252 dwellings) between 2011 and 2018 have caused considerable congestion at peak times.
- Parking problems in village centre
- Village road network not designed for this level of car traffic, and designed to discourage through traffic by narrow roads and sharp bends; buses have difficulty using some of village roads
- Narrow rural roads and historic hedgerows make it difficult to accommodate required road improvements to take more traffic.
- High existing car dependency in Dickens Heath village.
- Parked cars create long tailbacks and considerable congestion
- Undeliverable for pedestrian or walking routes to pass through Birchy Close as this will be strongly resisted by residents.
- Additional car trips to village from BL1 will exacerbate parking problems, which are already at capacity.
- Birchy Leasowes/Dickens Heath Road junction cannot be improved as it adjoins ancient woodland and LWS – there are no footpaths, and this is shortest route to village.
- Site conflicts with objectives on p.18, and Para. 582

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from plan

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14981

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Accessibility and public transport:

- Whitlocks End station is not a sustainable option, as:

o pre-Covid the rail services were overloaded.

o Does not provide a direct service to Solihull Town Centre

o No public transport to UK Central

o Takes more than 15 minutes journey time to access employment locations

o Car park full by 8am

o High car park use discourages off-peak rail use

- Council masterplan shows a proposed bus route along Birchy Leasowes Lane and Tythe Barn Lane, but neither of these are feasible.

- Only a slow and indirect bus service

- No direct access from Site BL1 to the services and facilities in Dickens Heath village itself, as no direct road or cycleway to village centre

- Need to travel as little local employment in area.

- Low accessibility, only meet rail criteria.

- Enabling road junction improvements and footpath at Birchy Leasowes Lane/Dickens Heath Road junction would necessitate part removal of ancient woodland, contrary to NPPF Para. 175.

- Cannot meet Challenge H (p.18)/objective of increasing accessibility and encouraging sustainable travel

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from Plan

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14982

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Not a sustainable location:

- Site in Local Plan with most adverse effects, site not meet objectives of achieving sustainable development (PCPA 2004)
- Site is contrary to NPPF Para. 33 & Para. 8
- Proximity to Whitlocks End Station does not negate the other adverse impacts for selecting Site BL1
- Site is contrary to Strategic Objectives and Guiding Principles of 2016 Draft Local Plan document
- Sustainability Appraisal Report for Site BL1 is incorrect, services and facilities in Dickens Heath village are not accessible by foot, and site is in the middle of Local Wildlife Sites.
- Adverse impacts identified in SHELAA 2016
- Council proposing significant level of mitigation, which proves that site is unsustainable
- Approach should first be do no harm, and then mitigate
- Carried out my own analysis using i) the Council's own analysis and ii) using the sustainability scorecard (www.thescorecard.org.uk)
- (ii) Using scorecard the Site was only 41% sustainable, and without mitigation scored 30%.
- (i) SA flawed, GBA not taken into account.

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14983

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters

Summary:

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Flooding and sequential test

- Part of site BL1 in Flood Zones 2 and 3

- Sports fields flood most years, and severely in 2012 and 2018, with neighbouring garden properties being flooded.

Council not recorded green space flooding over years, only properties.

- Frequent flood at Birchy Leasowes/Dickens heath Road junction and along Tythe Barn Lane.

- LLFA investigated options to reduce flood risk in Dickens Heath after May 2018 severe flood event

- LLFA report stated proposed use on Site 4 was vulnerable to flooding (see 2018 report)

- Sequential test not been fully carried out in accordance with NPPF Para. 158 – otherwise Tidbury Green Golf Club site would not be excluded

- Additional modelling required

- Due to regular flooding on site, should be re-classed as Flood Zone 2

- Flooding not been accurately recorded as no properties on this land, should be FZ2, not FZ1.

- EA are proposing to make sites a Critical Drainage Area

- Large area of land would be required as a balancing lake.

- Would need extensive piling on Site BL1 due to land lying on deep boulder clay – evidence by adjacent residential road Birchy Close.

- Therefore cost of developing site may be unsustainable due to considerable amount of fill material required as site is liable to flooding during wet periods every year.

- Would conflict with NPPF Para. 178 on ground conditions.

Change suggested by respondent:

Due to regular flooding on site, should be re-classed as Flood Zone 2

Remove part of Site BL1, south of Tythe Barn Lane, from plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14984

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Sports and recreation:

- Loss of substantial area of playing fields
- Contrary to NPPF Para. 97
- 2016 SHELAA states that suitability of Site BL1 is adversely affected to need to replace sports pitches
- Contrary to Policy P18 on promoting healthy lifestyles
- Considerable public objection to Site BL1 from club members and users from wide geographical area
- Relocation of sports grounds will cause upheaval and stress to local community
- Sport England have previously objected to Site (Reg 18 consultation in Feb 2017)
- Has more playing fields than any other proposed site location
- No alternative sports ground have been identified
- Access to countryside and recreation opportunities would be reduced
- Remaining areas of green space taken out of the Green Belt will be under pressure for development

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14985

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters

Summary:

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Ecology:

- Development of Site BL1a will conflict with natural environment objectives in DSP
- Profound adverse effect on wildlife; 4 LWS immediately surround the site, and 8 LWS within 1km - the most of any of the proposed sites. In particular little Tyburn Coppice (ancient woodland) and Tythebarn meadows (draining into canal)
- Contrary to NPPF Para. 177
- Appropriate Assessment has not been carried on Local Wildlife Sites in area
- Cannot mitigate harm fully, especially to ancient woodland
- Warwickshire Wildlife Trust strongly oppose inclusion of Site
- Lots of protected species recorded here
- See HBA Ecological Assessment
- Will be difficult to achieve access off Tilehouse Lane given proximity to LWS and pond constraint
- Concept masterplan only show a 15m buffer, not recommended buffer of at least 25m, to ancient woodland
- Enabling road junction improvements and footpath at Birchy Leasowes Lane/Dickens Heath Road junction would necessitate part removal of ancient woodland, contrary to NPPF Para. 175.
- Contrary to Solihull's Sustainable Community Strategy (p.8): protecting wildlife and local distinctiveness.
- Solihull Council's proposed solution appears focussed on offsetting rather than protecting precious habitats.
- Contrary to Defra's 25-year Environment Plan
- Solihull Local Plan only looking for 10% net gain, many other authorities are going for 20%
- Inaccuracy on Masterplan of red line ownership of Tythe barn Coppice (see Appendix 3)

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from Plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14986

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Historic landscape:

- Site BL1a within a LCA 2: Landscape Character Guide (p.7) states limited capacity to accept development without impact on local character, such as narrow lanes and strong hedgerow structure. Medium landscape value with high overall sensitivity to new development.
- Contrary to Policy P10 and emphasis on the Arden Landscape, site would erode the Arden landscape
- Contrary to Council's Woodland Strategy
- Age of hedgerows (indicated on 1840 map) indicates these are protected are under the 1997 Regulations.
- Historic landscape evidence apparent in field names, ownership and farm units

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14987

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Heritage:

- Listed building at Betteridge Farm, and a restored farmhouse of local historic interest, Tithe Barn Farmhouse.
- Proposal conflict with Policy P16, as would not preserve or enhance heritage assets, and attractive rural setting would be lost

Change suggested by respondent:

Remove part of Site BL1 (south of Tythe Barn Lane) from plan

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14988

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Loss of Blythe character of distinct villages in countryside:

- Loss of character and identity as Site BL1 outside of confined, identifiable village boundaries
- Original Dickens Heath village assessed at 1991 UDP Public Inquiry; Material consideration that at subsequent UDP Inquiries (1995 and 2004) additions or additional growth to village were rejected and original form of village confirmed.
- Site would be isolated and un-connected to the Village, and be outside of Village's built-up area, both physically and visually (see Council's Landscape Assessment Jan 2019)
- Dickens Heath village would no longer be a 'special identifiable place'
- Conflicts with Para. 127(d) of NPPF, as it would be isolated and not part of contained village boundaries.

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14989

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Local community view of Site BL1:

- Reference to survey carried out in 2016/17 for Draft Local Plan consultation
- Over 90% of residents strongly opposed to Site 4, including local Councillor, Ken Hawkins
- Councillor Ken Hawkins highlighted existing congestion issues on Dickens Heath Road, Tanworth lane and Blackford Road and impact on air quality in their blog.

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14990

Object

Blythe**Respondent:** Mrs Jean Walters**Summary:**

Disproportionate growth in Blythe & South Shirley area

- 39% of all proposed new housing to be in South Shirley/Blythe ward.
- Excessive burden on small area
- Lack ability to improve capacity of road network to cope with this level of growth
- Area already had a large amount of growth and roads and infrastructure have not been improved to accommodate this
- Seems continuing approach to add more housing to Dickens Heath to avoid finding sites elsewhere;
- Little local employment in the area; commuting creates traffic jams at peak times.
- Not everyone travels by train.

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the plan

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14991

Object

Spatial Strategy**Respondent:** Mrs Jean Walters**Summary:**

- Site selection flawed and part of site BL1 (south of Tythe Barn Lane) unsuitable for development
- Amber sites in lower performing Green Belt should be brought forward instead.

Change suggested by respondent:

- Amber sites in lower performing Green Belt should be brought forward instead of sites in higher performing Green Belt.

Legally Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14992

Object

Blythe**Respondent:** Mrs Jean Walters**Summary:**

Alternative Site should be considered instead of Site BL1 (south of Tythe Barn Lane):

Arden Green/Tidbury Green Golf Course, CFS Ref. 545:

- Would accommodate 250 dwellings
- Is also within walking distance of Whitlocks End station, Tidbury Green Primary School and Tidbury Green village Hall.
- SA score of 290.
- Site is available for development now.
- Site not surrounded by 9 Local Wildlife Sites or ancient woodland.
- Site does not flood on the proposed housing areas.
- No sports fields needing re-location.
- Similarly accessible to shops and services as BL1, still necessitating car journeys.
- Lower performing Green Belt parcel.
- Site visually and physically detached from Dickens Heath village like Site BL1
- Could link with POS at recent Lowbrook Farm development, making a more meaningful walkway/cycle route to Whitlocks End station, and link north to proposed country park south of Shirley.
- Accord with NPPF Para. 138.
- Could provide corner sop on Tilehouse Lane to increase sustainability score.
- Tidbury Green golf course should be Priority 5 status (yellow)

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, and include CFS Ref. 545, land at Tidbury Green Golf Club, instead as an allocation.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

14993

Object

Policy BL1 - West of Dickens Heath

Respondent: Mrs Jean Walters

Summary:

Transport evidence:

- No evidence of Traffic Impact Assessment for plan period for Site BL1
- Strategic Assessment by Mott Macdonald does not look at minor roads.

Change suggested by respondent:

- Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14994

Object

Policy BL1 - West of Dickens Heath

Respondent: Mrs Jean Walters

Summary:

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Evidence:

- External consultants who have authored reports have insufficient local knowledge

Change suggested by respondent:

- Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14995

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Jean Walters**Summary:**

Part of Site BL1 (parcel south of Tythe Barn Lane) objected to on number of grounds:

Previous comments have largely been ignored, and some only partly addressed by reducing quantum of development:

- Impact on ecology and Local Wildlife Sites
- Loss of sports ground and recreation
- High level of flood risk
- Disproportionate growth planned in area
- Large amount of development already delivered/planned in area
- Substantial local objection
- Traffic congestion and parking issues
- Impact on historic landscape character, hedgerow and trees
- Whitlocks End station full
- Landscape sensitivity

Change suggested by respondent:

Remove part of Site BL1, south of Tythe Barn Lane, from the plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Attachments:

15169

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sylvia Walton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14832

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr T N Walton**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14786

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Eileen Ward**Summary:**

Needs of those who live in the retirement home have put strain on local services such as GPs.

If the proposed plans go ahead then much of the greenbelt land between Shirley, Cheswick Green and Dickens Heath will be lost forever.

