

Solihull Local Plan Review

Draft Submission Plan

Regulation 22 (1) (c) Statement

Appendix C

Summary of Main Issues Raised by Regulation 19 Consultation (Draft Submission Plan – 2020) and the Council's Responses.

May 2021

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Introduction to this Document

This document provides a summary of the main issues raised in the representations made to the Draft Submission Plan which was published on 30th October 2020, and the Council's responses to them.

This document is set out using the same structure as the Draft Submission Plan itself, so that where representations have been made in relation to individual chapters or policies they have been summarised under that chapter or policy heading.

Representations have also been published (in other documents) in the following formats:

- A summary of all individual representations set out in document order
- A summary of all individual representations set out in representor order
- A schedule of representors

In addition to the above the full text of all individual representations can be accessed via the Council's [on-line portal](#).

Document section	Support	Object	Total
Foreword	8	49	57
Introduction	2	8	10
Our Borough	1	1	2
Challenges	18	15	33
Vision	6	9	15
Spatial Strategy	8	39	47
Sustainable Economic Growth	2	5	7
Policy P1 UK Central Solihull Hub Area	9	19	28
Policy P1A Blythe Valley Business Park	2	4	6
Policy P2 Maintain Strong, Competitive Town Centres	1	13	14
Policy P3 Provision of Land for General Business and Premises	1	16	17
Providing Homes for All	0	5	5
Policy P4A Meeting Housing Needs-Affordable Housing	6	33	39
Policy P4B- Meeting Housing Needs- Rural Exceptions	2	5	7
Policy P4C- Meeting Housing Needs – Market Housing	6	21	27
Policy P4D-Meeting Housing Needs- Self & Custom Build	4	23	27
Policy P4E- Meeting Housing Needs- Housing for Older People	11	47	58
Policy P5- Provision of Land for Housing	81	208	217
Policy P6- Provision of Accommodation for Gypsies and Travellers	2	1	3
Improving Accessibility & Encouraging Sustainable Travel	3	8	11
Policy P7 Accessibility and Ease of Access	3	15	18
Policy P8 Managing Travel Demand and Reducing Congestion	4	8	12
Policy P8A Rapid Transit	2	0	2
Protecting and Enhancing our Environment	3	6	9
Policy P9 Mitigating and Adapting to Climate Change	6	20	26
Policy P10 Natural Environment	6	13	19
Policy P11 Water and Flood Risk Management	3	9	12
Policy P12 Resource Management	5	39	44
Policy P13 Minerals	6	8	14

Policy P14 Amenity	2	7	9
Policy P14A Digital Infrastructure and Telecommunications	0	5	5
Promoting Quality of Place	0	0	0
Policy P15 Securing Design Quality	6	13	19
Policy P16 Conservation of Heritage Assets and Local Distinctiveness	2	7	9
Policy P17 Countryside and Green Belt	2	47	49
Policy P17A Green Belt Compensation	2	24	26
Health & Supporting Local Communities	0	0	0
Policy P18 Health and Wellbeing	4	17	21
Policy P19 Range and Quality of Local Services	1	3	4
Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation & Leisure	6	12	18
Delivery & Monitoring	0	1	1
Policy P21 Developer Contributions and Infrastructure	2	9	12
Balsall Common	6	68	74
Policy BC1 - Barratt's Farm	4	46	50
Policy BC2 - Frog Lane	0	18	18
Policy BC4 - Pheasant Oak Farm	0	15	15
Policy BC5 - Trevallion Stud	0	22	22
Policy BC6 - Lavender Hall Farm	0	10	10
Policy BC3 - Kenilworth Road/Windmill Lane	1	202	203
Blythe	2	92	94
Policy BL1 - West of Dickens Heath	6	148	154
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Policy BL3 - Whitlock's End Farm	2	42	44
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Policy KN2: South of Knowle (Arden Triangle)	43	54	97
Meriden	0	11	11
Policy ME1 - West of Meriden	2	6	8
North of the Borough	0	4	4
Solihull Town Centre & Mature Suburbs	0	8	8
Policy SO1 - East of Solihull	29	41	70
Policy SO2 - Moat Lane Depot	1	10	11
Policy UK1 - HS2 Interchange	2	15	17
Policy UK2 - Land at Damson Parkway	6	79	85
Schedule of Allocations	1	0	1

The number of representations recorded in this table relate to the number of submissions made under each policy of the plan. In some instances a submission has been made on behalf of a group who may share a similar view; and where this is known it is noted in the summary of that representation.

Forward

Key issues raised in representations received:

- The overriding theme in the responses (registered under this chapter) was that the consultation undertaken by SMBC regarding the Local Plan was inadequate. Many of the responses raised this point, and also that the consultation period should have been extended due to the COVID-19 pandemic.
- The proposed dwellings are not shared equally around the Borough, and instead are unfairly concentrated in areas.
- The Plan proposes too many new dwellings.
- The Green Belt should not be used for housing.
- The dwellings proposed are not directed at the correct demographics; there are not enough truly affordable dwellings proposed, which will price younger people out of the Borough and lead to gentrification. There is also too much retirement living proposed within the Borough.
- The proposed new dwellings will have a negative impact upon: school places, access to doctors, access to dentists, leisure facilities, traffic and infrastructure, pollution, wildlife and the environment and will result in loss of green spaces.
- The Local Plan will generally have a 'negative' impact upon the Borough.

Council response to key issues raised:

- The Plan is considered to have covered the key issues identified in the Issues and Options paper and has drafted policies which will address the issues identified to ensure the projected growth for the Borough is managed in a sustainable way. The level, type and location of housing and other development has been assessed and justified within the Local Plan and associated documents. The projected growth within the Borough has been taken into account in relation to education, healthcare, etc.
- Regarding the consultation process, both the regulations and the Statement of Community Involvement have been followed. Previous consultations included drop in events at libraries (and other public spaces) and making physical copies of the principal documents available for inspection in libraries. The Covid pandemic restricted the ability for these to take place in their traditional form, but alternatives through live streaming of Q&A sessions were undertaken, a dedicated phone line through the Contact Centre to members of the policy team was made available and a process put in place to supply hard copies of the plan if interest parties had difficulty in accessing on-line.

Introduction

Key issues raised in representations received:

- An incorrect approach has been used regarding testing the existing allocations (from the 2013 Local Plan) and that they have not been sufficiently justified for inclusion, nor their deliverability proven.
- An incorrect approach had been used whilst developing the Plan and it is not sound. The Plan does not address key issues, is not objective, nor offers sensible proposals for the Borough.
- Paragraph 20 suggests that that once the Local Plan is adopted, existing 'made' neighbourhood plans will no longer be part of the development plan.
- The importance of Neighbourhood Plans needs to be explicitly highlighted in the Plan.
- The COVID-19 pandemic had not been sufficiently addressed in the Plan.

Council response to key issues raised:

- The Plan is considered to have covered the key issues identified in the Issues and Options paper and has drafted policies which will address the issues identified to ensure the projected growth for the Borough is managed in a sustainable way. It is considered that Neighbourhood Plans and the COVID-19 pandemic have been addressed sufficiently in the Plan.
- The policies in existing 'made' neighbourhood plans will remain part of the development plan where there is no conflict with the strategic policies of the adopted Local Plan. Wording to be amended to reflect the status of existing 'made' neighbourhood plans.

Our Borough

Key issues raised in representations received:

- Disappointed that no reference to natural assets is made in the description of the Borough.

Council response to key issues raised:

- Whilst there is no reference to natural assets in the description of the Borough, the importance the Borough's natural assets is recognised throughout the Plan and the need to protect and enhance our natural assets is identified as a distinct challenge to be addressed.

Challenges

Key issues raised in representations received:

- The Council has not applied the National Planning Policy Framework policy on sustainable development.
- The sustainability appraisal does not take into account that site BL1 is in a very high performing green belt area.
- Brownfield sites are not being developed ahead of the green belt.
- The Plan fails to give equal regard to the gaps between Shirley and the Blythe villages as others.
- The Meriden Gap is a strategically important area and this should be recognised at the start of the Plan.
- The Plan fails to properly consider sites for employment uses in expanding settlements of Balsall Common and Knowle.
- The Plan does not identify the primary shopping areas in defined centres and has insufficient regard for the integral spatial planning requirements for retail and leisure uses.
- Policies on Blythe Valley and the HS2 interchange require clarity on the scale and type of retail that will be permissible.
- The Plan fails to evidence a full range of options for school provision over the long-term.
- Challenge A should be the highest priority.
- Challenge B should clearly state that Solihull cannot meet its housing requirement of 15,270 homes without significant adverse harm to Green Belt and environment and paragraph 11(b) of NPPF should be invoked.
- Challenge B should say that the full needs for older persons housing need will be met. Meeting the housing needs of older people should be made more explicit, and not conflated with other issues. The Plan does not address that there is an over provision of unaffordable housing for older people in Shirley.
Challenge C does not set out how the objective relating to the Commonwealth Games will be achieved.
- Maximising capacity of the airport (Challenge D) is inconsistent with the Climate Emergency measures, objectives of the Council, West Midlands Combined Authority and 2016 Paris Agreement. The impact of COVID-19 on the aviation industry and its growth is unclear.
- Challenge H should recognise that a policy of urban extension further compounds the problem of car use being the only form of available transport for some parts of the Mature Suburbs.
- The Plan has a minimal approach to densities which will lead to a minimal shift to sustainable travel which is incompatible with Plan climate and transport objectives.
- Challenge H should recognise that electric vehicles place the same infrastructure demands on the highway.
- The first point of Challenge I is not an appropriate aim and should be replaced by 'Providing waste management facilities of an appropriate tonnage to meet the needs of the Borough at the right time and in the right place'.
- Challenge J should make provision for land for expanding religious, social and cultural facilities.
- Challenge J implies that health is primarily driven by 'lifestyle choices', rather than other factors such as income and employment.
- Support for Challenge K

- Challenge K needs to include a commitment to achieve a net gain of trees to achieve a positive impact on CO2.
- The concentration of development in the Blythe/Shirley area will increase surface water discharge into rivers and therefore work against Challenge L. This Challenge should be amended to reflect the groundwater environment.
- The inclusion of a recognised need to protect the water quality of the River Blythe (SSSI) in challenge L is supported.
Challenge N (HS2 and UKC Hub) makes no mention of green infrastructure or habitat linkages.
- The objective for Challenge O should state working with 'primary care providers' to ensure there is no worsening of an already stretched primary care provision.

Council response to key issues raised:

- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- The Council considers that it has properly applied the National Planning Policy Framework policy on sustainable development.
- The Council considers that it has properly considered retail and leisure uses in the Plan.
- The Plan has been developed with the Council's Education and Children's Services Directorate. The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the plan.
- The challenges are not set in any priority order but Climate Change is Challenge A and paragraph 5 of the Foreword confirm that this is a matter of key importance for the Council.
- The Council has assessed the need for housing for older people and those with disabilities within the context of its local housing need assessment in accordance with the National Planning Policy Framework (paragraphs 60 and 61). Policy P4E promotes the delivery of housing for older people in locations across the Borough.
- Delivery of the 2022 Commonwealth Games will be a shared objective across many organisations and parts of the Council and the Local Plan will play an appropriate role in this.
- The Local Plan is aligned with the Council's Transport Strategy 'Solihull Connected', and the Local Walking and Cycling Implementation Plan and Policy P5 sets out densities which will exceed minimum densities. The Council agrees that electric vehicles place the same infrastructure demands on the highway but their increased uptake will reduce the carbon emissions and pollutants from vehicles. No changes are proposed for challenge H.
- The Council disagrees with the suggested change for Challenge I. It is not possible to manage all types of wastes arising within the Borough. Managing an equivalent tonnage to that arising is an appropriate policy response where it is not possible to deal with all types of waste arising.
- The Council does not think that Challenge J needs to be amended to refer to income and employment. The challenge refers specifically to some of the most significant challenges within the Borough and the need to improve this in accordance with the Health and Wellbeing Strategy. The Health and Wellbeing Strategy makes reference to the wider factors of 'good work', 'money and resources' and 'education and skills'.
- The Plan working alongside other Council initiatives will secure a significant net increase in trees across the Borough and changes are not proposed to Challenge K.

- Water quality and flood risk will be managed in accordance with Policy P11 which limits discharge rates to equivalent site specific greenfield run off rates and the Council does not think Challenge L needs be changed.
- The Council has and will continue to work with key decision makers to determine the impacts of population growth on the Borough's health services and it is not considered necessary to change Challenge O.

Vision

Key issues raised by representations:

- Support the provision of a range of homes across the Borough and the opportunity to maximise the economic and social benefits of HS2.
- Necessary transport infrastructure improvements will be fundamental in Solihull delivering on its Vision.
- The Vision should identify the important link between new employment opportunities and the housing requirement.
- Natural England welcomes recognition of the need to improve air quality, enhance and connect the natural environment and reduce net carbon emissions with sustainable travel.
- Natural England welcomes reference to the protection of the 'Meriden Gap'.
- Natural England supports the Vision being underpinned by the Council's 2019 Climate Change Declaration.
- The Vision should be more positively worded in order to significantly boost housing supply.
- The Vision should recognise the exceptional circumstances which justify the release of appropriate Green Belt sites to meet identified needs.
- The Vision should reference the need to provide housing for older people.
- The role and purpose of the UK Central Hub should be made clearer in the Vision as it represents an important component of the Plan.
- The importance of health for inclusive economic growth should be recognised.
- Clarification is required on the HS2 Interchange and its integration with green infrastructure.
- There is a risk that the economic growth proposed at the M42 corridor could be unsustainable.
- The loss of Green Belt land will undermine the qualities that make the Borough attractive to people and investment, which is contrary to the Vision.
- Previous consultation on the Plan indicates that local communities won't have greater involvement as the Vision suggests.
- Clarification is required on how the 'Meriden Gap' is to be protected as development is proposed here.

Council's response to representations:

- The Vision is considered to represent a fair balance between the desired to accommodate sustainable growth and protecting what makes Solihull special.
- Additional wording to make reference to assets listed being important components of the UK Central Hub.

Spatial Strategy

Key issues raised by representations:

- The Local Plan has failed to consider other reasonable alternative strategies/sites for development.
- There is potential for additional Green Belt release to deliver higher levels of growth.
- The Local Plan should include a settlement hierarchy.
- The Spatial Strategy should be set out as a strategic policy in the Local Plan.
- The Local Plan should identify safeguarded land to ensure longer-term development needs are met.
- The site selection process is contrary to national Green Belt policy as it did not firstly consider previously developed land and land well served by public transport.
- Certain sites may fall within Growth Options A to D as well as Growth Options E to G.
- The definition of 'high frequency' public transport (Growth Option A) in relation to rail stations is unnecessarily strict and not consistent with national policy.
- Growth Option A should recognise the opportunity offered by high frequency bus services not only rail services.
- Clarification is required on whether the criteria listed at paragraph 65 of the Local Plan (to inform the location of growth) takes precedence over Growth Options A to G.
- The Green Belt is an area of importance which should restrict the scale of development proposed.
- The distribution of proposed housing is uneven and focused on two geographic areas.
- Brownfield sites should be considered before the release of Green Belt land.
- Proposed development around existing densely populated areas will reduce gaps between settlements.
- Allocated sites in the Green Belt and urban extensions are unsustainable.
- Smaller allocated sites do not provide significant benefits to the local community.
- The need for regeneration in Shirley has been ignored.
- Warwickshire Wildlife Trust are concerned about the environmental impact of site allocations on designated Local Wildlife Sites, Ancient Woodland and the Green Belt.
- Natural England have no concerns with the Spatial Strategy or the site selection process.
- There is an overreliance on larger housing sites to deliver the housing requirement.
- The Local Plan should be more flexible and allocate further smaller sites that could be delivered quickly and without significant infrastructure provision.
- It should be acknowledged that Growth Option E (UK Central Hub Area and HS2) is a core component of the Spatial Strategy.
- The site selection process is inconsistent with sites being unjustifiably allocated or dismissed.
- There is greater potential for sustainable villages within the Borough to accommodate more growth.
- Consistency is required between the Local Plan and evidence base documents to make clear which tests were applied in the site selection process.

Council's response to representations:

- The spatial strategy has been used to guide the level and distribution of growth as reflected in the policies and allocations of the plan and it needn't have a policy in own right.
- The SA considers reasonable alternatives.

- Paragraph 65 sets out the approach on where (including which settlements) will be the focus for development and where development, which is of a proportionate addition to a settlement, should be located.
- Seven of the 18 (39%) residential allocations relate to sites of 100 dwellings or less. In addition, a significant proportion of the land supply that will come forward on windfall and sites identified through other means (e.g. land availability assessments).
- The Council is required to plan for and meet its identified housing needs. Whilst brownfield sites are prioritised, there is a lack of available land in the Borough to meet this need. It is therefore considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations.

Sustainable Economic Growth

Key issues raised in representations received:

General comments

- The Household Recycling and Waste Centre should not be relocated on site UK2. It is not legally compliant or sound. It does not take into account the climate change / environmental impacts of an unnecessary move. The plan should concentrate on how the Bickenhill site can be improved.
- The Arden Eco Park site should be allocated as a site for energy from waste and other related development as well as employment uses.
- The NEC could contribute to the sustainability goals as it has significant amounts of roof space that would allow for photovoltaic cells.
- Birmingham Airport suggest a new policy should be included in the plan which deals with Aerodrome Safeguarding and encourages pre consultation with Birmingham Airport. It should deal with all aspects of safeguarding.
- Transport for West Midlands highlight that high levels of employment growth rely heavily on good access to jobs. The plan should refer to the emerging regional Local Transport Plan which highlights good regional and community connectivity to key employment growth areas with greater emphasis on the importance of traditional bus services together with good walking and cycling measures to connect communities to key opportunities.
- Forecasts for passenger numbers at Birmingham Airport in Para. 96 are unlikely due to Covid 19 pandemic.
- Clarity on where the Council has asserted support for extension if the airport runway.
- Impact of Brexit is not mentioned at all, especially considering likely impact on Automotive and Travel Industries.

Matters relating to employment land supply and need

- Policy P3 fails to make sufficient provision of employment land to meet the needs of the area, including the unmet needs of the Black Country authorities. It is over reliant on two large allocations whose delivery and land availability is uncertain. It fails to match the spatial strategy of the Plan and has no regard to supply and demand in the HEDNA. It does not reflect evidence of supply and demand or the Local Industrial Strategy for the West Midlands Combined Authority.
- 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. Land south of Kenilworth Road/Park Lane, Balsall Common should be included as an employment allocation.

Matters relating to housing land supply and need

- There is inconsistency in housing figures at Arden Cross in relation to the master plan. The housing proposed at Arden Cross is inadequate in terms of the contribution to the housing market area.
- 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.

- The plan has not demonstrated that housing proposed at the UKC Hub Area is deliverable within the Plan period. Providing 20% of the housing target in a single location should be reviewed.
- Policy P2 fails to sufficiently recognise the potential opportunity for new residential development in ensuring the vitality of Shirley town centre.
- The plan for new homes in Shirley will add to existing congestion. Objectives for encouraging the use of public transport at the train station are flawed as car parks in Shirley are already full.

Council response to key issues raised:

- At Full Council on 13th April 2021 the Leader of the Council gave a commitment that the administration would not support or pursue the option for any relocation of the Household Waste & Recycling Centre (HWRC) to a site off Damson Parkway within the proposed allocation site known as UK2 in the Draft Submission Plan. This position will need to be addressed through the examination process.
- The Council is committed to ensuring the UKC Hub maximises opportunities for low carbon and renewable technologies and will work with key stakeholders to ensure this is explored as part of ongoing work to deliver the site.
- The role of Birmingham Airport as a consultee on matters of safeguarding is acknowledged.
- Agreed that ensuring good accessibility through sustainable transport options is key to supporting employment growth, it may be useful to refer to the emerging LTP, the text will be reviewed.
- The Airport Master Plan (2018) has informed the Local Plan in terms of the future role and expansion of Birmingham Airport. The Council will continue to work with the Airport to ensure that the Plan reflects the most up to date information.
- The potential impact of BREXIT will have been taken into account in the economic projections which inform the HEDNA. This forms part of the evidence base underpinning employment and housing need in the Borough.
- The Council considers that the Plan reflects the findings of the HEDNA in terms of the evidenced employment land need and that sufficient land has been identified to meet the needs of the Borough across the Plan period. It will continue to review the evidence in light of the representations received. It will also continue to review the employment land supply to ensure it reflects up to date information including deliverability of the sites and for the large allocations expected development trajectories. Further response to matters in relation to the HEDNA and provision of local and strategic employment land is provided in response to Policy P3.
- Responses to matters relating to housing supply across the plan period have been set out in more detail in policy P5. Figures for the amount of housing to be delivered across the UKC site have been informed by the Hub Growth and Infrastructure vision (2018) and Framework Plan, the NEC masterplan (2018) and Arden Cross Masterplan (2020) together with the Council's own assumptions on delivery. Further details on the quantum of housing, delivery timetable and the specific location and layout for residential development will be set out as work progresses on the UKC Hub area. It is agreed there should be consistency in the housing figures attributed to the site across the plan, the policy wording has been reviewed in relation to these references.
- Residential development is recognised as a key component of ensuring the continued viability of town centres.

Policy P1 UK Central Solihull Hub Area

Key issues raised in representations received:

Objection to relocation of Household Waste and Recycling Centre to the Damson Parkway Site (UK2):

- There are existing transport infrastructure issues, which would be exacerbated and its operation would impact on adjacent residential areas.
- Warwickshire Wildlife Trust is concerned that the proposal would result in noise impact, light pollution, impact on breeding species and on biodiversity and protected species on adjoining designated sites
- Relocation of the centre does not constitute exceptional circumstances to justify green belt release.
- The use does not fall under the category of uses related to the operations of JLR for which the land is intended
- The proposal has not previously been subject to public consultation and no details of the alternative sites are given.

General comments on policy and allocations:

- Objections raised to re-location of Household Waste and Recycling Centre to the Damson Parkway Site, in relation to Para. 106.
- The UK2 site directly covers a Local Wildlife Site, no mention is made to this or its preservation.
- Policy should be amended to include reference to development for Airport related uses proposed by Birmingham Airport only.
- A reference should be made to the West Car Park at Birmingham Airport which may be required to provide additional capacity for Airport related development beyond the 15-year Airport Master Plan
- Likely that there will be an increase in windfall sites as offices become redundant as more people continue to work from home as a consequence of Covid 19. Sites BL1 & BC3 should be omitted as a consequence.
- There is additional capacity in Solihull Town Centre and Arden Cross for residential development. Brownfield sites should be utilised before green field sites.
- Section on JLR should be removed.
- West Midlands Police state Policy P1 and supporting text should include reference to how proposals have considered security and safety. Developer contributions should be made to police infrastructure to ensure appropriate level of service in Hub area.

