Reviewing the Plan for Solihull’s Future

Solihull Local Plan Review

Scope, Issues and Options Consultation - Summary of Representations and the Council’s Response

April 2016
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1. **Introduction**

**Background**

1. In July 2015 the Council resolved to undertake a review of its local plan. Although the Solihull Local Plan (SLP) was only adopted in December 2013, the need for an early review was triggered by three factors.

2. Firstly, the successful legal challenge to the local plan post adoption means that the current Local Plan has no overall housing requirement for the Plan period. This makes it difficult to demonstrate that the Borough has a five-year housing land supply, as required by the National Planning Policy Framework. The absence of an adequate housing land supply increases the risk of speculative housing developments being allowed on appeal.

3. Secondly, the examination of the Birmingham Development Plan has made clear that the City Council is unable to meet its own housing need within its boundaries, and that the shortfall will have to be met elsewhere within the Housing Market Area (HMA) (or other nearby areas) such as Solihull. Although the scale of this shortfall and how it is to be shared within the HMA (and possibly beyond) is not yet firmly established, this is a factor which the Council will have to consider. Paragraphs 8.4.5 to 8.4.6 of the adopted Solihull Local Plan acknowledges that when work on housing needs identifies a need for further provision in the Borough, a review will be brought forward to address this.

4. Finally, the UK Central Masterplan and Prospectus for a ‘Garden City’ approach to the High Speed 2 Interchange have set out the Council’s ambitions for this part of the Borough. The Proposed Local Area Plan for the High Speed 2 Interchange and Adjoining Area highlighted the need to review the Green Belt boundary to enable the Interchange Area to be allocated for development. An updated Local Plan addressing this matter is vital if the full potential of the High Speed 2 project is to be realised.

5. The first stage in undertaking the review was the publication in November 2015 of a “Scope, Issues and Options Consultation”. This was open for consultation from 30th November 2015 to 22nd January 2016.

6. The consultation document set out the following key issues/questions:

    - That to meet the Borough’s own housing needs a housing target of 13,500 dwellings over the plan period should be accommodated. This would mean that it would be necessary to identify sites for at least a further 4,000 dwellings over and above those planned to be built under the SLP. But this should be considered a minimum figure.
    - Recognition that under the duty to cooperate Solihull may have to accommodate some of the 37,500 dwelling shortfall that is occurring in the Housing Market Area.
    - The HS2 rail link and interchange presents a major opportunity to maximise the economic and social benefits for the Borough and wider area, which will not be delivered through the HS2 proposal alone.

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• That the vision for UK Central represents one of the most significant opportunities for growth; in particular in the area around the Hub (including the HS2 Interchange site).

• The need for a comprehensive review of the Green Belt through a Green Belt Assessment.

• The identification of 7 broad potential options for accommodating growth and what opportunities and challenges these options may provide. The broad options sought views on focussing development in the following areas:
  o High frequency public transport corridors and hubs.
  o Solihull Town Centre
  o North Solihull/Chelmsley Wood
  o Shirley Town Centre and the A34 corridor
  o UKC Hub & HS2 Interchange
  o Limited expansion of rural villages and settlements
  o New settlements, large scale urban extensions or significant expansion of rural villages and settlements.

7. The consultation document invited respondents to comment on 27 questions, or to make any other comments they wished to at this stage.

8. This document sets out a summary of the representations received as a result of the consultation and provides the Council’s response to them.

9. The next stage will be for the Council to prepare a draft plan for consultation. This will be informed by the emerging evidence base and the outcome from the consultation that is now being reported upon. The timetable for the local plan review is as follows:

  • Winter 2015 – Scope, Issues and Options Consultation
  • Autumn 2016 – Draft Local Plan
  • Spring 2017 – Publication of Local Plan
  • Summer 2017 – Submission of Local Plan for Examination
  • Winter 2017 - Adoption

Publicity for the Consultation

10. In addition to using the Council’s planning policy consultation database (which allows all those with an interest in planning policy to register to be informed about consultations) other communication channels were used, including social media. The consultation and notifications included:

  • 1,000+ direct letters/emails
  • ‘Stay Connected’ email alert sent to approximately 2,000 subscribers.
  • Numerous tweets via Solihull Council and Policy and Spatial Planning accounts (15,000+ followers), many of which were retweeted to more followers
  • Facebook posts to 4,000+ recipients
  • Press release picked up by Solihull Observer and Solihull News
  • Button promoting the consultation on www.solihull.gov.uk homepage
  • Press notices/articles
11. The Parish Council’s and Resident Associations that took up the offer of the briefings included:

- Balsall Common Residents Association
- Balsall Parish Council
- Berkswell Parish Council
- Chadwick End Parish Council
- Cheswick Green Parish Council
- Dickens Heath Parish Council
- Hampton Parish Council
- Hockley Heath Parish Council
- Hockley Heath Residents Association
- Kingshurst Parish Council
- Knowle Society
- Knowle, Dorridge & Bentley Neighbourhood Forum
- Marston Green & Bickenhill Parish Council
- Meriden Parish Council
- Tidbury Green Parish Council

12. During the consultation period, the LPR web page was viewed on 3,755 occasions by 1,462 unique visitors.

13. Over 170 representations were made to the consultation. These have been summarised by each representor and then summaries have been prepared under each question/subject area. This document sets out these summaries by topic for ease of reference. Where a number of representors have made a comment or it has been substantiated it is noted as a ‘key’ issues, whereas one off, less substantiated comments have been made these are noted under ‘other’ issues.

14. The graph below shows the no. of representations received in relation to each question.
2. Evidence Base

Q1 – Evidence Base

Do you believe that the extent of evidence studies identified on p.10 is sufficient to provide a sound evidential basis for reviewing the plan? If not, what additional work do you believe is necessary?

Representations received (96):


Key Issues raised by Representations:

- Mixed response with nearly a quarter supporting evidence proposed but 15% opposed.
- Significant concern about lack of full objectively assessed housing need, and fact that Strategic Housing Needs Study does not provide this.
- Concern about lack of clarity about mechanism for resolving wider unmet housing needs across housing market area.
- Significant concern that the key evidence studies have not been updated for the consultation and that these should be progressed urgently.
- Support for preparation/updated of key studies including Strategic Housing Market Assessment, Housing and Employment Land Availability Assessment and Green Belt Assessment, providing the latter is comprehensive and uses an accepted methodology.
- Concern that content and consistency of various evidence studies will be of key importance.
- Evidence should look to longer time horizon where appropriate, e.g. Green Belt Assessment should assist establishment of new Green Belt boundaries to at least 2050.
- Lack of updated scoping report raises concerns about robustness of evidence behind sustainability appraisal.

Other issues:

- Infrastructure Delivery Plan should take account of education, health and social care demands, and cross boundary requirements, and should support implementation of the Plan.
- Evidence base should include GBSLEP employment studies, assessments strategies for main town centres, implications of wider economic strategy for high quality executive homes, rural housing needs, gypsy and traveller assessment update, review of deletion of Balsall Common bypass, climate change update, multi-agency geographic information for the countryside, Solihull Green Infrastructure study, Habitat Biodiversity Audit habitat connectivity mapping database, water cycle study, water framework directive assessment, watercourse modelling studies, historic environment assessment, impact of location of takeaways on children’s health, Birmingham/Solihull Playing Pitch strategy and fuller evidence on open space, sports facilities and recreation.
• Review should take account of NPPF changes, Highways England Delivery Plan, GBSLEP Spatial Plan and Strategic Economic Plan, adjoining housing market area assessments and LEP studies, Midlands Connect, South Midlands Route strategy, West Midlands Transport Plan, Warwickshire Coventry Solihull Green Infrastructure strategy, Solihull Countryside Strategy, Environment Agency Surface Water Management Plan and give greater emphasis to Solihull Connected.

• More detail on nature and scope of evidence studies would assist master planning of Borough’s key assets.

• Plan should emphasise importance of input through consultation as well as evidence.

• UK Central documentation is promotional and GBSLEP Spatial Plan has no status, and are not evidence.

Council’s Response to Issues raised:

• A Strategic Housing Market Assessment has been commissioned which will provide a full objectively assessed housing need figure for Solihull.

• The Scope, Issues & Options consultation document highlights evidence in the Strategic Housing Needs Study indicating that there is an unmet housing deficit across the housing market area which will need to be addressed. The implications for Solihull will be made clear in the GBSLEP Spatial Plan for Growth. In the meantime, the Council will continue to engage with neighbouring authorities as part of its duty to cooperate and this may include a Memorandum of Understanding amongst the authorities in the HMA.

• Key evidence studies, such as the Strategic Housing Market Assessment, the Strategic Housing & Employment Land Availability Assessment and the Green Belt Assessment have been, or are in the process of being commissioned. The key evidence base studies will be published to inform consideration of and consultation on the Draft Local Plan.