The railway stations that serve the area are not easily accessed by road, pedestrian footpath or cycleway.

The existing road system in and around Shirley is already far too congested.

There is a considerable amount of local flooding.

Would create overcrowding in schools.

Change suggested by respondent:

The empty / unused buildings could be repurposed for joint domestic / commercial use thus saving the greenbelt and keeping town centres alive

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14359

Object

Foreword**Respondent:** Geoffrey Ward**Summary:**

I would like you to understand that the consultation time offered by the council for the local population to acquire, digest, read, comprehend and react to the Local Plan is far too short. The entire plan contains over 10,500 pages with 30% being added on October 30th, the first day of the consultation period. To be given only six weeks to formulate a response is far too short a time.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14360

Object

Blythe**Respondent:** Geoffrey Ward**Summary:**

Shirley has taken more than its fair share of retirement and care homes in comparison to the rest of Solihull. This has had a marked impact on Shirley as residents in these kinds of properties have particular needs and demands on local services, many of which are unable to cope at today's levels of demand. Doctors are struggling, indeed at least one new care home is unable to find a local surgery at which to register its residents. Care services are well over subscribed in the area and south Solihull now has no primary care facility. Adding to the housing aimed at older people will only make matters worse. If these agencies are struggling now, what will be the impact of building even more homes in the area?

- 39% of new housing to be build in Shirely,
- Loss of Green belt
- Public Transport (away from Stratford Road) is poor and railway stations not easily accessible,
- The existing road system in and around Shirley is already far too congested
- More cars would mean gridlock in the area
- Schools/services provision not in accessible locations, down narrow roads. Danger to pedestrians.
- Flood Risk Concerns
- Houses should be directed towards Chelmsely Wood and Arden Cross

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14813

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Anna Waters**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14831

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr. William Watkeys**Summary:**

An overload of development in the Shirley area is not supported by the infrastructure especially in the area of GP provision.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

11117

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Edward Watson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

11177

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Edward Watson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

15093

Object

Policy BL1 - West of Dickens Heath**Respondent:** Graham Watson**Summary:**

At certain times of the day have to endure constant queues of traffic obstructing access or exit from my own drive.

The present infrastructure is inadequate to deal with existing traffic volumes and in my view any further expansion in houses people and traffic is complete madness.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

13714

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Marilyn Watson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13731

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Nicola Watson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

13809

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sophie Watson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

10669

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Jade Watts**Summary:**

1. Cheswick Green cannot cope with any more developments
2. Even more problems accessing local services
3. Strong likelihood of more flooding
4. Travel, employment and public transport
5. The environment - the council intend to create an artificial boundary by building a road as part of the proposed development. This goes against the spirit and intentions of national planning policy
6. Preventing even more development in future years

Change suggested by respondent:

1. Cheswick Green cannot cope with any more developments - a disproportionate number of houses are being built in Cheswick Green compared to the rest of the Borough. Not enough houses are being built on brownfield sites.
2. Even more problems accessing local services - further strain on the NHS for appointments, operations and a longer wait to see the Doctor. No plan included to build a new GP surgery alongside these houses.
3. Strong likelihood of more flooding - the more green space that is lost to housing the greater the likelihood of future flooding to a greater extent.
4. Travel, employment and public transport - it will take longer to commute on already busy, congested and gridlocked roads at peak times. No local employment and public transport benefits. A new transport policy is not included within the draft plan.
5. The environment - the council intend to create an artificial boundary by building a road as part of the proposed development. This goes against the spirit and intentions of national planning policy
6. Preventing even more development in future years - Dog Kennel Lane is the only boundary between Cheswick Green and adjoining areas of the Borough. If that boundary is lost the rest of Cheswick Green is open to further extensive development. We face the likelihood that very little if any green space will remain.

As a relatively new resident in Cheswick Green on the new Cheswick Place development I understand the importance in creating new homes for the increasing population in the Borough, however, as a young couple I am concerned about when I start a new family of the provisions that will be or not be available for my children. There is a lack of detail over how amenities will be managed and be able to cope with even more residents flooding the area. The balance between Urban/Rural areas is what currently makes the area so attractive at the moment and I fear with more development will have a detrimental effect.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments: None

10819

Object

Policy P12 Resource Management**Respondent:** Mr Alan Weeks**Summary:**

The proposal to locate a new waste site on Damson Parkway fails the criteria as "justified with clear evidence" as there is no consideration of the impact of relocation or any reasonable consideration of alternative locations.

It also fails on "consistent with national policy" as it proposes to develop on precious green belt land that is adjacent to an existing heavily developed area with high density residential housing. There are existing waste related sites that could be further developed and thus protect the precious green belt.

Change suggested by respondent:

The plan must describe why existing waste sites cannot be extended and any new facility can't be located adjacent to the final destination of the waster or processing site. The specific impact on traffic, conflict with other nearby developments, risk of fly tipping, needs and wants of local residents and the avoidance of further loss of green space and green belt land need to be addressed.

Where was the prior consultation before the draft plan was issued?

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

14564

Object

Blythe**Respondent:** Gemma Welch**Summary:**

Objects to Policy BL1/2/3;

Existing amenities/Schools cannot support proposed developments - Concerns over Bills lane/increase in traffic - Concern over healthcare services - Shirley area/services cannot support proposed allocation of houses - excessive retirement properties, would suit better to have smaller developments of houses.

Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Attachments: None

15181

Object

Policy BL1 - West of Dickens Heath**Respondent:** Gemma Welch**Summary:**

Objects to Policy BL1/2/3;
Existing amenities/Schools cannot support proposed developments - Concerns over Bills lane/increase in traffic -
Concern over healthcare services - Shirley area/services cannot support proposed allocation of houses - excessive
retirement properties, would suit better to have smaller developments of houses.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15182

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Gemma Welch**Summary:**

Objects to Policy BL1/2/3;
Existing amenities/Schools cannot support proposed developments - Concerns over Bills lane/increase in traffic -
Concern over healthcare services - Shirley area/services cannot support proposed allocation of houses - excessive
retirement properties, would suit better to have smaller developments of houses.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

15183

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Gemma Welch**Summary:**

Objects to Policy BL1/2/3;
 Existing amenities/Schools cannot support proposed developments - Concerns over Bills lane/increase in traffic -
 Concern over healthcare services - Shirley area/services cannot support proposed allocation of houses - excessive
 retirement properties, would suit better to have smaller developments of houses.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14128

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** Dr Richard Wellings**Summary:**

> The proposed development places an unmanageable increase traffic along the access road to the site and traffic from
 Wootton green lane is not achievable on this road network.
 > School in the village will not be within reasonable walking distance, thus will increase congestion/pollution via
 increased traffic flows.
 > School within Balsall common cannot deal with the increase in pupils as a result of an increase in housing.

Change suggested by respondent:

"The number of residences proposed from Balsall common place excessive pressure on the schools and medical
 services of the village".

Legally Not specified
compliant:

Sound: No

Comply with No
duty:

Attachments:

14407

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Lynn Welsher**Summary:**

I would like to register my objection to the Solihull Plans to potentially relocate the HWRC to Damson Parkway. It would add traffic.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14898

Object

Policy BC1 - Barratt's Farm, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
- Site policies are unsound without cross-referencing need to comply Policy P15
- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following:"
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'

- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include:
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14899

Object

Policy BC2 - Frog Lane, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
- Site policies are unsound without cross-referencing need to comply Policy P15
- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14900

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
- Site policies are unsound without cross-referencing need to comply Policy P15
- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14901

Object

Policy BC4 - Pheasant Oak Farm, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
- Site policies are unsound without cross-referencing need to comply Policy P15
- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14902

Object

Policy BC5 - Trevallion Stud, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
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- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14903

Object

Policy BC6 - Lavender Hall Farm, Balsall Common**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
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- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14904

Object

Policy BL1 - West of Dickens Heath**Respondent:** West Midlands Police

Agent: Tyler Parkes Partnership Ltd

Summary:

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
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Change suggested by respondent:

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14905

Object

Policy BL2 - South of Dog Kennel Lane

Respondent: West Midlands Police

Agent: Tyler Parkes Partnership Ltd

Summary:

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Attachments:

14906

Object

Policy BL3 - Whitlock's End Farm**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14907

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
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- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14908

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
- Site policies are unsound without cross-referencing need to comply Policy P15
- Site policies are contrary to the requirements of NPPF Para.'s 34, 91, 95 and 127f) and PPG Para: 004 ID: 23b-004-20190901, Para: 017 ID: 25-017-20190901, and Para: 144 ID: 25-144-20190901.

Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14909

Support

Policy HH1 - Land South of School Road, Hockley Heath**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
- Important to note that increase in local population or number of households does not directly lead to an increase in central government funding or local taxation.
- Viability Assessment shows that police contributions are viable.
- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
- Site policies should include more social infrastructure, such as 'emergency services' within likely infrastructure requirements, as within 2013 Local Plan.
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Change suggested by respondent:

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Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14910

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
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Change suggested by respondent:

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- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14911

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
- If additional infrastructure for WMP is not provided, then Police's ability to provide a safe and appropriate level of service will be seriously impacted by level of growth in the DSP.
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- Considered therefore contributions to policing are essential for delivery of DSP, and should be expressly stated in site policies and P21, not just Draft Infrastructure Delivery Plan.
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- Site policies are unsound without reference to need for financial contributions to police infrastructure in list of 'likely infrastructure requirements'
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14912

Object

Policy ME1 - West of Meriden (Between Birmingham Road and Maxstoke Road)**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
- PPG provides for planning obligations in policy requirements, understanding infrastructure evidence and costs and guidance for CIL.
- Vital that Police are not deprived of legitimate sources of funding so they're not under-resourced
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
'Create a place which is safe with a strong sense of identity, incorporating high quality design which meets 'Secured by Design' standards to reduce crime and the fear of crime and to this end applicants are encouraged to engage with the West Midlands Crime Prevention Advisor at the earliest opportunity.'
- An additional sub-paragraph to be included Paragraph "Likely infrastructure requirements will include":
Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14913

Object

Policy S01 - East of Solihull**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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Change suggested by respondent:

- An additional sub-paragraph to be included under Paragraph "Development of this site should be consistent with the principles of the Concept Masterplan for this site, which includes the following":
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Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14914

Object

Policy S02 - Moat Lane Depot**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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Change suggested by respondent:

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Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes
compliant:

Sound: No

Comply with Yes
duty:

Attachments:

14915

Object

Policy UK1 - HS2 Interchange**Respondent:** West Midlands Police**Agent:** Tyler Parkes Partnership Ltd**Summary:**

- West Midlands Police has a statutory duty to secure maintenance of efficient and effective police force for its area
- Council statutorily required to consider crime, disorder and community safety in exercise of its duties, with aim to reduce crime.
- NPPF and PPG refer to designing out crime, supporting safe communities, working with police and security agencies, importance of considering and addressing crime and disorder, and fear of crime.
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Change suggested by respondent:

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Developer contributions to Police infrastructure to ensure an appropriate level of service can be maintained so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

10828

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mrs Victoria Wheelhouse**Summary:**

The plan does not consider the impact on the traffic congestion that would be caused entering Knowle.

The number of houses and the density is significantly higher.

Another retirement village is a terrible idea. These properties are springing up all over Solihull, very high density, they are difficult to sell on and I don't think these are a good option many elderly people.

I don't think this plan benefits the current residents of Knowle.

The football club should be saved as it is of huge benefit to the local children. It is central to the village people can walk there.

Change suggested by respondent:

Family homes, green space, sports facilities all central.

Traffic survey and measures

No retirement village

Significantly reduced density to minimise risk of infections spreading

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10829

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mrs Victoria Wheelhouse**Summary:**

This will create significant traffic problems in Knowle as only way in from Solihull and M42 is Warwick Road. Density of housing is far higher than existing density. Knowle attracts families because of good schools.