Housing delivery and master planning across the site:

- Further information is needed to confirm the quantum of housing, which will be provided on the site, the trajectory for the delivery of housing on the site and clear plans to show where residential development will be delivered on the site. It is unclear why North Solihull, the Town Centre and Blythe Valley are not included as they are also stated to be UKC.
- The rate of delivery is unrealistic even if the necessary infrastructure was achieved to allow housing completions. At the NEC development would not start before 2030 and at Arden Cross is dependent on HS2. A very high level of delivery will be required to develop out 2,740 units across the UKC Solihull Hub area to 2036. The nature of the developments being largely apartment based means it is more likely, the whole amount will be delivered at the end of

the plan period leaving a shortfall early on in meeting OAN and housing delivery in the first 5 years of the Local Plan period.

- The housing numbers to be provided on the site are too high. Providing 20% of the housing supply on one site should be reviewed. Additional housing allocations at small to medium sites, would provide a 'buffer' and mitigate against the risk of stalled delivery at larger sites.
- TfWM state that Policy should demonstrate the importance of transport master plans, and opportunities, which can reduce car dependence and fully promote sustainable transport.
- TfWM ask that Policy refer to WMCA's HS2 Connectivity Package.
- Wording amendments are suggested in relation to the Birmingham Airport Masterplan and operations, phasing and development trajectories for the site, place making principles in the Arden Cross Masterplan, maximizing low carbon technologies, to support the expansion and continued operations of JLR.

Representations in support:

- Natural England supports section 3iv and 3v as core policy requirements relating to sustainable travel and delivery of a 'high quality strategic green and blue infrastructure network across the Hub area to enhance natural assets'.
- UGC supports the allocation and policy for the UKC Hub. Highlights work being undertaken to progress an alternative arrangement for car parking to release land for development to deliver the masterplan for Arden Cross and to bring 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.
- Supportive of the Fore business park as an allocation but it is largely built and it is unlikely further floorspace will come forward due to adjacent green belt.
- Birmingham City Council supports approach of the policy 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.
- Coventry City Council supports concept of UK Central Hub and proposed developments in that locality, especially around HS2 and Arden. 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. CCC 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.
- Warwickshire County Council will work with Solihull MBC to develop a joint UKC Surface Access Strategy.

Council response to key issues raised:

- At Full Council on 13th April 2021 the Leader of the Council gave a commitment that the administration would not support or pursue the option for any relocation of the Household Waste & Recycling Centre (HWRC) to a site off Damson Parkway within the proposed allocation site known as UK2 in the Draft Submission Plan. This position will need to be addressed through the examination process.
- Agreed that the presence of the Local Wildlife Site on site UK2 should be acknowledged in the plan.

- There is existing flexibility within the policy to allow for any additional capacity needed to accommodate car parking or other airport related activities.
- In respect of the suggested wording amendments in relation to Birmingham Airport, JLR and matters relating to the Arden Cross Masterplan:
- Amendments are suggested to the plan wording to clarify and ensure consistency in the quantum of housing to be delivered across the UKC Hub area.
- The reference to new passenger facilities at Birmingham Airport will be removed to reflect the Airport Masterplan
- Further review of the wording of Policy UK1, UK2 and P1 will be undertaken to ensure consistency.
- The evidence informing the need for office floor space will continue to be reviewed taking account of recent changes in working patterns.
- Figures for the amount of housing to be delivered across the site have been informed by the Hub Growth and Infrastructure vision (2018) and Framework Plan, the NEC masterplan (2018) and Arden Cross Masterplan (2020) together with the Council's own assumptions on delivery. Further details on the quantum of housing, delivery timetable and the specific location and layout for residential development will be set out as work progresses on the UKC Hub area. Further consideration will be given to ensure consistency across the plan document in terms of geography and development aspirations for the site. This policy together with UK1 and UK2 provide a framework to ensure a coordinated approach to delivery and necessary infrastructure provision through the overall master planning of the site. The plan contains a range of sites in terms of size and location to provide for the evidenced housing need across the plan period.
- The importance of ensuring a coordinated approach to transport across the site to reduce car dependency and encourage the use of sustainable transport options is acknowledged. This will continue to form part of the overall master planning for the site as work progresses on the Concept Masterplan and SPD.
- It is agreed, the policy would be strengthened by changing the wording to 'maximising' low carbon in Part 3(viii).
- Potential changes to the policy wording in response to West Midlands Police comments will be reviewed through the examination process.

Policy P1A Blythe Valley Business Park

Key issues raised in representations received:

- Policy should demonstrate the importance of transport master plans and through these the opportunities to reduce car dependence and fully promote sustainable transport. Sustainable transport should play a major role for sites in the green belt. This is 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.
- 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.
- 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.
- 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 included in BVP to meet additional employment needs. It is 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. It was assessed as a 'good' site in terms of market attractiveness in the SHELAA and the HEDNA identifies that further land of this type is needed.
- Part 3 is not enforceable as the level of competition, and the geographical extent are not defined.
- Part 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.
- Public transport improvements are needed to ensure people can access the site sustainably.
- New developments should be designed with off grid energy networks.
- Natural England support the requirement to protect and enhance natural environment
- Comments also expressed ongoing support for development of Blythe Valley.

Council response to key issues raised:

- In line with other policies in the Plan, proposals at the Business Park should demonstrate that opportunities to reduce car dependency and to provide sustainable transport options have been maximised and are implemented as part of a wider approach to master planning on the site.

- The Policy is flexible to respond to market demand in terms of the mix of uses allowed and proposals for associated employment uses will be considered in line with the overall objectives of the policy.
- Agreed that the wording of the policy should reflect the most up to date position in terms of the land available for industrial uses, the status of the residential scheme and the current stage of developing site, the text will be reviewed in response. The Council will continue to review the employment land supply to ensure it reflects up to date information including deliverability of the sites and is sufficient to meet evidenced employment need.
- Any proposals to extend the Business Park would need to be considered in the context of further assessment of the employment land supply balance. The Council considers that sufficient land has been identified to meet the needs of the Borough as evidenced by the HEDNA but acknowledges that further work may be necessary to clarify this in responding to representations received.

Policy P2 Maintain Strong, Competitive Town Centres

Key issues raised in representations received:

- The housing figure proposed is over ambitious and unachievable in the Plan period. The Council should undertake detailed, site-specific housing trajectory, setting out the anticipated delivery rates of the Town Centre Sites pursuant to Policy P5(1).
- That Policy P2 should be updated to refer to the refreshed Town Centre Masterplan (2020)
- There is a lack of flexibility in the policy to allow for a 'shift' in different uses that may emerge in town centre locations.
- Policy P2 sets out a list of the "primary retail frontages" where retailing activity should remain the main street level use. There is concern that this approach to protecting retail frontage is too restrictive to allow delivery of the flexibility that is referred to within the main Policy.
- Paragraph 129 of the supporting text makes reference to an economic appraisal and market analysis undertaken by Amion in 2020. It is considered in the context of current and forecast market conditions the potential for 50,000sqft of office floorspace to be brought forward to be ambitious.
- In Shirley Town Centre there is concern for the effectiveness of the proposed highway work that aims to improve congestion and pedestrian safety.
- Some support for Policy P2's recognition of diversification of Town Centres.
- Suggestion of increasing the natural environment offer in Town Centres.
- 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 (especially in areas where town centres are vulnerable).
- Policy P2 should recognise the opportunity for new residential development in Shirley Town Centre.
- Concern regarding the effectiveness of Policy P2 in relation to Chelmsley Wood Town Centre, particularly where town centre uses are encouraged in edge of centre locations.
- West Midlands Police state Policy P2 and supporting text should state that development proposals are expected to demonstrate how they have considered security and safety, and will achieve Secured by Design standards across whole area. Developer contributions should be made to police infrastructure to ensure appropriate level of service can be maintained.

Council response to key issues raised:

- Note the concern for the proposed housing development in Solihull Town Centre.
- Agree that a 'shift' in town centre uses may emerge as retail habits change. Agree that Policy P2 should encourage a broad range of uses to include types that will help to make Solihull Town Centre distinctive and prepared for change.
- Highway works will continue to mitigate pressure on the local highway network, further work will be carried out as part of the UK Central Development programme (along the A34 as a key transport route).
- Agree that there is a need to diversify uses in Solihull Town Centre without restricting uses to retail only.
- Note that work may need to be carried out to assess the thresholds over which impact assessment will be required for retail use.

- Note that residential use will continue to play a part in Shirley Town Centre's future development, alongside the presence of traditional town centre uses.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Update following publication of Draft Submission Plan:

- Policy P2 of the Draft Submission Plan made reference to an updated Solihull Town Centre Masterplan that was being undertaken at the time. Whilst this was not able to be finalised prior to publication of the Regulation 19 consultation, it has now been completed and published.
- It is expected that the supporting text of Policy P2 will be updated accordingly along with the housing land supply in the table at paragraph 222. The required changes will be considered through the Examination process, where the Inspector may recommend the need for main modifications.

Policy P3 Provision of Land for General Business and Premises

Key issues raised in representations received:

General comments

- There is no employment land provision to provide for balanced communities rather than commuter villages. Sites at Balsall Common and in Knowle are identified as potential employment allocations to address this.
- The Birmingham business park allocation is directly adjacent to a designated Local Wildlife Site, the policy wording does not refer to a buffer or consideration of any impact.
- 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.
- The loss of Green Belt due to the amount of land made available for office space is unnecessary.
- 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.
- There is no protection against employment land being used for other business purposes such as car dealerships such as on the A34.

Employment land supply

- Evidence should be provided as to the availability and deliverability of the proposed allocations and the trajectory for their delivery.
- Employment Land Supply table should be amended to provide the developable areas - Land at HS2 Interchange (UK1) C140 (gross) c30 (net available) Land at Damson Parkway (UK2) c94 (gross) c39 (net available).
- Policy does not match the spatial strategy of the Plan, it 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 and deferring cross-boundary strategic matters.
- 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.

HEDNA and employment land requirement

- 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 employment requirement should be set out 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.
- Policy P3 is unsound as it fails to provide an employment land supply to meet the needs of the borough for industrial and warehousing land. Policy P3 should plan for a higher amount of industrial floorspace (between 22.1 and 60.7ha).

- The HEDNA underestimates the amount of land needed for industrial and warehousing and the plan does not address the acknowledged need for strategic employment sites based on the 2015 study. It ignores 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
- There are shortcomings in the method used in the HEDNA, a five year rather than two year margin should have been included. There is insufficient justification for the dismissal of recent evidence of much stronger growth in the industrial stock. Last years data (2019/20) shows a new record level of growth, a continuation of the short-term trend would see more pronounced growth and a greater need than the 16ha concluded in the HEDNA. If flexibility of 5 years take up was included it would be sensible to plan for between 22.1 and 60.7ha.
- 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 (44 hectares to meet local needs and 35ha for large scale logistics). The developable areas for UK1 and UK2 set out in the policy should be clarified as 30ha and 39ha.
- The HEDNA sets out the assumed employment floorspace figures derived from the UGC and Arden Cross masterplanning work

Strategic Employment Land

- The plan is unclear as to the extent to which Land at Damson Parkway is intended to meet local or strategic needs.
- Land has been put forward adjacent to M42 Junction 4 to meet strategic employment land need.
- The amount of strategic warehousing accounted for as part of UKC is modest. The plan does not provide for large scale logistics and take account of the sub-regional shortage of strategic employment sites set out in the 2015 West Midlands Strategic Employment Sites Study¹³ (WMSESS) and in the forthcoming second stage of this study. There is a identified shortfall in sites along the M42 corridor. It is a failure in the duty to cooperate that the main authorities in the area are not providing for this need and there has been little engagement between Birmingham and Solihull despite being within the same LEP.
- Association of Black Country Authorities state that 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.

Council response to key issues raised:

- The Council considers that policy P3 reflects the findings of the HEDNA in terms of the evidenced employment land need. The policy seeks to ensure a range of sites in terms of size and location and suitability for different types of employment are available to meet the employment needs of the Borough across the plan period as well as deliver the opportunities presented by the HS2 interchange. This is through the sites listed in the supply table but also through the protection of existing sites including the retention of small and medium sized enterprises.
- It is agreed that the plan should reflect an accurate picture of the employment land available. The Council will continue to review the employment land supply to ensure it reflects up to date information including deliverability of the sites and for the large

allocations expected development trajectories. Further detail on the proposals at UK1 and UK2 will be provided as progress continues on the Concept Masterplans and through the preparation of an SPD to support the delivery of these sites.

- The Council considers that the methodology used in the HEDNA is reasonable and reflects best practice. The study used the most up to date information available at the time and allowing for a margin of 2 years in determining the employment land need was considered appropriate in this instance.
- The representations received in respect of more recent rates of employment land take up and the time period for projecting these forward, evidence of specific need relating to commercial market information and the need to provide for a higher employment land requirement particularly to meet industrial and warehousing needs are noted. The Council will continue to review the evidence to ensure it is satisfied that employment land needs in the Borough will be fully met across the plan period.
- The need to meet strategic employment land needs across the region is acknowledged. However, what constitutes a local or strategic employment site is not always defined by size or location. It is clear that suitable land in an accessible location and of a suitable scale to meet the needs of the occupier could be attractive to a range of users both local and strategic. Sites within the employment land supply, including the large scale allocations at UK1 and UK2, could therefore contribute to meeting both local and strategic needs.
- Through the Duty to Cooperate the Council is committed to working with neighbouring authorities and other stakeholders both to meet the Borough's local employment land need and to assist in delivering the wider economic strategy across the sub region including the opportunities presented by the HS2 interchange. The Council will seek to reflect these discussions and emerging evidence such as the West Midland Strategic Sites Study Phase 2 as appropriate.

Providing Homes for All

Key issues raised in representations received:

- Planning regulations need to ensure that developers deliver those sites with planning approval.
- Should introduce Regulations to ensure derelict/empty properties are developed.
- Policies should do more to encourage housing for younger people, and not so focused on older persons housing.
- Chapter introduction (Para. 153) should also refer to link between housing and good physical and mental health.

Council response to key issues raised:

- National planning policy and regulations are beyond the scope of the Local Plan.
- Council has a separate Empty homes strategy.
- Policies seek to provide a wide range of housing types and tenures for different housing needs.
- Policy P18 highlights the links between the built and natural environment as key determinants of health and wellbeing.

Policy P4A Meeting Housing Needs – Affordable Housing

Key issues raised in representations received:

- Support for policy P4A affordable housing including the high affordable housing need pressure and 40% affordable requirement.
- The Council does not meet the 40% affordable housing target, currently delivering under 30%. This will remain an ambition unless it is increased.
- The scale of the affordable housing need identified in the HEDNA highlights Solihull needing to deliver additional housing over and above the standard method baseline and the requirement currently being proposed.
- The viability and deliverability of development sites should not be compromised by over ambitious requirements to deliver 40% affordable housing.
- The Policy fails to take into account potential changing needs over the plan period. Tenure, type and size should be in the form of guidance or supporting text rather than prescription. This will allow flexibility to respond to emerging Government Policy such as First Homes and other discount market tenure in annex 2 of NPPF. The HEDNA highlights the requirement for both social and affordable rent but recommends that the Council does not propose a rigid mix on the split. The policy does not allow for a suitable amount of weight to be applied to the tenure type, and size mix on a site by site basis. A more detailed explanation need to be given on the range of house types and sizes.
- References to SPDs and guidance are inappropriate and non-compliant with the Regulations. 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. The definition of 'affordable' should be set out in the policy and not left to the Meeting Housing Needs SPD.
- The Policy 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.
- The policy states that in circumstances where the provision of affordable housing would prejudice the realisation of other planning objectives the affordable obligation will be reduced, it is difficult to envisage any circumstances where other planning objectives take precedence over the delivery of affordable housing.
- The more social rent and affordable housing provided in the north of the borough, and the less provided in other parts, will worsen inequalities.
- Policy P4A does not address occupation by households with a strong local connection and there is a failure to recognise the presence of neighbourhood plan policy dealing with local needs affordable housing on allocated housing sites.
- The continuing use of Housing Associations as the principal provider of such accommodation should be reduced to avoid the effect of 'staircasing'. This results in a permanent reduction in the number of affordable homes.
- The policy fails to recognise and potentially excludes almshouses as form of affordable housing and excludes almshouse charities as providers of affordable housing.
- The Viability Study does not take into account the full burdens of all the policies and potential policies in SPD's contained within the Local Plan.
- Welcome the flexible wording of the policy, including references to viability.

- Viability studies should be published to ensure the transparency of financial transactions and ensure that developer profits are not exceeding 20%.
- The omission of specific reference to Community Led Housing reduces the soundness of the Local Plan. There should be explicit reference to Community Led Housing, as a mechanism for Providing Homes for All and this will give considerable weight to the acceptability of this form of development and in turn this gives confidence to community groups to pursue Community Led Housing.

Council response to key issues raised:

- Policy P4A ensures 40% affordable housing with 65% social rent and 35% shared ownership. This level of provision is supported by the HEDNA and viability study in accordance with NPPF and PPG.
- NPPF and PPG and case studies highlight the burden from any policy needs to be made clear. The policy also includes flexibility to take account of site constraints if necessary.
- The affordable housing policy including affordable tenure, type and size is set out in the Local Plan Policy. This gives certainty to developers and site promoters about the requirements and burden of the policy. The financial burden has then been tested by the viability study, including all Local Plan policies. The SPD will not change or add to the policy but provide detail on its application.
- Policy 4A is set on a Borough wide basis. This reflects the fact that needs cannot always be met where they arise, so use has to be made of the development opportunities that become available. Therefore any development may need to provide for needs arising in another part of the Borough.
- Eligibility and priority for social housing is governed by the Council's Housing Allocation Scheme. This is a statutory policy required under the Housing Act 1996. However where neighbourhood plans include a policy relating to the occupation of affordable housing, due consideration should be given to the neighbourhood plan. This will be taken forward as part of the review into the Council's Housing Allocation Scheme during 2021.
- A 'C2' development can provide residential accommodation in the form of dwellings. An affordable housing contribution on 'C2' development providing self-contained dwellings is appropriate to help meet the housing needs of the Borough.
- Further detail and guidance for delivery of Policy P4A will be set out in the Meeting Housing Needs Supplementary Planning Document.

Policy P4B Meeting Housing Needs – Rural Exceptions

Key issues raised in representations received:

- Support for Policy P4B.
- 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.
- Text should be added to Policy P4B 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.
- The Policy fails to recognise and potentially excludes almshouses as form of affordable housing and excludes almshouse charities as providers of affordable housing.
- The draft submission Plan fails to identify if the green belt land referred to includes the land that the plan is seeking to release from the green belt or whether this is additional green belt to meet a Local Need for housing.
- The Policy conflicts with Neighbourhood Plans e.g. Brownfield sites should be considered first.
- The Policy fails to reference and include Community-Led Housing.

Council response to key issues raised:

- Policy P4B is an enabling policy for Parish Council’s and Neighbourhood Areas to meet their own needs and support the vitality of villages and there services and facilities. In order that Parish Council’s and Neighbourhood Forums have confidence in the policy it is important that their support is vital if any proposal is taken forward.
- The policy states “Proposals will also be considered against openness and character of the village/settlement and any design criteria in an adopted Neighbourhood Plan”. The justification for the policy states “The policy will ensure that the most suitable site in the village is used as outlined in the Parish or Neighbourhood Plan”.
- Further detail and guidance for delivery of Policy P4B will be set out in the Meeting Housing Needs Supplementary Planning Document. The policy does not exclude community led housing schemes being used as the mechanism for delivering rural exception sites, the Council would welcome this approach and this will be outlined in the Meeting Housing Needs SPD.

Policy P4C Meeting Housing Needs – Market Housing

Key issues raised in representations received:

- Developer view that dwelling mix within the policy is overly prescriptive; and housing mix should be negotiated on a site by site basis at planning application stage.
- View that Part 4 conflicts with flexibility contained within criteria of Part 1.
- Proposed that indicative housing mix ranges should be included, either in the policy, in a supporting text or within an SPD.
- Object to housing mix weighted towards smaller homes (3 beds or fewer).
- Housing profile for concept masterplans (Part 2) could conflict with HEDNA mix (Part 3), and be confusing at planning application stage.
- HEDNA housing mix could become quickly out-of-date.
- Market mix differs from KDBH Neighbourhood Plan, need clarity on which housing mix should be prioritised if there is a conflict between emerging local plan and made Neighbourhood Plan.
- Developers should have option to propose their own evidence on housing mix at planning application stage.
- Prescriptive approach could negatively affect development viability and obstruct development.

Council response to key issues raised:

- Policy P4C ensures a range of market housing to meet the projected needs of the existing and future population, that is supported by the HEDNA and Viability Study in accordance with the NPPF and PPG.
- NPPF and PPG and case studies highlight the burden from any policy needs to be made clear, and therefore the recommended mix is included within the policy text, rather than the justification or an SPD.
- The policy justification states that the market mix is the recommended market mix, and that ‘a similar mix of housing in all areas is expected but this will be applied flexibly according to specific local characteristics. In applying the mix to individual development sites, regard will be given to the size and nature of the site and character of the area; any relevant policies in Neighbourhood Plans; up-to-date evidence of need; and the existing mix and turnover of properties at the local level.’
- The policy is a non-strategic policy. Although the PPG states that the latest Plan will take precedence, the policy supporting text and Para. 21 in the introduction of the DSP, reiterate that existing neighbourhood plans may provide a more appropriate local expression of a standard or expectation that should be taken into account and given due weight.

Policy P4D Meeting Housing Needs - Self and Custom Housebuilding

Key issues raised in representations received:

- Support for policy.
- 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. The policy is not supported by the HEDNA.
- An individual showing of interest via a Housing and Custom Build Register rarely equates to a genuine desire/ability to build on a Self/Custom Build plot. The actual demand is likely to be significantly lower.
- There is no robust evidence provided as to how the threshold of 100 dwellings was calculated nor the provision of 5%.
- A more refined approach to the location of self and custom build plots across the Borough is needed, to reduce reliance on allocated housing sites delivering specific self and custom build plots. The Council should consider providing specific site/allocations to meet this need, in line with Paragraph 61 of the NPPF.
- National guidance does not require allocated sites to contribute land for self and custom build plots, which seeks local authorities to "engage" with landowners and "encourage" them to consider self-build and custom housebuilding.
- The provision of such plots on strategic size housing sites is unlikely to be what those on the register are seeking, meaning they are left empty which could delay the delivery of housing.
- 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, including local authority owned land.
- 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
- Serviced plots on larger developments adds complexity and slows delivery and is makes it difficult to coordinate different construction logistics.
- Where plots are unsold, policy should be clear that these revert to the original developer. Reversion timescale should be as short as possible as it is also harmful to the visual and residential amenity of those living in close proximity to them, 12 months is too long.
- Disagree with the viability evidence on self-build plots. This does not take into account all the cost.
- Policy will cause delay to processing planning applications, slow housing delivery and have implications for the housing land supply.
- 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.
- The policy makes no differentiation 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.