• The Solihull Green Belt Assessment will provide a comprehensive assessment of the whole of the Green Belt in the Borough. The methodology adopted will take account of Green Belt Reviews undertaken by neighbouring authorities and the principles for Green Belt Reviews agreed by GBSLEP authorities.

• It is acknowledged that the various evidence base studies will need to be consistent with the requirements for evidence and each other. This will be a key element of the brief preparation and consideration of draft studies.

• The Solihull Green Belt Assessment will provide evidence to support the establishment of new Green Belt boundaries. The potential for and implications of using a longer time horizon for establishing Green Belt boundaries will be considered during the development of the Draft Local Plan.

• The Sustainability Appraisal Scoping Report will be updated in advance of the next stage of appraisal for the Draft Local Plan.

• The Infrastructure Delivery Plan will take account of education, health and social care demands, including any relevant cross boundary requirements.
Appropriate evidence covering employment, retail, housing, transport, environmental concerns, health issues and sport and recreation will be utilised/developed to support the Draft Local Plan.

The Review will take account of strategies, plans and other studies developed by the Council and other organisations. The Local Plan spatial strategy and policies will be consistent with and support the Council’s transport strategy Solihull Connected.

The evidence base studies will be published at the appropriate time and be available to inform consideration of the Draft Local Plan. Information on specific studies can be obtained from the spatial planning team in Policy & Spatial Planning.

The Review will be subject to several key consultation stages as well as more general engagement with stakeholders and views obtained will help to shape the Draft Local Plan.

The GBSLEP Strategic Economic Plan and the UK Central Master Plan set out the ambitions for growth in the sub-region. Whilst these ambitions are not evidence, they are in line with the Government’s commitment to securing economic growth, reflected in National Planning Policy, with which local plans have to be consistent. The emerging GBSLEP Spatial Plan for Growth will provide a strategic overview with which the Review will need to be consistent and evidence of compliance with the duty to cooperate.
3. Cross Boundary and Strategic Issues

Q2 – Cross Boundary and Strategic Issues

Do you agree with the range of cross boundary and strategic issues in Chapter 3? Are there any others you think should be added?

Representations received (84):


Key Issues raised by Representations:

- More than a quarter of representations support issues identified with small percentage opposing.
- Support for recognition of housing needs shortfall in housing market area & constraints that many authorities face.
- Updated evidence required to inform housing needs target for Solihull & should take account of contribution to wider housing market area needs.
- Should recognise that there are authorities other than Birmingham that may require assistance in meeting needs, e.g. Coventry & Tamworth.
- Need to ensure that cross boundary issues are fully considered with neighbouring authorities, especially North Warwickshire & Coventry around UK Central Hub issues & definition of Meriden Gap.
- Should recognise that Green Belt releases required across the housing market area, including in Solihull, but not release Green Belt without full justification.
- Plan should recognise that Solihull in strong position to meet unmet housing needs across the housing market area, based on evidence in Strategic Housing Needs Study steering a significant proportion of needs towards Borough.
- Concern that reference to the level of development that the authority is “prepared to accept”\(^2\) suggests a rather negative approach to cross boundary issues and one that is political rather than evidence based.
- Support identification of Green Belt & importance of gaps between settlements as key issues.
- Support recognition of strategic importance of UK Central, including growth potential of Airport, NEC & Birmingham Business Park.

Other issues:

- Welcome recognition of importance of GBSLEP Spatial Plan for Growth.
- Fails to reflect Combined Authority vision.
- Cross-boundary issues should not influence Plan, which should provide for needs proportionate to existing population.

\(^2\) Paragraph 39 of the Scope, Issues and Options consultation.
• Green Belt should only be used for strategic housing sites around HS2 Interchange where exceptional circumstances exist.

• UK Central & HS2 Interchange proposals conflict with Local Plan & NPPF protection for Green Belt & insufficient evidence to justify employment growth which should be located in North Solihull, Solihull town centre & Shirley/A34 corridor.

• Unlikely that housing will come forward at HS2 Interchange until very late in Plan period, so growth will be required elsewhere in Borough.

• Need to recognise wider land use requirements associated with Airport growth, such as car parking.

• Cross-boundary assessment of need for high value executive housing & provision in Solihull required to support the wider economic strategy.

• Questions whether social housing included in housing growth figures.

• Should be greater focus on identifying needs rather than opportunities.

• Should recognise need to promote ‘green’ growth.

• Support growth as long as impacts on strategic highway network can be mitigated.

• Need for more detail in transport strategy on mitigation of cross-boundary issues for cyclists & pedestrians.

• Infrastructure element should include natural environment & importance of green/blue infrastructure corridors, & reflect work of Warwickshire Coventry Solihull Local Nature Partnership.

• Should consider sport strategically to avoid duplications & strengthen stability of clubs.

**Council’s Response to Issues raised:**

• A Strategic Housing Market Assessment has been commissioned which will provide a full objectively assessed housing need figure for the Borough. The implications of the unmet housing deficit across the housing market area for Solihull will become clearer through the duty to cooperate and will ultimately be reflected in the GBSLEP Spatial Plan for Growth.

• Through the duty to cooperate it is recognised that the housing shortfall across the wider area is a shared issue for the HMA as a whole. The Tamworth Local Plan 2006-2031 indicates that a proportion of its housing and employment needs will be met within Lichfield and North Warwickshire. Coventry is unable to meet its housing and employment needs within its boundaries, but the shortfall is being addressed within the Coventry & Warwickshire housing market area.

• The Council is working closely with North Warwickshire and Coventry to consider cross boundary issues, including those relating to the UK Central, the HS2 Interchange Area and the Meriden Gap.

• The Strategic Housing Needs Study suggests that the housing needs across the housing market area can only be met by significant Green Belt allocations. The Scope, Issues & Options consultation document notes that most of the options that do not require the release of Green Belt land would only provide limited capacity. Full justification will be
required to enable the release of Green Belt for new housing or other needs, in accordance with the NPPF.

- The Council recognises the potential it has in making a contribution towards the housing shortfall in the wider housing market area, and has taken a lead role in taking forward negotiations within the housing market area. Once negotiations have been completed, it will be clearer what the implications are for Solihull.

- The reference to “prepared to accept” is taken from the Planning Practice Guidance and reflects the positive approach the Council is following under the duty to cooperate.

- The next iteration of the GBSLEP Spatial Plan for Growth will set out the justification for the distribution of the shortfall in the wider housing market area, and will be supported by a sustainability appraisal. In the meantime a Memorandum of Understanding will help progress distribution of the housing shortfall across the HMA. The level of housing provision within individual authorities is ultimately a matter for each authority to determine, provided they have properly engaged in the duty to cooperate.

- The West Midlands Combined Authority priorities are skills, transport and housing. The Review will provide the spatial strategy and policies to deliver growth and support Solihull Connected.

- The Council is required through the duty to cooperate to consider wider strategic needs that cross authority boundaries and which cannot wholly be met within an individual authority’s area.

- The spatial strategy and distribution of growth will be considered as part of the development of the Draft Local Plan, and exceptional circumstances will need to be demonstrated for adjustments to the Green Belt.

- The UK Central & HS2 Interchange proposals are in line with the Government’s commitment to securing economic growth reflected in the NPPF. Evidence will be needed to demonstrate the exceptional circumstances required to justify adjustments to the Green Belt in these areas.

- The Review will include a housing trajectory demonstrating the expected rate of housing delivery for the Plan period, in line with the overall housing target figure and ensuring that a 5 year housing land supply is provided.

- The Review will take account of the implications of growth across the Borough, including that associated with Birmingham Airport.

- The Strategic Housing Market Assessment will provide evidence of need for new housing in the Borough and the types of new housing required, taking account of the expected level of employment growth.

- The full objectively assessed housing need figure for Solihull will include provision for social housing.

- The Council is focussing on identifying needs through the evidence base for the Review, but will need to consider the opportunities that exist to meet those needs.
- The Review will need to contribute to the achievement of sustainable development, including protecting and enhancing the environment and moving toward a low carbon economy, to be consistent with the NPPF.

- Growth will only be accommodated where its impacts on the strategic highway network are acceptable, or can be mitigated to an acceptable level.

- The Local Plan spatial strategy and policies will be consistent with and support the Council’s transport strategy Solihull Connected.

- The Infrastructure Delivery Plan supporting the adopted Local Plan includes Green Infrastructure and waterways, and will be updated for the Review, which will also take account of the work of the Warwickshire Coventry Solihull Local Nature Partnership.