Scale of development is far too high.

Current Arden School location is good for pupils, but is so rundown, it does need rebuilding.

Building a bigger school also increases traffic problems due to children coming from outside the area.

Not safe for the children to get to school with the increase in traffic.

Existing facilities such as doctors insufficient for level of housing

Change suggested by respondent:

Needs expert traffic consultation

Significant reduction in density

Protection of traditional and green space

Safe journey to school for this many pupils. Current pavements are very narrow and no safe cycling route

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10853

Support

Knowle, Dorridge & Bentley Heath**Respondent:** Mrs Jennifer Whitehill**Summary:**

All government & independent studies agree that an allocation of new housing is justified and warranted within this area.

It is also clear that:

- (1) recent new housing have contributed little in terms of improvement to local facilities; and
- (2) the long-term viability of quality learning in Arden Academy is unsustainable on the current site, it being long-overdue for re-development but having no means by which to undertake this work.
- (3) proposals align to KDBG NF policies

The proposals outlined in the Concept Masterplan therefore represent a balanced, justified, legally compliant and sound basis on which to meet these needs.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10663

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Pauline White**Summary:**

The reasons i'm against the Site BL3 are because the roads in this area Bills lane ,Haslucks green road already struggle to cope with increased traffic since the new ASDA was built and at rush hour its difficult to even get off your driveway to increase this amount of traffic flow through Bills lane and Haslucks green road would be horrendous not to mention the extra strain on local services in shirley like the doctors which is extremely poor now and we now have an extra 803 retirement units on Stratford road too .

Change suggested by respondent:

WE all agree new homes have to be built but i'd ask that they be spread further apart across the borough and not built in such close proximity in shirley the roads network simply won't cope with such an increase in traffic especially if site BL3 and site BL1 are built .

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

10870

Object

Policy S01 - East of Solihull**Respondent:** Mrs Pamela Whitney**Summary:**

The site is green belt and will be harmed.
Extra traffic causing pollution.
More pressure on local doctors.
Not enough school provision for added population.

Change suggested by respondent:

No building should take place

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10871

Object

Policy P12 Resource Management**Respondent:** Mrs Pamela Whitney**Summary:**

Not fit for purpose.
Highway and safety problems

Change suggested by respondent:

Another location

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Attachments: None

10927

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Mrs Sally Wilcock**Summary:**

1. Public Transport/Traffic Congestion
2. Adverse Impact on Health Services
4. Eradication of acres of Greenbelt
5. Impact on local wildlife sites and general environment
6. Contribution to pollution and detriment to well being of local residents
7. Increased risk of flooding
8. Loss of Amenities
9. Sustainability

Change suggested by respondent:

BL3 site as proposed to be removed. The immediate area is incapable of carrying and coping the volume of traffic. Public transport is inadequate in size to cope with extra passengers and car parking. there is sufficient development in other areas of Blythe Valley that make the use of this site disproportionate and unnecessary. extra housing should be targeted to Brown Site areas. I understand the McCarthy Brown site on Stratford Road is no longer proceeding as Housing for the elderly and could be used in lieu of this site.

Legally Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Attachments:**

14838

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr Graham Wilkinson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

13806

Object

Foreword**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The plan does not allow for a simple and enforceable interpretation, contrary to Paragraph 16d of the National Planning Policy Framework. Longer policies should be separated by topic to ensure they are not too lengthy. For example Policy P5 relates to several key issues within one policy which is not suitable- numerous policies would be more effective.

Change suggested by respondent:

A review of the policies and supporting text should be carried out, with specific consideration of the policies' interpretation for development management purposes.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

13816

Object

Policy P1 UK Central Solihull Hub Area**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

Support the principle of the approach taken in relation to the UK Central Solihull Hub Area and development adjacent to the HS2 hub.

The Council are heavily reliant on timely delivery from these larger sites however there is uncertainty. The length of the total development process increases with site size. The rate of delivery is wholly unrealistic at the NEC as commencement would not begin until approximately 2030. At Arden Cross, the situation is complex and dependent upon the delivery of HS2. Inefficient delivery of transport and utilities infrastructure represents a significant constraint to delivery.

Change suggested by respondent:

Additional housing allocations at small to medium sites, such as 'Land off Old Station Road', would provide a 'buffer' and mitigate against the risk of stalled delivery at larger sites.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13817

Object

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The viability and deliverability of development sites should not be compromised by over ambitious requirements to deliver affordable housing.

The definition of affordable should be set out in the Plan as policies that have a cost implication on development proposals cannot be deferred to a Supplementary Planning Document.

Policy P4A does not allow for First Homes / Discounted Market Sales as part of the mix and is therefore not consistent with Paragraph 35d of the National Planning Policy Framework.

Change suggested by respondent:

Reconsider approach to affordable housing requirement with a specific emphasis on development viability. Either reduce the overall affordable housing requirement across the Borough, or adopt a varied approach which takes into account less viable development typologies (i.e. based on location, site type etc.)

A definition of “affordable” must be included as part of Policy P4A.

Reconsider the proposed affordable housing tenure split, to allow for First Homes / Discounted Market Sales.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13818

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

Do not support the inclusion of a market housing mix within Policy P4C. The housing mix may quickly become out-of-date. The Council should allow flexibility to take into account site specifics and market demand.

Change suggested by respondent:

The Policy should remove the housing mix, with an indicative mix included in the supporting text.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13819

Object

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

An individual showing interest via a Housing and Custom Build Registers rarely equates to a genuine desire / ability to build on a Self / Custom Build plot. The actual demand is likely to be significantly lower.

The blanket policy approach, requiring 5% of open market dwellings to be delivered in the form of Self and Custom Build Plots on sites of 100 dwellings or more, does not take account of localised needs or site specific constraints to delivery.

Change suggested by respondent:

The policy should be revoked as it is fundamentally unsound.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13821

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

There is no sufficient evidence, including in the HEDNA, to suggest that 95% of dwellings should be provided to M4(2) standard. Policy requirement should not undermine the deliverability of sites in the Borough.

Change suggested by respondent:

A requirement of 25% of housing to M4(2) standard, unless delivered to M4(3) standard (a requirement of 5%) should be adopted.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13823

Object

Policy P5 – Provision of Land for Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The housing requirement should be clearly set out within Policy P5 and should form the basis of the Council's monitoring of land supply.

If a 'stepped' approach to the housing requirement be taken forward, that should be clearly set out within Policy P5.

HS2 must be considered an exceptional circumstance to boost housing delivery within the Borough above that minimum local housing need. The scale employment growth proposed means the actual housing need will be higher than that derived from historic household projections.

Change suggested by respondent:

A considerable uplift should be implemented to take account of the economic growth / infrastructure provision and to allow for flexibility in the housing supply.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13824

Object

Policy P5 – Provision of Land for Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The intention to make provision to meet the unmet housing needs arising within the Greater Birmingham should be set out within Policy P5.

The origin of the contribution of 2,105 dwellings to the Greater Birmingham Housing Market Area is unclear.

Change suggested by respondent:

A 3,000 dwelling contribution should be made to the wider HMA in the plan period to 2036.

The total housing requirement should be at least 15,912 dwellings in the plan period and should be expressed in Policy P5 as a minimum housing requirement.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13825

Object

Policy P5 – Provision of Land for Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

Insufficient evidence of 10% non delivery rate that is applied to sites within planning permission that have not yet started construction, sites identified in land availability assessments, the Brownfield Land Register and the extant Solihull Local Plan.

The windfall allowance of 200dpa is a considerable figure. Development on windfall sites may well become increasingly limited / depleted.

The supply is dominated by large sites, which often experience delay. The deliverability of a number of sites is uncertain.

The Council must provide clear evidence of the trajectories and build-out rates of all sites.

The Council should allocate additional housing above its housing requirement to represent a buffer and ensure flexibility. SMBC should identify a further 4,077 dwellings (20% uplift) on small-medium sized sites in sustainable settlements.

Old Station Road, Hampton in Arden is suitable, available and achievable within the first five years of the plan period. Technical and environmental assessments have been undertaken, demonstrating there are no insurmountable constraints.

Change suggested by respondent:

The housing supply should be increased to at least 19,094 dwellings (a 20% buffer on its requirement). Land off Old Station Road, Hampton in Arden should be allocated.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments:

13826

Object

Hampton-in-Arden**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The plan does not provide a Spatial Strategy to clearly specify how development is to be guided, resulting in an illogical approach.

Calculating the housing requirement of Neighbourhood Area wholly on the basis of capacity is not robust and fails to consider the distinction between the specific housing needs of the area, and the ability of the area to meet that need.

Site S01 comprises the bulk of provision in the Hampton in Arden Neighbourhood Area. The site has land assembly issues which could impact upon delivery. Housing in this location will meet the need arising from Solihull town rather than Hampton-in-Arden and Catherine-de-Barnes. Development should be focused on suitable sites within the settlement of Hampton-in-Arden.

Change suggested by respondent:

The Spatial Strategy should be re-drafted. Hampton in Arden should be given a favourable position in the settlement hierarchy.

The housing requirement should reflect housing need in the Neighbourhood Area, rather than the capacity of the area.

Site S01 should not be considered as playing a part in meeting the housing requirement in the Hampton in Arden Neighbourhood Area. Land off Old Station Road, Hampton in Arden should be allocated.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13827

Object

Hampton-in-Arden**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The site assessment and selection methodology has been inconsistently applied in identifying allocation sites.

Significant weight has been attributed to two issues in relation to 'Land off Old Station Road, Hampton in Arden' (Site Ref. 6), which is unfounded as these can be effectively mitigated against.

There has been considerable inconsistency with the Council's interpretation and application of the matter of 'defensible Green Belt boundaries' between sites, jeopardising otherwise favourable site assessments.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13828

Object

Policy P5 – Provision of Land for Housing**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The indicative densities should be included within the body of Policy P5.

Clarity is needed on the distinction between a "limited extension of urban or larger village edge", which would allow for a residential density of 30-35dph, and a "significant extension of urban or larger village edge", which would allow for a residential density of 30-40dph.

Change suggested by respondent:

A separate policy should be drafted in relation to density. The policy should give more clarity on what qualifies as "limited" / "significant" extensions, and which settlements are classed as "urban or larger villages".

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

13829

Object

Policy P7 Accessibility and Ease of Access**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The requirement at Policy P7 part 2(ii) is ambiguous and not enforceable for development management purposes. No definition is provided of what constitutes as a "high frequency" service. No justification is given for the requirement for sites to be within 400m and / or 800m of a bus service or rail station and it does not allow for mitigation by providing transport-related contributions.

The requirement at Policy P7 part 2(iv) is ambiguous and is not considered enforceable for development management purposes.

Change suggested by respondent:

Part 2(ii) of P7 should either be revoked or re-drafted to provide clarity on "high frequency", and the choice of 400m and 800m should be justified.

Part 2(iv) of P7 should be revoked or re-drafted to provide clarity on the amount, scope, level or type of on-site transport infrastructure that would be considered acceptable, and how an 'enhancement' in accessibility levels would be measured.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13830

Object

Policy P9 Mitigating and Adapting to Climate Change**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The requirement of Policy P9 3i and 3ii constrain development. Requiring a 30% reduction in carbon reduction would be in conflict with the Government's adopted Building Regulations.

A fabric first approach' to ensuring energy efficiency and sustainability as an alternative should be promoted.

Policy P9 3vi lacks the clarity that is required by Paragraph 16d in the National Planning Policy Framework

Change suggested by respondent:

Policy P9 should be re-drafted to require new developments to adhere to the latest Building Regulations or, when adopted, the Future Home Standards / national guidance that requires all new dwellings to be net carbon zero.

The Council should make allowance for a fabric-first approach within Policy P9.