Council response to key issues raised:

- 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, National Planning Policy Guidance and the needs on the self-build register. Self and custom build housing need for the policy is evidenced by both the Self and Custom Housebuilding Register and the HEDNA.
- The Housing and Planning Act 2016 took forward the requirements of the Self-build and Custom Housebuilding Act 2015 further by introducing a 'Right to Build'. This requires local planning authorities to support custom and self-builders registered in their area in identifying enough suitable plots of land to build or commission their own home to meet local demand through their Local Plan.
- The Policy in the Local Plan allows for plots to be delivered across the plan period allowing choice over location and timing over the plan period. Additional plots also come forward each year via windfall redevelopment, evidenced by CIL self-build exemptions.
- Further detail and guidance for delivery of Policy P4D will be set out in the Meeting Housing Needs Supplementary Planning Document.

Policy P4E Meeting Housing Needs – Housing for Older and Disabled People

Key issues raised in representations received:

- The HEDNA significantly underestimates need because it adopts provision rates that are too low.
- The HEDNA significantly underestimates the proportionate requirement from owner-occupiers for specialist provision.
- There is no mechanism for delivery. The policy does not actually guarantee delivery of any specialist housing for older people.
- The rate of delivery has not been considered. The HEDNA sets out that the majority of the shortfall is needed by 2026.
- There is a need to allocate specific sites for specialist provision.
- Viability testing has not properly considered the costs of:
 - Applying policy P4A to 'C2' development
 - Introducing M4(2) and M4(3)
 - Providing extra care housing leading to these developers being priced out of the market for land by 'C3' developers
- P4E should include a figure of how many older persons units are needed over the plan period and to recognise the different typologies.
- The HEDNA does not justify 40% affordable provision on C2 uses and this requirement is held within the justification rather than the policy.
- Inconsistency between Parts 4 and 5 of this policy. Part 5 suggests that it will be applied flexibly and on a site-by-site basis. In contrast, Part 4 states that 'all developments of 300 dwellings or more must provide specialist housing or care bedspaces'
- Provision is not necessary on all large, strategic sites and should be directed to those areas where there is an identified need.
- The policy should include an additional point to help avoid over-supply of older persons accommodation in some areas.
- Policy fails to consider suitability criteria such as vulnerability to flooding, site topography or local demographic requirements.
- P4E needs to be clearer on the 'C2/C3' use class distinction.
- References to Primary Health Care services sub-clauses should be modified to recognise the potential for on-site provision.
- The Council has provided no evidence on accessibility and adaptability of existing housing stock to justify the optional standards for accessible and adaptable dwellings.
- Policy text should be amended to clarify that M4 (3 2b) will only apply where the Council is responsible for allocating or nominating.
- References to SPDs and other guidance are inappropriate and non-compliant with the Regulations. Reference to guidance provided in SPDs could be inserted into supporting text.

Council response to key issues raised:

- There is no definitive method for establishing the amount of housing needed for older and disabled people. National Planning Policy Guidance says that policies can '...provide indicative figures or a range for the number of units of specialist housing for older people

needed across the plan area throughout the plan period' (Paragraph: 006 Reference ID: 63-006-20190626).

- The provision rates in the HEDNA are not too low. The different prevalence rates are summarized in Table 72 of the HEDNA. The rates used are from the Housing LIN in accordance with NPPG (Paragraph: 004 Reference ID: 63-004-20190626) which are in the mid-range of those provided by other sources.
- The Council agrees that the proportionate requirement for owner occupation should be higher. Shared ownership is a form of leasehold sale and should be included in the owner occupation proportion.
- The mechanism for delivery will be set out in the statement of need on older persons accommodation, which will be part of the 'Meeting Housing Needs' Supplementary Planning Document. This will include the proportionate requirement for owner occupation. The Concept Masterplans for sites of 300 dwellings or more will define the requirements for specialist housing and care bedspaces on these sites.
- Of the proposed allocated sites with a capacity of 300 dwellings or more, 5 have a delivery period that includes the first period of the Plan. In addition, two smaller sites scheduled for the first delivery period have a stated interest in making provision.
- The Council's assessment is that the indicative need can be met through the proposed policy, and with the anticipated contribution from some smaller allocated sites and other housing land supply. There is not a need to make additional specific site allocations to meet the needs identified.
- The Viability Study will include P4E requirements in its Round 2 testing.
- Part 4 of the policy sets a requirement for all developments of 300 or more dwellings. Part 5 refers to the application of the policy overall. This may include flexibility on the quantum or type of part 4 provision, subject to the factors listed.
- Policy P4E is set on a Borough-wide basis, so any development may need to provide for needs arising in another part of the Borough. An over-supply of any of the distinct types of older persons accommodation is not likely to occur.
- Part 5 (i) of the policy will be amended to say 'Site specific factors which may make step-free access unsuitable or unviable'
- The Meeting Housing Needs SPD will include a statement of accommodation need, which shall set out the detail of the needs to be met. The statement will be reviewed every 3 years. The SPD will define the distinction between 'C2' and 'C3'.
- The need for 40% on 'C2' uses is appropriate to help meet the housing needs of the Borough. A proportion of the affordable need for extra care will be leasehold sale to help meet the needs of older home owners.
- Policy P4E provides the flexibility to take account of on-site health care provision.
- The HEDNA provides the evidence for exceeding the minimum building regulation standards and implementing the optional standards.
- The policy does not require 'wheelchair accessible' (M4 (3 2b)), stated in paragraph 207. The policy does not need to be amended.
- References to SPDs are appropriate and their use is consistent with the adopted Local Plan, and the approach taken by other local authorities.

Policy P5 Provision of Land for Housing

Key issues raised in representations received:

Housing Supply

- Developers express doubts over robustness of housing supply and trajectory:
- Brownfield land register is unreliable as only Part 1, not Part 2; capacities are inconsistent
- Land availability assessments supply is not secured
- SLP allocations, including Town Centre, should not be included in supply as should have come forward by now
- Solihull Town Centre figures are not based on robust evidence; should set out specific sites and provide concept masterplans. Housing capacities are over-estimated.
- Apartments in the Town Centre do not meet Borough need for family housing
- Windfall supply is double-counted against Brownfield land register, land availability assessments and town centre sites
- Past trends are not compelling evidence of future windfall supply; windfall allowance is not justified. Windfall allowance is unrealistic, should revert to 150dpa as in currently adopted Plan.
- Proposed allocations should be reviewed in terms of suitability, achievability and capacities (see Site specific policies for more detail)
- No evidence provided on housing trajectories, larger sites rarely come forward at anticipated rates. Reference made to Lichfields 'Start to Finish' analysis of build out rates.
- Land assembly and infrastructure issues could impact on timing and phasing of delivery on several sites.
- Calculation errors in housing supply regarding existing sites and communal dwellings.
- At least 10% of housing requirement should come from sites of up to one hectare. Insufficient evidence provided on 10% small sites.
- Small and medium sized sites can make an important contribution to housing supply (NPPF Para. 68).
- CPRE view that ONS household projections (only) up to 2036 could be met without Green Belt release, other than UKC Hub site.
- Plan does not specify housing numbers in Solihull Town Centre, Arden Cross and National Exhibition Centre.
- Brownfield sites (North Solihull, Solihull Town Centre, Arden Cross and NEC) are being under-utilised at the expense of Green Belt release.
- Alternative view that site UK1 (Arden Cross) could accommodate up to 9000 dwellings.
- Town centre locations may release more housing as retail and office culture changes post-Covid.
- Phased delivery approach is unsound.
- Unlikely that Plan can provide 5 year land supply upon adoption.
- Concern that Viability assessment does not fully quantify all the financial burdens of different policies, including significant infrastructure requirements.

Council response to key issues raised (housing supply)

- Further information on the evidence behind the housing supply figures and their components is provided in the Draft SHELAA 2020 published to support the Regulation 19 consultation.

- Over 10% of housing supply will be provided on small sites from several site sources as set out in the Draft SHELAA 2020
- Windfall sites are counted separately, and constitute those sites that were not previously counted within known sources such as Local Plans, Town Centre Masterplans, Land Availability Assessments and the Brownfield Land Register.
- Indicative delivery periods are based on the scale and complexity of the site allocations, as well as consideration of other infrastructure requirements, such as HS2.
- Viability Assessment has assessed different policies within the Plan for key typology sites, including £20K for strategic infrastructure on sites of at least 200 dwellings, as well as an additional £1K buffer on Section 106 assumptions.
- Policy proposes a stepped trajectory to take into account build out rates of site allocations, and includes a five year land supply assumption.
- Plan does specify housing numbers for Chelmsley Wood Town Centre (Policy P2, Para. 140) and UKC Hub (Policy P1, Para. 89). Agreed that housing numbers anticipated in Solihull Town Centre could be more clearly signposted. The quantum of housing assumed in the housing supply is that of the 2016 Draft Local Plan (861 dwellings – Policy P2, Para.'s 128 and 130). This figure is considered justified, as Para. 130 further states the emerging work for the revised Town Centre Masterplan is 'expected to at least match that assumed in the Draft Local Plan, if not exceed it.'

Housing requirement

- Although generally agreed that standard methodology is starting point and minimum assessment for LHN, Council need to be mindful of Government's consultation on changes to standard methodology.
- View that HEDNA does not sufficiently forecast employment growth at UKC Hub, nor accurately estimate commuting ratios from within Solihull/out of boundary.
- Growth in UKC Hub Area under-estimated in HEDNA when compared with other documents, e.g. Midlands HS2 Growth Strategy, UGC Growth and Infrastructure Plan, Viability Study.
- 25% in-commuting ratio for jobs at UKC Hub Area is far too low.
- UK Central Hub will generate migration demand different from that in the 2014 household projections; comparable to extraneous migration at Ebbsfleet on the HS1 route, which is much higher than historic demand. Needs to be factored into housing projections.
- Historic in-commuting to jobs in the Borough likely a result of constrained housing supply in previous years.
- Barton Willmore conducted own demographic modelling that concludes the between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario; or 16,570-19,975 dwellings over plan period.
- Furthermore, need to increase housing requirement to meet affordable housing need – 40% affordable housing of LHN figure does not meet annual need of 578 dpa.
- Lack of Statement of Common Ground at publication stage to commit to resolving the GBBCHMA shortfall, contrary to NPPF.
- Several HMA authorities questioned level of contribution to HMA shortfall (Birmingham CC, Lichfield, South Staffordshire, North Warwickshire).
- Barton Willmore Housing Need paper state that GBBCHMA Position statement (July 2020) underestimates HMA shortfall and overestimates supply up to 2031. Birmingham actual shortfall estimated to be 11,294-13,010 dwellings up to 2031.

- Council not considering to meet post-2031 HMA shortfall; note Black Country Authorities state they expect a shortfall of 27,000 homes to 2038, and a shortfall of 287-567ha employment land.
- Barton Willmore estimate that post-2031 need is greater than stated (17K – 18.4K for 2031-2040).
- No evidence provided to justify why 2,105 homes contribution to HMA is sufficient.
- Developer view that Council’s contribution should follow methodology used by Staffordshire authorities, i.e. based on commuting patterns. Therefore at least 11,500 additional homes should have been tested, not 2,000.
- Concern that early review will be required to meet additional HMA shortfall in the Black Country, for which Green Belt boundaries will have to be altered again, which is contrary to NPPF.
- Should provide for safeguarded land on alternative sites to protect Green Belt boundaries in the future.
- Housing requirement is same as housing supply, does not provide any flexibility or buffers other than lapse rate on proportion of sites.
- Additional housing buffers proposed, up to 20%.
- 15,017 dwellings should be stated as a minimum requirement.
- Views that housing requirement (or at least UK Hub contribution), stepped trajectory, HMA contributions should be in the Policy P5 itself.
- Local Plan period should be extended to 2037 as likely adopted in 2022.
- Stepped trajectory is contrary to Government’s aim to boost housing supply e.g. Planning White Paper.
- Objection to Neighbourhood Requirement from KDBH as relies on allocations.
- 20% uplift to housing requirement should be made (4,077 dwellings) to increase small-medium sized sites in sustainable settlements.
- Table at Para. 220 should use latest ONS household projections.
- Overall, developer view that more land should be allocated, and Green Belt released for development (on a range of alternative sites), as housing supply is over-estimated and housing requirement is under-estimated.
- Alternative view that less land should be allocated, especially in the Green Belt and environmentally sensitive areas, and capacities on brownfield land should be increased.
- Alternative view that Council should not release Green Belt to accommodate HMA needs, and/or should base housing need on ONS demographic projections only, with no further affordability or employment uplift.

Council response to key issues raised (housing requirement):

- Council have commissioned an up-to-date HEDNA and have consulted with stakeholders in the UKC Hub Area to assess proposed levels of growth.
- The standard methodology for assessing Local Housing Need, as outlined in the NPPF and PPG, is based on the 2014 ONS projections.
- Council’s Local Housing Need figure has been calculated in accordance with national policy; including an affordability uplift and taking into account any further uplift required for employment needs.
- The Government have published their response to the recent consultation on revising the standard methodology; the outcome is that the method to calculate LHN is unchanged for Solihull.

- Council is seeking to meet their full objectively assessed housing need and have tested a 2,000 contribution figure at Regulation 18 and 19 stage. The overall level of growth is supported by the Sustainability Appraisal and evidence within Green Belt Assessment, Landscape Character Assessment and various studies summarised in Site Selection Document. The Plan seeks to strike an appropriate balance between the need for housing across the borough and the HMA; the environmental and infrastructure capacity of the Borough, as well as the impact on the Borough's Green Belt and sub-regionally important strategic Meriden Gap.
- Statements of Common Ground with HMA authorities will be submitted with the Local Plan.
- 10% lapse rate has been included for sites that have not yet started on site/ without planning permission. Proposed site allocations as they have been tested through concept masterplan process and their deliverability is supported by site promoters.
- Premature to specify post-2031 contribution to HMA.
- 15,017 is stated as the housing requirement to ensure clarity on delivery. Any increase in site capacities or additional development will be assessed at planning application stage to ensure mitigating factors have been taken fully into account.
- Local Development Scheme anticipates that Local Plan will be adopted in Autumn 2021.

Other Main Issues raised

- Differences in densities between Policy justification and concept masterplans.
- Densities should be stated in Policy P5 and not the supportive text.
- Need further clarity on densities for different types of settlements, and how these will be achieved on site e.g. level of land-take required.
- Status of concept masterplans needs to be confirmed within the plan.
- All important development principles should be a matter of policy and not confined to concept masterplans.
- Important that local communities are confident that development will proceed in line with concept masterplans and not be subject to material change.
- No justification for nationally described space standards; more flexibility should be provided
- Housing capacities have not taken into account the need to meet open space provision.
- Objection to inclusion of word 'enhancing' in Policy P5 (Part 3) as it is unclear for Development Management and has been challenged at Judicial Review.
- Sustainable and/or innovative design may be different to local character, but this should not be a reason to refuse development.

Council response to key issues raised (Other Main Issues):

- Densities are presented as a range on site, with upper limits for mixed development going above those cited in the concept masterplans. This may be appropriate given the mix on different plots at the time of planning application.
- Concept masterplans densities and capacities are based on calculated site areas, and have taken open space provision into account.
- Policy seeks to ensure high living standard and flexibility in how homes are occupied, considered especially important in since the start of the Covid-19 pandemic.
- Considered that innovative and sustainable design can still respond to local character and distinctiveness.
- Council will provide additional guidance on wording 'enhance' local character within updated Design SPD.

Policy P6 Provision of Accommodation for Gypsies and Travellers

Key issues raised in representations received:

- The number of Gypsy and Traveller Caravans is relatively stable. The Plans need to account for diversity of sites, not only pitches.

Council response to key issues raised:

- Whilst the number of Gypsy and Traveller caravans may be currently relatively stable, the Council has a duty to plan for the future accommodation needs of this community. Within Solihull there are already sites that cater for a range of tenure types including private rented, social rented and privately owned sites. The Council will continue to ensure that a diversity of sites remain available.

Update following publication of Draft Submission Plan:

- Policy P6 of the Draft Submission Plan made reference to an updated Gypsy and Traveller Accommodation Assessment (GTAA) that was being undertaken at the time. Whilst this was not able to be finalised prior to publication of the Regulation 19 consultation, it has now been completed.
- It is expected that Policy P6 and the supporting text will be updated accordingly, and the required changes will be considered through the Examination process, where the Inspector may recommend the need for main modifications.

Improving Accessibility and Encouraging Sustainable Travel

Key issues raised in representations received:

- Congestion around Stratford Road is already significant. Future development will exacerbate the existing issues and should be delayed until improvements are made.
- The Policies listed in the chapter do not constitute a transport policy or strategy for the Borough. The Planning Practice Guidance (PPG) requires Local Plans to have a Transport Assessment carried out, at the main stages of Plan preparation and this has not been done.
- Reference should be made to Transport for the West Midlands (TFWM) emerging Local Transport Plan for 2021 and TfWM's Delivery Plan.
- Concerns about predicted traffic increases at site allocations that will likely result in further congestion and poorer long term social and environmental outcomes.
- The West Midlands Combined Authority's (WMCA) #2041 Climate Change Strategy/Action Plan should be noted in this chapter, especially as transport is the biggest source of carbon emissions.
- Inclusion of a separate walking and cycling policy is required to ensure that walking and cycling infrastructure is integral to new development.
- No mitigation measures referenced in the Local Plan for construction traffic. The use of Construction Management Plans for significant development should be encouraged to mitigate against construction logistics and the environmental impacts on the surrounding area.
- Significant windfall development on the A34. Traffic Assessments should consider impact on health, well being and safety.
- Parking standards should be developed.
- New road building not compatible with climate commitments. A policy section that includes road building cannot be described as mitigating nor adapting to climate change.
- Paragraph 291 should be updated to reflect the current situation with the Motorway Service Areas.
- A policy should be developed which sets out standards and requirements to enable new structures and sustainable transport infrastructure to be provided safely where it interacts with the Strategic Road Network.

Council response to key issues raised:

- The Infrastructure Delivery Plan includes the projects which will help to address existing and future transport infrastructure needs. The transport Infrastructure identified seeks to improve accessibility, promote sustainable travel and address key areas of existing congestion and congestion as a result of the development proposed in the Local Plan. The IDP also identifies the timescale, sources of funding and delivery organisations for the infrastructure needed. Traffic modelling work has been undertaken to support preparation of the Local Plan. This has been supplemented by more localised assessments of the impact of particular Local Plan sites on nearby traffic levels, and a range of interventions to mitigate impacts associated with specific site proposals has been identified. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The 'Improving Accessibility and Encouraging Sustainable Travel' section of the Local Plan sets out the Council's strategy for integrating transport and development across the

Borough. A summary of the transport evidence base and how it has been used to develop the Local Plan is detailed in the Transport Topic paper. It includes a range of regional and more local studies and strategies to identify current transport issues and potential options to address them. Traffic modelling and accessibility work has also been undertaken to support preparation of the Local Plan, along with more localised assessments relating to the impact of particular Local Plan sites on nearby traffic levels. The transport evidence base is comprehensive, it has been developed iteratively throughout the Local Plan process and is considered to meet the requirements of the NPPF and the PPG.

- The importance of current West Midlands Strategic Transport Plan, 'Movement for Growth' is recognised by the Council in helping to improve accessibility and ease of movement within and from north Solihull. It is appropriate for the emerging Local Transport Plan for 2021 to also be referenced.
- The WMCA #2041 Climate Change Strategy/Action Plan is included in the 'Protecting and Enhancing our Environment' chapter of the Plan and Policy P9 makes reference to transport in the context of reducing carbon emissions.
- Policy P7 explicitly states that prioritisation should be given first to pedestrian and cycle movements. Policy P15 requires the design and layout of developments to encourage walking and cycling and create streets and public spaces, which integrate with existing paths, streets and patterns of activity. Site allocation policies also seek to promote pedestrian and cycle connectivity within and beyond site boundaries.
- Construction Management Plans can be considered at the planning application stage and can be included as a condition of any future planning permission where considered necessary.
- Transport Assessments assess the potential transport impacts of development and will need to ensure that detrimental impacts, including any impacts on safety, are adequately mitigated. This will include the implementation of, or contributions towards measure to encourage sustainable travel, which in turn can encourage greater social inclusion, community cohesion and healthier communities. Policy P18 also makes provision for Health Impact Assessments to be prepared where development proposals may have a significant impact on health and wellbeing.
- Local planning authorities should seek to ensure parking provision is appropriate to the needs of the development. This will include consideration of issues such as existing accessibility, the type of development and the availability of public transport. It is therefore appropriate for parking provision to be evidence led, on a case by case basis.
- The provision of a Balsall Common Bypass is considered to be justified given the impact on the existing A452 as a result of traffic associated with the HS2 interchange site (and wider hub area), growth from Coventry and the traffic generated by new housing in the area. This alternative route will accommodate through traffic and enable environmental improvements (including cycle lanes) to be provided on the A452 within the village, making it safer and more attractive to encourage walking and cycling.
- Agree that paragraph 291 be updated to reflect the current position with the Motorway Service Areas.
- The Council will proactively engage and work with Highways England where the provision of transport infrastructure will impact on the Strategic Road Network, including the M42.

Policy P7 Accessibility and Ease of Access

Key issues raised in representations received:

- Existing transport infrastructure is unsuitable and under too much pressure already.
- No definition is provided of what constitutes a “high frequency” service.
- No justification is given for the requirement for sites to be within 400m and / or 800m of a bus / rail service.
- The distance to a bus stop/train station should not be seen as the only measure of sustainable access. There may be other ways in which sustainable access options can be implemented.
- Many of the site allocations in the Plan would not meet the accessibility standards in the Policy.
- Policy P7 should include a section on transport innovation.
- The policy lacks detail, clarity and fails to meet the objectives of the NPPF, particularly for non-motorised travel.
- The policy draws no distinction between urban and rural locations in determining the criteria for accessibility.