- A joint Playing Pitch Assessment and Strategy is being prepared on behalf of Birmingham and Solihull, which will update evidence in the 2012 Assessment and Strategy.
4. Challenges to be Addressed

Q3 – Previous Challenges Still Appropriate

*Do you agree that the previous challenges (as amended) identified by the Solihull Local Plan on p.22 are still an appropriate basis upon which to plan for the Borough? If not, why not?*

Representations received (72):


Key Issues raised by Representations:

- Main response was from development interests reminding the Council of the challenges and complexities of establishing development needs in the Review focussed mainly on housing and covering quantum nature/type.
- Conversely, another main issue is challenge of protecting the environment, particularly the Green Belt/rural character and building into the Review an emphasis on sustainability/climate change.
- Other issues related to the challenge of providing adequate infrastructure to support development and to the review of Green Belt boundaries to enable development and to cover missing subjects in the Review such as tourism.
- Meeting Solihull/HMA housing and/or employment needs, including relationships between market/affordable housing, employment growth/housing, and types/balance/quality of housing needed (e.g. elderly provision, small/large households, quality housing).
- Securing protection of attractive rural character, Green Belt/gaps between settlements (including using brownfield before greenfield issue).
- Addressing transport and other infrastructure requirements to support development such as access to services/facilities/broadband, including in rural settlements.
- Green Belt boundaries/function should be reviewed to enable development.
- Provision should be made for tourism needs.
- Greater emphasis on climate change/protection of natural assets.
- Provision should be made for JLR needs/diverse economic base/review of employment sites.

Other issues:

- Definitions need clarity e.g. affordable housing, sustainable economic development, key gap (Green Belt context).
- Any challenge relating to sand and gravel needs to be clear.
- Balsall Common By Pass line needs reinstating to provide development potential.
- Economic growth too reliant on car industry.
- Spatial planning has strong role in reducing inequality and in climate change.
• Close working needed to ensure conformity with Neighbourhood plans.

• Needs of rural east should be considered in terms of employment, housing, services and public transport.

• Accessibility and alternatives to the car should be considered.

• Council should adhere more strictly to its policies.

**Council’s Response to Issues raised:**

• Agree that the Review process will need to make appropriate provision for housing and employment (and other types of development) having regard to all relevant influences, internal and external to Solihull.

• Through the Review process land may need to be excluded from the Green Belt in order to meet development needs. Green Belt land will continue to be protected in order to meet its strategic purposes, including countryside protection, in accordance with established principles and the NPPF.

• The Review will address transport and other infrastructure requirements to serve developments in both rural and urban areas.

• Agree that the Green Belt should be reviewed taking into consideration strategic function and purpose. The Green Belt assessment will be an important part of the evidence base that informs the Review in planning for future development.

• Agree that the Review should consider Solihull’s tourism needs.

• A sustainability appraisal and other evidence will inform the Review process including in regard to climate change, inequality and the protection of natural assets.

• Provision will continue to be made to enable important economic assets to meet future aspirations having regard to the need to protect Solihull’s attractive environment. The review will seek to provide for Solihull’s diverse economic base and will also review employment land sites for fitness for purpose.

• Terminology used in the Review will be taken from widely accepted understanding or else will be defined as needed.

• Provision for mineral extraction, including sand and gravel will be built into Review policy.

• The need for an access road to serve development is dependant on where future development is to be located and its relationship to the nature and extent of traffic that is already on the network (or will be on the network). The Review will consider the necessity and justification for a by-pass to serve Balsall Common to see if evidence supports such infrastructure.

• The influence of the Review in attracting/repelling a particular industry is limited. The Review is generally confined to provision for broad use classes e.g. warehousing, manufacturing or business offices.

• The Review will take into consideration Neighbourhood plans which are important to the Review from a conformity perspective.

• The Review is a Borough wide plan that will aim to meet development and related needs in all areas in a sustainable way, including the needs of rural areas.
- Sustainability will be a key focus of the Review including sustainable transport accessibility.

- The Review will guide the use and development of land. In order to encourage sustainable development policies may need to be applied in a flexible way depending on the context of particular circumstances and having regard to the overall aims of the Review.
Q4 – Additional Challenges

Do you agree that the Borough now faces the additional challenges identified on p.25, and/or do you believe there are any other additional challenges that ought to be considered?

Representations received (78):


Key Issues raised by Representations:

- Main response was from development interests seeking to ensure the Review considers various documentation/evidence/duties in arriving at the quantum/type of development to be planned for.
- Others seek mitigation of development impacts (particularly where related to HS2), protection of Green Belt/rural character and consideration of infrastructure provision.
- Full housing need should be addressed by the Review. Various documents/studies support increased housing/employment need in Solihull. Examples put forward are HMA requirements through duty to cooperate, Birmingham’s overspill issue, NPPF aspirations to boost housing, Fully Objectively Assessed Needs (FOAN) for Solihull and need to provide for a broad range of housing (including quality/type/tenure/affordability).
- Maximising HS2 benefits (including associated development) should embrace economic/environmental/social considerations. Benefits should be for everyone (including for example North Solihull residents). Mitigation of impacts is needed.
- In delivering sustainable development need to maintain/Protect Green Belt/rural character/Meriden Gap (including by prioritising brownfield sites over greenfield).
- Adequate infrastructure/services (for example, transport/public services/shops/broadband) required to support development or consider areas with under-used infrastructure.
- Need to address development/expansion/support for Airport/NEC/JLR.
- Consider provision for sport and leisure/health and wellbeing.

Other Issues

- Addressing housing need should not be at the expense of green space in urban areas.
- Need to address firm Green Belt boundaries on the ground and safeguard land for long term needs.
- Construction traffic for HS2 needed to east of Balsall Common. Reintroduce bypass and provide housing with access to station. Or HS2 and new station not needed. If station built should be in alternative location put forward by CPRE. Or HS2 will make it more difficult to protect/enhance natural assets.
- Housing need requires full consideration before overspill is accommodated. Market forces won’t be provided for without intervention. Or impact of Touchwood on viability of Mell Square.
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- Combined authority and elected mayor. New investment in Region. Or reduction in public spending will affect ability to meet challenges. Or Climate change and other government policy needs to be reflected.

- Challenges are also opportunities. Or Amend M and N to refer to other sustainable locations for growth within UKC Hub. Or a balance will be needed between M and N.

- Eastern Green development impacts on utilities/facilities/infill development along A45/Millisons Wood. Clarity needed on additional challenges. Not clear what it means for Meriden residents getting into Solihull.

**Council’s Response to Issues raised:**

- Agree that the Review process should make appropriate provision for housing and employment (and other types of development) having regard to relevant factors that influence need whether internal or external to Solihull.

- Agree that maximising HS2 benefits should embrace economic, social and environmental considerations and should aim to be of broad benefit for everyone. Mitigation of HS2 impacts will be pursued by the Council.

- Agree that in providing for development needs the Review should protect the countryside and should wherever practical prioritise brownfield sites for development over greenfield.

- Agree that in meeting development needs adequate infrastructure will be required to support it.

- The Review will address the future aspirations of key economic assets such as the NEC, Airport and JLR having regard to the need to protect Solihull’s attractive environment.

- The Review will take into consideration provision for sport, leisure, health and well-being.

- Access to open space, opportunities for sport and recreation and the importance of green and other public open space in developments is reflected in the NPPF to which the Review must be in general conformity.

- The Review will need to be in conformity with the NPPF that advises on Green Belt policy and the setting of Green Belt boundaries. Consideration will need to be given in the Review process to the issue of safeguarding land for long-term development needs.

- Reintroduction of Balsall Common bypass would need to be in the context of the evidence base to the Review. Further housing at the village would depend on the preferred option for growth and distribution to be determined through the Review process.

- The Review needs to take account of HS2 and its station within the borough, but alignment is set by government. The Council will seek mitigation of adverse environmental impacts of HS2.

- Market trends may influence policies required to ensure needs are met (e.g. policy may be needed on affordable housing).
• The Review process will consider what policies and proposals are needed for town centres, including Solihull town centre. These will be informed by the evidence base to the Review.
• Various factors external and internal to Solihull will bear upon on the content of the Review.
• Agree that climate change and other government policy relating to the development and use of land should be reflected in the Review.
• Agree that a balance is needed between securing the benefits of development and mitigation of environmental and other impacts, for example, HS2 and its interchange, as reflected in challenges M & N.
• Implications of the additional challenges depend upon choice of option (or options) for growth that will be determined through the Review process.
5. Vision and Spatial Strategy

QS – Borough Overview

Do you believe the Borough overview on p.25 remains appropriate? If not, why not and what alternative would you suggest?