Further information in relation to limb 3vi should be provided to ensure this is enforceable.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

13831

Object

Policy P17A Green Belt Compensation**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

Policy P17A does not provide guidance in relation to what the scope of each form of compensation would have to be in order for a site's removal from the Green Belt to be considered as appropriate, contrary to Paragraph 16d of the National Planning Policy Framework.

Change suggested by respondent:

Further information should be provided in relation to the scope of the green belt compensation that would be required for a site's removal from the Green Belt to be considered as appropriate.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

13832

Object

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

Policy P20 would benefit from the inclusion of guidance on the indicative breakdown of the 3.57 hectares of Public Open Space (POS) that are required per 1,000 population. This would assist developers with viability considerations. This should be substantiated on up-to-date and relevant evidence.

The Policy is written somewhat ambiguously, and could be mistakenly interpreted that the POS requirements of new developments should compensate for any prior under-provision.

Change suggested by respondent:

Guidance is required on the indicative breakdown of the 3.57ha of POS that are required per 1,000 population, and include a caveat that final POS provision should respond to localised assessments of demand.

It should be made clear that the POS requirements of new developments are not expected to compensate for any prior under-provision from other developments.

Legally Yes**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13833

Object

Policy HA1 - Meriden Road, Hampton in Arden**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

A planning application submitted on SLP Site 24 in October 2019 suggests that the development of the site will not be considered comprehensively with proposed allocation HA1, contrary to the Council's intention cited in the Plan. This may reflect the numerous outstanding matters in relation to HA1, in particular the site's availability as the site remains in use as a storage depot with the existing owners having no plans to vacate the site in the near future.

There are a number of suitability issues associated with the site, threatening its deliverability. The site is located wholly in an area that is considered to be potentially contaminated land, a land contamination assessment is required.

The site has far fewer positive effects when compared to 'Land off Station Road' within the Sustainability Appraisal. The site is not located in a suitable location, a significant negative.

The assessment of potential development sites and approach towards allocating land has not been "based on proportionate evidence" or taken into account reasonable alternatives.

Change suggested by respondent:

Land off Old Station Road, Hampton in Arden should be allocated for residential development whether in place of or in addition to allocation site HA1.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

13834

Object

Policy HA2 - Oak Farm, Catherine-de-Barnes**Respondent:** William Davis Ltd**Agent:** Define Planning & Design**Summary:**

The deliverability of Site HA2 is not assured as it is dependent on either re-housing existing tenants or the applicant being able to agree to purchase the site. The site is significantly constrained, including a high pressure gas pipeline being present on site.

The site is considered to have low / medium accessibility. Catherine-de-Barnes is less suitable for large scale expansion than Hampton in Arden.

Development at Site HA2 would be on one of the Borough's high scoring Green Belt parcels, contrary to the Council's proposed Green Belt approach.

Change suggested by respondent:

Site HA2 is not considered to be suitable and Land off Old Station Road should be allocated for residential development whether in place of or as well as site HA2.

Legally compliant: Yes

Sound: No

Comply with duty: Not specified

Attachments:

14706

Object

Blythe**Respondent:** Benjamin Williams**Summary:**

Concerns around Health provision in Shirley. Existing doctors/dentist are over subscribed. Further housing development must consider this situation and plan to add further GP surgeries, NHS dentists and schools.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14669

Object

Policy P5 – Provision of Land for Housing**Respondent:** Association of Black Country Authorities (ABCA)**Summary:**

PARAGRAPH 228 -

BC expect a shortfall in the BC of 27,000 homes to 2038, and a shortfall of employment land of between 287-567ha. BC previously commented that SMBC's previously stated contribution of 2,000 was disappointing Contribution to the HMA should be to 2036, not just to 2031.

The 2,105 contribution is disappointing, given the strong physical and functional relationship of Solihull to the conurbation, and in the context of the Strategic Growth Study (SGS) that identified options (for further exploration) south of the airport and for a new settlement at Balsall Common

Further clarity sought on why only 2,105. Plan should consider HMA shortfalls over full period of the plan.

2,740 dwellings in the UKC appears a proportionate response to the SGS, but 1,615 at Balsall Common is short of being a 'new settlement'. Not explained how limits of the environment and attractiveness of the Borough prevent allocation of further housing, and not all reasonable alternatives have been explored.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14670

Support

Policy P5 – Provision of Land for Housing**Respondent:** Association of Black Country Authorities (ABCA)**Summary:**

PARAGRAPH 241

The table of indicative densities in paragraph 240 identifies a series of locally-derived density assumptions ranging from 90 – 150dph for apartments in town centres and at UK Central to 30 – 35dph for houses in limited settlement expansions.

ABCA would wish to be satisfied that these represent the most appropriate and robust densities for all locations through seeing evidence for the adoption of the identified levels. The HMA Growth Study recommends testing and adopting densities of at least 35dph outside the Birmingham and Black Country urban areas, where higher densities of 40dph are promoted.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14671

Object

Policy P3 Provision of Land for General Business and Premises**Respondent:** Association of Black Country Authorities (ABCA)**Summary:**

The Plan has made no contribution to the Black Country in respect of employment land. The reasoning behind the lack of a contribution to meeting employment land needs arising in the Black Country, equivalent to housing needs, is unclear, and at this stage this represents a failure to meet the requirements of the Duty to Co-operate.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: No

Attachments:

14672

Support

POLICY P13 Minerals**Respondent:** Association of Black Country Authorities (ABCA)**Summary:**

SMBC approach generally supported and BC acknowledge that Solihull provides for over 90% of the recent-most Local Aggregate Assessment (LAA) production target for the Metropolitan Area. BC note SMBC that policy may need to be reviewed, but is should acknowledge that the review should consider increased demand.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

10628

Object

Policy BL1 - West of Dickens Heath**Respondent:** Mrs Deborah Williams**Summary:**

The area cannot cope now with the volume of traffic. Also this area is a flood zone

Change suggested by respondent:

Consider the people who already live in the area. It needs to be disbanded. Find another location!!!!!!!.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14714

Object

Foreword**Respondent:** Mr Ian Williams**Summary:**

Community Involvement - The process of community involvement is not in general accordance with the SCI. Despite requests, Site 127 has not been reassessed, if so it would demonstrate that errors were made in the first assessment and that the site is suitable.

Consultation on the submission plan was not long enough, particularly given the introduction of new evidence and the impact of covid restrictions.

Paragraph 52 SCI – In respect of the responses to the 2019 Consultation, Cabinet Member only received a summary of all the comments received during the consultation.

Paragraph 53 SCI – This was not complied with in relation to the publication of the submission version of the plan. In particular, prior to submission, there is no opportunity to explain how the consultation had been used to shape the final submission plan.

The FTA does not address the disadvantageous impact of a minimum 6 week consultation period on protected characteristics during a global pandemic with severe restrictions.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14715

Object

Introduction**Respondent:** Mr Ian Williams**Summary:**

The Introduction needs to be modified to indicate that, following adoption of the Local Plan, neighbourhood plans will still be part of the development plan. In addition, neighbourhood plan policies that provide a more appropriate local expression should be identified in the related settlement chapter / allocation policy.

Change suggested by respondent:

Amend Para 20 as follows:

"There are now three neighbourhood development plans that have been 'made' and are part of the development plan for the Borough. Others that come forward will need to reflect the strategic policies of this plan".

Amend Para 21 as follows:

"The Council places great importance on neighbourhood plans and recognises the substantial efforts that communities have made in bringing forward plans. In the context that this plan provides a number of policies that include Borough wide standards or expectations, there may be occasions when existing neighbourhood plans (particularly if they are up to date and reflect current evidence) provide a more appropriate local expression of a standard or expectation that should be taken into account and given due weight. These policies are identified in the related settlement chapter or allocation policy."

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14717

Object

Spatial Strategy**Respondent:** Mr Ian Williams**Summary:**

Uncertainty and lack of clarity resulting from using different expressions in the evidence base and Site Selection e.g. in relation to sites being "adjacent to" or "isolated".

Change suggested by respondent:

Growth Option F – Limited Expansion of Rural Villages/Settlements - should be noted as applying to KDBH to meet its Housing Needs.

The Spatial Strategy needs to align with site selection criteria to prevent uncertainty and to be clear in respect of phrases such as "adjacent to" and "isolated" (See other representations on the lack of clarity and ambiguity around the use of various words and the relevant criteria).

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14718

Object

Spatial Strategy**Respondent:** Mr Ian Williams**Summary:**

Site Selection: The selection process and allocations are not in accordance with NPPF para 139 and other amendments are needed for clarity and soundness.

Clarity is needed on the various uses of the words "adjacent/next to/close to/near" to villages etc throughout the Draft Plan and Evidence Base as there is uncertainty around the tests being applied based on inconsistent use of these types of phrases. Accordingly the use of the word "isolated" is misleading.

Non-compliance with NPPF para 139 e) as it is likely that Green Belt boundaries will need to be altered at the end of the plan period.

The spatial strategy diagram should reflect Knowle, Dorridge and Bentley Heath as a rural village identified for limited expansion based on the allocation of site KN1.

Change suggested by respondent:

Growth Option F and associated diagrams should be amended to include Knowle/Dorridge/KDBH as rural villages identified for limited expansion.

Clarity is needed on the various descriptions of the site selection and assessment process being applied to avoid uncertainty and not be misleading. It is submitted that the correct wording should be either "close to or near to" a village or settlement (and "isolated" should be used correspondingly) as this reflects the actual wording and assessment measurements used in the site assessment criteria, the Evidence base.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14719

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Mr Ian Williams**Summary:**

The recommended market mix in this policy differs from Policy H3 Market Mix of the Knowle, Dorridge and Bentley Heath Neighbourhood Plan (NP). The NP was 'made' in April 2019 and is up to date and relevant. It is noted that para 187 states that relevant policies in neighbourhood plans will be taken into consideration along with other matters. However, the other matters are also referenced within the policy. In view of the role and status of neighbourhood plans, they should also be included in the policy.

Change suggested by respondent:

Add to policy P4C, after point 1vi:

"1 vii any relevant policies in neighbourhood plans."

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14720

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Ian Williams**Summary:**

The Council will not be able to meet its assessed Housing Need and the Plan is unsound.

There is evidence that the Housing Need figure for Solihull of 13,056 (Para 221) is in fact too low and should be adjusted upwards.

The Windfall Allowance (as of 1st April 2020) is disputed and not based on sound evidence.

No small sites are allocated.

Some sites in the SHELAA are not deliverable e.g. St George and St Teresa school as relocation is no longer an option.

Some sites on the Brownfield Land Register are not reasonable allocations and would fail the site assessment or are not deliverable.

Approach to housing density in the plan is not clear and inconsistent with the masterplans and the KDBH neighbourhood plan.

Change suggested by respondent:

The delivery of the Housing Need for Solihull should be re-assessed so the Plan is sound.

The Local Plan must be modified so that it will meet the currently assessed Housing Need, for the Borough and each area (even if delivery is reduced based on representations).

Windfall allowance should be reduced unless demonstrated by compelling evidence.

The Local Plan should be modified to specifically allocate small sites to comply with the NPPF.

It is submitted that Site 127 should be allocated in the Local Plan/counted in the housing delivery numbers.

St George and St Teresa Catholic School should be deleted from the Land Availability Assessment in Schedule E of SHELAA as there is no (or insufficient) evidence that it is deliverable in the Plan.

Brownfield Land Register sites Blythe House, 1806 Warwick Road and 1817 Warwick Road should be deleted as allocations. Site 127 should be included as a replacement site, albeit not currently in the BLR, Site 127 does not need to be BLR (even though it meets all the requirements to be included in the BLR) to be allocated under the Local Plan.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14721

Object

Policy P7 Accessibility and Ease of Access**Respondent:** Mr Ian Williams**Summary:**

Policy KN1 and KN2 is not in accordance with Policy P7.

Para 272 states that "where development cannot be provided in accordance with the accessibility criteria as part of this policy then mitigation will be expected to demonstrate how sustainable transport choices can be made. Such mitigation will be proportionate to the scale of development."