Council response to key issues raised:

- The Infrastructure Delivery Plan sets out a list of the infrastructure necessary, including transport infrastructure, for the implementation of the Local Plan. The transport Infrastructure identified seeks to improve accessibility, promote sustainable travel and address key areas of potential congestion as a result of the development proposed in the Local Plan. The IDP also identifies the sources of funding and delivery organisations for the infrastructure needed.
- The accessibility criteria are considered to be feasible and viable in most circumstances, and in accordance with the implementation of the Solihull Connected Transport Strategy. The accessibility threshold of 400m from a bus stop is based on Transport for West Midlands’ desirable walking distance to bus services. The criteria for access to bus and rail seeks to ensure that it is frequent and convenient enough for people to choose to use it.
- It is considered appropriate for high frequency services to be defined in the supporting text and this can be included.
- The policy recognises that there are different ways to promote ease of access and enhance accessibility levels, and is not overly prescriptive in its approach.
- The spatial strategy has sought to focus significant developments in locations that are or can be made accessible and sustainable. The site allocation Policies also identify the need for transport infrastructure requirements including appropriate measures to enhance sustainable modes of transport, including walking and cycling. It is recognised in the supporting text that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Where development proposals are unable to meet the specific criteria set out by the policy, mitigation will be expected to demonstrate how sustainable transport choices can be made.
- Potential changes to policy wording to include transport innovation in response to comments from Transport for the West Midlands will be reviewed through the Examination.
- The Policy is considered to be sufficiently detailed, particularly with regard to what the Council will require from development proposals and the criteria to be fulfilled. The Policy meets the objectives of the NPPF in that it seeks to facilitate the use of sustainable modes of transport and direct development to the most accessible locations or where it can be readily

accessed by non-car modes. The policy is explicit that prioritisation should be given first to pedestrian and cycle movements.

Policy P8 Managing Travel Demand and Reducing congestion

Key issues raised in representations received:

- Point 2(ii) goes further than required by the NPPF, which 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.
- In addition to mitigating highway issues, Transport Assessments and Travel Plans should also enable walking, cycling and public transport usage and deliver high quality, attractive, liveable and sustainable environments.
- Policy should request developer contributions, covering required/appropriate public transport infrastructure - both within, adjacent and in proximity to development site.
- Freight should be referenced in the Policy, including the need to minimise freight levels and the adverse impacts on communities.
- Part 1(i) - a clearer definition is required. Safe and practical access to a site by sustainable forms of transport is integral to promoting sustainable travel.
- Part 1(iii) - an unacceptable impact on public highway safety needs quantifying.

Council response to key issues raised:

- A reduction in safety for any users of the highway is considered to represent an unacceptable impact on highway safety and is therefore in accordance with the NPPF.
- The supporting text to the policy recognises that Transport Assessments and Travel Plans should secure the implementation of, or contribution towards appropriate measures to encourage and enable travel by non-car modes. Other policies in the Plan also seek to ensure that the design and layout of developments encourage walking and cycling, and create attractive streets and public spaces, which integrate with existing routes and patterns of activity.
- Policy P21 sets out the approach to developer contributions and infrastructure provision. There is nothing in the plan to preclude the requirement for developer contributions to fund public transport infrastructure where the necessary regulatory tests are met.
- Agree that freight operations should be referenced in the Plan.
- The supporting text to the Policy provides additional explanation to Part 1(i).
- In Part 1(iii) the unacceptable impact on public highway safety will be determined on a case by case basis having regard to the details of the application and the mitigation proposed.

Policy P8A Rapid Transit

Key issues raised in representations received:

- Support for positive policies in relation to sustainable transport, including SPRINT and Metro.
- Proposed Rapid Transit Routes highlighted should be referenced and safeguarded on the Policies Map.

Council response to key issues raised:

- Welcome support for the policy.
- Rapid Transport routes can be included on the Policies map.

Protecting and Enhancing our Environment

See individual policies for representations made.

Policy P9 Mitigating and Adapting to Climate Change

Key issues raised in representations received:

- Support for ambitious energy policies and consideration of Climate Change emergency, although developer concerns that policies may not be practicable; and environmental group concerns that policies should go further.
- Natural England welcome inclusion of soft measures, e.g. GI, to assist in tackling climate change.
- Environment Agency support Part 4 (flood prevention and mitigation measures) and inclusion of GI. Suggest policy could be more prescriptive e.g., reference to green roofs, and should explicitly reference Circular Economy in Part 2.
- Developer objection to Parts 3 (i) (30% carbon reduction on new dwellings), (ii) (net zero carbon dwellings from 2025) and (iv) (15% of energy from renewable/low carbon sources), particularly in relation to viability considerations and on-site feasibility. Policy should provide more flexibility related to site-specific viability or constraints.
- Part 3 (vi) (sustainable materials) lacks the clarity required by NPPF Para. 16d
- Not always feasible to orientate every home to enhance ventilation or lighting in accordance with Part 4 (ii)
- Suggestion that Part 2(iv) is future-proofed to include 'other suitable sustainable/ low carbon energy solution.' This would support NPPF Para. 149 – 151.
- Part 3 (iii) (BREEAM on commercial sites) may not be feasible on all sites; policy should be less specific to ensure a holistic approach to sustainable design.
- Alternative approaches to sustainable design could be included in Climate Change SPD, e.g. Passiv design proposed by site promoters of Site UK2.
- Part 3 (viii) (electric charging points) – need to demonstrate that policy is deliverable. Concerns raised that grid may not have capacity.
- 30% carbon reduction considered contrary to Building Regulations and PPG, which states standards can only be set up to Level 4 of Code for Sustainable Homes.
- Government does not require zero carbon buildings now or at 2025; rationale for policy is unclear.
- Should promote fabric first approach to ensure energy efficiency and sustainability.
- Risk that housing developments not benefit from district heating. Conversely view that 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 can be more expensive.
- Some site promoters of alternative sites have put forward net zero masterplans
- Policy addresses how things are built rather than sustainable development patterns.
- Unclear if Plan will achieve Solihull's contribution to the targets within the UK's Climate Change Act.
- Green Belt should be considered for renewable energy opportunities, as sacrificed for other purposes.
- Suggestion for stronger monitoring measures.
- Transport for West Midlands note that as 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.

- Policy should acknowledge WMCA Climate Emergency declared in 2019 and regional carbon budgets.
- Carbon offsetting should be heavily regulated and seen as a last resort.
- More emphasis should be made on tree planting as carbon capture.
- Net Zero Carbon needs a definition.
- Should clarify energy vs carbon reduction on development as they are different measures.
- Reference to SPDs and other guidance in the policy are inappropriate and should be contained within a Development Management Document.

Council response to key issues raised:

- Since the publication of the Draft Submission Plan, the Government have responded to their initial Future Homes Standard consultation and committed to delivering Option 2 (31% uplift to Part L) through the Building Regulations in 2021. The uplift (energy demand/carbon reduction) in Part 3(j) will be in accordance with the revised Building Regulations.
- Agreed that 'fabric first' is an important step to reducing energy demand on buildings, however, to meet climate change challenge, other technologies are also necessary.
- Council is committed to addressing gravity of climate change emergency and minimising CO2 emissions arising from and in association with new development.
- Climate Change SPD will support delivery of policies, and will not introduce new policies or financial burdens, therefore will be in accordance with national policy.
- Council is currently consulting on a Net Zero Action Plan. The finalised NZAP is due to be published later in 2021. This will inform the carbon budgets for the Borough, and the Plan will be updated to reflect those targets. Furthermore, the NZAP will further inform the range of interventions and measures will be required to transition successfully to net zero by 2041.
- Understood that transport emissions and patterns of development play a key role in reducing carbon emissions, and as such policies seek to reduce need to travel, enable mode shift to sustainable transport options and increase uptake of electric vehicles. Addressing climate change is key to the Sustainability Appraisal framework and the spatial strategy.
- Viability Assessment has assessed costs of different levels of low carbon development.
- The DSP references the benefits of safeguarding trees and tree planting in several policy areas, as well as the Council's Urban Forestry Strategy. It should be noted that a range of green infrastructure assets, as well as healthy soils, contribute to carbon capture and sequestration, not just trees.

Policy P10 Natural Environment

Key issues raised in representations received:

- Natural England have expressed general support for policy and structure, however, concern raised that policy does not reference the importance of soils as a component of the natural environment and the importance of protecting soils and their sustainable use.
- Warwickshire Wildlife Trust seek stronger wording in the policy and clarity on deliverability aims to ensure biodiversity is protected.
- Environment Agency support policy inclusion of 10% biodiversity net gain. EA state net gain should follow mitigation hierarchy and spatial preference.
- EA also suggest P10 also refer to water quality and groundwater resources, in addition to P11 and P14.
- View that Policy should not state a percentage net gain increase until legislated in the Environment Bill; may not be achievable on all sites.
- Use of Warwickshire, Coventry and Solihull Biodiversity Impact Calculator is considered contrary to provisions in Environment Bill.
- Seek clarity on what is meant by 'tranquillity' in Part 16 – how it can be measured or impact assessed. Without this evidence not clear how policy can be applied at planning application stage.
- Part 18 - Unclear how weighting of wildlife is counted against benefits of housing.
- View that development should be considered unacceptable on SSSIs or affecting ancient woodland/veteran trees.
- Need for Local Recovery Network evidence to support strategic, plan-level solutions on biodiversity net gain.
- Coventry City Council state they will continue joint collaboration with Solihull on Habitat Biodiversity Audit, and Enhancement/Net Gain pilot.
- Plan needs to be clearer on how it will take action against reducing biodiversity.
- HBF view that policy should have 10% as a limit, not a minimum, and that Council should follow approach to set up local compensation schemes so that development is not delayed.
- Viability assessment should assess costs of biodiversity net gain based on Defra costs.
- Policy should take account of Environment Bill transition period.
- Alternative view that Council should adopt 20% net gain as other local authorities have done
- Policy is silent on approach to be taken when a proposal has a positive biodiversity impact, and how this is addressed in the planning balance. Policy therefore unbalanced.
- Policy should only refer to the Defra biodiversity metric and not the local WCS metric.

Council response to key issues raised:

- Welcome support from Natural England, and acknowledge that policy could be improved with inclusion of protection of soils in accordance with their recommendations. Potential changes to policy wording will be reviewed through the examination.
- Part 2 of policy clear that development whose primary objective is to conserve or enhance biodiversity and/or geodiversity is supported, and justification confirms that full value of natural environment will be taken into account.
- Welcome continued collaboration with Coventry City Council and commitment to Habitat Biodiversity Audit.

- Halting and reversing the decline of biodiversity is a key objective of the Council and Government; policy seeks to achieve biodiversity net gain in accordance with principles within the 25-year Environment Plan and Environment Bill.
- Council is working on Natural Capital Investment Plan as part of their Council Plan (2020-2025).
- Policy includes high level of protection for SSSIs and ancient woodland, in accordance with national policy.
- Considered that Policies P11 and P14 provide sufficient protection of groundwater sources.
- At the time of writing, it is acceptable to use both the Defra and local biodiversity metric. If following the enactment of the Environment Bill it changes so that only the Defra metric is applicable, then this will be used for planning applications only.
- See response on tranquillity under Policy P14.
- Further detail on the delivery of Green Infrastructure and Biodiversity net gain will be provided in a supporting SPD.

Policy P11 Water and Flood Risk Management

Key issues raised in representations received:

- Natural England suggest that the water quality of River Blythe SSSI should be enhanced.
- The Environment Agency supports the Policy in ensuring that there is no deterioration of water quality.
- The Environment Agency notes that package treatment plants provide a lower quality of sewage treatment than water company assets and are more difficult to regulate.
- The Environment Agency recommends that more specific flood risk management requirements are included within the Policy text.
- The Environment Agency recommends that it should be made clear that single-storey dwellings and habitable basements are not acceptable in Flood Zone 3.
- The Environment Agency suggests that the protection of groundwater resources should be given greater weight within the Policy.
- The Environment Agency welcomes the sequential approach to the location of new development to avoid and/or manage flood risk.
- The confirmation of discharge into a public sewer falls under Section 106 of the Water Industry Act 1991, therefore planning permission can be granted prior to this confirmation.
- The Policy needs to make clear that any contribution through a Section 106 Agreement is only required where it meets the tests set out in the National Planning Policy Framework.
- Concerns that the proposed development in Blythe will increase the risk of flooding to existing properties.
- Concerns that the Plan will allow further deterioration to watercourses.
- Insufficient evidence to justify adoption of optional water efficiency standard.

Council response to key issues raised:

- The Policy seeks to protect and improve the quality of water bodies in and adjacent to the Borough, including the River Blythe.
- The importance of protecting water quality is recognised.
- An appropriate level of detail is included in the Policy, which requires developers at planning application stage to demonstrate that the proposed development will be served by appropriate sewerage infrastructure.
- Agree that more specific flood risk management requirements, as set out in paragraphs 347-348 of the Local Plan, should be added into the body of Policy P11.
- Residential development is generally not appropriate in Flood Zone 3.
- Agree that additional text should be added to emphasise the importance of the protection of groundwater resources.
- The flood risk sequential test aims to minimise the risk of flooding by avoiding development in high risk areas wherever possible.
- Reference to confirmation being obtained from the relevant infrastructure owner is appropriate as this does not only apply to those assets owned by water companies.
- No change to the Policy is necessary as the planning obligation tests are clearly set out in paragraph 493 of the Local Plan.
- A Level 2 Strategic Flood Risk Assessment has been undertaken that provides a detailed assessment of the proposed site allocations in Blythe. Site specific policies in the plan include the requirements to minimise and mitigate flood risk. Applications for new development where there is a flood risk issue must be accompanied by a flood risk assessment.

- The Local Plan has sought to ensure that development protects and improves the quality of the water environment.
- Evidence supports the inclusion of the requirement for the highest possible standards of water efficiency to minimise consumption to a maximum of 110 litres per person per day.

Policy P12 Resource Management

Key issues raised in representations received:

- A significant number of representations object to the proposed re-siting of the Household Waste and Recycling Centre within Site UK2, as this has not been previously subject to consultation and the site is considered to be unsuitable.
- Expectations for an increase in the amount of waste should be re-assessed in context of zero waste/waste reduction initiatives.
- Policy should be clearer, more succinct and not rely on managing an equivalent tonnage to that arising as this relies on other areas for management.
- Sequential approach inappropriate as on-site management only relevant for major non-waste developments, should give greater priority to industrial areas and previously developed land.
- Policy should provide for hazardous waste and management of secondary and recycled materials.
- Policy should cover biogenic waste, use of anaerobic digestion and new sources of energy generation.
- Should reference Circular Economy and whole life planning for new buildings
- Policy should provide safeguarding for regulated activity from sensitive receptors
- Arden Brickworks site should be allocated for an Eco-Park for waste management and energy generation.
- Meriden should not be used for landfill.
- Policy should support permanent retention of mineral infrastructure.

Council response to key issues raised:

- See Policy UK2 for comment on the potential relocation of the HWRC.
- Policy is supported by evidence from the Waste Needs Assessment including predictions of future waste levels.
- Managing an equivalent tonnage to that arising is an appropriate policy response where it is not possible to deal with all types of waste arisings.
- It is not appropriate to require specific management approaches or techniques.
- The policy could be modified to recognise the Circular Economy, whole life plans for buildings and conflict between regulated waste management activities and sensitive receptors.
- The former Arden Brickworks site is identified as a strategic waste management site, but it's location in the Green Belt means it is unlikely to be suitable for all waste management activities and energy generation.
- Meriden Quarry is identified for operations that are complementary to mineral extraction, such as recycling of construction and demolition waste.
- Mineral infrastructure is covered in Policy P13.

Policy P13 Minerals

Key issues raised in representations received:

- Plan should identify a sand and gravel aggregate mineral production target for the Borough with a policy commitment to retain a minimum 7 year landbank.
- Plan should recognise the importance and role of mineral development and associated infrastructure facilities.
- Arden Brickworks site should be allocated for an Eco-Park for waste management and energy generation.
- Safeguarding of minerals should cover the whole of the Plan area.
- The Mineral Safeguarding Area should be re-drawn away from the built-up area of Meriden.
- Policies Map should identify specific sites, clarify Sites MIN 1-5 and show Area of Search.
- Policy should include guidance on management of buffers between mineral sites and rivers.
- Hours of operation should be specified for Meriden Quarry.

Council response to key issues raised:

- The Local Aggregates Assessment identifies requirement for the West Midlands Metropolitan Area, for which Solihull provides more than 90%.
- Policy recognises important mineral infrastructure which are located within the Mineral Safeguarding Area.
- Arden Brickworks is covered under Policy P12.
- The Mineral Safeguarding Area is based on evidence in Mineral Safeguarding in Solihull and includes areas where evidence of viable resources exists.
- Plan/Policies Map to be modified to show Area of Search, specific sites and clarify mineral sites.
- Policy/justification to be modified in accordance with Environment Agency advice on buffers to rivers.
- Policy includes hours of operation as a criterion for assessing planning applications, but it would be inappropriate to specify a blanket restriction in the Plan.

Policy P14 Amenity

Key issues raised in representations received:

- Natural England support the reference to the importance of safeguarding important trees.
- The Environment Agency suggest that safeguarding existing waste uses from proposed new sensitive receptors should be considered within this Policy.
- West Midlands Police support the inclusion of principles that ensure that local amenity is not jeopardised by inappropriate development.
- The Environment Agency suggest that issues relating to contamination and the protection and remediation of controlled waters are not relevant to this Policy.
- Further clarification is required on the reference to tranquillity and how this will be assessed as part of a planning application.
- The Policy is too rigid and doesn't allow for other factors to be considered that could deliver significant benefits which outweigh any impacts on amenity.
- Noise arising from Houses in Multiple Occupation must be considered as well as sound proofing if necessary.
- The impacts of noise and vibration should be investigated on site rather than desktop modelling or surveys.
- Adopted policies have failed to protect trees and hedges in the past. Clarification is required on how this Policy differs from the 2013 Solihull Local Plan.
- Sport England suggest that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of new development.
- Highways England suggest that the Policy should identify how air quality impacts and noise pollution is to be monitored and managed in relation to the Strategic Road Network.

Council response to key issues raised:

- The Policy recognises the importance of protecting and increasing trees and woodlands for amenity and other benefits.
- Policy P14 Part 1(vii) refers to existing or approved uses and the potential impact on the amenity of new residential or other sensitive development.
- Reference to contamination issues and the protection of tranquil and locally distinctive areas, which could include canal corridors, is considered relevant. Policy P11 refers specifically to the protection and improvement of the quality of water resources.
- As noted in the Local Plan, the Planning Practice Guidance suggests tranquil areas are likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area.
- Policy P14 Part 1(vii) provides flexibility and recognises that development which could cause significant harm will not be permitted unless appropriate attenuation, mitigation or remediation measures are provided.
- The Policy requires the Council, when determining planning applications, to seek to minimise the adverse impact of noise from any new development, extensions and changes of use. Policy P14 Part 1(vi) recognises that mitigation may be required to remove, minimise, attenuate or otherwise control any adverse impacts.
- Any assessment of noise and vibration will be expected to meet the relevant legislation, standards and guidance.
- The policy wording has been strengthened. Policy P14 in the Solihull Local Plan 2013 'encouraged' new and replacement tree and hedgerow planting whereas draft Policy P14 'requires' new and replacement tree and hedgerow planting. Draft Policy P15 also states

that there should not be an unacceptable loss of or damage to existing trees from development proposals.

- The Policy requires proposals for new development to safeguard the amenities of existing businesses and other uses. In locations that may be affected or influenced by existing or approved uses or activities, development should not be permitted unless any negative impacts can be satisfactorily mitigated or abated.
- An appropriate level of detail is included in the Policy, which seeks to ensure development does not have a significant adverse impact on local air quality and minimise the adverse impact of noise and vibration.

Policy P14A Digital Infrastructure and Telecommunications

Key issues raised in representations received:

- Minimal responses were received in relation to Policy P14A.
- The potential for sharing telecommunications sites should be given additional weighting.
- SMBC has failed to ensure that developments over recent years have been provided with adequate broadband infrastructure.

Council response to key issues raised:

- The policy is considered to be acceptable as written and will help to ensure that the Borough's digital infrastructure and telecommunications needs are met moving forward.

Promoting Quality of Place

See individual policies for representations made.

Policy P15 Securing Design Quality

Key issues raised in representations received:

- General support expressed for the policy, including from Natural England.
- West Midlands Police support the inclusion of principles that attempt to create safe places, including designing out crime.
- The British Horse Society ask for additional protection of public rights of way to ensure that all users are protected, and opportunities are sought to increase connectivity where the network is fragmented.
- EA recommend that an addition is made to the policy to state 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.
- View that Part 9 overlaps with Para. 243; we seek further clarification on what the Council means by 'demonstration of engagement' by landowners and site promoters.
- View that Part 2(iv) should reference innovative design solutions for water management, and should acknowledge that SuDs are not always feasible on sites.
- Policy could have more flexibility, otherwise may stifle high quality innovative design that may be a departure from local character.
- Greater clarity sought on certain elements, including Parts 2(ii) – size of private and public amenity spaces; 2(iii) – carbon reduction; 2(vi) - extent of tree stock; 6 – optimising densities; 7 – proactive in response to climate change.
- Design codes should include sustainability measures.
- Aim of 'tree-lined' streets should not compromise safety, or the fear of being unsafe/subject to crime.
- Alternative view that policies are too prescriptive and should be more flexible.
- Policy should include a section on phasing of construction on larger allocations to ensure the concept masterplan principles are not lost, and piecemeal development is avoided.
- Building for Life 12 has been superseded by Building for a Healthy Life.
- Council should be aware that design principles set out in the specified documents are not always compatible.

Council response to key issues raised:

- Council welcomes broad support for the policy.
- Policy P7 refers to the potential of development to contribute/enhance public rights of way. Site Policies seek to increase connectivity both within sites and where applicable to the wider countryside.
- More detail on certain elements are beyond the scope of this policy, but may be included in the other policies within the Plan, or supporting or emerging evidence. For example, policies on climate change, the natural environment, water management and open space. Further detail on how policy objectives can be delivered will also be included in SPDs.
- The site policies and concept masterplans provide development principles to ensure that site allocations are assessed in a comprehensive manner at planning application stage, according to key guiding principles.
- Acknowledge that Building for Life 12 has been superseded by Building for a Healthy Life.
- Acknowledge that wording could be altered in Part 2(i) to say 'respond' rather than 'conserve'.

Policy P16 Conservation of Heritage Assets and Local Distinctiveness

Key issues raised in representations received:

- Strong support for the inclusion of recognising the importance of the historic environment to the Borough.
- Support for the need for applications to be supported by appropriately informed heritage statements.
- Concern raised that the qualities and characteristics of rural settlements will not be conserved by the plan. The nature of rural settlements will be adversely impacted by disproportionate developments.
- Historic England have noted that Policy should be refined to reflect the NPPF section on heritage. The proposed policy wording does not differentiate between harm and substantial harm, as set out in the NPPF, and HE are of the view that this should be addressed within the policy.
- Suggestion that desk-based assessments alone may not be sufficient, therefore recommend that Policy P16 acknowledge that further field evaluation may also be necessary.
- Highlights that section 4 of this policy only 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.
- View that Part 3 is imprecise and requires greater clarity on the recognised process. 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. This should be included or referenced.