Representations received (59):


Key Issues raised by Representations:

- Extend time horizon to 2033, or at least 15 years from adoption of Local Plan Review.
- Emphasise need to balance employment provision with housing provision.
- Refer to identity of semi-rural areas and maintaining countryside views.
- Inequality is key – Solihull is increasingly a Borough of two halves.
- Refer to environmental issues, such as climate change and maintaining Solihull’s distinctive natural and built environmental quality.
- Include health and well-being.
- Consider impact of growth on M42 traffic.
- Support economic growth of key assets of national concern, i.e. Airport, NEC and JLR.

Council’s Response to Issues raised:

- Agree that the time horizon will need to be amended to reflect the period covered by the Review, currently proposed for up to 2033.
- The overview recognises the Borough’s role as a place to live, learn, work and play, but the overall vision and strategy will need to reflect the housing and employment needs identified in the evidence.
- The vision recognises the importance of the Borough’s distinctive rural settlements and wider rural area, but could be refined to highlight the importance of countryside and views in areas where growth has to be accommodated.
- The vision is for a fairer and more equal Borough and recognises the importance of regeneration in North Solihull, as well as the existence of pockets depravation elsewhere.
- The vision provides for the protection and enhancement of the Borough’s historic and natural environment and green infrastructure, and for the reduction of carbon emissions and adaptation to the impacts of climate change.
- The vision is for existing and future generations to live healthier lifestyles, make healthier choices and have equal opportunities to a better range of high quality and affordable housing, education, jobs and an attractive safe environment.
- The vision is of a more accessible and integrated Borough where walking, cycling and public transport are more attractive and convenient alternatives to the car, but could be...
refined to recognise that this is especially important in areas of growth, such as the M42 corridor. The Council is working with stakeholders such as Highways England to ensure that the impacts on the M42 are managed.

- The vision recognises the potential and ambitions for the M42 Economic Gateway, including those of the Borough’s key economic assets.
Q6 – Vision and Spatial Strategy

**Do you believe the overall vision and spatial strategy set out in Chapter 4 remain valid? If not, why not, and what alternative would you suggest?**

Representations received (80):


**Key Issues raised by Representations:**

- Mixed response with about a fifth of representations indicating vision & spatial strategy remain valid but more than a fifth saying no longer appropriate.
- Vision should recognise new Plan period & look beyond 2033, so that Plan can meet longer term population growth & future challenges.
- Should reflect increased emphasis on economic & housing growth; reflect the strategic importance of the Borough, & the Combined Authority focus on skills & connectivity.
- Significant increase in housing & other needs means Green Belt releases will be required, necessitating review of spatial strategy.
- Significant level of concern that specific protection of Meriden Gap no longer appropriate, as has same status as other Green Belt, Green Belt releases will be required and Meriden Gap includes some sustainable locations for growth.
- Economic growth & provision for housing needs important, but should not be at expense of Borough’s wider qualities, or continued protection for Green Belt & the Meriden Gap.
- Growth around HS2 Interchange would be in conflict with protection for Meriden Gap.
- UK Central element should reflect need for housing across the Borough to support its economic potential, & include opportunities associated with the HS2 Interchange.
- Should recognise importance of key economic assets & support their future growth.
- Support recognition that urban renaissance strategy no longer applicable, which means spatial strategy must be reconsidered & informed by needs & potential of UK Central to drive growth.
- Emphasis on North Solihull regeneration no longer appropriate, as significance of regeneration diminished & scale of growth needed requires alternative strategy.
- Changing spatial strategy focus would undermine regeneration of North Solihull.
- Vital that spatial strategy continues to promote Solihull town centre as focus for retail & leisure.
- Should focus growth in locations where more sustainable modes of transport are a genuine alternative & reflect commitment to reducing car travel.
- Growth & associated increase in traffic will result in deterioration in quality of life.
- Should continue to protect the quality of the mature suburbs, especially open space, but make clear that does not preclude appropriate urban extensions.
• Should recognise importance of high value housing for attracting inward investment.
• Support recognition of potential for growth at rural settlements which should adopt a holistic approach & reflect need to improve local facilities.
• Should avoid significant growth in rural settlements.
• Support continued emphasis on reduction of carbon impacts, but spatial strategy should address challenges of climate change & inequality.
• New theme required to protect, enhance & restore natural assets in view of increasing challenge from levels of growth.
• Should make provision for specific needs including growing elderly population, sport & recreation, & tourism.

Council’s Response to Issues raised:
• Agree that the time horizon will need to be amended to reflect the period covered by the Review, currently proposed for up to 2033. The Council will consider through the Review whether a longer time frame is appropriate, for example when considering adjustments to the Green Belt.
• Agree that the vision and spatial strategy should reflect the Government’s emphasis on economic and housing growth and the strategic importance of the Borough, as articulated in the NPPF and the UK Central Master Plan. The Review will need to help deliver the priorities of the West Midlands Combined Authority and support the Council’s transport strategy, Solihull Connected.
• The Scope, Issues & Options consultation document makes clear that the spatial strategy will need to be replaced to reflect the GBSLEP Spatial Plan for Growth (and matters arising from the duty to cooperate), the ambitions in the UK Central Master Plan and the priorities of the West Midlands Combined Authority.
• The Council will continue to protect the Green Belt in the Borough, including the Meriden Gap, but the Scope, Issues & Options consultation document makes clear that most of the available options that will deliver significant additional capacity will require adjustments to Green Belt boundaries. The Solihull Green Belt Assessment will provide a comprehensive assessment of the whole of the Green Belt in the Borough, based on the purposes of including land in Green Belts in the NPPF.
• The UK Central & HS2 Interchange proposals are in line with the Government’s commitment to securing economic growth reflected in the NPPF. Evidence will be needed to demonstrate the exceptional circumstances required to justify adjustments to the Green Belt in these areas.
• The Strategic Housing Market Assessment will provide evidence of need for new housing in the Borough, taking account of the expected level of employment growth, and the spatial strategy and distribution of growth will be considered as part of the development of the Preferred Option/Draft Local Plan.
• The vision and spatial strategy recognise the potential and ambitions for the M42 Economic Gateway, including those of the Borough’s key economic assets.
- The Scope, Issues & Options consultation document makes clear that the spatial strategy will need to be reviewed and should reflect the ambitions in the UK Central Master Plan and the scale of growth needed.

- Whilst the emphasis on urban regeneration should be seen in the context of the commitment in the NPPF to securing economic growth and boosting the supply of housing, the need to address the inequalities between North Solihull and the rest of the Borough means that regeneration will remain an important element of the spatial strategy in the Review.

- The Scope, Issues & Options consultation document identifies that Solihull town centre remains a sustainable location as a focus of commercial and other activity, and evidence will be used to support renewed or new allocations for the centre.

- The need to focus growth in locations where more sustainable modes of transport are a genuine alternative is reflected in the growth options outlined in the Scope, Issues & Options consultation document, and will be a key consideration in the development of the Draft Local Plan. The Review will seek to reflect the commitment to reducing car travel in the Council’s transport strategy Solihull Connected.

- The Council will seek through a managed growth approach to ensure that growth does not result in deterioration in the quality of life of residents and visitors. However, failure to meet the objectively assessed needs for housing and jobs will also have an adverse affect on the quality of lives.

- The vision recognises the importance of protecting and enhancing the Borough’s high quality mature suburbs and rural settlements, and the level of growth required will enable a contribution towards high value housing in appropriate locations.

- Agree that growth will need to be supported by the provision for necessary infrastructure, including improvements to local facilities where appropriate.

- The level of growth required is such that the spatial strategy for the Review is likely to incorporate elements from a number of the growth options set out in the Scope, Issues & Options consultation document. Growth in rural settlements will be considered in the context of emerging Neighbourhood Plans and the capacity of local infrastructure or the potential for new capacity.

- Agree that the spatial strategy should address challenges of climate change & inequality.

- The spatial strategy includes a theme to protect, enhance & restore the Borough’s environmental assets and green infrastructure, and it is agreed that this is required in the context of increasing levels of growth.

- The Strategic Housing Market Assessment and the Playing Pitch Assessment and Strategy commissioned jointly with Birmingham will provide evidence of the specific needs for older people and sport and recreation, which can then be taken into account in developing the Draft Local Plan. Tourism in the Borough is primarily business related with significant opportunities for growth focussed on town centres, the NEC and in rural areas, and will be considered as part of the Review.
6. **Policies to be Significantly Amended or Replaced**

**Q7 — Policies to be Significantly Amended or Replaced**

*Do you agree with the schedule of policies on p27 that need to be significantly amended or replaced? If not, why not?*

Representations received (74):


**Key Issues raised by Representations:**

- Significant number agree that policies P1 Support Economic Success and P5 Provision of Land for Housing need to be significantly amended or replaced.