The mitigation is respect of sites KN1 and KN2 are insufficient.

Change suggested by respondent:

Policy KN1 and KN2 need to comply with P7 or be deleted.

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14722

Object

Policy P15 Securing Design Quality**Respondent:** Mr Ian Williams**Summary:**

It is important to ensure that the aim of "tree-lined streets" does not compromise the safety or contribute to the fear of being unsafe and subject to crime, especially for women, disabled and ethnic minorities and at night.

Change suggested by respondent:

Amend Policy 15 2vi – "Developments should incorporate new tree planting, including streets being tree-lined wherever possible and safe with due consideration for potential crime and the fear of crime".

Para 398 - "In accordance with the 'Living with Beauty' report of the Building Better, Building Beautiful Commission (January 2020), there will be an expectation to incorporate tree planting in development including streets being tree-lined wherever possible and safe. However, it is essential that new developments are appropriately designed and planted to ensure that new trees are suitable for the location, have longevity, and that existing mature trees are not compromised. In addition, any tree planting must consider the importance of reducing potential crime and the fear of crime for all residents."

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14723

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Ian Williams**Summary:**

Contrary to the assertion in Para 685, Knowle and Bentley Heath is not well served by public transport. This needs to be corrected. If development is to proceed, improvements in bus services are required but no specific proposals in the IDP, other than CIL or s106.

No mention of community access to Arden Academy or to replacement sports provision on KN1 by the community.

Relevant Neighbourhood Plan policies should be referenced in the Plan.

Need reference to improvements in primary health care.

Clarify that the settlement is also suitable for limited expansion under option F.

Density constraints should be referenced and appropriate densities set out in policy.

Change suggested by respondent:

See specific wording as set out in representations.

Delete references to the settlement being well served by public transport.

Include references to the settlement being included in growth options F and G.

Include reference to traffic lights being detrimental in the conservation area.

Include references to Neighbourhood Plan policies.

Include section on primary health care.

Include additional paragraph on density reflecting character and distinctiveness of the area.

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14724

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Ian Williams**Summary:**

Lack of evidence to demonstrate deliverability and viability. The Site is not "very accessible" and is not the best site compared to other possible alternatives. It is not clear that the sporting facilities could or would be provided. No opportunity to consult on or assess the Traffic report, which is out of date and unrealistic especially regarding cycling and walking and access to key facilities. It is unsatisfactory that the Green Belt boundary is not finalised, risking development creeping further into Green Belt. The masterplan is not agreed with the developer.

If the Site were subsequently deemed deliverable, additional measures are needed to add to or strengthen policy provisions in relation to site KN1 including densities; Grimshaw Hall; trees and hedgerows; footpaths; engineering works; community use; primary health care; highway improvements; and concept masterplans.

Change suggested by respondent:

See representation for detailed wording which include.

Densities shall not exceed 35 dph other than in any care village or retirement complex developed on the southern part of the site.

The area between Hampton Road and the limits of the development shall be landscaped as amenity areas

Reference to sports pavilion in point 2 viii

Retention of footpath along current alignment.

Reference to neighbourhood plan policies

Reference to contributions to primary health care.

No departure from the policy principles.

Inclusion of specific infrastructure requirements

There shall be no commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects. No more than 20% of the housing shall be occupied before the playing fields and sports pavilion are brought into use.

Modifications as set out in the representations for justification section which include:

Additions to paragraph 713.

Deletion of paragraph 715

Correction in paragraph 716 to say that the former hedge line still exists

Amend accessibility commentary in paragraph 718.

Say that development is consistent with Option F for the limited expansion of rural villages in paragraph 719.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14726

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Ian Williams

Summary:

Lack of evidence regarding the deliverability and viability of this allocation.

In addition to physical constraints, particularly the challenge of locating the through school and sports pitches on sloping ground, there are landownership issues and disagreement over the masterplan.

Densities are still too high and not reflective of the area's character or Neighbourhood Plan policies.

Transport and health mitigation measures are not effective.

A raft of measures that are needed to add to or strengthen policy provisions in relation to KN2: South of Knowle (Arden Triangle). They concern densities; community access; highway access; trees and hedgerows; structure planting; primary health care; bus services; footpaths; and concept masterplans.

Other sites should be released if the number of dwellings on KN2 reduces.

Change suggested by respondent:

Modifications as proposed in the representations for Policy KN2 which include:

Setting out densities specifically.

Referencing Neighbourhood Plan policies relating to community access to school.

No vehicular access to the schools off Station Road.

Important landscape features specifically mentioned.

Need for a landscaping strategy to include screen planting along Warwick Road (wouldn't this be part of the planning application anyway)

Developer contributions will be required for related improvements to the local primary health care system;

Provision shall be made for access to enhanced bus services; (yes, but how. Planning has no control over this)

Retention of exiting rights of way along current alignment (Why, when that may not result in best permeability through the new site.)

No departure from the principles and other requirements applying to Site KN2 (where's the flexibility required by NPPF?)

No commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects.

Additional para after Para 720 as follows:

That part of the site adjacent to Station Road is closer to bus routes and to the amenities of Knowle and Dorridge. Higher densities would be appropriate. Elsewhere, the landscape setting and proximity to the listed Rotten Row Farm dictate a lower density of housing, reducing in a southerly and easterly direction reflecting the transition to countryside.

Additional para after Para 724 as follows:

"Policy KN2 requires access to enhanced bus services. As a minimum, applicants will be expected to negotiate with providers to achieve a meaningful diversion of existing services into the site. Increased frequency and the provision of new services shall also be considered and addressed where feasible".

Additional constraints and Valued landscape features should be named.

**Legally No
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

14727

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Mr Ian Williams**Summary:**

Site 127 should be an allocated site in the Local Plan.

The current assessment for Site 127 is fundamentally flawed and demonstrably wrong. (The correct assessment of Site 127 would render Site 127 "Green" and it should be included in the Local Plan, in accordance with the Site Selection criteria.

The site is in a sustainable location, there is residential development on site currently, development of the site would have a relatively low impact and any adverse impact can be mitigated.

It would not open up surrounding land for development given the different nature of adjacent and nearby land uses and any development would not encroach onto open countryside. A clear and logical, defensible Green Belt boundary can be created.

Change suggested by respondent:

Allocate Site 127 in the Local Plan in accordance with the Site Selection Criteria with a redefined Green Boundary along the roads surrounding the site.

Site 127 should be allocated in accordance with the Site Selection Criteria either as an addition to current allocations or to be available as part of the solution to deliverable Housing Need in place of any of the reduced housing availability.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14751

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Ian Williams**Summary:**

Concept Masterplans - Their status of as part of the Local Plan needs to be confirmed as it is presently unclear. All important development principles should be a matter of policy, not relegated to being consistent with concept masterplans. The concept masterplans are central to the delivery of housing development and each allocated housing sites has a concept masterplan. The development of some 5,270 dwellings is dependent upon their provisions. As such, it is important that their contribution in meeting the Borough's housing requirement is recognised in the policy; also, for local communities to be confident that what is shown in the concept masterplans is broadly what will be delivered and will not be subject to material change.

Change suggested by respondent:

Policy P5 - additional paragraph (Para 7)

Concept Masterplans

7. Development on allocated housing sites shall be carried out in accordance with the related concept masterplan and the principles set out in the housing allocation policies. The content shall be as prescribed in the Local Plan (Insert location of Concept Masterplans)

Para 242 - addition to text:

242 - The Council has prepared a concept masterplan for each site to ensure confidence on capacity and deliverability. These form part of the Local Plan and are to be found in X.8 Concept masterplans include details on:

Legally No
compliant:

Sound: No

Comply with Not specified
duty:

Attachments:

14752

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Ian Williams**Summary:**

Concept Masterplan document - It should be made clear that the concept masterplans are an integral part of the Local Plan and that adherence to key principles will be required; also, that only minor changes are envisaged in the future.

Essential matters and key principles of development should be clearly stated requirements and distinguished from any material that might be illustrative.

Densities differ between what is contained in the MP document and table at para 240 of the Local Plan.

Change suggested by respondent:

Modifications as proposed in the representations for the Concept Masterplan document which include:

Clarification that the document forms an integral part of the Local Plan, are not illustrative and subject to only minor change.

Clarify and align the terminology relating to densities in paragraph 240 of the Local Plan and the Concept Masterplan methodology.

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

14753

Object

Policy KN1 - Hampton Road, Knowle**Respondent:** Mr Ian Williams**Summary:**

Concept Masterplan - The new Green Belt boundary on the northern part of the site should be formed by retention and strengthening of the existing hedgerow. The outer limit of residential development should be pulled back so as to avoid breaching the ridgeline that crosses the site. This could be compensated for by higher density development on the other (football club) site, but only in the form of a care village or retirement complex. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types and other key principles.

Change suggested by respondent:

Various modification to the Masterplan as set out in representations including:

1. The developer's proposal should be deleted.
2. Insert new paragraph at the start of the text on the page headed "SMBC Illustrative Concept Masterplan: KN1: Hampton Road": The objective / aim of the proposals is to build a new sports pavilion and pitches for Knowle Football Club, facilities that could be used by the public. This would be funded by new housing. The site of the club's existing premises could be used as a care village or retirement complex.
3. Add a new paragraph after the above addition: The possibility exists for development of a care village or retirement complex on the southern part of the site (site of the existing football club).
4. After the above, amend the original first paragraph in respect of the new green belt boundary as follows: [a road – delete] the existing hedgerow [along-delete] just beyond the northern perimeter of the housing site will be supplemented by additional planting and will define the new green belt boundary.....
5. Insert a clear phasing and delivery strategy, including reference to a legal mechanism to ensure delivery of the community benefit.
6. Include details of the likely required profile of household types. Add: Regard should also be paid to Policy H3 of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan. In terms of affordable housing, Policy H2 of the Neighbourhood Plan will apply.
7. At the end of the second paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", add the following: The public footpath crossing the site is to be retained on its current alignment.
8. After point 7, add the following: With regard to off-site highway works, safety will be a prime consideration at the junction of Arden Vale Road with Warwick Road and at the Hampton Road / High Street junction. However, traffic lights at the High Street junction will be avoided to protect the character of Knowle Conservation Area.
9. At the end of the third paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", amend the wording as follows: Likewise, the trees and hedgerows along Hampton Rd and across the site must be retained, and the Tree Preservation Orders respected, to ensure the character of this approach to part of Knowle is conserved.
10. Amend the final paragraph of the text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road" to read: Harm to the setting of the Grade 1 listed Grimshaw Hall should be avoided. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in significantly reducing harm.

**Legally No
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

14755

Object

Policy KN2 : South of Knowle (Arden Triangle)**Respondent:** Mr Ian Williams**Summary:**

Concept Materplan - To reflect the character of the area, future housing on the Arden Academy site should be no higher than medium density. In addition, and to effect a transition between built development and countryside, the housing along the southern and eastern sides of the site should be low density. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types, landscaping and highway matters.

Change suggested by respondent:

Various modification to the Masterplan as set out in representations including:

Annotate Landscape Assessment Plan to show school playing fields, trees and parkland, contours, extent of semi-improved grassland and structural landscaping opportunities.

Developer masterplan to be deleted.

Include the objective for including the site i.e. to build a new through school funded by housing. available for use by the public.

A planning obligation (or similar binding legal agreement) will be necessary to secure the objectives of the site.

Inclusion of likely required household types and reference to Neighbourhood Plan policies.

Include a maximum density of 40dph reducing towards Grove Road and Warwick Road.

Include reference to the integrated drainage strategy featuring "a strong green framework for the development and include screen planting along the Warwick Road frontage."

Clarify the position regarding access onto Grove Road (one access point or two) and required junction works.