Council response to key issues raised:

- Agree that the historic environment makes an important contribution to the character of the Borough. Policy P16 seeks to conserve Solihull's historic assets and ensure that new development is responsive to local distinctiveness.
- Policy P16 achieves a balance between the protection of historic character and the viability of development by requiring proposals to conserve all heritage assets as appropriate to their significance, i.e. the most significant assets are afforded the greatest conservation.
- Proposals for development will be expected to demonstrate how the impact on heritage assets has been assessed & minimised. Development will be expected to conserve heritage assets in a manner appropriate to their significance.
- Policy P16 refers to those features that are considered to be heritage assets - In Solihull, heritage assets include; Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas and also non-designated assets. This text may benefit from clarity regarding those assets that are 'non-designated' to include those which are unknown such as buried archaeological features.
- Through the examination will review potential changes to policy wording in response to Historic England's comments.

Policy P17 Countryside and Green Belt

Key issues raised in representations received:

- The parcels in the Green Belt Assessment are too large for an informed decision on a site's suitability, as they do not account for differences within the parcel. No further detailed Green Belt assessment has been undertaken.
- It is necessary for the Plan to safeguard additional Green Belt land in order to meet longer term development needs.
- Some site allocations are in high performing Green Belt areas.
- The NPPF does not require the safeguarding of Best and Most Versatile Agricultural Land (BMVAL). Planning policies are required to contribute to and enhance natural and local environment by recognising economic and other benefits from BMVAL.
- Disagree with the Council's approach to infill development and it should not be limited to named settlements.
- Part 5 goes beyond the scope of the NPPF.
- The Plan's aspiration to maintain the Meriden Gap and the wider Green Belt is in conflict with the detail. Brownfield land should be developed first. Green Belt land should be protected and no justification to demonstrate that all other alternatives have been considered and analysed in detail.
- Consideration only given to removing land from the Green Belt for the purposes of site allocations. No consideration given to revisiting Green Belt boundaries where land no longer fulfils a Green Belt function.
- Settlements such as Cheswick Green, Tidbury Green and Millisons Wood should be removed from the Green Belt.
- 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.
- Sports hubs in the Green Belt should be referenced as not being inappropriate development.

Council response to key issues raised:

- The Green Belt assessment has been undertaken using a sound methodology. The site assessment process has allowed for a finer grain analysis to be undertaken, allowing site specific circumstances to be considered.
- The Council does not believe that it is appropriate to remove land from the Green Belt for safeguarding purposes, as the long established and continuing strategy is to protect the Green Belt. Given the future potential changes to the planning policy landscape and the fact that some Local Plan site allocations are expected to deliver beyond the Plan period that will contribute to longer term development needs, it is not considered necessary to identify areas of safeguarded land in the Plan.
- Whilst some site allocations may be located in higher performing Green Belt areas, their allocation has also been assessed against wider criteria, including analysis of constraints, the spatial strategy, site selection methodology, accessibility and other policy considerations. The site allocations are considered to be the most appropriate and suitable, taking into account the reasonable alternatives.
- "Best and most versatile" agricultural land is explained in the supporting text and is referred to in the NPPF. There are significant areas of lower grades of farmland in the Borough, so it is

considered appropriate to safeguard best and most versatile land and direct development where necessary to lower grade areas subject to other sustainability considerations.

- Whilst recognising that this may not be the case for some ribbon development, the approach to infilling reflects the character, size and location of settlements, and the impact that small infill developments may have on the wider Green Belt.
- The NPPF supports positive planning to retain and enhance landscapes, visual amenity and biodiversity. The policy appropriately indicates that development within or conspicuous from the Green Belt must not harm visual amenity.
- The Council is required to plan for and meet its identified housing needs. Whilst Brownfield sites are prioritised, there is a lack of available land in the Borough to meet this need. It is therefore considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations, where this is supported by evidence, the sustainability appraisal and having regard to the spatial strategy.
- There are no exceptional circumstances to justify the alteration of Green Belt boundaries or to remove washed over settlements from the Green Belt.
- Mineral extraction is not inappropriate development in the Green Belt.
- The NPPF includes the provision of appropriate facilities for outdoor sport and recreation as exceptions to inappropriate development in the Green Belt, provided that they preserve openness and do not conflict with the purposes of including land within the Green Belt.

Policy P17A Green Belt Compensation

Key issues raised in representations received:

- Policy does not provide guidance on the scope or type of compensation required in order to justify the removal of a site from the Green Belt.
- Policy P17A(4) should incorporate reference to viability given the possible tension with other costs associated with delivering physical and social infrastructure via CIL and/or Section 106 obligations.
- Green Belt compensation 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.
- No indication of how commuted sums for Green Belt compensation will be determined what will be required or how it will be spent. A formula or calculation should be provided to allow developers to plan for this requirement on top of the other contributions sought.
- Council's viability work does not take Green Belt compensation into account.
- Compensatory improvements are not possible where gaps between distinct settlements are reduced to minimal distances.
- Policy 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.

Council response to key issues raised:

- As recognised in the Planning Practice Guidance, Green Belt compensation can take many forms. The compensatory improvements that will be expected for site allocations are set out in the relevant policies. Policy P17A sets out a hierarchy of how compensatory improvements should be provided in other cases, and the supporting text identifies a range of potential improvements that can be pursued.
- The NPPF states that plans should set out ways that Green Belt loss can be compensated for, but does not state that the site specific requirements must be explicit.
- Further work may be required to support the delivery of the policy objectives and provide additional guidance to developers.
- As required by the NPPF, the Policy sets out how the Council will ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured. Using evidence, the compensatory improvements that will be expected for each site allocation are set out in the respective policies. The Policy has been subject to Sustainability Appraisal.
- Compensatory measures can include qualitative improvements which may be equally or more beneficial, particularly where sites to be removed from the Green Belt do not currently include wider public access or lack biodiversity or habitat connectivity. Required compensatory measures are set out in the relevant site allocations policies.

Health & Supporting Local Communities

See individual policies for representations made.

Policy P18 Health & Health and Wellbeing

Key issues raised in representations received:

- The requirement set out in Policy P18 Part 2(vii) for all new development to deliver new and improved health services is not justified.
- Financial contributions as necessary mitigation could make development acceptable.
- The Policy should acknowledge the importance of specialist housing and care accommodation for older people or those with disabilities in delivering improved health outcomes.
- Sport England support the Policy and the Active Design Principles, which help to promote physical activity.
- Sport England suggest that the co-location of community facilities should be promoted.
- There are already too many hot food takeaway provisions in the Borough.
- There is no evidence of a link between the location of schools next to hot food takeaways causing adverse health consequences.
- The Policy is inconsistent and discriminates against Sui Generis uses, as it does not apply equally to all relevant food retailers.
- Natural England support the retention and enhancement of the green infrastructure within developments.
- A Health Impact Assessment should be required for proposals, which result in the loss of community and cultural facilities.
- The ageing population within the Borough is a key challenge and must be addressed.
- Local health provision is already at capacity.
- References to Supplementary Planning Documents and other guidance is inappropriate and should be removed.

Council response to key issues raised:

- Policy P18 Part 2(vii) recognises that healthy lifestyles will be enabled by delivering new and improved health services and facilities in areas accessed by sustainable transport modes. The Council is working with the CCG to assess the healthcare requirements of new development in more detail.
- The Policy recognises that where significant negative impacts on health and wellbeing are identified, the Council will require applicants to mitigate for such impacts, in order to make the proposal acceptable. The Council may use planning conditions and/or developer contributions to achieve this.
- The Local Plan recognises that specialist housing can contribute to older and disabled people having good housing options. Policy P4E sets out where applications for specialist housing for older people and younger adults with disabilities will be supported.
- The Local Plan gives significant weight to the benefits of physical activity in enabling healthy lifestyles.
- The provision of community facilities will be expected to support sustainable development principles. Policy P19 'Range and Quality of Local Services' recognises that new proposals should be focused towards designated centres or alongside existing community assets to support the creation of community hubs, encourage linked trips, community cohesion and reduce the need to travel.
- Policy P18 includes policies to restrict the number of hot food takeaways.

- Given the growing obesity levels in Solihull, and in light of guidance from Public Health England on regulating the growth of fast food outlets, it is considered appropriate to control provision in sensitive locations, particularly around schools.
- The majority of hot food takeaways offer food high in calories, fat and salt whereas other food retailers are more likely to provide a range of healthier food consumption choices.
- The Local Plan recognises that the natural environment including green infrastructure is a major factor in health and wellbeing.
- All development proposals that may have a significant impact on health and wellbeing are required to submit an assessment of the potential health impacts. More detail on Health Impact Assessments will be included in a Health Supplementary Planning Document to support the Local Plan on adoption.
- The Local Plan recognises that Solihull's ageing population is a key challenge. Policy P4E 'Meeting Housing Needs' and Policy P15 'Securing Design Quality' seek to ensure that developments address this issue and mitigate some of the health impacts of an ageing population.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for each of the site allocations is set out in the Site Policies.
- Reference to the Council's Health Supplementary Planning Document which will support the Local Plan on adoption is considered appropriate.

Policy P19 Range and Quality of Local Services

Key issues raised in representations received:

- Concern that action is needed to positively encourage local shopping facilities within the policy.
- Some general support is expressed for Policy P19.
- Concern that the policy is not clear on the position of cultural facilities in local areas.

Council response to key issues raised:

- Agree the importance of local centres, however their provision should be of suitable scale in relation to the local area and its needs.
- The policy refers to the provision of local shops and parades, demonstrating their importance within the Borough. The policy notes that proposals that result in a loss of local shops will not be supported unless appropriate provision can be found.

Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure

Key issues raised in representations received:

- There is a lack of play equipment and facilities for children aged 7-11 years in Balsall Common.
- Public open space should be protected.
- Open spaces, play, sport and recreational facilities should be marked on a planning map to avoid any breaches of the Policy.
- Equestrian access on public rights of way should be protected and there should be new multi-user routes.
- The minimum public open space standards should not be applied across the whole Borough but respond to localised assessments of demand.
- Public open space requirements of new developments should not be expected to compensate for any prior under-provision.
- Clarification is required on the provision of open space for care homes given that older people would have limited need for some types of open space.
- The requirements for the size and quality of children play areas should be set out.
- Clarification is required on what is meant by 'of value to the local community'.
- The Policy should allow greater flexibility as evidence may demonstrate that there is no need for an existing facility to be replaced.
- Specific reference should be made to the provision of sports hubs in the Green Belt.
- Support and objections to 'Land between Old Waste Lane and Waste Lane, Balsall Common' being designated as a Local Green Space.
- Sport England welcomes the updated Playing Pitch Strategy and suggests the Indoor Sports Facilities Strategy 2012 should be updated.
- Sport England suggest that the demand for playing pitches should be informed/justified by evidence, and open space standard should be clear on whether it includes playing pitches.

Council response to key issues raised:

- The Policy recognises that in areas where an existing local open space provision shortfall is identified, the new or improved provision should accommodate the needs of the population. More detail on the type and range of open space provision will be included in an Open Space Supplementary Planning Document, to support the Local Plan on adoption.
- The Policy seeks to ensure existing public open space, children's play, sports and recreational facilities that are of value to the local community are protected.
- Mapping information will be included in the Open Space Supplementary Planning Document.
- Public rights of way are protected in law. The Plan seeks to maintain and enhance Solihull's public rights of way network.
- The Open Space Assessment provides a robust assessment of needs and deficiencies in open spaces and recommends a minimum borough wide standard of 3.57ha per 1,000 population which has informed Policy P20. 'Open Space' in this context does not include playing pitches. More detail will be included in the Open Space Supplementary Planning Document.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Agree that new developments should not be expected to compensate for any prior under-provision of public open space.

- The Council recognises the value of public open space for young and older people alike, therefore an open space requirement for care homes is appropriate. Detail on the provision of open space for care homes will be included in the Open Space Supplementary Planning Document.
- Policy P20 Part 12 states that proposals for family housing will be expected to provide opportunities for safe children's play in accordance with the Design for Play and the Free Play Network's 10 Design Principles. More detail on children play areas will be included in the Open Space Supplementary Planning Document.
- Existing facilities that are of value to the local community are those that make an important contribution for recreation, play, sports, visual amenity or nature conservation. The National Planning Policy Framework states that local authorities should guard against the loss of valued facilities and services where it would reduce the community's ability to meet its day-to-day needs.
- Policy P20 Part 4 provides sufficient flexibility allowing for appropriate compensatory measures where existing provision is not being protected.
- Agree to include reference to the Mitigation Strategy, which identifies the potential of new sports hubs to mitigate the impact upon or loss of existing playing pitch capacity, in the justification text supporting the Policy.
- Retaining the openness of the entrance to Balsall Common is seen as a key importance. The allocation of 'Land at Old Waste Lane/Waste Lane' as a local Green Space is justified.
- The Policy is supported by evidence. The Playing Pitch Strategy update was considered vital in determining the effect that development will have on sport and what mitigation is required to offset any loss of provision and cater for any additional demand.
- Where any existing local open space provision shortfall is identified, new or improved provision should be informed by the adopted Green Spaces Strategy, the Indoor Sports Facilities Strategy and Playing Pitch Strategy (including the Playing Pitch Mitigation Strategy) and any future revisions thereof.

Delivery & Monitoring

See individual policies for representations made.

P21 Developer Contributions and Infrastructure Provision

Key issues raised in representations received:

- SMBC's viability testing does not take into account digital infrastructure, it should be evidenced that this will not render development unviable.
- West Midlands Police note there is no definition of 'social' infrastructure in Policy P21 nor in the supporting explanatory text. This should be amended and include police infrastructure.
- Policy P21 does not make reference to the Infrastructure Funding Statement to help inform judgements regarding the use of planning obligations and pooling.
- Support for policy P21 and the provision of strategic infrastructure and developer contributions, further support for the inclusion of the Infrastructure Delivery Plan and the Infrastructure Funding Statement and their roles in guiding delivery.
- The policy should make reference to the tests set out in CIL regulation 122.
- There is poor consideration of infrastructure provision, including demand on health services and loss of sports facilities.

Council response to key issues raised:

- To amend Policy P21 to include the Infrastructure Funding Statement as a reference point for future infrastructure delivery.
- The Viability Study has taken into account off-site infrastructure costs on strategic sites. Furthermore, in 2020, OpenReach, as part of the Government's drive to deliver gigabit-capable connections on new development, have committed to providing 95% of new build homes on sites being newly contracted with Openreach will get full fibre infrastructure for free.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for each of the site allocations is set out in the Site Policies. The Council has and will continue working with the Clinical Commissioning Group to determine the impacts of the new population growth on the Borough's health services.
- The re-provision of sports facilities and playing pitches is addressed in Policy P20 and specific site policies.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Balsall Common

Key issues raised in representations received:

- Level of growth proposed for Balsall Common is disproportionate.
- Level of growth not supported by Sustainability Appraisal due to limited employment.
- Use of Green Belt land for housing inappropriate/plan should have greater emphasis on brownfield land, empty shops and offices rather than Green Belt.
- Green Belt enhancement should be around existing settlement.
- Green Belt boundary should be amended to retain public open space south of Waste Lane and Local Green Space in Green Belt.
- No evidence that transport links will be improved.
- Relief Road is ill conceived, against policy to reduce car use, solely to support housing proposals.
- Insufficient evidence to support delivery of Relief Road. Plan should explore alternative options.
- Relief Road route crossing Hob Lane is unacceptable.
- Relief Road inappropriate as it divides Parish.
- Relief Road should be developed in single phase to avoid rat running on rural lanes.
- Support principle of Relief Road.
- Uncertainty over route of Relief Road is blighting property.
- More housing should be located in Bickenhill where HS2 station will be developed.
- Timetable for HS2 needs correcting in paragraph 525 to accord with paragraph 280.
- Sustainability Appraisal has not considered reasonable alternatives in respect of levels of employment growth.
- Plan should highlight importance of retaining open space at entrance to settlement from east.
- Plan should include funding provisions and delivery commitments for the enhanced centre.
- Need for convenience shopping/foodstore should be highlighted in paragraph 528.
- Plan should recognise that new foodstore may have to be out of centre due to insufficient opportunities in centre.
- Village centre is adequate for community's needs.
- Need for education strategy taking account of the 3 schools in the area, recognising limitations of existing sites.
- Plan should reflect needs for nursery and SEND provision and set out interim arrangements prior to new school opening.
- Berkswell Primary school should be referenced in paragraph 518.
- Primary school should be provided before housing to ensure sufficient provision.
- SLP Site 19 Riddings Hill not delivered and should not rely on delivery within Plan period.
- Site 43 Old Lodge Farm, Kenilworth Road should be allocated for housing as will be removed from Green Belt.
- One or more of Site BC6, Site 1 Station Road and Site 43 Kenilworth Road should be allocated for employment.
- Balsall Common poorly related to employment so omission site 134/205 Widney Manor Road should be allocated for housing as alternative.
- The following alternative sites were proposed for housing, which are considered to perform as well or better than the allocated sites. Call for Sites reference:
 - 82 – 152-172 Kenilworth Road

- 233 - North of Balsall Street
 - 304 - Oakes Farm
 - 338 - Kenilworth Road
 - 421 – Silver Trees Farm, Balsall Street
 - 422 – Rose Bank, Balsall Street
 - 544 - Broad Lane
- Call for Sites Ref. 534 at Kenilworth Road/Park Lane should be allocated for employment.
 - Land east of Wootton Lane should be allocated for employment and community purposes.
 - Statement of Common Ground should be published for scrutiny before Plan submitted to ensure potential for housing needs to be addressed outside the Green Belt have been considered
 - Inappropriate to be submitting Plan at time of pandemic.
 - Qualified support for concept masterplans.

Council response to key issues raised:

- Plan takes account of wider strategic framework and considered alternatives.
- Balsall Common is accessible to major employment areas.
- Insufficient brownfield land or alternatives to Green Belt incursions.
- Green Belt boundary proposed is firm and defensible, and compensation set out in site policies.
- Evidence indicates that proposed Relief Road route is most appropriate, phasing to be firmed up as funding becomes clearer
- Significant housing proposed at Site UK1.
- Employment needs set out in HEDNA and Sustainability Appraisal considers growth options.
- Public open space shown on concept masterplans, Local Green Space designated in Policy P20.
- Masterplanning on enhancement to centre being undertaken.
- Education provisions proposed following close working with Children’s Services.
- SLP Site 19 to be delivered within Plan period.
- Site 43 too small to warrant specific allocation.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated taking into account the reasonable alternatives.
- Duty to Cooperate topic paper published and Statement of Common Ground will be published at time of submission.
- Council has a duty to review Local Plan.

Policy BC1 Barratt's Farm

Key issues raised in representations received:

- Contrary to commitment to retain Meriden Gap and its strategic importance as Green Belt.
- Not justified by Green Belt Assessment which requires more detailed assessment, or SHELAA that is out of date.
- Site is partly higher performing Green Belt.
- Fails to take account of Green Belt growth in Coventry and fact this is the narrowest part of Meriden Gap.
- No obvious suggestion of required Green Belt compensation.
- Alternative strategic options not investigated.
- Does not meet requirements for access to facilities, so will create congestion and parking problems.
- Requires commitment to construct Relief Road in one to avoid increase of traffic on rural lanes.
- Need for improvements for equestrians.
- Site performs poorly in Sustainability Appraisal and incorrectly categorised in Site Selection process.
- Dependent on 2 major infrastructure projects, HS2 and Relief Road, making delivery uncertain within Plan period.
- Fails to provide adequately for primary school before major housebuilding or for health services and other facilities.
- Policy should include funding commitment for primary school and information on delivery.
- Location of primary school at junction of Relief Road and Station Road not appropriate.
- No evidence of collaborative working by multiple landowners to ensure delivery.
- Significant noise impacts from HS2 and lack of mitigation.
- Unclear how biodiversity enhancement will be delivered.
- Fails to take opportunity to address settlement-wide deficiency in public open space, as no site for sports hub, no buffer between existing and new housing and Central Park proposal by residents not incorporated.
- Concept masterplan should identify Hall's Wood as of ecological value and provide connectivity between public open spaces.
- Fails to take account of ecological significance of habitats or access to ponds for drainage purposes.
- Fails to comply with NDP requirements for open space buffer between existing and new housing or for density of new development to respect existing.
- Concept masterplan should identify land shown for open space/heritage protection for housing and access from Meeting House Lane.
- Concept masterplan should identify land at Old Waste Lane for housing as ecological restriction not justified.
- Site should be extended to include land at Old Waste Lane (Site 101) and Waste Lane (Site 102) for housing.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- Some support for allocation.

Council response to key issues raised:

- Part of site within higher performing area will be cut off from wider Green Belt by line of HS2 and contribution of site to GB purposes therefore will be reduced.
- More detailed assessment undertaken through Site Assessment process.
- Policy includes Green Belt enhancements and provision for playing pitches.
- Noise impacts to be addressed through the planning application process.
- Alternative options considered across wider Housing Market Area and through Scope Issues and Options.
- Well related to station and other facilities, whilst new primary school will be part of development.
- Different funding opportunities for sections of Relief Road means it is important to keep options open.
- Development will mitigate impacts of heritage assets and provide for significant biodiversity enhancement which can include connectivity between open spaces.
- Plan includes strong commitments for infrastructure improvements and location of primary school is indicative.
- Evidence of collaborative working though not all landowners involved.
- Concept masterplan takes account of NDP requirements regarding open space buffer between existing and new housing, and of Ecological and Heritage Impact Assessments.
- Surrounding sites have been subject to site assessment.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BC2 Frog Lane

Key issues raised in representations received:

- Disagree with Green Belt Assessment as parcel 59 performs highly important role for Green Belt Purpose 1 and Balsall Street provides defensible boundary.
- Poorly related to centre and station/public transport.
- Access unsuitable/better from Frog Lane/flexibility on location of access required.
- Access road and junction will require traffic management and protection for residential amenity.
- Need for footpath link across adjacent playing fields or at eastern end of site to Balsall Street and improvement for equestrians.
- Impact on flooding, ecology, heritage and rural character.
- Inadequate infrastructure.
- Site incorrectly categorised in site selection process.
- Capacity should be flexible.
- Part 2(ii) and (iii) should be combined, Parts 2(iv-vii) and 3(iii) deleted and Part 4(i) justified given designation of playing fields a Local Green Space in NDP.
- Fails to comply with NDP as density does not reflect existing housing and no open space separation provided.
- Does not comply with open space requirement of 0.9ha and playspace.
- Reference to Holly Lane recreation ground incorrect as education playing fields not public open space.
- Concept masterplan should retain strong hedgerow boundary to playing fields.
- Zone of significance around listed buildings arbitrary and should be amended.
- Base mapping used is out of date.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Disagree, as Green Belt Assessment independently prepared and provides justification for findings.
- Site has medium accessibility with good access to primary school.
- Frog Lane is a rural lane and unsuitable for access to site.
- Policy responds to recommendations in Flood Risk and Ecological assessments.
- Settlement well served with facilities, and there are proposals for improvements.
- Site is correctly assessed as greenfield on the edge of a settlement with a range of services and is supported by evidence.
- Capacity is indicative.
- Policy meets requirements elsewhere in Plan.
- Site is more restricted with less opportunity for open space buffer.
- Concept masterplan shows open space that complies with requirement, but site not suitable for play space.
- Education playing fields provide potential for enhancement.