- Other policies were also identified as requiring significant amendment or replacement as follows: P2 Maintain Strong Competitive Town Centres; P3 Provision of Land for General Business; P4 Meeting Housing Needs; P7 Accessibility and Ease of Access; P8 Managing demand for Travel and Reducing Congestion; P9 Climate Change; P10 Natural Environment; P14 Amenity; P15 Securing Design Quality; P17 Countryside and Green Belt; P18 Health and Well Being; P20 Provision for Open Space; Children’s Play, Sport, Recreation and Leisure and P21 Developer Contributions and Infrastructure Provision.

- Some respondents consider Green Belt policy / boundary needs amendment, particularly in light of future development pressures and significant amendment required to Policy P5.

**Other issues:**

- Support for brownfield development rather than Green Belt.

- Need more focus on maintaining the identity of small rural settlements and continue to develop area with a built up identity.

- Inadequate public transport in rural areas.

**Council’s Response to Issues raised:**

- Policies P1 and P5 have been identified by the Council as requiring significant amendment or replacement. It is welcomed that a significant number of respondents to the consultation agree with this position.

- The Council will again consider the extent to which the other policies specifically identified in the consultation responses as requiring significant amendment, should be revised.

- As part of the evidence base, a Green Belt assessment is being undertaken. This will help to inform any decisions that may be taken with regards to any Green Belt boundary changes.

- The Council will continue to encourage the effective use of land by reusing brownfield land wherever possible.
- The Vision and Spatial Strategy for the Borough will be developed through the review of the Local Plan. This will set out what this means for different areas of Solihull, including the rural and urban areas of the Borough.

- The review of the Local Plan will seek to ensure sustainable transport options are promoted. Solihull Connected will set the strategic direction and establish policy to guide the transport agenda in the borough for the next 20+ years. This will be an integral part of the Local Plan Review and for the rural areas it is recognised that consideration needs to be given as to how best to serve the area by public transport.
Q8 – Additional Policies to be Significantly Amended or Replaced

Are there other policies which you believe need to be significantly amended or replaced?

Representations received (64):


Key Issues raised by Representations:

- Over two-thirds of those responding to this question consider that there are other policies requiring significant amendment or replacement.
- Policy areas identified as requiring amendments are summarised as follows: *(see also representations to Q7)*

<table>
<thead>
<tr>
<th>Policy</th>
<th>No. of representations</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>P2</td>
<td>Maintain Strong Competitive Town Centres</td>
<td>1</td>
</tr>
<tr>
<td>P3</td>
<td>Provision of Land for General Business</td>
<td>12</td>
</tr>
<tr>
<td>P4</td>
<td>Meeting Housing Needs</td>
<td>17</td>
</tr>
<tr>
<td>P6</td>
<td>Provision of Sites for Gypsies and Travellers</td>
<td>3</td>
</tr>
<tr>
<td>P7</td>
<td>Accessibility and Ease of Access</td>
<td>3</td>
</tr>
<tr>
<td>Policy</td>
<td>No. of representations</td>
<td>Reason</td>
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</tr>
<tr>
<td>P8</td>
<td>5</td>
<td>Need to ensure social and environmental costs of increased housing and economic success are not overlooked. Policy should be tightened.</td>
</tr>
<tr>
<td>P9</td>
<td>6</td>
<td>Need to reflect Government sign up to the Paris Protocol and more stringent targets.</td>
</tr>
<tr>
<td>P10</td>
<td>4</td>
<td>May require amendments based on national changes.</td>
</tr>
<tr>
<td>P11</td>
<td>3</td>
<td>May require amendments based on national changes.</td>
</tr>
<tr>
<td>P14</td>
<td>1</td>
<td>Need to ensure social and environmental costs of increased housing and economic success are not overlooked.</td>
</tr>
<tr>
<td>P15</td>
<td>2</td>
<td>Need to reflect abolition of lifetime homes standards/building for life.</td>
</tr>
<tr>
<td>P17</td>
<td>17</td>
<td>Changes to P1 and P5 will require Green Belt boundary changes and releases. Protection of Green Belt needs greater precedence. Needs to be greater certainty for businesses in the Green Belt. Green Belt assessment needed and need to review washed over settlements.</td>
</tr>
<tr>
<td>P18</td>
<td>5</td>
<td>Strengthen link between planning and public health. More stringent policy on hot food takeaways. Need to include provision for sport and leisure needs and Sport England’s new strategy.</td>
</tr>
<tr>
<td>P19</td>
<td>1</td>
<td>No specific reason cited.</td>
</tr>
</tbody>
</table>
### Policy Table

<table>
<thead>
<tr>
<th>Policy</th>
<th>No. of representations</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>P20 Provision for Open Space, Children’s Play, Sport, Recreation and Leisure</td>
<td>2</td>
<td>Need to ensure social and environmental costs of increased housing and economic success are not overlooked. Need clear methodology in the policy.</td>
</tr>
<tr>
<td>P21 Developer Contributions and Infrastructure Provision</td>
<td>3</td>
<td>Infrastructure plan should be updated in light of new evidence.</td>
</tr>
</tbody>
</table>

- Less than a third of those responding to this question do not consider any other policies require significant amendment / replacement.
- New policies on broadband, cycling, schools, tourism and the development of brownfield sites before Green Belt sites are suggested.

**Other issues:**
- Reinstatement of Balsall Common bypass.

**Council’s Response to Issues raised:**

- The Council has identified that many of the above policies will require only minor, rather than significant amendments. These minor amendments could address the comments made in response to the consultation. However, in light of the responses received and the reasons given, the Council will again consider the extent to which the policies highlighted above should be revised.

- The Council has identified that policies P6, P10, P11, P14, P16, P20 and P21 require no change and can be rolled forward. However, in light of the responses received and the reasons given, the Council will again consider whether there is any justification to amend the policies.

- In considering the consultation responses, reviewing and updating the evidence base, the Council will identify whether any new policies should be included in the Local Plan Review.

- The Council will consider evidence in relation to the potential necessity/justification for any reinstatement of the Balsall Common bypass, which will also be dependent on the potential distribution of housing growth across the Borough.
7. Policies Requiring Only Minor Amendments

Q9 – Policies requiring Minor Amendment

Do you agree with the schedule of policies that only need minor amendments? If not, why not?

Representations received (68):


Key Issues raised by Representations:

- Of those responding to this question, almost half agree with the schedule of policies identified for minor amendments (although some respondents include a caveat that some policies listed require more than minor amendment)*.
- A third disagree with the schedule of policies identified and / or identify policies requiring more than minor amendments*.
- Circa one fifth make general comments about the type of amendments required.
- Policies P3, P4 and P17 are frequently cited as requiring more than minor amendment.
- Need to clarify what constitutes minor amendment.
- All policies should be reviewed to avoid further challenges to the plan in future.

* see also key issues raised in Q7 and Q8.

Council’s Response to Issues raised:

- The Council welcomes the significant number of respondents who agree with the policies that have been identified as requiring minor amendment.
- The Council acknowledges that several respondents consider some policies require more than minor amendment. In terms of the type of amendments required and the reasons for them, the Council consider that minor changes will address many of the points raised in the responses. However, in light of the comments received, the Council will again consider the extent to which the policies should be revised, particularly policies P3, P4 and P17 which are frequently cited as requiring more than minor amendment.
- Policies requiring minor amendments are those that are still fit for purpose for the most part, but require updating to reflect a change in circumstance or evidence without the need for an entirely new or significantly re-written policy.
- The Council is reviewing all the existing policies in the adopted Solihull Local Plan to assess those where there has been a significant change in circumstances since they were adopted or where the evidence base needs updating.
Q10 – Additional Policies Requiring Minor Amendment

Are there other policies which you believe need minor amendments?

Representations received (49):


Key Issues raised by Representations:

- The majority of respondents to this question consider that other than those identified, there are no other policies requiring minor amendments (apart from those already cited as requiring significant amendment in Q7 – Q9).
- Other policies identified as needing minor amendment include:
  - Policy P6 Provision of sites for Gypsies and Travellers - Non-compliance with national policy. Local plans must set out criteria for assessing planning applications, regardless of need.
  - Policy P10 Natural Environment - Remove reference to the West Midlands Sustainability Checklist as this is never referred to, and instead include a reference to best practice and guidance.
  - Policy P11 Water Management - Should consider impacts of 2015/6 flooding on water related policies.
  - Policy P16 Conservation of Heritage Assets and Local Distinctiveness – Needs to be strengthened to protect local character of Knowle, Dorridge and Bentley Heath.
  - Policy P20 - Minor amendments required to provide greater clarity with regard to open space requirements for new developments and to provide sufficient sport and play space.
- Additional policy issues identified include, tourism, recycling, more brownfield development, protection of the countryside and the identity of rural areas.