**Legally No
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

14756

Object

Policy P17 Countryside and Green Belt**Respondent:** Mr Ian Williams**Summary:**

Policy P17 is overly restrictive and unnecessarily so and in some areas it does not comply with NPPF (Para 68) and does not reflect the direction of travel in national planning aims and policies.

3 i) and ii) are too restrictive. Limited in-filling or redevelopment should not be limited to listed locations

3 iii) should specify that additions under national permitted development rights are not included, affected or limited/reduced by the Policy and that development of a third floor in the loft should not count towards the 40%.

4) The very special circumstances factors are too narrow.

Green Boundary should be changed to include Site 127.

Change suggested by respondent:

See modifications in the representations which include:

3 i) and ii) – delete and replace with "Limited infilling or redevelopment will be permitted in accordance with NPPF paras 145 and 146.

3 iii) should be amended to, "Disproportionate additions shall be interpreted as additions that are more than 40% of the original floorspace of the building. However:

a) Additions in the third floor loftspace shall not count towards the additional 40% as they do not impact on the openness of the Green Belt; and

b) Any development under national permitted development rights will not be i) included in the calculation of the original floorspace; ii) counted towards the 40% addition; or iii) otherwise affected or restricted by this Policy."

4 – The list after "In considering proposals for inappropriate development in the Green Belt, the following factors may be taken into account as very special circumstances": Add all circumstances listed in [para 145 and para 146 NPPF].

Para 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, that Solihull has significant Green Belt @67% with the boundary being set in 1997 when Solihull Metropolitan Borough Council adopted its Unitary Development Plan (UDP) which formally delineated the Borough's Green Belt boundaries including those areas designated as interim Green Belt.

Set out the minor modifications to the Green Belt under Para 420 and include Site 127 as a minor modification on the Green Belt boundary as it is an anomaly given the location, surrounding land uses and the self-contained nature of the site and/ the inability to of the Site to expand further into the Green Belt or be used as a precedent for other expansion
Para 422 – delete.

Para 242 –Deletions and additions as suggested in the representations.

**Legally No
compliant:**

Sound: No

**Comply with Not specified
duty:**

Attachments:

14757

Object

Policy P10 Natural Environment**Respondent:** Mr Ian Williams**Summary:**

The Biodiversity Net Gain section of the Draft Plan (page 97), suggests there is a plan to take some action against reducing biodiversity but it is unclear and ambiguous (NPPF para 16 d) what that will be or how it will be achieved. Footnote 41 - "The Council will take seriously any attempt to minimise the biodiversity baseline value, such as the removal of trees prior to planning application."

Change suggested by respondent:

The statement needs clarity over what this means and how it is proposed it will be achieved to avoid uncertainty and being unsound. In the absence of this, Footnote 41 should be deleted.

Legally No**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

14758

Object

Policy P5 – Provision of Land for Housing**Respondent:** Mr Ian Williams**Summary:**

Concept masterplans are discussed in the justification to Policy P5. However, they are not addressed within the policy itself. Given their importance, key provisions should be included within the strategic policy. The provisions also need to be strengthened so as to give confidence to the public and a clear steer to developers. The status of the concept masterplans as part of the Local Plan needs to be confirmed.

Change suggested by respondent:

Policy P5 - additional paragraph (Para 7)

Concept Masterplans

7. Development on allocated housing sites shall be carried out in accordance with the related concept masterplan and the principles set out in the housing allocation policies. The content shall be as prescribed in the Local Plan.

Para 242 - addition to text

242 The Council has prepared a concept masterplan for each site to ensure confidence on capacity and deliverability.

These form part of the Local Plan and are to be found in X. Concept masterplans include details on:

Legally No**compliant:****Sound:** No**Comply with** Not specified**duty:****Attachments:**

13767

Object

Hampton-in-Arden**Respondent:** Ms J Williamson**Agent:** Felsham Planning & Development**Summary:**

The Council must balance its legal requirement to maintain a five year housing land supply against the requirement of green belt policy to prevent inappropriate development.

The site '145 Old Station Road, Hampton-in-Arden' should not be part of the green belt. Development at the site would not compromise any of the 5 purposes of the green belt set out in the NPPF.

The site's self-containment, boundary characteristics and relationship to the village, means that the site can be developed as an exception to planning policy, particularly when the presumption in favour of sustainable development is triggered.

Development at the site can be realistically delivered within a 5 year timeframe, helping the Council with its housing land requirement. There are no constraints which would prevent or delay development coming forward. There would be social and community benefits associated with the proposed development.

Change suggested by respondent:

The site '145 Old Station Road, Hampton-in-Arden' should be allocated.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

13768

Object

Policy P5 – Provision of Land for Housing**Respondent:** Ms J Williamson**Agent:** Felsham Planning & Development**Summary:**

There is an over reliance on large sites and over optimistic assumptions about windfall sites. Large sites rarely come forward at the rate that is originally envisaged and there is no control of the delivery of windfall sites.

Change suggested by respondent:

Additional allocations are necessary to produce a balanced land supply as a likely shortfall will emerge.

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

13769

Object

Policy P5 – Provision of Land for Housing**Respondent:** Ms J Williamson**Agent:** Felsham Planning & Development**Summary:**

The effectiveness of the Site SLP24 (Meriden Road, Hampton in Arden) should be questioned as it has not been developed since being allocated in the 2013 Adopted Local Plan.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Yes

Attachments:

10747

Object

Policy UK2 - Land at Damson Parkway**Respondent:** Mr Martin Wills**Summary:**

With reference to Paragraphs 105 and 831 Damson Parkway Area

I would ask that you remove the proposals for even more JLR expansion and the relocation of the HWRC to the above area.

There will be traffic chaos here, also offensive odours, and removal of green belt. We cannot sustain any more building or traffic in this area.

You have already refused airport parking behind the Kia garage, so a precedent of refusing Planning Permission in this area already exists

This area is a gateway to Solihull, and should be retained as "Urbs In Rure"

Change suggested by respondent:

Removal of the proposals to allow further expansion to JLR and more importantly, the relocation of HWRC

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

11043

Support

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Andy Wilson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10665

Object

Policy BL2 - South of Dog Kennel Lane**Respondent:** Mr Daniel Wilson**Summary:**

Houses built here will not be affordable. There is not enough infrastructure to support the people proposed to live there. There are plenty of empty homes in inner city areas. This plan is clearly to make housing developers rich at the expense of the current residents.

Change suggested by respondent:

The plan should be cancelled for the above reasons. The current doctors surgeries cannot cope. Services at Solihull Hospital have been reduced. Shirley Police Station has been knocked down. Solihull Police Station is closing. There are not enough school places.

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments: None

11219

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Mr John Wilson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

13803

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Sam Wilson**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

14150

Object

Balsall Common**Respondent:** Mrs Wendy Wilson**Summary:**

Site BC3 is unsustainable, as confirmed by findings of Sustainability Appraisal (1 red, 9 amber), has no sense of place, protruding into open countryside, is outside defined accessibility limits, will add to congestion/poor air quality on A452. Bypass is uncertain and effectiveness unproven, whilst harming biodiversity. Too much reliance on Green Belt sites contrary to brownfield first policy/protection of Meriden Gap, and no need to release Green Belt if results in significant harm. Capacity from BC3 can be met in Solihull town centre, as demonstrated by Masterplan. Highly inefficient use of Green Belt land, whilst alternative sites in Balsall Common omitted without justification.

Change suggested by respondent:

- 1) Site BC3 should be removed from the LPR as it is non-compliant with National and Local Planning Policies and is unsustainable. It would also be a highly inefficient use of Green Belt land in the most constricted part of the Meriden Gap.
- 2) The phasing of any development in Balsall Common must be cognisant of the necessary supporting infrastructure, in particular primary school provision and the construction of the proposed bypass

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14152

Object

Balsall Common**Respondent:** Mrs Wendy Wilson**Summary:**

Site BC3 Concept Masterplan. Whilst capacity has been reduced to partially reflect constraints, concern remains due to significant harm to grade II* listed Berkswell Windmill from traffic and visual perspective. Whilst restrictions in building height made any proposed development should be modelled to ensure Windmill's functionality. High value ecological areas are fragmented or ignored, no nature reserve identified, and no mitigation for Great Crested Newts where roads cross protected corridors. No measures to mitigate safety concerns on A452. No separation between existing and proposed dwellings, amenity not respected and public open space not overlooked contrary to NDPs. Highly inefficient use of Green Belt land

Change suggested by respondent:

Site BC3 should be removed from the LPR as it is non-compliant with National and Local Planning Policies and is unsustainable. It would also be a highly inefficient use of Green Belt land in the most constricted part of the Meriden Gap.

2) The phasing of any development in Balsall Common must be cognisant of the necessary supporting infrastructure, in particular primary school provision and the construction of the proposed bypass

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

14153

Object

Balsall Common**Respondent:** Mrs Wendy Wilson**Summary:**

Serious flaws in data reliability/analysis within the evidence, particularly the SHELAA, Accessibility Study and Sustainability Appraisal undermining the soundness of allocating Site BC3.

No evidence of any plan to "manage the growth" in Balsall Common. Circa 350 housing units are planned for the next 5 years. None of the required infrastructure, in terms of a new primary school, the proposed bypass and improvement to amenities will be available until at least

phase II. The ongoing construction of HS2 will add to the congestion and upheaval. Balsall Common is already at full capacity, as evidenced by the lack of primary school places and difficulties in securing a doctor's appointment. No more houses can be built until the infrastructure is in place

Change suggested by respondent:

1) Site BC3 should be removed from the LPR as it is non-compliant with National and Local Planning Policies and is unsustainable. It would also be a highly inefficient use of Green Belt land in the most constricted part of the Meriden Gap.

2) The phasing of any development in Balsall Common must be cognisant of the necessary supporting infrastructure, in particular primary school provision and the construction of the proposed bypass

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Attachments:

11068

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Carole Wise**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

>Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

>Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments: None

10908

Object

Blythe**Respondent:** Mrs Andrea Wood**Summary:**

1. Roads already congested heavily into DH village, building 350 houses would have a detrimental impact on roads and peoples safety especially around TG & DH schools. 2. Village schools have already been extended to cope with the recent influx of children from the last build. 3. Adding more houses will take away the village feel of TG & DH. 4. DH has been subject to flooding in the past . 5. WE train station in normal times is used by many residents and people travelling into the village where the carpark is always full, this will put additional pressure.

Change suggested by respondent:

No more building. DH & TG has seen over the past 10 years significant building already.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14854

Object

Blythe**Respondent:** Mrs Sally Woodhall**Summary:**

Object to housing in Shirley Area;
already a large amount of retirement properties - Healthcare services already struggling - Flooding issues - traffic concerns

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

14686

Object

Blythe**Respondent:** Mr Stuart Woodhall**Summary:**

39% of housing to be built in Shirley, which is not a sustainable location in view of infrastructure and local services.
Housing should be more evenly spread and more at the HS2 Interchange
Shirley has higher proportion of older residents, doctors already over capacity.
Concerns for further flood risk, flood defences are not adequate.
Traffic concerns - area is already gridlocked.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10991

Object

Policy P12 Resource Management**Respondent:** Mr james wood**Summary:**

The proposed relocation of the waste site has been done with every effort to fly "under the radar", and avoid the scrutiny of local residents who will be adversely affected. The hearing that took place gave every impression the plan had been decided upon and the raising of the topic, and subsequent dodging of questions, clearly indicated a true lack of interest in changing the location to lessen the impact.

Change suggested by respondent:

The consultation process should be re-run, it should invite local residents to speak and be in attendance, and take every possible step to be inclusive in the collateral that is circulated in the community. Previous hearings were not publicised, made no attempt to raise the profile of the relocation, which is in direct contrast to the way local residents have been kept informed of changes at JLR (for example). Local residents adjacent to the proposed site are in direct opposition to the relocation, and were only made aware of this by a video circulated on local social media sites, there is no democratic decision being made here. The decision has been made, that is clear, and the uneasiness of the people responsible was clear during the "consultation" that was circulated. This is not a plan that should be allowed to proceed in it's current form. To be clear, I am referring to the proposed relocation of the waste site to Damson Parkway.