- Strong boundary retained to playing fields with exception of link for access.
- Zone of significance around listed buildings shown on site analysis not concept masterplan but wording will require amendment.
- Concept masterplan addresses key development principles and more detailed matters can be addressed through the planning application process.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BC3 Windmill Lane/Kenilworth Road

Key issues raised in representations received:

- Disagree with Green Belt Assessment parcel 57 as performs important role for Green Belt purposes 1 and 3.
- Inefficient use of Green Belt land as significant constraints will restrict development
- Site protrudes into open countryside.
- Capacity can be met elsewhere in Borough such as Solihull town centre.
- Should utilise omission sites in Balsall Common.
- Outside defined accessibility limits for housing and will increase congestion/air pollution.
- Distance to key economic assets.
- Road safety concerns on A452.
- Incorrectly categorised in Site Selection process.
- Performs very poorly in Sustainability Appraisal.
- Serious flaws in evidence in SHELAA, Accessibility study and Sustainability Appraisal.
- Fails to protect setting and character of Grade II* listed Berkswell Windmill resulting in significant harm/fails to enhance heritage asset.
- Meaning of zone of significance on setting of listed building unclear.
- Part 2(i) should be re-worded as 'conservation or enhancement of heritage assets and their settings'.
- Fails to protect biodiversity as high value ecological areas fragmented/ignored, no nature reserve provided and no mitigation for Great Crested Newts where roads cross corridors.
- No buffer between existing development and new housing.
- Public open space is not overlooked.
- Concept masterplan infringes buffers to woodland defined in Ecological Assessment.
- No evidence of growth being managed and infrastructure inadequate.
- Capacity should be flexible.
- Part 2(vi) should be deleted.
- Areas of significant habitat value disputed.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Disagree, as Green Belt Assessment independently prepared and provides justification for findings.
- Makes use of compromised Green Belt.
- Does not extend further south than existing development and provides firm defensible Green Belt boundaries.
- Additional sites considered and included and capacity from SHELAA and windfall sites incorporated in housing figures.
- Site accessible to schools and opportunities to enhance links to centre.
- Settlement has rail links to Birmingham International station and there is good road access by A452/A45.

- Access can be provided safely.
- Site is correctly assessed as greenfield on the edge of a settlement with a range of services.
- Many of the adverse effects relating to ecology, landscape, green infrastructure, historic assets and amenity can be mitigated via the more modest development proposed to address concerns in the Sustainability Appraisal.
- Amendments have been made to evidence to address concerns.
- The proposal respects the recommendations in the Heritage Impact Assessment for Site BC3 and takes account of the potential impacts on the functionality of Berkswell Windmill.
- The terminology used in the site analysis in the concept masterplan will be addressed in a future update.
- The revised wording suggested for Part 2(i) is acceptable.
- The residential element of the site is not expected to infringe any areas of ecological significance.
- Site is more restricted with less opportunity for open space buffer.
- The location of the public open space addresses a number of other issues, including protecting the setting of Berkswell Windmill and areas of ecological importance.
- Capacity is indicative.
- Areas of significant habitat value shown in Ecological Assessment.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BC4 Pheasant Oak Farm

Key issues raised in representations received:

- Inappropriate as higher performing Green Belt and results in indefensible boundary to east.
- Should retain open space in Green Belt.
- Low accessibility and poorly served by public transport.
- Will lead to increased traffic on surrounding roads.
- Reliant on by-pass which is uncertain.
- Lack of reference to equestrian access.
- Performs poorly in Sustainability Appraisal and incorrectly categorised in site selection process.
- Impact on overlooking, flooding, rural character and wildlife.
- Inadequate infrastructure.
- Infrastructure requirements should meet CIL tests.
- Multiple ownership and complex land assembly means delivery uncertain.
- Site should be restricted to brownfield land area.
- Inconsistency between Plan and Concept Masterplan in respect of Green Belt boundary and open space to east, and alignment of by-pass.
- Site capable of delivering greater capacity ca. 270 dwellings.
- Concept masterplan incorrectly shows field to north-west as semi-improved grassland and should be used for housing.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- The western part of Site BC4 is lower performing Green Belt and the higher performing area is predominantly brownfield land.
- Waste Lane and the eastern boundary of the site will provide a firm defensible Green Belt boundary.
- There are opportunities to improve accessibility, for example to the new Primary School proposed within Site BC1.
- The by-pass is an important part of the infrastructure improvements for the settlement and required for access to Site BC1.
- There are opportunities to enhance green infrastructure and amenity to address some concerns in the Sustainability Appraisal.
- Policy responds to recommendations in Flood Risk and Ecological assessments.
- Site is correctly assessed as mainly brownfield on the edge of a settlement with a range of services and is supported by evidence.
- Significant infrastructure improvements are proposed for Balsall Common.
- Brownfield land area is detached from the settlement.
- The Concept Masterplan will be addressed to be consistent with the Plan policy.
- The capacity is indicative.

- The Ecological Assessment shows the area as improved grassland, but the best one for species rich grassland enhancement due to its proximity to other grassland habitat. This can be addressed on a concept masterplan update.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BC5 Trevallion Stud

Key issues raised in representations received:

- Adverse impact on openness of Green Belt and sprawl.
- Identified as high visual sensitivity in Landscape Character Assessment.
- Wootton Green Lane unsuitable for use for access points.
- Concept masterplan fails to take account of changes to A452.
- Site not accessible to schools and poorly related to employment.
- Performs poorly in Sustainability Appraisal.
- Impact on tranquillity, flooding, rural character and wildlife.
- Inadequate infrastructure/amenities.
- Multiple ownership and complex land assembly means delivery uncertain, and less than comprehensive development will result in indefensible Green Belt boundary.
- Site inappropriately designated as brownfield land.
- Site capable of delivering greater capacity ca. 300 dwellings.
- Requirement for public open space to south of site in Part 4(i) not evidenced.
- Concept masterplan should not identify Stoneycroft mainly for open space.
- Object to proposal for retail park as not based on community's needs.
- Area for commercial or mixed use should be identified for Class E or residential development.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Support as sustainable settlement with good range of facilities.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Site would have firm defensible Green Belt boundary utilising roads.
- The Landscape Character Assessment is a high level study with this finding covering a wide area and more detailed landscape assessment included in concept masterplan.
- Concept masterplan to be updated to omit access from Wootton Green Lane and show changes.
- Site has medium accessibility and good links to employment areas, whilst there are opportunities to improve accessibility.
- There are opportunities to enhance landscape, green infrastructure and amenity to address some concerns in the Sustainability Appraisal.
- Policy responds to recommendations in Flood Risk and Ecological assessments.
- Significant infrastructure improvements are proposed for Balsall Common.
- Evidence of landowners working together submitted.
- Site is correctly assessed as mainly brownfield and a large part is included in the Brownfield Land register.
- The capacity is indicative.
- Compensation is required for deletion from Green Belt and open space is shown on concept masterplan.
- Site is considered as a whole.

- No proposal for retail park, although a proposal has been submitted for a foodstore and the concept masterplan takes account of this and surrounding land uses.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BC6 Lavender Hall Farm

Key issues raised in representations received:

- Unsuitable for allocation as in highest performing Green Belt, contributes to sprawl and breaches defensible Green Belt boundary for settlement.
- Poorly related to settlement and facilities.
- Should not rely on HS2 as not yet constructed.
- Should include provision for footway/cycleway to nearest school, Berkswell Primary and improvements for equestrians.
- Performs poorly in Sustainability Appraisal and incorrectly categorised in site selection process.
- Significant noise impacts from HS2/West Coast mainline railways and lack of mitigation.
- Designation of whole site as brownfield is inappropriate.
- Site more appropriately allocated for employment purposes to meet needs of settlement.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Site currently permitted for landfill and design/development will need to take account of landfill and ensure operational permit surrendered.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Site separated from wider Green Belt by HS2 line and due to development performs less well. HS2 line will provide firm defensible Green Belt boundary and is used elsewhere in settlement.
- Site has medium high accessibility with footpath access to rail station.
- Policy BC6 includes enhancement of walking and cycling network.
- There are opportunities to enhance landscape, green infrastructure and historic assets to address some concerns in the Sustainability Appraisal.
- Noise impacts can be addressed through the planning application process.
- Site is correctly assessed as mainly brownfield on the edge of a settlement with a range of services and is supported by evidence.
- Site is considered suitable for residential use and employment provision is addressed elsewhere in the Plan.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Concept masterplan addresses key development principles and more detailed matters can be addressed through the planning application process.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Blythe

Key issues raised in representations received:

- Significant local objection to level of housing proposed in Shirley area, considered disproportionate amount at 39% of new housing.
- Area has already been over-developed with older persons housing, and subsequent impact on healthcare
- Substantial developments already brought forward under current Local Plan at Cheswick Green, Dickens Heath, Blythe Valley Park and Tidbury Green
- More affordable housing is needed in the area rather than expensive new builds
- Community view that infrastructure in the area is already stretched:
 - Schools are oversubscribed
 - GPs are under-resourced and it is difficult to get an appointment
 - Downgraded Solihull hospital and lack of A&E in borough
 - Existing traffic congestion in area, in particular on Dickens Heath Road, Bills Lane, Haslucks Green Road, Creynolds Lane and Stratford Road A34
 - Parking issues
 - Consequent concern for highway safety and increase in accidents
 - Local country lanes cannot take more traffic, nor are they suitable for highway improvements
 - Bus services are infrequent and unreliable
 - Consequent increase in air pollution and worsened air quality
 - Adverse impact on flood risk, area has history of flooding
 - Crime in area has increased since new developments built out
 - Impact on Local Wildlife Sites
- Concern about loss of Green Belt and erosion of separation between settlements, urban edge and distinct places.
- View that release of land south of Tidbury Green would be preferable for the integrity of the Green Belt.
- Concern about impact on landscape character, rural setting and enjoyment of countryside.
- Concern that public transport and active travel improvements will not be achievable in the area
- Other areas of the Borough should be considered for development, such as Knowle and Dorridge, close to HS2 Interchange site, North Solihull and Town Centre; and that brownfield sites should be exhausted before developing on the Green Belt.
- Alternative sites promoted in the area, that are considered to perform as well or better than the allocated sites. Call for Sites reference:
 - 62 – Creynolds Lane
 - 116 – Land west of Tilehouse Lane
 - 131 – Kidpile Farm
 - 173 – Winterton Farm
 - 313 – Fulford Hall Farm
 - 340 – Three Maypoles Farm
 - 404 – Rumbush Lane
 - 544 – Tidbury Green Golf Club

- Landscape Character Assessment not considered fine-grained enough to form basis of evidence for specific sites.
- Chapter ignores Shirley itself.
- Developments need to ensure sufficient green space is provided and set back from main roads.
- Worcestershire County Council have raised concerns that cross-boundary impact on school provision is considered; as well as traffic impacts on network in Wythall, Hollywood and Majors Green; and railway impacts at Whitlocks End Station.

Council response to key issues raised:

- Council have prepared a draft Infrastructure Delivery Plan (2020) to support the growth in the Plan, and have consulted with a range of infrastructure providers, including taking into account school provision, transport interventions, engagement with CCG, utilities and green infrastructure
- Council have commissioned a number of transport studies to assess the impact of sites both individually and cumulatively. (See comments under site policies).
- The Council have engaged with Worcestershire Council and prepared a SoCG.
- Level 2 SFRA and Ecological Assessments have been carried out for the proposed sites, which has informed the site policies and concept masterplans. Flood risk mitigation and biodiversity net gain will be provided in accordance with Policies P11 and P10 respectively.
- Concept masterplans have been prepared with green infrastructure and landscape setting approach.
- Shirley is addressed in more detail in Policy P2 and referenced within Solihull and Mature Suburbs chapter.
- Sites will provide a range of housing to meet needs in accordance with Policies P4A, C, D and E.
- All sites submitted for inclusion in the Plan have been assessed. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- The Council has conducted a lengthy Call for Sites exercise, invited Brownfield Call for Sites and maintained a Brownfield land register as well as assessed capacity on Town Centre Sites. Significant development is being proposed in the UKC Hub Area, as well as distributed between urban edge, larger and smaller settlements, proportionate to their public transport accessibility, scale and facilities. Therefore, Green Belt release has been considered as a last option, and in accordance with the NPPF.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BL1 West of Dickens Heath

Key issues raised in representations received:

- Some reserved support for parcel of site north of Tythe Barn Lane, however significant local objection to site, in particular parcel south of Tythe Barn Lane.
- Parish Council welcome the reduction in scale from 700 to 350 dwellings, retention of Akamba and Council's engagement over process. Particular concern and local objection is raised over loss of sports pitches and impact on health and wellbeing of local community, loss of community asset and uncertainty over re-provision, including distance from village. DHPC propose that pitches are replaced on land north of Tythe Barn Lane (within landowner's holdings) and Local Wildlife Sites are replaced elsewhere instead.
- Concerns about impact on local infrastructure (see comments under Blythe chapter).
- Unacceptable loss of Green Belt and will cause coalescence with Whitlocks End & Tidbury Green, as well as erode gap with Majors Green in Bromsgrove. Average GB score in Blythe is 7.23, highest in the Borough. Sites scoring 7 or above should not be removed from the Green Belt. Government committed to conserving Green Belt and unlikely that unmet housing demand will outweigh Green Belt
- Dickens Heath village already increased in size from original Masterplan of 850 dwellings to 1757 dwellings. Original Masterplan designed so that all facilities within 800m or 10 minutes walking distance with strong physical boundaries. New village was examined at 1991 UDP Public Inquiry - material consideration that in subsequent UDP examinations (1995 and 2004) additional growth to village was rejected by Inspectors. Village roads and infrastructure not designed for this scale of development, rather to restrict traffic and parking. Buses cannot pass some village roads.
- Located away from main employment areas, therefore will create more workplace travel and traffic jams
- Site would adversely impact on historic Arden landscape setting and character of village surrounds
- Site should be re-classified as Flood Zone 2 due to frequency and level of flooding. Site lies on deep boulder clay. If site were to be developed, a large balancing lake would be required and substantial fill and piling, which may affect viability. Site selection does not accord with sequential test.
- Environment Agency welcome Level 2 SFRA and that LLFA have been involved in drafting of the assessment.
- Site is not as highly accessible as stated in Sustainability Appraisal. Only accessible by rail, and that only to Birmingham and Stratford-upon-Avon, not Solihull. Whitlocks End station is overload and station full before 8am. Narrow country lanes are unsuitable for pedestrian, cycling and public transport links. Proposed highway and junction improvements will result in loss of important hedgerows, trees and at Dickens Heath Road/Birchy Leasowes junction this would result in loss of ancient woodland.
- Wythall Parish Council concerned about impact of increased traffic on local roads, in particular with regard to highway safety issues on Haslucks Green Road. No measures to mitigate these concerns or how increase in passenger numbers will be addressed at Whitlocks End station car park.
- Lack of local transport assessment.
- Sport England note that in Para. 605 should refer to Wychall Wanderers FC and not Leafield FC.

- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- Loss of substantial number of sport pitches with no alternative facilities provided prior to adoption of the Plan is contrary to NPPF.
- Site is surrounded by Local Wildlife Sites, 9 within 1km and 4 within immediate vicinity. Although sites are not proposed for development, their value and connectivity will be harmed by adjacent development. Insufficient buffers have been proposed with ancient woodland at Little Tythebarn Coppice on north-east corner. Contrary to Government's 25-year Environment Plan. Appropriate Assessment has not been carried out for the site, contrary to NPPF.
- Warwickshire Wildlife Trust raised concerns in relation to site due to proximity of Local Wildlife Sites and objections from supporters. Policy requires stronger wording to ensure appropriate buffers are provided on Local Wildlife Site edges.
- Site promoters support the principle of the site allocation, and timing of its delivery. It is an available, suitable and deliverable site for housing at one of the larger settlements within Solihull Borough, which sits on a public transport corridor and has a range of facilities. Two landowners will collaborate on masterplan, however, promoters of parcel north of Tythe Barn Lane state their land can come forward ahead of replacement of playing pitches. Therefore, propose some modifications to provide some flexibility.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Welcome support from site promoters of Site BL1.
- Council have commissioned Traffic Assessment for Sites BL1, BL2 and BL3 to assess individual and cumulative impact on local road network. Council will work with Transport for West Midlands to address concerns on bus connectivity, and promote innovative transport solutions, as well as enhancing pedestrian and cycle network in accordance with Local Cycling and Walking Implementation Plan.
- Council will work with the site promoters to enhance flood alleviation measures on site and in vicinity.
- Site will provide biodiversity net gain in accordance with Policy P10.
- Amend text to state the correct football club on parcel south of Tythe Barn Lane.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policy BL2 South of Dog Kennel Lane

Key issues raised in representations received:

- Significant local objection to site being developed.
- Cheswick Green Parish has already had substantial development of over 1000 additional homes in recent years at Cheswick Place and Blythe Valley Park (Sites 21 and 10 in current Local Plan respectively).
- Parish Council have significant concerns about the site, which have been raised under previous consultations and have not been addressed in Regulation 19 version (including traffic, public transport, flooding, erosion of Green Belt and loss of open countryside, historic setting, over-development of Parish, schools).
- Concerns about impact on local infrastructure (see comments under Blythe chapter).
- Loss of Green Belt and narrowing of gap between Shirley and Cheswick Green is unacceptable. Dog Kennel Lane provides a strong, defensible and permanent boundary to the Green Belt and should not be removed.
- Inconsistencies between concept masterplan and Policies Map with regards to site boundary.
- Proposal of new road to create new Green Belt boundary is contrary to NPPF.
- Concern over loss of wildlife and open countryside. Important to preserve trees and hedgerows along all boundaries of the site.
- Concern that historic setting of Grade II listed building has not been fully taken into account in concept masterplan.
- Loss of viable farmland and pastures (stated that over 20ha best and versatile agricultural land), open rural paths.
- Loss of historic nuclear bunker on site.
- Site will add to existing congestion on busy A34, Stratford Road. Main mode of travel will be by private car. Lack of local transport assessment. Public transport access in the area is limited and a poor service.
- Concern that site will increase flood risk and potential for site to alleviate flood risk downstream in Cheswick Green village has not been secured. CGPC state that flood alleviation should not be 'likely' infrastructure requirement, but a requirement.
- Existing known flood issues within Cheswick Green village (Mount Brook) and number of flood events in recent years, including severe event in May 2018. Suds scheme at new Cheswick Place development have proved inadequate to prevent flooding in Cheswick Green (see Solihull MBC flood report).
- Concern that developers will increase quantum of development above 1000 dwellings.
- Doubts expressed over need to add school when Cheswick Green Primary school is being doubled.
- Site promoters and landowners support principle of allocation and confirm joint working to bring site forward comprehensively. Taylor Wimpey seek policy amendment to effect that 1000 dwellings be stated as a minimum, unless mitigating factors determine otherwise. Unclear how 8.2 ha of open space is derived in concept masterplan, should be addressed at planning application stage. Support retention of trees and hedgerows, although some may need to be removed for highway safety reasons. Seek clarification on concept masterplan with regard to area of developable land around Grade II Light Hall Farm and extent of public open space within and around development. Object to southern site boundary, which should follow existing field boundaries and not a new road, and the omission of field parcel between east of site and Creynolds Lane/South of Stratford Road.

- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

Council response to key issues raised:

- Welcome support from site promoters of Site BL2.
- Council have commissioned Traffic Assessment for Sites BL1, BL2 and BL3 to assess individual and cumulative impact on local road network. Council will work with Transport for West Midlands to address concerns on bus connectivity, and promote innovative transport solutions, as well as enhancing pedestrian and cycle network in accordance with Local Cycling and Walking Implementation Plan.
- Council will work with the site promoters to enhance flood alleviation measures on site and in vicinity.
- Given extent of existing field boundaries between proposed site and Cheswick Green village, it is considered suitable in this instance to introduce a Green Belt boundary in the form of a new permanent structure such as the outer estate road, to maintain a gap between Cheswick Green and the site.
- Site will provide biodiversity net gain in accordance with Policy P10.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.
- Cold war bunker located on edge of allocation and insufficient evidence of significant heritage value that would preclude allocation. At the detailed design stage a decision can be made as to whether it is appropriate for the structure to be retained as a feature of interest.

Policy BL3 Whitlocks End Farm

Key issues raised in representations received:

- Dickens Heath Parish Council would have preferred housing numbers to be reduced to 250 dwellings from 300, however, agree that this is more sustainable location as closer to public transport hub at Shirley railway station than previous Site 13 proposal.
- Council have not provided sufficient rationale for allocation of Site BL3 instead of prior proposal at Site 13 in 2016 Draft Local Plan.
- Concerns about impact on local infrastructure (see comments under Blythe chapter).
- Particular concern about highway safety and existing congestion on Bills Lane and Haslucks Green Road. Traffic congestion in area increased since opening of Asda at Parkgate in Shirley.
- Network Rail comment that any new development must take into account low bridge at Bills Lane (12ft 3) and risk of strike. Network Rail must be consulted at planning application stage to assess impact; any mitigation measures to protect railway bridge must be met by the developer.
- Poor bus service connectivity in the area, will lead to even more car use.
- Concerns that development will change local landscape character and increase urbanisation.
- Coalescence between Shirley and Dickens Heath and loss of high value Green Belt.
- Site would lack a defensible Green Belt boundary.
- Loss of natural green space, wildlife and hedgerows – not sufficiently referenced in the policy.
- Irreplaceable loss of Christmas trees on site, which will affect wildlife and air pollution capture.
- Loss of a key safe pedestrian and cycle bridleway and connection to canal.
- Development will increase flood risk in area.
- Site promoters support principle of allocation in the Local Plan. Can confirm that site can meet policy requirements and is suitable, available and achievable in the early stages of Plan. Single private ownership eases deliverability of site. State that site can be expanded to accommodate 750 dwellings, without greater impact on purposes of Green Belt or adverse impact on local traffic. Site could provide new green space to the south of development, and accord with Policy P17A in terms of Green Belt compensation with enhancements to accessibility to countryside.
- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- Welcome support from site promoters of Site BL3.
- Council have commissioned Traffic Assessment for Sites BL1, BL2 and BL3 to assess individual and cumulative impact on local road network. Council will work with Transport for West Midlands to address concerns on bus connectivity, and promote innovative transport

solutions, as well as enhancing pedestrian and cycle network in accordance with Local Cycling and Walking Implementation Plan.