Council’s Response to Issues raised:

- The Council welcomes the fact that the majority of respondents to this question consider that there are no other policies requiring minor amendments, other than those identified.
- The Council considers that Policy P6 - Provision of sites for Gypsies and Travellers is compliant with national policy. Policy A of Planning Policy for Traveller Sites (PPTS) sets out that local planning authorities should use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions. Policy P6 of the adopted Local Plan does this by setting a pitch target using the 2012 Solihull Gypsy and Traveller Accommodation Assessment (GTAA) which is still the most up to date evidence of the identified need in Solihull. The GTAA is not due to be updated until around 2017. In accordance with PPTS, Policy P6 also sets criteria to guide land supply allocations where there is an identified need and this has been used to inform the Solihull Gypsy and Traveller Site Allocations Plan which was adopted in December 2014. Policy P6 also establishes that the criteria will also be used in the determination of planning applications, which contribute to meeting any identified
unmet need. This is also considered to be in accordance with PPTS which states that when considering planning applications, local authorities should amongst other things, consider the existing level of local provision and need for sites. The Council therefore considers it acceptable that the consideration of unmet need is a factor in determining planning applications.

- In light of the comments received on Policy 10, the Council will consider removing reference to the West Midlands Sustainability Checklist.

- With regard to the representation on Policy P11, an updated Strategic Flood Risk Assessment will be undertaken to inform the review of the Local Plan and any changes that may be required to this Policy.

- Knowle, Dorridge and Bentley Heath Neighbourhood Forum are preparing a Neighbourhood Development Plan for their area. It is considered that the issue of protecting the local character of Knowle, Dorridge and Bentley Heath can be developed through the neighbourhood planning process to provide a specific local interpretation of Policy P16 and what that means for Knowle, Dorridge and Bentley Heath. This is also applicable to other policies where a specific reference to Knowle, Dorridge and Bentley Heath is requested.

- In considering the consultation responses, reviewing and updating the evidence base and undertaking further consultation with stakeholders, the Council will identify whether any new policies should be included in the Local Plan Review.
8. Policies Requiring No Change and can be Rolled Forward

Q11 – Policies Requiring No Change

Do you agree with the schedule of policies that require no change and can be rolled forward in their existing form? If not, why not?

Representations received (53):


Key Issues raised by Representations:

- The majority of respondents agree with the schedule of policies requiring no change and consider they can be rolled forward in their existing form.
- Policies identified as requiring change include:
  - P6 Provision of sites for Gypsies and Travellers - Non-compliance with national policy. Local plans must set out criteria for assessing planning applications, regardless of need.
  - P10 Natural Environment – Should be amended to extend protection of ancient and notable trees, absolute protection for ancient trees and woodlands. May need updating to reflect any new recommendations from the updated Water Cycle Study and Strategic Flood Risk Assessment. Need more explicit links to health and well being.
  - P11 Water Management – Should recognise the benefits provided by trees and woodlands in delivering positive water quality and flow outcomes. May need updating to reflect any new recommendations from the updated Water Cycle Study and Strategic Flood Risk Assessment.
  - Policy P16 Conservation of Heritage Assets and Local Distinctiveness – Needs updating to reflect current good practice, also out of date references in supporting text need amendment. Needs to be strengthened to protect local character of Knowle, Dorridge and Bentley Heath.
  - P20 Provision for Open Space, Children’s Play, Sport, Recreation and Leisure – evidence referred to in the Policy is out of date. Need to ensure provision of sufficient sport and play space. Need more explicit links to health and well being.
  - P21 Developer Contributions and Infrastructure Provision – needs changing and updating, particularly with regard to broadband provision.
- New evidence or guidance may necessitate a review of the policies identified.
- Protection of the Countryside should be given greater prominence and the need for policies to include greater respect for smaller communities.
- All policies need review.

Council’s Response to Issues raised:

- The Council welcomes the fact that the majority of respondents to this question agree with the schedule of policies requiring no change.
• The Council considers that Policy P6 - Provision of sites for Gypsies and Travellers is compliant with national policy – see response to question 10.

• In light of the comments received on policies P10 and P11, through the review of the Local Plan the Council will consider whether any suggested changes to the policies are necessary, particularly as a result of new evidence that may come forward through the updated Water Cycle Study and Strategic Flood Risk Assessment.

• Consideration will be given to whether more explicit links to health and well-being can be made through and between policies in the plan and / or the supporting text.

• With regard to the representation on Policy P16 the Council will consider updating the policy to reflect current good practice and amend any out of date references in the supporting text. The Knowle, Dorridge and Bentley Heath neighbourhood plan can provide the local interpretation of policy P16 for the Knowle, Dorridge and Bentley Heath neighbourhood area.

• The Council will amend policies where new or updated evidence suggests that changes are necessary, or where evidence is considered to be out of date.

• The Council will consider whether any reference to broadband provision is needed in Policy P21, in the light of evidence and taking account of the its inclusion in the list of the types of infrastructure that may be funded by the Community Infrastructure Levy.

• The Vision and Spatial Strategy for the Solihull will be developed through the review of the Local Plan. This will set out what this means for different areas of Borough and the communities within it.
Q12 – Additional Policies Requiring No Change

Are there other policies which you believe that require no change and can be rolled forward in their existing form?

Representations received (46):


Key Issues raised by Representations:

- A large majority of respondents identify no other policies (other than those listed) that can be rolled forward in their existing form.
- The wording regarding the Motorway Service Area on the M42 should be retained.
- All policies must be reviewed, not rolled forward.
- New evidence and guidance may necessitate changes to those identified.

Council’s Response to Issues raised:

- The Council acknowledges that a large majority of respondents have identified no other policies (other than those listed) that can be rolled forward in their existing form.
- A planning application for a Motorway Service Area (MSA) is currently being considered by the Council. The outcome of this application will have an influence on how the MSA is dealt with in the Local Plan Review; and whether, and to what extent, any further reference is required in the LPR.
- The Council is reviewing all the existing policies in the adopted Solihull Local Plan to assess whether there has been a significant change in circumstances since they were adopted or where the evidence base needs updating.
- The Council recognises that any new evidence or guidance may necessitate amendments to those policies previously identified as requiring no change.
9. Additional Policies

Q13 – Additional Policies Required

Do you believe there are any issues that require an additional policy not yet in the Local Plan? If so what issue are it meant to address and what suggestion to you have for a policy?

Representations received (57):


Key Issues raised by Representations:

- Additional policy suggestions include:
  - Inequality and poverty.
  - Green corridors or other measures to link animal populations and secure ease of movement through the built environment.
  - Superfast broadband in new developments.
  - Memorandum of understanding between authorities in the Housing Market Area regarding meeting the housing shortfall.
  - The use of brownfield sites instead of countryside.
  - Respect for the natural environment and focus building away from existing rural communities.
  - Social and cultural well being. Policy is needed on Community and Cultural Facilities.
  - Reintroduction of bypass at Balsall Common.
  - Identification of sites for storage of caravans to address need and reduce visual impact.
  - Development within village envelopes and custom built housing. Settlements washed over by the Green Belt should be excluded from the Green Belt.
  - Infrastructure to support housing growth.
  - Law and order.
  - Policy document giving weight to Parish Councils.
  - Policy to guide development and provision of car showrooms.
  - Criteria relating to rural exception sites and brownfield sites in the Green Belt.
  - A specific UK Central policy to set out key aspirations for the whole UK Central area and the key sites within it.
  - Provision for C2 uses within the plan.
  - Reducing the need to travel and prioritise local journeys over long distance, high speed travel.
  - Increasing energy performance of requirements on new and existing buildings to mitigate climate change.
- Specific policy for Jaguar Land Rover which recognises existing operations and supports future growth of the business.
- Preservation of mature trees and replace those lost with native species.
- Any planned housing development in Balsall Common to be delayed until completion of HS2 construction.
- Policy to identify specific sites for high value, executive housing to support growth aspirations of the region.
- Tourism.
- The elderly.
- High Speed 2.
- Health improvement reflected as a theme throughout and specific reference to mental health and well being.

**Council’s Response to Issues raised:**

- In considering the consultation responses, reviewing and updating the evidence base and undertaking further consultation with stakeholders, the Council will identify whether any new policies covering the areas subject to representation should be included in the Local Plan Review. Neighbourhood Plans may be able to provide local interpretation of some of these policy areas where relevant.

- The Local Plan Review will consider to what extent any phasing of development may be necessary or justified. This may take into account a number of factors including the relationship to any infrastructure requirements and the construction activity associated with large scale projects.
10. What Level of Growth is Needed

Q14 – 2011 as Appropriate Base Date

Do you agree that 2011 is the appropriate base date to consider housing delivery against? If not, why not?