Legally Yes
compliant:

Sound: No

Comply with No
duty:

Attachments: None

10636

Object

Policy BL1 - West of Dickens Heath**Respondent:** Matthew Wood**Summary:**

The site includes sports fields, which will affect children and adults who use the fields.
The land is high grade Green Belt - should protect greenbelt and build on brownfield first
Development will be surrounded by LWS & Ancient woodland - so will impact wildlife
Road network cannot take further development
Site is in Flood zone 1
Mitigation measures in plan are not achievable, so the site is not sustainable. Other sites are more suitable
Character and setting of village will be adversely affected. Community feel and identity will be compromised. Village already had strong definable boundaries.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

13781

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Philip Wood**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: No

Comply with Not specified
duty:

Attachments: None

15120

Support

Spatial Strategy**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Spatial Strategy (Page 24) –

The spatial strategy is supported as it is considered that this represents the most effective and sustainable means of delivering the scale of housing growth that is necessary to meet the affordability and other housing needs set out in the Draft Submission Plan. In particular Growth Option G is considered to be the preferred option strategy for the bulk of housing delivery.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

15121

Support

Policy P4A Meeting Housing Needs – Affordable Housing**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Supported on the basis that 40% affordable housing is the level necessary to address the issue of affordability which is the most acute in the West Midlands.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15122

Support

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

The general provisions of this policy are supported.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15123

Support

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

This is supported and is considered to be a key component of housing delivery and provision of choice.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15124

Support

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Supported.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15125

Object

Policy P5 – Provision of Land for Housing**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:****Housing Requirement:**

This policy is not supported on the basis that it is considered that the housing requirement is low and will not fully reflect both local needs and the pressures on Solihull emanating from Birmingham. Setting too low a target will make it impossible to address affordability which, at Paragraph 155, the Draft Submission Local Plan acknowledges is the most severe across the West Midlands. Appropriate additional provision should therefore be made up to at a total of some 10,000 net additional homes.

Change suggested by respondent:

Appropriate additional provision should therefore be made up to at a total of some 10,000 net additional homes.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments:

15126

Support

Policy P5 – Provision of Land for Housing**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

The housing trajectory is supported, subject to the concerns expressed above in respect of Policy P5, particularly with regard to the proposed allocation of 300 dwellings on land at Whitlocks End Farm – Site BL3.

However, it is noted that this could accommodate up to 750 dwellings, as set out in the Vision Document attached to this submission, which will provide additional flexibility for the Council should other sites fail to come forward, are delayed or if housing figures are increased.

In terms of the delivery of this site, the suggested delivery periods are accepted.

The site is in single ownership and the owners are experienced developers in their own right. Whilst they would not wish to develop out all of the site themselves, they are able to ensure that the site is brought forward quickly. See further comments below for Policy BL3.

Deliverability of the large allocations is key if the Council is to achieve the required level of growth (set out in Paragraph 228).

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15127

Object

Policy P5 – Provision of Land for Housing**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Para. 226 - Summary of Residential allocations

The summary table in Paragraph 222 is considered to be incorrect in that Whitlocks End Farm (BL3) is in part previously developed land with some four hectares of hardstanding and sheds.

However, In terms of the delivery of this site, the suggested delivery periods are accepted.

Change suggested by respondent:

The summary table in Paragraph 222 is considered to be incorrect in that Whitlocks End Farm (BL3) is in part previously developed land with some four hectares of hardstanding and sheds.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15128

Support

Spatial Strategy**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Support Spatial Strategy in Para. 63

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

15129

Support

Policy P7 Accessibility and Ease of Access**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

This is accepted and supported. It is essential that as much development as possible is accommodated with access to public transport and also encourages and facilitates accessibility by pedestrian and cycle modes.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15130

Support

Policy P8 Managing Travel Demand and Reducing Congestion**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

This is supported. There is clearly a need to locate development where it can reduce reliance upon private motorised transport. It has to be accepted that any development will generate some additional traffic, no matter how much it facilitates and encourages the use of public transport and other non-car borne modes. As such, it is essential that the bulk of housing delivery is located where the full effects of traffic impact has been fully modelled and assessed. This has occurred in respect of site BL3 where it is agreed with the Council that up to 750 dwellings can be accommodated in accordance with the principles set out in the Policy P8.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15131

Object

Policy P17 Countryside and Green Belt**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

This policy is not supported and objected to in very strong terms in the context of the proposed boundary to the Green Belt around site BL3.

Green Belt boundaries should endure for more than one plan period and should provide sufficient flexibility to enable the Council to meet its housing requirements in the short term should sites be delayed or not brought forward for some reason. In this regard, the Council hasn't attempted to identify "reserve sites" that serve no long term Green Belt function and which could be brought forward for development should that be necessary to meet housing or other needs.

It is proposed that land adjoining site BL3 at Whitlocks End Farm should be excluded from the Green Belt in the same manner and in accordance with the submitted Vision Document (attached).

This Vision Document demonstrates the development that accords with the Council's objectives of maintaining a 300 metre separation between South Shirley and Dickens Heath and also follows existing hedgerows which form strong and natural boundaries. It also maintains the separation to Majors Green to the west established by the existing railway embankment.

The Vision Document also demonstrates how the proposed allocation BL3 can be implemented yet allows for a natural extension to accommodate further development, particularly to the east, as a natural rounding off of development up to the proposed new public open space.

Redrawing the Green Belt boundary to comply with this Vision Document will not only facilitate further development, if required, of up to 750 dwellings in total but it will also provide a natural edge to Shirley which accords with the five purposes of Green Belts as set out in Paragraph 134 of the NPPF.

Change suggested by respondent:

Redraw Green Belt boundary for Site BL3 so that land adjoining site BL3 at Whitlocks End Farm should be excluded from the Green Belt in the same manner and in accordance with the submitted Vision Document (attached).

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

15132

Object

Foreword**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:****Policies Map:**

This policy is not supported and objected to in very strong terms in the context of the proposed boundary to the Green Belt around site BL3.

Green Belt boundaries should endure for more than one plan period and should provide sufficient flexibility to enable the Council to meet its housing requirements in the short term should sites be delayed or not brought forward for some reason. In this regard, the Council hasn't attempted to identify "reserve sites" that serve no long term Green Belt function and which could be brought forward for development should that be necessary to meet housing or other needs.

It is proposed that land adjoining site BL3 at Whitlocks End Farm should be excluded from the Green Belt in the same manner and in accordance with the submitted Vision Document (attached).

This Vision Document demonstrates the development that accords with the Council's objectives of maintaining a 300 metre separation between South Shirley and Dickens Heath and also follows existing hedgerows which form strong and natural boundaries. It also maintains the separation to Majors Green to the west established by the existing railway embankment.

The Vision Document also demonstrates how the proposed allocation BL3 can be implemented yet allows for a natural extension to accommodate further development, particularly to the east, as a natural rounding off of development up to the proposed new public open space.

Redrawing the Green Belt boundary to comply with this Vision Document will not only facilitate further development, if required, of up to 750 dwellings in total but it will also provide a natural edge to Shirley which accords with the five purposes of Green Belts as set out in Paragraph 134 of the NPPF.

Change suggested by respondent:

Redraw Green Belt boundary for Site BL3 so that land adjoining site BL3 at Whitlocks End Farm should be excluded from the Green Belt in the same manner and in accordance with the submitted Vision Document (attached).

Legally compliant: Yes

Sound: No

Comply with duty: No

Attachments:

15133

Support

Policy P17A Green Belt Compensation**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Supported.

The Vision Document referred to above also demonstrates very clearly how the “compensatory improvements” required to comply with Paragraph 138 of the NPPF can be achieved in respect of site BL3 (as proposed in the Submission Draft Local Plan or as proposed in the Vision Document attached). There will be far greater and enhanced public accessibility in the form of additional and circular walks and access through to the new large area of public space to the east. In addition it is recognised that there is potential to locate playing fields close to the proposed housing area (possibly also to support further development in Dickens Heath) as part of a comprehensive master plan. It is also proposed that a new canal marina could be accommodated to the southwest of site BL3. This has been assessed by the landowners who have sought specialist advice which has concluded that this would be both practical and feasible. Such a marina would not just help meet a real need for additional canal related berths and facilities but it could also form a base for other facilities for public recreation across the retained Green Belt area.

Change suggested by respondent:

Proposed that a new canal marina could be accommodated to the southwest of site BL3.

Legally Yes**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Attachments:**

15134

Support

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

Supported.

It is clear that open recreational facilities (both formal and informal) underpins community health (both physical and mental). As such the encouragement for proposals that retain (where appropriate) and enhance such facilities is supported. In addition, the support given to the role that waterways play in meeting this, plus the support that is provided to proposals that will enhance the formal and informal use of the river and canal network, is also welcomed.

As noted above, site BL3 will fully accord with Policy P20, including presenting an opportunity to enhance access to the countryside and the canal network policy.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15135

Support

Policy BL3 - Whitlock's End Farm**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services**Summary:**

This response to the Draft Submission Plan for Solihull has been prepared on behalf of Woods Farm Christmas Trees Limited, owners of a large site which is proposed for development (in part) on land south of Bills Lane in Shirley.

- Site BL3 is supported with the following additional points noted.
- The promoters (who are the owners) intend to meet the requirements of Policies P4 (A, D and E) in full.
- Furthermore, the owners are also experienced small scale housing developers and builders and who thus fully understand the benefits and requirements of SME housebuilders.
- Accordingly, it is proposed that up to 10-15% of the houses to be provided will be released through smaller sites of up to one hectare to support SME house builders in accordance with the minimum requirements of NPPF Para. 68.
- Will not only assist the Council meet this requirement but it will also help to accelerate delivery of housing in this area and to create a more varied residential scheme.
- single private ownership of land at site BL3 means owners are not constrained in the same way as, say, is the case with volume national house builders or land promoters

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Not specified

Attachments:

15136

Object

Policy BL3 - Whitlock's End Farm**Respondent:** Woods Farm (Christmas Trees)**Agent:** Twelve Twenty One Planning Services

Summary:

Principle of site allocations is supported, however, site can be expanded in area to accommodate up to 750 dwellings, as set out in Vision Document:

- Transport: Agreement has been reached with the Council in respect of accessibility and offsite highway works (all of which are either in Highway land or are in the same ownership as the entirety of Site BL3 (and adjoining land)).
- Green Belt: Site can be extended to accommodate 750 dwellings with no diminution to the effectiveness of the Green Belt in this area nor to its overall form and function. I.e. by maintaining the separation between Shirley and Dickens Heath but will also represent a more natural rounding off to the southern edge of Shirley using natural hedgerow boundaries to establish the circa 300 metre separation to the south with the new public open space to the east and the railway line to the west.
- Heritage: detailed Heritage Assessment relating to the single listed building within the site has been carried out by site promoters and underpins Vision Document.
- Policy compliance: This location is highly accessible to all modes of transport in accordance with Policy P7 and will establish a clear sense of place in accordance with Policy P15 whilst respecting and enhancing natural and heritage assets in accordance with Policies P10 and P16.
- Green Belt compensation: the proposal offers the clear opportunity to enhance accessibility to the countryside, building on and incorporating within it existing and proposed bridle paths, open space, etc and making full use of the canal environment in accordance with Policies P17A and P20.

Change suggested by respondent:

Change and expand site boundary to accommodate up to 750 dwellings and align with Vision Document prepared by site promoters.