- It is not proposed to close public rights of way from Bills Lane, but to work with site promoters to improve accessibility to local green space proposed to east of site, and canal to south.
- Given layout of Christmas Tree Farm, it is considered suitable in this instance to introduce a Green Belt boundary in the form of a new permanent structure such as the outer estate road.
- Site will provide biodiversity net gain in accordance with Policy P10.
- Council acknowledge Network Rail's response and need to consult on preparation of planning application.
- Council propose site of 300 dwellings to retain separation with Dickens Heath.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Hampton in Arden

Key issues raised in representations received:

- Alternative sites promoted in the area, that are considered to perform as well or better than the allocated sites. Call for Sites reference:
 - 2 - Land adj. 339/337 Lugtrout Lane
 - 6 - Land off Old Station Road, Hampton in Arden
 - 12 - Land to north of Lugtrout Lane
 - 21 – The Paddock, Bickenhill
 - 96 - Land on north side of Lugtrout Lane
 - 322 - 145 Old Station Road, Hampton-in-Arden
 - 418 - Diddington Lane, Hampton-in-Arden

Council response to key issues raised:

- All sites submitted for inclusion in the Plan have been assessed. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.

Policy HA1 Meriden Road

Key issues raised in representations received:

- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- The red line boundary of HA1 on the Illustrative Concept Masterplan is unclear and needs to accord with the boundary of the existing Arden Woods Shavings site.
- Para 643 – there is concern that the Sustainability Appraisal has not been taken in to account.
- Site's availability uncertain due to its current use as a storage depot
- Viability of allocation in question due to potential contamination making the site's deliverability uncertain.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Policy HA1 considered sound by the site promoter Stansgate Planning subject to minor modifications

Council response to key issues raised:

- Council acknowledge that the red line boundary is not included on the concept masterplan; this can be updated to accord with the boundary on the Policies map.
- Land promoter supports the principle of allocation and alternative location for existing use will be secured.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Policy HA2 Oak Farm

Key issues raised in representations received:

- Concern over proposed housing developments, particularly those proposed for Catherine De Barnes and Lugtrout Lane (site SO1).
- No development should be proposed for the current green belt. An area of brownfield could accommodate part development, but family housing would continue to be unsuitable due to the lack of facilities.
- Site constraints mean HA2 is not considered to be suitable; land off Old Station Road should be allocated for residential development - in place of or as well as site HA2.
- Oak Farm's potential as a site for small scale starter light industrial use has not been explored. The balance between additional housing and employment has not been considered sufficiently.
- Support for development of a housing with care facility, but not general family housing
- The site is allocated for unrestricted housing, and is below the 300 home threshold of Policy P4E. There is no guarantee this site will include any specialist provision.
- More information should be provided how development will affect the village in terms of traffic and infrastructure (including doctors, schools and post offices). Proposals show insufficient parking.
- There is a need for proper community engagement.
- Objection to loss of wildlife and habitats.
- Before redevelopment a risk assessment is required to ascertain whether redevelopment will pose a risk to controlled waters through mobilising contaminants.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- Concept Masterplan principles need to include 'Secured by Design' standards
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- The Council is required to plan for and meet its identified housing needs. Whilst brownfield sites are prioritised, there is a lack of available land in the Borough to meet this need. It is therefore considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated taking into account the reasonable alternatives.
- The draft Plan has carefully considered the need for employment and housing land, informed by the HEDNA evidence study.
- Community engagement has occurred through the development of the Local Plan, contributions of the Hampton-in-Arden Parish Council in conjunction with representatives of Catherine de Barnes Residents Association and the Hampton Society. A future planning application for the site will provide further opportunity for community engagement.
- The Council agrees that there is no guarantee the site will provide specialist accommodation. The Council thinks that it is likely to be developed in a way that has the support of the Parish Council.

- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for this site are set out in Part 3 of Policy HA2.
- The developer of the site will follow the Concept Masterplan principles for the site, summarised in Part 2 of Policy HA2. The developer will be aware of the risks and constraints on the site and land nearby.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Hockley Heath

Key issues raised in representations received:

- Additional housing is not required in Hockley Heath, there is a good range of affordable housing available.
- The provision of facilities in Hockley Heath will not be able to support growth proposed, there is no health centre or post office, and bus services are poor and infrequent.
- The increase in the size of the village is not limited or proportionate
- Some general support for the amended Green Belt boundary. Support given for the potential development of the two areas either side of School Road as it 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).
- The land to be removed from the Green Belt (partially formed by CFS 49, referenced in paragraph 671) should be formally allocated for housing development, or be provided with more certainty on the site's development prospects. CFS 49 is available now, offers a suitable location for development and has realistic prospect that housing will be delivered within five years.
- 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.
- Alternative view from developers that village could cope with further expansion, over and above allocation of Site HH1.
- Alternative sites proposed at following locations, considered to perform as well or better than HH1:
 - CFS 121 (r/o 2241 Stratford Road)
 - CFS 503 (Stratford Road)

Council response to key issues raised:

- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development and will reflect each site's particular set of needs. The likely infrastructure requirements for each of the site allocations is set out in the Site Policies.
- Smaller sites (under 50 dwellings) have been included in the SHELAA land supply rather than be allocated specifically in the Local Plan.

Policy HH1 School Road

Key issues raised in representations received:

- Site promoters support principle of allocation and introducing speed reduction and pedestrian safety measures, as well as retention of trees and hedgerows and flood risk mitigation. Can confirm early delivery of the site is achievable.
- Local objection to site HH1 as an allocation and amendment of Green Belt boundary. Brownfield land should be utilised in the Borough to maintain existing Green Belt boundaries as much as possible.
- The addition of 90+ homes will have a detrimental impact on road congestion and safety.
- Concerns raised regarding the impact of development proposals on local environment and infrastructure in terms of noise, air pollution, local wildlife, canal damage, landscape character, utilities supply, sewer system and flooding.
- Loss of Green Belt and intrusion into countryside
- The Green Belt boundary to the north of School Road should not be amended. By removing the land to the north, windfall infill development will be permitted and will set a precedent for poor development
- The number of houses to be provided at HH1 differs between the Policy (90 houses) and the Concept Masterplan (100 houses). It is not clear which is correct.
- 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 the Stratford Road.
- Paragraph 658 states that is a bus service that links to Birmingham, this is incorrect.
- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- The value and benefits of the natural environment will be taken into full account when considering all development proposals, in accordance with Policy P10.
- Policy justification states that development should provide highway mitigation proposals that will contribute to alleviation of congestion issues in the vicinity of the school, and this is supported by site promoter.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

- Amendment to be made to the supporting text (paragraph 658) to remove sentence that states there is a bus service that connects Hockley Heath to Birmingham.

Knowle Dorridge and Bentley Heath

Key issues raised in representations received:

- The Local Plan and the site allocation policies do not take into account the Knowle, Dorridge and Bentley Heath Neighbourhood Plan or make reference to the policies within it.
- Objections to the proposed site allocations in the settlement. Criticism that they have multiple and complex land assembly issues which may lead to deliverability issues or delays.
- Alternative sites promoted in the area, that are considered to perform as well as or better than the allocated sites. Call for Sites reference:
 - 59 - Land at Golden End Farms
 - 107 - Land at Gentleshaw Lane
 - 110 - Land to rear of 114 Kenilworth Road
 - 127 - Woodford, Grange Road, Dorridge
 - 199 - Land at Four Ashes Road, Dorridge – Box Trees
 - 207 - Land bounded by Brown's Lane, Smiths Lane & Widney Manor Rd
 - 413 - Land at Oak Green, Dorridge
 - 526 – Land at Jacobean Lane
 - 552 - Land at Warwick Road, Knowle
- Viability of the site allocations in Knowle is questionable.
- The settlement is not well served by public transport.
- Sites suitable for specialist housing for older and disabled people should be specifically allocated, in particular Call for Sites reference:
 - 29 - The Orchard, Earlswood Road
 - 210 - Land between 39 and 79 Earlswood Road
 - 502 – Land off Jacobean Lane.
- Insufficient regard given to the impact of traffic and congestion around the settlement.
- Insufficient consideration of existing and future infrastructure requirements, including health infrastructure.
- Concept Masterplans for allocated sites in the settlement are lacking in detail.
- No justification for Green Belt release or adequate consideration of brownfield sites.
- Density and capacity of site allocations in Knowle should be reduced.

Council response to key issues raised:

- The importance and value of Neighbourhood Plans are recognised by the Council. The Local Plan makes reference to this and includes the need to consider relevant Neighbourhood Plan policies as required. However, Local Plans must set out the strategic policies for the Borough as a whole, including areas where Neighbourhood Plans have previously been made. As set out in paragraphs 20 to 22 of the Draft Submission Plan, Neighbourhood Plans will often provide local interpretation of Local Plan policies which are of importance to the local community and which the Council will want to support. Neighbourhood Plans will remain part of the development plan where there is no policy conflict with the strategic policies of the adopted Local Plan. More specific and detailed design issues for each site allocation will be considered at the planning application stage in the context of wider Plan policies which seek to promote sustainable development. Any future applications will also be assessed against any relevant Neighbourhood Plan policies. It is not therefore considered necessary to specifically repeat Neighbourhood Plan policies in the Local Plan.

- The Council is required to plan for and meet its identified housing needs. Whilst brownfield sites are prioritised, there is a lack of available land in the Borough to meet this need. It is therefore considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the sites proposed are appropriate and suitable, taking into account the reasonable alternatives.
- All sites submitted for inclusion in the Plan have been assessed. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- The settlement benefits from a railway station with regular train services. There are also a number of bus services running regularly throughout the day providing access to Solihull and other settlements.
- The Council has assessed the need for housing for older people and those with disabilities within the context of its local housing need assessment. The Council's assessment is that the indicative need can be met through the proposed policy, P4E, and with the anticipated contribution from some smaller allocated sites and other housing land supply. There no need to make additional specific site allocations to meet the needs identified.
- Traffic modelling work has been undertaken to support preparation of the Local Plan. This has been supplemented by more localised assessments of the impact of particular Local Plan sites on nearby traffic levels and parking provision. It includes the Knowle Transport Study 2020, which identifies a range of interventions to mitigate impacts associated with specific site proposals. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for each of the site allocations is set out in the Site Policies. The Council has and will continue working with the Clinical Commissioning Group to determine the impacts of the new population growth on the Borough's health services.
- At this stage, the masterplans are intended to set out at a broad level how sites are expected to be developed, in order to provide certainty to developers and the local community. Further detail will be required at the planning application stage, including more detailed transport work.
- The spatial strategy has sought to focus significant development in locations that are or can be made accessible and sustainable. Knowle, Dorridge and Bentley Heath is the largest rural settlement and has a full range of services and facilities, including primary schools and a secondary school. It is well served by public transport and benefits from a railways station. In considering the evidence base and having regard to the sustainability appraisal, Knowle, Dorridge and Bentley Heath is well placed to accommodate growth in excess of just its own local needs. However, the Local Plan seeks to ensure that this growth responds positively to the character and context of the villages.

Policy KN1 Hampton Road, Knowle

Key issues raised in representations received:

- The policy and supporting text should not prejudice whether very special circumstances will be likely to be demonstrated for the relocation of Knowle Football club into the Green Belt.
- Sport England advise that the policy should make clear that the replacement sports provision includes 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.
- Re-provision of the sports pitches should be secured prior to allocation.
- Some concerns with the Concept Masterplan including from the site promoter, the Knowle, Dorridge and Bentley Heath Neighbourhood Forum and Sport England
- Objection to the extent of the heritage buffer proposed between Grimshaw Hall and built development.
- Wording in Policy KN1 requires alteration in line with NPPF requirements for harm.
- Unclear what is meant by 'zone of significance on the setting of the listed building' on the Concept Masterplan.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- The nature and development of site KN1 is out of character for Knowle and the density is too high.
- Lack of evidence to demonstrate the viability and deliverability of this allocation, including the ability of the football club to relocate.
- Development of the site will add to the already congested road network around Knowle (see comments on settlement chapter).
- Impact of development on existing transport and other social and community infrastructure has not been considered (see comments on settlement chapter).
- The Green Belt boundary should be the canal, which would allow the site to deliver additional dwellings.
- The site is subject to flooding and drainage issues.
- Concern about the impact on the Local Wildlife Site.
- Objections to the site, loss of Green Belt and lack of consideration of brownfield sites
- Adverse impact on Knowle Conservation Area.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- The Council recognise that very special circumstances will need to be demonstrated for the relocation of Knowle Football club into the Green Belt and will be considered at the planning application stage.
- The policy makes clear that the existing sports facilities will need to be re-provided and that the current site of Knowle Football Club will not be available for redevelopment until the new facilities are ready for use. Specific details of what this re-provision is likely to include will be considered at the planning application stage with reference to the Playing Pitch Strategy and advice from Sport England and the Football Association. It is not therefore considered necessary to secure re-provision of the sports pitches prior to allocation.

- The Concept masterplan addresses key development principles and more detailed matters can be addressed through the planning application process. Whilst the policy expects the principles of the Concept Masterplan for the site to be followed, it recognises that there may be changes in light of further work carried out at the planning application stage. However, as stated in the policy, any changes will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.
- The Council's independently commissioned Heritage Assessment recognises the significance of Grimshaw Hall and identifies potential harm to its setting as a result of development in the immediate vicinity. It recommends that development is confined to the western part of the site and having regard to this evidence, the Council consider the heritage buffer to be appropriate at this stage.
- Policy P16 provides further detail on developments affecting the historic environment and will be updated to reflect NPPF heritage policy and requirements for harm. Zone of significance is shown on site analysis, not concept masterplan but clarity can be provided.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Policy KN1 and the Concept Masterplan for the site, together with other policies in the Local Plan seek to ensure the development will be sympathetic to the surrounding natural, built and historic environment. However, it is important that land is used as efficiently as possible, particularly in areas where there is a shortage of land to meet identified needs. The Plan seeks to do this whilst also ensuring that development proposals deliver high quality design that contributes positively to local character.
- The indicative delivery period for this site is within years 0-5 and 5 -10. There is no evidence to suggest that the site cannot be delivered within this timescale and there is sufficient time for the Football Club to put in place the required mechanisms for its relocation. Notwithstanding this, the principal part of the allocation is not dependent on the Football club moving.
- The proposed Green Belt boundary seeks to round off the settlement in a logical manner, consistent with the existing built form. Extending the Green Belt boundary towards to the canal is not considered appropriate as it would remove the policy protection currently afforded to the land, opening it up for development and extending the settlement into open countryside.
- The Development will have regard to flood risk areas. Applications for new development where there is a flood risk issue must be accompanied by a flood risk assessment. The policy requires the provision of suitable SuDS and flood risk management.
- The policy makes provision for retaining the Local Wildlife Site and the need to provide an appropriate buffer. Policy P10 requires developers to take full account of nature conservation value on sites. This policy also provides further detail on what will be expected from developments affecting locally designated sites such as Local Wildlife Sites.
- Given the distance and intervening development, it not considered that the allocation of the site will have an adverse impact on Knowle Conservation Area.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Policy KN2 South of Knowle (Arden Triangle)

Key issues raised in representations received:

- Objection to the site and to the loss of Green Belt. More suitable sites are available and more brownfield land should be utilised.
- Scale of development is out of character with the village and out of proportion with Knowle
- Insufficient regard given to the Neighbourhood Plan. Concern that densities and layout does not reflect the character the area or reflect the policies in Neighbourhood Plan. Densities should be no higher than medium density.
- The southern portion of the site is sensitive in Green Belt, ecology, heritage and landscape character terms. This area should be kept free of development and should remain in the Green Belt, which would allow Green Belt compensation to be provided at source.
- Proposed access arrangements from the South are difficult and will adversely impact on the sensitive landscape and heritage on this part of the site.
- Green Belt compensation measure will be difficult to achieve on this site, given the scale of development.
- No evidence to demonstrate that a comprehensive and co-ordinated approach to delivery of the whole site can be achieved. The site faces complex issues meaning that much of the housing will not be delivered until the later in the plan period.
- No evidence to support or justify the relocation of Arden Academy. No evidence to demonstrate that it is financially viable, deliverable or whether it is a necessary infrastructure requirement arising from the development.
- Landowner support for removal of the site from the Green Belt and support for many of the requirements in the Policy.
- No comprehensive agreement from landowners on the concept masterplan as proposed in the Submission Draft Plan. An alternative Masterplan has been proposed and submitted through the representations process.
- Development will exacerbate congestion in the settlement and parking issues in the village centre and at Dorridge Railway station.
- Insufficient consideration given to the impact on existing and future infrastructure requirements, including transport and parking, health and other community infrastructure requirements. Concern that infrastructure mitigation measures will not be effective.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- Loss of wildlife and natural features
- Support for retention of the LWS but the site would be surrounded by built development, noise, light pollution etc, which would affect species using the site, habitats and biodiversity.
- Support inclusion of biodiversity offsetting on site, although this should only be considered as a last resort. The policy requirements in Point 4 are vague and would be hard to effectively enforce on a meaningful level.
- Support for relocation and redevelopment of Arden Academy. Existing facilities at the school are poor and not appropriate for the needs of the community.
- The Policy should refer to the site having capacity for at least 600 dwellings to allow for flexibility at the planning application stage.
- Some anomalies between the Concept Master Plan and associated text.
- Provision of social and affordable housing should be prioritised as the Council has some ownership.

- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- Where there is a shortage of land to meet identified development needs, it is important that land is used as efficiently as possible. The Plan seeks to do this whilst also ensuring that development proposals deliver high quality design that contributes positively to local character. The density ranges proposed for Site KN2 have regard to the context, character and constraints of the site. Higher density is proposed in locations closer to the village centre, with density reducing across the site towards Grove Road.
- It is considered that development can be sensitively located on the southern part of the site and that Grove Road and Warwick Road provide a firm and defensible Green Belt boundary. The Local wildlife site will be kept free of development and the density of dwellings will reduce across the site towards Grove Road to respect the character of this part of the allocation. The proposed access arrangements in the south of the site will respect the local context.
- Not considered that the scale of development will impact on the deliverability of Green Belt enhancement measures that will be expected on this site.
- There is collective support from all landowners for the site to be allocated in the Plan. The Council is continuing to work with other landowners and their representatives to ensure that a comprehensive scheme that delivers the overall objectives for the site can be secured. The indicative delivery period for this site is within years 0-5 and 5 -10. There is no evidence to suggest that the site cannot be delivered within this timescale.
- The Council consider there are legitimate reasons for relocating Arden Academy. In order to secure the maximum benefits, a comprehensive and holistic approach to the school's redevelopment is required. Funding discussions are ongoing, and the Council will continue to work with other landowners to bring the site forward in a coordinated way.
- The site is well connected to the settlement and additional measures to promote and enhance sustainable modes of transport will be required to provide attractive and accessible walking and cycling links to the village centre and the railway station.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for Site KN2 are set out in the policy. The Council has and will continue working with the Clinical Commissioning Group to determine the impacts of the new population growth on health services.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- The policy makes clear that the Local Wildlife Site on the site will be retained and will not be built on. Policy P10 requires developers to take full account of nature conservation value on sites. This policy also provides further detail on what will be expected from developments affecting locally designated sites such as Local Wildlife Sites.

- The concept masterplan will be amended to be consistent with the text.
- The evidence identifies a capacity of 600 dwellings. However, the policy recognises that further work carried out at the planning application stage, may result in changes to the Masterplan. Any significant departure from policy principles outlined for Site KN2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.
- Policy P4A sets out the requirements for affordable housing.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Meriden

Key issues raised in representations received:

- Meriden is well-served by facilities with ability for expansion without impacting on Green Belt. It is identified for expansion, performs well in the Sustainability Appraisal. In addition to ME1, the village can provide more housing, which should be identified as a reserve site.
- The amount of growth allocated to Meriden is just 1.2% of the overall total allocation in the Plan. Level of proposed growth does not reflect the need for proportionate growth to the settlement consistent with the spatial strategy and 'balanced dispersal' approach. Further consideration should be given to increasing location of land at smaller settlements.
- Disagree with selection of a single proposed housing allocation in Meriden. A higher requirement between 187 to 352 new dwellings would support Meriden's continued role and function as a local service centre.
- Direction of growth at Meriden should be south of the settlement rather than north. 'Land off Main Road' Meriden (RP26 in the Green Belt Assessment Report) performs less against Green Belt purposes than the proposed allocation ME1.
- Alternative sites promoted in the area, that are considered to perform as well as or better than the allocated sites. Call for Sites reference:
 - 144 - North of Fillongley Road
 - 197 - Land at Berkswell Road, Meriden
 - 522 - Land off Main Road, Meriden
 - 556 - Land north of Main Road Meriden
- The bus service could not be considered frequent.
- Cumulative impact on traffic and parking nor considered. Large HGVs pass through the village despite routing agreements affecting several protected monuments by vibration and fumes.
- Insufficient health services locally. When social housing at Leys Lane and Meriden Gate was approved there were no resources allocated for either the GP or Meriden school.
- Clarification required for para. 73 as to where in the village centre this refers to.
- Paragraph 748 – CIL funding is not a 'significant' source.
- Maintenance of SuDs is a significant issue in Meriden as previous systems have not been maintained.
- Compensatory improvements required for loss of the greenbelt should be discussed with the Parish Council.

Council response to key issues raised:

- Meriden identified for limited growth, reflecting the sensitive environmental nature of the area and the need to manage the capacity and viability of local infrastructure.
- All sites submitted for inclusion in the Plan have been assessed. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- Clarification of wording at paragraph 732 (bus service), paragraph 738 (village centre) and paragraph 748 (CIL funding) to be provided.

Policy ME1 West of Meriden

Key issues raised in representations received:

- Proposed site allocation would be suitable for a range and type of housing, including both C2 and/or C3 Use Classes. Wording of policy should be amended to confirm that a housing mix/type could be brought forward on the site, which could include provision for older person housing, in line with policy P4e. This will ensure the policy conforms to the provisions of national planning policy.
- Greater clarity required on some of the specific criteria of the policy.
- Council's site analysis does not adequately deal with flood risk.
- Due to constraints on site, such as flood risk and Potential Local Wildlife Site, less units are likely to be delivered or densities increased.
- Policy wording should clarify that requirement for financial contribution to education provision would be applied to class C3 housing only and not for any housing for older people (usually class C2).
- Allocation is not justified or effective as the site does not have the capacity to accommodate the amount of housing without significant harm to the landscape character on approach to the settlement.
- Density of proposed site is too high given its landscape setting. It should be reduced to 50 dwellings and a new or additional site allocated in Meriden.
- Fully support the principle of allocation of site ME1. Proposed amendment to settlement boundary to accommodate this is sound.
- Site was the preferred site for housing development by residents when consulted as part of the Meriden Neighbourhood Plan process.
- Site includes an area with a Certificate of Lawfulness for use of the site for caravan storage and there is a building on this part of the site. This should be referenced as brownfield land in the Masterplan document.
- Header should refer to Maxstoke Lane instead of Maxstoke Road.
- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- Guidance re Local Housing Need is provided in the emerging Meriden Neighbourhood Plan as stated within paragraph 747. Paragraph 752 also indicates the provision needed in the settlement and it is not considered further clarification is necessary.
- Masterplan indicates 100 dwellings acceptable on the site with appropriate design criteria.
- All known constraints have been considered in the development of the masterplan for the site.
- Amend header to Maxstoke 'Lane'.
- Policy P21 sets out the policy regarding developer contributions for all sites in the Plan.

- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

North of Borough

Key issues raised in representations received:

- Alternative sites promoted in the area, that are considered to perform as well or better than the allocated sites. Call for Sites reference:
 - 131 – Coleshill Heath Road
 - 193 – Coleshill Road, Marston Green
 - 196 – Bickenhill Road, Marston Green

Council response to key issues raised:

- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the area have been allocated taking into account the reasonable alternatives.

Solihull Town Centre & Mature Suburbs

Key issues raised in representations received:

- Concern regarding an increase in over 60's schemes in the Shirley area.
- Concern for the increasing number of developments and their impact on infrastructure, most notably transport/road infrastructure and health provision.
- The supporting text should acknowledge that 'all' schools experience traffic congestion.
- Comments raised regarding the impact of development proposals on the environment.
- Alternative sites promoted in the area, that are considered to perform as well or better than the allocated sites. Call for Sites reference:
 - 195/528 – East of Damson Parkway
 - 246 – Sharmans Cross Road
 - 407 – Land at Widney Manor Road

Council response to key issues raised:

- The Council has assessed the need for housing for older people and those with disabilities within the context of its local housing need assessment (National Planning Policy Framework, paragraphs 60 and 61). The Council's assessment is that the indicative need can be met through the proposed policy, P4E, and with the anticipated contribution from some smaller allocated sites and other housing land supply.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement/area have been allocated taking into account the reasonable alternatives.
- The value and benefits of the natural environment will be taken into full account in considering all development proposals, in accordance with Policy P10.

Policy SO1 East of Solihull

Key issues raised in representations received:

- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- Concerns that development will have an impact on designated heritage assets and the natural environment.
- Development will increase traffic congestion and road safety issues.
- Brownfield land and infill sites should be prioritised and there are no special circumstances to remove the site from the Green Belt.
- The existing infrastructure does not have the capacity to cater for additional residents.
- The scale of development proposed is inappropriate and the site capacity should be reduced.
- Development would have an impact on the openness of the Green Belt and would threaten coalescence between settlements.
- The site is located within the parish of Catherine de Barnes and Hampton-in Arden. It is misleading for this allocation to be in the Solihull section of the Local Plan.
- Concerns that development would have an impact on pollution and air quality.
- The site is sustainable and located in close proximity to local services and facilities.
- Lugtrout Lane is prone to flooding.
- All landowners and their representatives have agreed a masterplan for the allocation.
- The site could deliver a higher number of dwellings.
- The loss of accessible recreational sports facilities is unacceptable.
- Development would lead to an adverse visual impact.
- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.

Council response to key issues raised:

- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
- Part 2(i) of the site policy states that: the setting of the Grade II Listed Field Farm and 237 Lugtrout Lane must be carefully considered. Development should be set back from the immediate locality to avoid harm. Development must respond sensitively to areas of ecological importance and any loss of habitat will require biodiversity off-setting.
- Traffic modelling work has been undertaken to support preparation of the Local Plan. More detailed transport assessments will be required to support any future planning applications, including on and off-site mitigation.
- The Council is required to meet its future housing needs. Whilst brownfield sites are prioritised, there is a lack of available land in the Borough. Given the lack of available

brownfield land in the Borough to meet this need, it is considered that exceptional circumstances exist to amend Green Belt boundaries in the most sustainable locations.

- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for each of the site allocations is set out in the Site Policies, which in the case of SO1 includes a financial contribution to education and health provision as well as highway improvements.
- It is important that land is used as efficiently as possible. The Plan seeks to do this whilst also ensuring that development proposals deliver high quality design that contributes positively to local character.
- The site lies within a parcel of lower performing Green Belt and is influenced by built development. The site is relatively well-contained and a defensible Green Belt boundary could be provided using the Grand Union Canal and Field Lane.
- This site appears in the Solihull chapter as it functions as an extension to the urban area, but it is noted that it falls within the parish of Hampton in Arden.
- The Local Plan supports the aims of the Solihull Clean Air Strategy (2019 – 2024). Developers will be expected to ensure that development does not have a significant adverse impact on local air quality.
- The Spatial Strategy seeks to focus developments in locations that are, or can be made, accessible and sustainable. The site performs well in terms of accessibility to all key services and facilities, as well as public transport.
- Development will have regard to flood risk areas. Applications for new development where there is a flood risk issue must be accompanied by a flood risk assessment.
- The site has multiple landowners and it's important that there is a comprehensive approach to development.
- It is considered that a low to medium density housing is appropriate and 700 homes can be accommodated on the site. The density of the housing ranges from 30–40+ dph.
- The playing pitches are currently occupied by Coldlands Colts Boys FC and are to be retained.
- The Landscape Assessment (2016) states that the area on the fringe of Solihull has medium landscape value and medium overall sensitivity to new development. The concept masterplan seeks to ensure important landscape features are retained along with the rural character of Lugtrout Lane and Field Lane.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Policy SO2 Moat Lane Depot

Key issues raised in representations received:

- Some support for the allocation, stating that the allocation of Site SO2 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.
- SO2 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.
- Moat Lane Depot is a currently licensed site and therefore the permit will need to be surrendered prior to redevelopment. There is a concern over relocation of the current uses on the site and the timing of such a relocation is an issue.
- There are issues that need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.
- 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. Site SO2 could provide space for this.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- West Midlands Police state Policy should include reference to developer contributions for police infrastructure, to ensure appropriate level of service can be maintained. Should also reference need to meet Secured by Design standards.
- Sport England advise need to set out how playing pitch demand generated from the new development will be met, with reference to Playing Pitch Strategy/Playing Pitch Mitigation Strategy.

Council response to key issues raised:

- It is important that land is used as efficiently as possible. The Plan seeks to do this whilst also ensuring that development proposals deliver high quality design that contributes positively to local character.
- The allocation is proposed to be appropriate for medium to high density development, reflecting the surrounding residential area. To therefore meet the appropriate density for the area, 90 dwellings is considered to be suitable.
- Development will have regard to flood risk areas. Applications for new development where there is a flood risk issue must be accompanied by a flood risk assessment.
- Additional requirements to be set out within policy with regard to playing pitch provision & mitigation.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

UK Central

Key issues raised in representations received:

Significant objections raised concerning the relocation of the Household Waste and Recycling Centre to the UK2 allocation:

- Will create significant traffic issues, including queuing of traffic which will compound the impact from existing JLR operations and the logistics facility. Loss of natural landscape and pollution.
- Would result in loss of further green belt between Damson Parkway & A45. There are already high levels of noise and air pollution.
- Will result in disruption and odours.
- Removal of green belt.
- The area cannot sustain more building or traffic.
- HWRC needs to be relocated to site away from residential areas, there are better alternative sites.
- Relocation of the HWRC contradicts many of the Council's stated objectives.
- Inconsistent with such very special circumstances justifying the release of land from the Green Belt and would undermine the policy objectives for the site.
- Local residents have not been informed of these proposals.
- Proposal is not legally compliant or sound and does not properly take account of the negative climate change / environmental impacts of an unnecessary move.
- The need for community involvement has not been met.
- This area is a gateway to Solihull, and should be retained as "Urbs In Rure".

Other matters

- Insufficient evidence has provided on the deliverability of 2,740 dwellings from the UK Central Hub within the Plan period and it is unclear where the housing is being provided. The housing contribution from the Hub area should be clearly defined.
- 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.
- 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.
- The delivery of the UK Central Hub requires co-ordination of several landowners and the implementation of necessary social, transport, utilities and flood risk management infrastructure. The policy and/or Concept Masterplan should set out details of this including delivery. There is no evidence of a legally binding Memorandum of Understanding/ agreement amongst landowners.
- 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.
- The NEC site should be fully assessed for its suitability for development, the quantum and location of housing to be provided is not specified, it appears that the housing area was not subject to a Sustainability Appraisal and it would likely have scored low against certain

objectives. 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.

- Arden Cross should be fully assessed for its suitability as a site, there is no site specific policy or concept masterplan to identify the quantum or location of residential development, the site scores poorly in the Sustainability Appraisal, if it had been assessed as part of a larger green belt parcel assessment it would have scored poorly, 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.
- 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.
- 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.
- An area should be designated as Arden Ecopark for industrial uses and an Energy from waste facility to serve the Arden Cross Development – the Council has not dealt with this submission made as part of the Call for sites.
- Plan appears to support encroachment of commercial and industrial activity into residential areas.
- Supports recognition of the NEC site in the plan but that the content could be strengthened to acknowledge the scale of the opportunity at the NEC site for residential development and there is sufficient flexibility to enable the economic role of the NEC site to evolve.

Policy Support

- Support site and opportunity to work with stakeholders to identify an appropriate well located site to meet the future needs of Solihull Moors Football club.
- HS2 Ltd 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 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.
- The Plan should reflect recent schedule 17 submissions for the HS2 station, automated people mover and surface car parking.
- Sport England 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. Welcomes 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. Highlights the need for a site specific leisure and playing pitch needs assessment to inform the requirements for the site.

Council response to key issues raised:

- At Full Council on 13th April 2021 the Leader of the Council gave a commitment that the administration would not support or pursue the option for any relocation of the Household Waste & Recycling Centre (HWRC) to a site off Damson Parkway within the proposed allocation site known as UK2 in the Draft Submission Plan. This position will need to be addressed through the examination process.
- Further detail on the development of the UK Central site will be provided through the emerging Masterplans and the proposed Supplementary Planning Document. The Council will continue to work with key stakeholders in preparing these documents to ensure the coordinated delivery of development and infrastructure across the site. Further details on the quantum of housing, delivery timetable and the specific location and layout for residential development will be set out as work progresses. Figures for the amount of housing to be delivered across the site have been informed by the Hub Growth and Infrastructure vision (2018) and Framework Plan, the NEC masterplan (2018) and Arden Cross Masterplan (2020) together with the Council's own assumptions on delivery. Both the NEC and Arden Cross land together with all of the components of the UK Hub area have been considered as part of the site assessment methodology including through the Sustainability Appraisal. Overall the UK1 site will provide a mix in the type and tenure of housing the full nature of this mix will be detailed as work on the site progresses through the Concept Masterplan. It is agreed that it is important to maximize opportunities for low carbon energy solutions to be incorporated into the site.
- The Council is committed to maximizing the development opportunities presented by the HS2 interchange station in order to provide for the residential and employment needs of the Borough over the plan period. It will continue to work with key stakeholders in progressing the Concept Masterplans for UK1 and UK2 and the development of an SPD to coordinate the delivery of infrastructure and development across the UK Hub area. It is recognized that further more detailed work is needed on matters such highway capability which will be progressed through this ongoing work.
- Agreed the plan should acknowledge the recent approvals for the HS2 interchange station and automated people mover. The Council acknowledges that further work is necessary to identify an appropriate site to secure the long term future of Solihull Football Club and is committed to working with key stakeholders to achieve this.
- It is agreed that references to the UK Central geography through the plan should be reviewed to ensure consistency.

Policy UK1 HS2 Interchange

Key issues raised in representations received:

- Specific policy for the allocation is supported but text should be reviewed to avoid overlap with P1.
- A review of the quoted figures for the amount of housing to be provided on the site should be undertaken as different figures appear throughout the plan.
- A review of the place making and development principles referred to in the policy should be undertaken to align with the Arden Cross Masterplan which should provide the guiding principles for the policy.
- The role and purpose of the SPD for the UKC Hub area should be clarified, it is unclear why it is referred to in P1 and not UK1.
- Site is too close to existing residential areas, Damson Parkway is already busy, this will create extra traffic issues and pollution and a loss of green belt. It will have a negative impact on quality of life.
- The plan fails to set out a detailed, site-specific housing trajectory outlining the anticipated delivery rates of all the strategic allocations. It fails to demonstrate the rate at which UK Central Hub will deliver the housing allocation. The likely build rates anticipated by the Council are 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.
- Objection to the use of greenbelt land to build homes at the Arden Cross development as it is beyond the budget of local people. This will result in the loss of valuable wildlife habitat and corridor between Catherine De Barnes and Chelmsley Wood. It will impact on climate change removing carbon absorbing trees and vegetation.
- The Arden Cross site should be fully assessed for suitability. It would perform poorly as part of a wider green belt parcel, proposals are likely to have a significant archaeological impact, there appears to be no ecological assessment and delivering the necessary infrastructure to support development will present a challenge.
- References to garden community principles is misleading.
- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.
- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Comments in support

- Too few homes are planned on this allocation in total within the plan period. It is strategically right to focus additional housing here as one of the most sustainable locations. The capacity could be 1,000 homes higher.
- Supports the creation of new residential development next to the NEC / HS2, which would benefit from some of the best transport links in the country, has the potential to be a showcase village.
- UGC supports the allocation and policy to deliver the UKC Hub and without which the wider benefits associated with HS2 would not be realised. Pleased to see the overarching place making principles set out in the Framework and the need for a flexible based policy approach are reflected in the policy. It is highlighted that an alternative arrangement for car parking is being progressed to bring forward development at Arden Cross and 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.

- The Environment Agency welcome the proposals in relation to flood risk and water quality. 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. The Local Plan should carry through the aspiration of BREEAM Excellent rating for the HS2 station, and extend to wider area. A key element is sustainable transport, with non-car travel solutions such as a cycle route over the M42 being integral to the success of the station.

Council response to key issues raised:

- The Council will review the text of the policy in relation to Policy P1 to ensure there is consistency with the development principles set out in the Arden Cross Masterplan and amend references to garden community principles where appropriate. For consistency the name of the policy will be amended to refer to the Arden Cross Site.
- Agreed there should be consistency in the housing figures attributed to the site across the plan, the chapter introduction and Policy P1 wording has been reviewed in relation to the housing figures for the site and changes are suggested.
- At Full Council on 13th April 2021 the Leader of the Council gave a commitment that the administration would not support or pursue the option for any relocation of the Household Waste & Recycling Centre (HWRC) to a site off Damson Parkway within the proposed allocation site known as UK2 in the Draft Submission Plan. This position will need to be addressed through the examination process.
- Figures for the amount of housing to be delivered across the site have been informed by the Hub Growth and Infrastructure vision (2018) and Framework Plan, the NEC masterplan (2018) and Arden Cross Masterplan (2020) together with the Council's own assumptions on delivery. Further details on the quantum of housing, delivery timetable and the specific location and layout for residential development will be set out as work progresses on the UKC Hub area. There should be consistency in the housing figures attributed to the site across the plan, the policy wording will be reviewed in relation to these references.
- The Council will work in consultation with key stakeholders to prepare an SPD, which together with policies P1, UK1 and UK2 will set out key development principles to ensure the coordinated delivery of infrastructure and development of the UK Hub site. The Council will review the text of the policy to ensure it is consistent with the development principles set out in the Hub Framework Plan and Arden Cross Masterplan. A reference to the SPD will be made in Policy UK1.
- The Council considers that the UK Hub area will make a positive contribution to the provision of sustainable development for residential and industrial uses across the plan period taking advantage of the sites location in relation to the HS2 interchange station.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.
Through the examination will review potential changes to policy wording in response to West Midlands Police comments.

Policy UK2 Land at Damson Parkway

Key issues raised in representations received:

Relocation of the Household Waste and Recycling Centre within the site:

- The site should be removed from the plan.
- The construction and operation of the centre would cause noise, pollution, odour, disruption and visual intrusion to the residents of the Damson Parkway estate and adjacent areas. It would have an impact on the levels of harmful emissions, both from the plant itself and the vehicles accessing it. It would have a detrimental impact on the quality of life of adjacent residents and is contrary to the Council's commitment to residents' health and wellbeing. It would create further traffic congestion in addition to the existing traffic problems resulting from the operations of JLR. It would result in further loss of green belt and increased flood risk. The plan already proposes significant residential development in this area. The existing site at Bickenhill should be developed or an alternative site away from residential areas.
- With the government initiatives towards a Zero Waste economy, difficult to believe that the waste for Solihull is going to increase by 52%.
- This is already a flood risk area development here will increase the severity and occurrence of these events
- Warwickshire Wildlife Trust has serious concerns of the impact on breeding species and on the biodiversity and protected species on adjoining designated sites- Elmdon Grange wood LWS and Elmdon Wood Nature Park and part of Castle Hill Meadows LWS, and adjoining Hampton and Elmdon Coppice.
- The HWRC proposal is not legally compliant and contrary to the Statement of Community Involvement as this is the first time the proposal has been published and no evidence has been provided to justify the location and allow scrutiny. There is no information on the exact location and potential access points. The plan should justify the need for the improved facilities and provide potential options including expanding the site. There is no evidence of traffic / environmental assessments of the site. There is no evidence the local planning authority has sought to engage constructively, actively and on an ongoing basis with the neighbouring authorities. Opportunities to brief key stakeholders were not taken.
- JLR specifically object to the relocation of the HWRC on the site due to the potential impact on the future site expansion of JLR, 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 and the proposal 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. There should be flexibility in the policy to accommodate the dual carriageway proposal and allow for future rail freight capacity.
- References to the Household Waste and Recycling Centre and Council Depot should make it clear that the Council has not yet made a decision on this issue and other sites are still in consideration.

Other matters

- Policy should reference that site has significant archaeological potential and that a detailed archaeological assessment and evaluative fieldwork should be undertaken prior to submission of a planning application.

- More clarity should be provided on how the concept masterplan for the Hub area will be developed and the role of stakeholder and landowner engagement including how it will be recorded and addressed, suggests changes to the wording of the policy to clarify this.
- Environment Agency 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.
- Objection to the amount of land allowed for the operations of JLR.
- Objection to the policy as the area is predominately residential and there has already been too much industrial development.
- References to 'local' employment needs should be removed. The term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this, which will 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.
- The opportunity should be taken in the supporting text to clarify the scale of the available allocated land.
- There is no need for duplication of the special circumstances case for Green Belt release in the plan text. Solihull Moors Football Club is supportive in principle of Site UK2 and welcome the 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.
- Sport England seek amendment 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.

Council response to key issues raised:

- This site was identified as potentially a suitable option for the relocation of the Household and Waste recycling centre as part of an assessment of a number of options considered as part of the Assessment of land for the potential relocation of a HWRC and Depot (2019). At Full Council on 13th April 2021 the Leader of the Council gave a commitment that the administration would not support or pursue the option for any relocation of the Household Waste & Recycling Centre (HWRC) to a site off Damson Parkway within the proposed allocation site known as UK2 in the Draft Submission Plan. This position will need to be addressed through the examination process.
- Further detail on the land available, constraints including flood risk areas, archaeological assets and the location and layout of future proposals for the site. will be progressed through the examination process and as work progresses on the site. The Council will continue to engage with key stakeholders to ensure coordinated development of infrastructure and development across the site, and through the SPD to ensure the framework for delivering the UKC Hub area is clear.
- Jaguar Land Rover is a key economic asset and the provision of land adjacent to the existing site to support its continued operations justify the very special circumstances to allow development in the Green Belt. Work will continue to clarify the land needed.
- What constitutes a local or strategic employment site is not always defined by size or location. It is clear that suitable land in an accessible location and of a suitable scale to meet

the needs of the occupier could be attractive to a range of users, both local and strategic. The wording of the policy will be reviewed through the examination process.

- It is agreed that the references to the site should be reviewed to ensure consistency between policies P1 and UK2.
- The Council is considering options for new Sports Hubs within the Borough to meet the needs identified in the Playing Pitch Strategy, and Playing Pitch Mitigation Strategy.
- Paragraph 413 of the Plan recognises the role of the Archaeological Assessment (2018 and 2020) in providing evidence of the archaeological assets in the Borough with reference to the site allocations proposed in the plan. Policy P16 requires development proposals that affect the historic environment to demonstrate how evidence in the Historic Environment Record has been used to inform the proposal.

Policies Map

Key issues raised in representations received:

- TfWM seek modification to Policies Map; to include lines of rapid transit routes described in Policy P8A and for the routes to be fully safeguarded.
- Concern raised that base map is not up-to-date, and could therefore be misleading.
- Concerns raised the site boundaries in concept masterplans differ from those in the Policies Map.
- Wildlife Trust seek modification to include Nature Reserves and potential Wildlife Sites to the Policies Map.
- Primary shopping areas within Town Centres should be annotated on the Policies Map.
- HS2 Ltd welcomes the identification of the high-speed railway on the Policies Map.
- Representations relating to changes in Green Belt boundary to reflect alternative sites are contained within the settlement chapter; those relating to changes to washed over Green Belt or inset villages are within the Policy P17.
- NEC proposals should be included on Policies Map.
- Failure to distinguish between Mineral Safeguarding Areas and the safeguarding of minerals-related infrastructure sites, which should be safeguarded wherever they are. Amendments to the Policies Map are required to identify Specific Sites, clarify MIN1 to MIN5 and show minerals Area of Search.
- Local Geological Site should be removed from the Policies Map
- Housing supply from all sources should be included in the Policies Map.

Council response to key issues raised:

- Rapid Transport routes can be included on the Policies map, for consideration in planning applications in accordance with Policy P8A.
- The base map can only be a snapshot in time, and will change over the course of the plan period. The Council are considering the introduction of a live Policies Map for their website on adoption of the Plan, which will have a dynamic base-layer, based on OS mapping.
- Primary shopping areas for Solihull Town Centre are included in Para. 116 of the Draft Submission Plan.
- The NEC site boundary is included on the Policies Map – further detail relating to site proposals are contained within the NEC Masterplan (December 2018).
- The Policies Map includes allocations for housing that are being pursued through the Plan. Location of small-medium housing are included within supporting documents, e.g. the land availability assessment, Brownfield Land Register and Solihull Town Centre Masterplan.
- The Policies Map includes designated Local Wildlife Sites, Local Nature Reserves, SSSIs and Ancient Woodland. The Council has records of potential Local Wildlife Sites, nature reserves (e.g. Wildlife Trust) and habitats of importance, and these are taken into account by the Ecology team in assessing planning applications, and have been appraised as part of the Ecological Assessments for proposed site allocations.