Representations received (53):

Key Issues raised by Representations:
- Mixed response received:
  - Support for 2011 base data as coincides with HMA Strategic Housing Needs Study and last census.
  - Objection that 2011 is out-of-date and new evidence should be considered.
- View that shortfall in delivery from 2006-2011 should be carried over.
- View that shortfall in delivery from 2011-2015 should be addressed early in the Plan and not spread over the full period.

Other issues:
- Combined Authority Mayor will control social and economic welfare.
- Have regard to duty-to-cooperate with Coventry and Warwickshire HMA evidence.
- Question whether 2011 is a typo.

Council’s Response to Issues raised:
- Delivery post 2011 will be taken into account and the SHMA technical report will be based on the most up-to-date evidence
- The housing target in the Unitary Development Plan, from 2001 to 2011, was 4,000 dwellings. 5,147 net additional dwellings were provided over the whole period.
- Under the constitution currently proposed for the Combined Authority, Solihull MBC will retain its planning functions.
- The Council are actively engaged with Coventry and Warwickshire under the duty to cooperate.
- Solihull falls within the wider Birmingham HMA; this includes North Warwickshire borough (in part) and Stratford-upon-Avon district (in part), but not Coventry.
Q15 – Housing Requirement of 13,500

Based on the emerging evidence, do you believe that it is appropriate to plan for a housing requirement of 13,500 dwellings over the plan period? If not, why not?

Representations received (75):


Key Issues raised by Representations:

- Significant response that 13,500 is not the full objectively assessed need, and should be regarded as a minimum.
- Further evidence required on impact of future jobs growth, market signals, suppressed household formation rates, historic building rate and affordability.
- Significant response that Solihull should provide additional housing to contribute towards HMA shortfall.
- Estimates of FOAN provided by house builders ranging from 15,300 to 23,700; not including HMA shortfall and other needs.

Other issues:

- View that Coventry’s shortfall should be accounted for.
- Caution that existing housing supply may not be deliverable over the Plan period.
- Concern that evidence for housing need in general is not robust or transparent.
- Concern that rural areas have taken their share of growth.

Council’s Response to Issues raised:

- The Planning Practice Guidance (PPG) advises that the DCLG household projections, based on the ONS population projections, are the starting point for assessing full objectively assessed housing needs. The assessment will further take into account economic needs, evidence of suppressed housing supply, market signals, affordable housing and local circumstances.
- The Council has commissioned an independent PPG-compliant Strategic Housing Market Assessment (SHMA) and is awaiting the technical evidence on the full objectively assessed need (FOAN).
- All authorities within the HMA have a role in addressing the overall HMA shortfall, within their capacity.
- The Council is actively engaged with neighbours, LEP partners and the HMA authorities in addressing housing need and other strategic priorities.
- Coventry’s shortfall is being addressed through the Coventry and Warwickshire HMA.
Q16 – Additional Level of Growth

Do you believe there is scope to go beyond this level of growth? If so what level of growth should be provided and why?

Representations received (60):


Key Issues raised by Representations:

- Should go beyond 13,500 dwellings as the FOAN will be higher, and housing requirement will be further increased by meeting some of the HMA’s shortfall.
- Suggested additional growth ranges from 500 – 17,500.
- Green Belt is not an absolute constraint and some Green Belt release should be considered.
- Growth should not significantly affect the character of Solihull.

Other issues:

- Consider wider housing solutions such as bringing empty properties back into use.
- Strategy should consider housing needs beyond 2033 as well.
- Connectivity between Solihull town centre and Airport/NEC/Birmingham Business Park needs improvement.
- Growth should be directed to urban parts of West Midlands.

Council’s Response to Issues raised:

- The Council has commissioned an independent PPG-compliant SHMA (see response to Q.15).
- Under the NPPF, the FOAN is established first and then the capacity within the Borough to accommodate those needs is considered. The Council will need to consider all the options for housing and economic growth and align with the strategic transport work, such as Solihull Connected, infrastructure delivery plan and strategic environmental assessment.
- An independent Green Belt Assessment, Landscape Character Assessment and Sustainability Appraisal are all being commissioned as part of the LPR evidence base.
- The strategy will consider whether safeguarded sites should be allocated for beyond the plan period; in accordance with the NPPF, in particular Para. 83 ‘authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’
- The Local Plan will have a 15 year horizon from adoption.
- The Council’s Housing Strategy sets out the wider approach to tackling housing need in the Borough.
• Work on the SHELAA has commenced with the Call for Sites, and all options for distribution of growth will be considered in accordance with the overall spatial strategy and taking full account of capacity and constraints.

• Land for housing and economic development is being provided across the HMA and West Midlands conurbation.
11. Where Should the Growth Take Place?

Q17 – Option A – Public Transport Hubs & Corridors

Do you believe that focussing development around public transport hubs and corridors is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (104):


Key Issues raised by Representations:

- Development industry representors tended to either oppose or support the option depending on whether it lends supports or detracts from locations/sites being promoted.

- The option was generally considered to be sustainable, particularly in urban areas. Many felt the option would not meet the scale of growth required without other options or that the option provides insufficient scope for development near hubs.

- Some representors oppose development in some locations relevant to Option A. These include: Whitlocks End/Stratford Line, Dorridge, Balsall Common/Berkswell, Hampton, Dickens Heath, Tidbury Green and Catherine De Barnes. Reasons cited by respondents include: threat to rail park and ride, unsuitable local roads, lack of/need for public transport, lack of supporting infrastructure/jobs/services, settlement size too small, loss of Green Belt, inconsistency with SHNS, effects on adjoining district.

- Some representors support development in some locations relevant to Option A. These include: Warings Green, Balsall Common/Berkswell, NEC Bickenhill, Solihull, North Solihull, Olton, Shirley, Widney Manor, Whitlocks End, Dorridge, Hampton, Meriden, Marston Green and at motorway junctions. Reasons sited include: scope for variety of uses, no Green Belt loss, suitable for development/suitable post HS2, would support UKC, supports a station node/public transport, fits with SHNS report. Would reflect car use.

- A number of representors considered Option A sustainable for reasons of: support for public transport accessibility/frequency and other infrastructure, consistency with SHNS and NPPF changes, support for employment, would connect residents to the City and would support rail use.

- A number of representors considered Option A to be reliant on other hubs/options (typically A, B, C, D, F, G) to meet capacity needed. Various caveats/points were made to qualify this: should avoid if adversely affects communities or puts development in overcrowded locations. Land around hubs is restricted. Parking/other infrastructure needed and could encourage car use. Consider scope for public transport improvements elsewhere to spread development. Consider educational/medical facilities/demand for smaller households. Reflect connected corridors.

- Need to consider DfT Circular O2/2013 in choosing development areas (particularly regarding BVP relative to M42).
- Balanced approach needed focussing on various accessible Solihull locations and on smaller settlements to boost services.

- Some Option A areas are at risk of flooding.

Other Issues:

- Only use hubs with infrastructure capacity. Capacity limited in mature suburbs. Need to retain character.

- Rural areas have poor hubs relying on car access. Rural bus services already being cut.

- Should develop near public transport but operators reluctant to provide services until development well established.

- High frequency transport not well defined. Effective services are need to where people want to go. Travel to work is a cross boundary issue requiring analysis. Most drive because it is more convenient. Housing in rural areas could add pressures on road network.

- Each site should be assessed for sustainability. Not all hub sites score positively.

- Avoid nature conservation sites/set out nature conservation constraints.

- Option A damaging to rural settlements and not SHNS compliant.

- A range of housing sites needed to meet scale of development. Green Belt land in sustainable locations should be released to meet need.

- Develop in main settlements with infrastructure/services and proportionate growth at smaller settlements.

- Will only minimise traffic if development near public transport links with high frequency public transport to multiple destinations.

- Dispersed nature of development makes connectivity to key destinations challenging. Limited scope to provide adequate public transport in some areas.

- Evidence needed before choosing options. Housing figures too low.

- Limited development potential in urban area should extend along public transport corridors (including A34).

- Large areas would have no beneficial development should also focus on areas that could be made more sustainable. Greater potential in the Green Belt.

- Sustainable but Green Belt release needed on urban edge near town centre to deliver housing levels.

- Allocations should be sites of least environmental value with policies to address concerns.

- SEA all options. Produce a hierarchy: Urban area, corridors, and car-based developments.

- Should be informed by Solihull Connected Study.

- Qualitative landscape assessment need in regard to Para 124.
Council’s Response to Issues raised:

- In reaching a preferred option the Review process will take into consideration concerns raised including those related to sustainable access, infrastructure and services, loss of Green Belt/rural character, effects on adjoining local authorities and overall development needs.

- The Review process will be guided towards a preferred option by a variety of factors including the evidence base, consultation responses, the need to plan for sustainable development supported by infrastructure and the overall quantum of development that needs to be accommodated.