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

10943

Object

Policy HH1 - Land South of School Road, Hockley Heath

Respondent: Sarah Wood

Summary:

See above

Change suggested by respondent:

No developments at all in this location it is simply not a suitable place

Legally No
compliant:

Sound: No

Comply with No
duty:

Attachments: None

14735

Support

Policy P12 Resource Management**Respondent:** Worcestershire County Council**Summary:**

WCC support the plan's intention to aim for equivalent self-sufficiency for waste management development and to aim for the maintenance of a 7-year landbank for sand and gravel from identified areas.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14742

Support

POLICY P13 Minerals**Respondent:** Worcestershire County Council**Summary:**

WCC support the plan's intention to aim for equivalent self-sufficiency for waste management development and to aim for the maintenance of a 7-year landbank for sand and gravel from identified areas.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

14749

Support

Blythe**Respondent:** Worcestershire County Council**Summary:**

Education - WCC note the potential for cross boundary pupil migration and that a new primary school is proposed to serve the new developments in the Blythe area. WCC also note that Woodrush Community High School (in Worcestershire) has direct links with the adjacent Dickens Heath area, as Tidbury Green Primary School in Solihull is a named school for pupil admissions. Any proposals for this area may impact secondary school provision in Worcestershire as a result of housing development. WCC would therefore welcome the opportunity to be included in any future consultations on education provision in this area that may impact on Worcestershire provision.

Transport - As set out in previous consultation responses to the Draft Local Plan, WCC has concerns about the potential cumulative transport impacts of the growth set out in the plan on the network within Bromsgrove District, in particular around Wythall and Hollywood. It is clear that several proposed allocations will have an impact on Worcestershire's transport network.

The specific issues that need to be considered are (1) Junction 3 M42 (known to have some capacity constraints), (2) some local roads are currently at capacity and transport modelling is necessary to understand the capacity of the local roads to accommodate further traffic generated from new development, and (3) car parking capacity at rail stations along the corridor is poor, as is the level of rail service provision.

The evidence presented in the Forecasting report shows that M42 Junction 3 will be over capacity in all peak periods modelled, including the Inter peak in 2036. The evidence indicates that this is an existing issue and that the development included in the Plan will have a minor impact on its operation.

The Plan is supported by a Draft Infrastructure Delivery Plan. A stated aim of the IDP is that it is a live document that will be updated over the Local Plan period. It is assumed that the evidence collected through the transport assessment process, being of a greater level of detail than that presented at Local Plan stage, would be used to inform updates to the IDP. On that basis (and noting the amendments suggested by Bromsgrove DC) WCC would be content that congestion and potential road safety risks along the Tilehouse Lane / Haslucks Green Road corridor due to multiple developments would be resolved.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14602

Object

Policy BL1 - West of Dickens Heath**Respondent:** Adam Wright**Summary:**

Loss of pitches will affect our children (and adults)

The land is high grade GREEN BELT.

The site is surrounded by Local Wildlife Sites and Ancient Woodland so would be detrimental to them.

Road network cannot take further development and is already overloaded.

These fields flood every winter

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None

10947

Object

Policy S01 - East of Solihull**Respondent:** Ms Carol Wright**Summary:**

700 dwellings is far too many. A significant smaller number of dwellings would enhance and help preserve the natural character, wildlife and value of a precious green corner of this lovely Midlands town. The proposed site is within the green belt area. The Grade II listed field is beginning to be harmed. Damson Parkway traffic has already been affected by JLR expansion, and a further 1400 cars would create more traffic and pollution,

Change suggested by respondent:

This site is precious green belt land that provides valued open space to the large local community. The site is already a problem area due to JLR commercial and employees traffic.

No building should take place here if this requires removing beautiful green belt pastures, and the overcrowding of the historic village of Catherine de Barnes, certainly not of the size of 700 dwellings. If building was to take place on this site the plan should be greatly reduced in size to protect the environment the site set well back from the existing Damson Parkway.

Legally compliant: No

Sound: No

Comply with duty: No

Attachments: None

14601

Object

Policy BL1 - West of Dickens Heath**Respondent:** Jane Wright**Summary:**

Loss of pitches will affect our children (and adults)

The land is high grade GREEN BELT.

The site is surrounded by Local Wildlife Sites and Ancient Woodland so would be detrimental to them.

Road network cannot take further development and is already overloaded.

These fields flood every winter

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Comply with duty:** Not specified**Attachments:** None

11188

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Gianpiero Wyhinny**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

> Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.

> Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.

> Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with.

Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.

> Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Comply with duty:** Not specified**Attachments:** None

11019

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** Knight Frank**Summary:**

Policy P4E relates to meeting housing needs for older and disabled people. As currently drafted, the policy does not meet the tests of being positively prepared, justified, effective or in accordance with national policy, as it will fail to meet the housing needs for older and disabled people.

The Plan should allocate specific sites for the housing of older people across all tenures, thereby enabling provision that cannot be achieved through open market competition for sites. This would provide additional flexibility in policy that responds to the difficulty these schemes face in competing with conventional, policy compliant sites.

Change suggested by respondent:

-

Legally compliant: No

Sound: No

Comply with duty: Not specified

Attachments:

11020

Object

Knowle, Dorridge & Bentley Heath**Respondent:** Knight Frank**Summary:**

Plan to provide additional site allocations solely to assist with meeting identified housing needs for older and disabled people. This could be achieved through additional settlement-based allocation policies.

Site in the Local Plan evidence base under site references 29 ('The Orchard, Earlswood Road') and site 210 ('Land between 79 and 39 Earlswood Road) to be allocated as a Delivery Period 1 site.

Change suggested by respondent:

Proposed Policy Modification

Policy KN3: Land at and adjacent to No.79 Earlswood Road, Dorridge

1. The site is allocated to provide up to 75* or 160** units of specialist accommodation for older people. (* Using land at SHELAA site 210 as per Appendix 2 & 3

** Using land at SHELAA sites 29 and 210 as per Appendix 1)

2. Development should incorporate the following:

- i. Vehicular and pedestrian site access from Earlswood Road.
- ii. Retained/enhanced areas of species rich grassland as part of Local Wildlife Site;
- iii. Biodiversity off-setting/compensation for any loss of grassland.
- iv. Retained/enhanced planting and landscaping around site perimeter;
- v. Existing Public Right of Way running through the site retained;

3. Infrastructure requirements should include:

- i. Provision of suitable pedestrian and vehicular access from Earlswood Road;
- ii. Appropriate measures to promote and enhance sustainable modes of transport.

4. Green Belt enhancements should include:

- i. Tree and hedgerow planting;
- ii. Improved landscaping;
- iii. On site green and blue infrastructure;
- iv. Access improvements to the green belt beyond the site boundary;
- v. Biodiversity enhancements;
- vi. Any other compensatory improvements that considered acceptable.

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11213

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

Respondent: Knight Frank

Summary:

Policy P4E makes no reference to needs figures in the HEDNA or specific targets, nor is there any evidence provided to demonstrate the policy will provide a strategy which, as a minimum, will meet the identified needs for specialist older persons housing within the plan period. The plan therefore does not address specific housing requirements in accordance with para.56 of the NPPF.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments:

11214

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

Respondent: Knight Frank

Summary:

It is unclear how the strategy of providing specialist housing for older people on larger residential sites has been selected, justified, or whether is more appropriate than reasonable alternatives such as making specific allocations for specialist housing for older people.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments:

14391

Object

Policy UK2 - Land at Damson Parkway

Respondent: Paul Yates

Summary:

I object to the proposal to move the HWRC TO Damson Parkway due to increase in traffic and pollution.

Change suggested by respondent:

-

Legally Not specified
compliant:

Sound: Not specified

Comply with Not specified
duty:

Attachments: None

14847

Object

Policy BC3 - Kenilworth Road/Windmill Lane, Balsall Common**Respondent:** Bill Young**Summary:**

Objection (Wants site BC3 removed from Solihull Draft Submission Local Plan and Final Local Plan): Fails 3/4 tests of soundness.

- > Not positively prepared as it is not practical to deliver the unmet need of the HMA (2105 units). NPPF para. 11 has not been given due consideration. To build 4410 units (Greenfield) and 1195 units (Meridian Gap) is not required to comply with planning policy. Furthermore, site BC3 specifically is not sustainable using the council's own criteria.
- > Allocation of site BC3 has not been justified. Omission of sites within Balsall common and in the wider Borough which should have been chosen based on merit or for which the omission has not been justified. Final findings from Solihull Town Centre Masterplan are not incorporated and cannot be reconciled with the Draft Local Plan.
- > Inconsistencies with the NPPF, specifically para 1; 94; 108; 109; 122; 138; 185 and 194 are not complied with. Sustainable development will not be complied with if site BC3 remains in the Draft Local Plan.
- > Wishes to preserve the biodiverse rich habitat that is Site BC3 and protect the character of the Grade II Listed Berkswell Windmill.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

Attachments:

14918

Support

Vision**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- Support Vision to provide a range of quality homes across Borough by 2036 alongside maximising the economic and social benefits of HS2.
- Could strengthen Vision by identifying link between new employment opportunities and requirement to deliver new homes.

Change suggested by respondent:

- Could strengthen Vision by identifying link between new employment opportunities and requirement to deliver new homes.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14919

Support

Spatial Strategy**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- Broad support for Spatial Strategy in Para.'s 63-67.
- Could be more robust if set out a settlement hierarchy to guide site selection to strongly support development on edge of the main urban area around Shirley, due to connectivity to town centres, railway stations, services and facilities.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14920

Object

Policy P4C – Meeting Housing Needs - Market Housing**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- Support policy wording which states Council will negotiate housing mix on allocated sites. Rest of policy conflicts with this approach.
- Reference to housing mix in Concept Masterplans not required in this policy, inclusion of profiles could be confusing at development management stage.
- Specified mix of market dwellings (P4c (3)) not required if refer to latest assessment for housing mix negotiations, and conflict with Para. 188.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14921

Support

Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- Welcome flexibility built into policy to enable an applicant to negotiate amount and type of provision of self and custom homes.
- Welcome marketing period of 12 months.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14922

Object

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- Prefer additional criterion to ensure that oversupply of older persons accommodation can be avoided, given proliferation along A34 corridor.

Change suggested by respondent:

- Prefer additional criterion to ensure that oversupply of older persons accommodation can be avoided, given proliferation along A34 corridor.

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14923

Support

Policy P5 – Provision of Land for Housing

Respondent: ZF Automotive UK Ltd

Agent: Turley

Summary:

- Positive that SMBC seek to meet LHN and contribution to Greater Birmingham HMA shortfall.
- Important Site BL2 comes forward as one of largest single contributors to housing supply in Borough.
- Confirm support for Taylor Wimpey's promotion of BL2

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Comply with duty: Yes

Attachments:

14924

Support

Policy BL2 - South of Dog Kennel Lane**Respondent:** ZF Automotive UK Ltd**Agent:** Turley**Summary:**

- ZF Automotive UK Ltd (ZF) own Lodge Farm site (18ha), off A34, Stratford Road. Site forms part of allocation BL2.
- To date, with ZF support, Taylor Wimpey have promoted the wider proposed allocation.
- Seek to support proposed allocation BL2 and confirm it can be delivered within plan period, either under one application or brought forward by 2 separate parties.
- Welcome location of new 2-form entry primary school.
- Acknowledge requirement of public open space, play areas, flood alleviation measures and betterment for Mount Brook tributary of the River Blythe.
- Acknowledge developer contributions will be required for primary and secondary care health services.
- Mindful of intention to review CIL Charging Schedule.
- Important that Green Belt compensation is proportionate to the loss and comparable to other sites.
- ZF owns land to west of Jerrings Hall Farm off Tanworth Lane, which could form part of biodiversity net gain.
- Green Belt definition is unclear.
- Question Para. 609 that internal estate roads should form boundary with housing overlooking the Green Belt. Other ways to provide a suitable urban edge.

Change suggested by respondent:

- Green Belt definition is unclear.
- Question Para. 609 that internal estate roads should form boundary with housing overlooking the Green Belt. Other ways to provide a suitable urban edge.

Legally Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Attachments:**