- Agree that in principle option A can be a relatively sustainable option if pursued in a carefully planned way. A number of factors will lead the Review process to a preferred option.

- Agree option A cannot accommodate limitless development and additional or alternative options may be needed in response to a variety of factors as the Review process progresses.

- DfT Circular 02/2013 (Strategic Road Network and the Delivery of Sustainable Development) will be taken into consideration as appropriate.

- The preferred option (or options) and the way in which development is distributed will be determined through the Review process in response to a variety of factors.

- Flood risk is one of a variety of considerations to be taken into account in determining the location of development through the Review process.

- Agree that some hubs will be more suitable for significant development than others and for a variety of reasons, including accessibility by sustainable travel modes.

- Agree that the prospect of access to public transport will need to be considered through the Review process in determining where significant development is located.

- Agree that provision for sustainable access needs to be in the context of where people are likely to want access to and that travel to work can be a cross boundary issue. Development will need to be carefully planned through the Review process to avoid harm, including harmful pressures on urban or rural roads.

- Agree that sites identified through the Review process will need to be assessed for sustainability.

- The need to protect nature conservation sites and the need for mitigation of any harmful affects of development will need to be addressed in the Review.

- Any harm to rural settlements will depend on a number of considerations, including the level and distribution of development proposed. The Review process will need to ensure development is carefully planned. SHNS makes suggestions on how development should be accommodated but it is not prescriptive.

- The Review process will need to determine the number, size and location of sites required to meet the scale of development needed. Any release of Green Belt will take into consideration sustainability issues.

- Sustainable access will be one of a number of important considerations in determining where development will be located.
• Agree that evidence should inform the choice of preferred option (or options) and the overall amount of development to be planned for.

• Environmental impact will be a consideration in determining where development will be located.

• SEA will be carried out as necessary.

• Solihull Connected is part of the evidence base/informing strategy for the Review.

• A landscape assessment will form part of the evidence base to the Review.
Q18 – Option B – Solihull Town Centre

Do you believe that focussing development in and around Solihull town centre is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (78):

Key Issues raised by Representations:

- Some unconditional support for the option but overall mainly qualified support based on lack of opportunities to deliver enough housing/employment development.
- Also opposition or concerns that the option would not deliver the range/type of housing or development needed i.e. would be too many small households (e.g. for elderly/single persons) and concern for the impact of development on the town centre environment.
- Capacity concerns with the option in isolation including that option will not provide sufficient land/capacity to meet growth needs. Will require other options/Green Belt land to meet housing/development needs (typically F&G).
- Support because potentially accessible/sustainable option in terms of providing access to services or to employment (including employment in Birmingham) or to other services/facilities (e.g. access to evening economy, apartments for young professionals, residential in place of offices) and supports vitality/viability.
- Concern over the range and general nature of housing such as the type of housing will not deliver an adequate range of residential or there may not be sufficient sites and premises/residential would need to be maximised on mixed use sites/ high density needed. May only enable small households.
- Concern for town centre environment including that sufficient transport links needed or should not damage/encroach onto parkland/open spaces or other attractive features. Good design/master plan required and sites of least impact should be chosen governed by policies. Urban greening needed. Opposed to high rise.
- Opposes option because town centre is constrained in some way and land availability is complex. Unrealistic option or too much retail and only smaller developments should be enabled or only use options that protect natural assets/biodiversity.
- Opposes option because housing/ employment needs should be accommodated in appropriate locations elsewhere over the Review period (e.g. North Solihull or rural areas north and east, Dickens Heath).
- Opposes town centre focus because would burden services/infrastructure. Or, Supports option as infrastructure already exists.
- Should consider DfT Circular 02/2013⁴ in regard to town centre noting impacts on Junction 5 of M42. Concern regarding growth levels in the town centre as a risk to J5.

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⁴ DfT Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development
• Need to distribute growth to main settlements with supporting facilities. Allow proportionate growth of small settlements.

Other Issues

• Chosen option should protect primacy of town centre.
• Evidence is needed before options can be chosen.
• Centre must change and develop. Should be mix of retail and residential.
• Locates housing with jobs but need to ensure demand for business space does not push up rents. Multi-storey apartments needed.
• Alderbrook is culverted at Homer Road. Redevelopment could provide attractive feature. Blue/Green infrastructure provision is challenging. Remove barriers to biodiversity.
• Strategy also needed for Shirley/Chelmsley Wood Town centres. Chelmsley Wood centre could benefit from nearby development (NEC/HS2).
• Needs more residential over retail.
• SEA all options. Have a hierarchy: intensification of urban area, corridors down to car based.
• Develop brownfield sites.
• Main focus should be urban areas but may not be attractive to developers.

Council’s Response to Issues raised:

• Agree that option B will not meet overall development needs on its own. Will need other option or options and may require Green Belt land releases.
• Agree that Solihull Town Centre is a highly accessible location and development could help support vitality and viability of the centre.
• Agree that option, on its own, unlikely to deliver a broad range of dwelling types or the overall quantum of housing required and that development is likely to be of a high density nature.
• Development of the Town Centre will need to be carefully planned in order to avoid harm to its environment or its attractive features. A master plan will be needed.
• Option B is not mutually exclusive. It would need the support of another option or options. The location of development will be determined through the review process.
• If the town centre is to be developed it will need to be served by necessary infrastructure.
• Dft Circular 02/2013 will be taken into consideration as appropriate.
• The preferred option (or options) and the way in which development is distributed within the option will be determined through the Review process in response to a number of factors.
• Agree the Review needs to be evidence based.
The town centre is a sustainable location for development and retail and residential are appropriate town centre uses.

Agree that residential should be located with access to jobs and that high density apartments are a likely form of development in the town centre.

Agree with the principle that redevelopment can potentially bring environmental improvements and that infrastructure provision can be challenging. Protection of biodiversity will be taken into consideration through the Review process.

The Review process will consider what strategies/policies are required to support town centres.

Agree that residential over retail is an appropriate form of development in centres.

The Review process will need to carry out SA/SEA in accordance with regulatory requirements. The Review will be focussed on sustainability in the process of determining the distribution of development.

As a general principle brownfield development will be preferred to green field development in so far as brownfield development is able to realistically meet development needs.

The urban areas are unlikely on their own to be able to meet development needs over the Review period.
Q19 – Option C – North Solihull & Chelmsley Wood

Do you believe that focusing development in and around North Solihull & Chelmsley Wood is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (83):

Key Issues raised by Representations:
- Mixed response, although many recognising limited capacity.
- Has already taken significant growth & further development likely to be on valuable green space or sites of ecological value.
- Insufficient capacity to address Borough’s needs, will not meet market housing needs & significant viability issues for delivery.
- Would not reflect growth needs that are focussed in south/south-west of Borough.
- Supports regeneration objectives & should be part of wider solution utilising brownfield & town centre opportunities with accessibility to employment opportunities at UK Central Hub area.
- Should be prime focus for development given investment already made, infrastructure availability & potential to ease pressure for development elsewhere.
- Could explore potential to extend growth to the east with North Warwickshire BC.
- UK Central Hub area more appropriate for growth as has greater capacity & infrastructure can be provided to improve wider connectivity.
- Job creation & skills should be priority rather than more housing, with opportunities associated with Birmingham Business Park.
- Concerns about loss of schools & green space, increased congestion & environmental impacts from Airport, major roads & rail link.
- Concern that additional growth could overburden existing infrastructure.
- Should reappraise Green Belt & consider release where does not fulfil Green Belt functions, as developers will deliver if unable to develop Green Belt land elsewhere.

Other issues:
- Strategic Flood Risk Assessment should be updated to reflect risk of flooding in area & fragmentation of green/blue infrastructure avoided.
- Sites with least environmental value should be brought forward with assessment against clear set of criteria.
- Appropriate option based on approach of urban intensification & development along transport corridors.
- Would require positive involve from public sector & renewal of housing stock which is questionable.
• Would contain growth west of M42.
• Could address need for housing other than social housing.

Council’s Response to Issues raised:

• The adopted Local Plan allocated sites for up to 660 new homes, although one of the sites was subsequently earmarked for non-residential use. The North Solihull Green Space Review will ensure that there is no net loss in green space value.

• The Scope, Issues & Options consultation document indicated a view that there is limited additional scope for growth within the regeneration area without further adjustments to the Green Belt boundary. It is acknowledged that focusing on North Solihull will not meet housing needs in other parts of the Borough. Issues of viability will be considered by a viability assessment.

• Agree that growth option could be part of a wider solution.

• Level of growth required and the lack of capacity in North Solihull means that growth option is unlikely to be appropriate as prime focus for growth in the Review.

• The Council is working closely with North Warwickshire to consider cross boundary issues, including those relating to the UK Central, the HS2 Interchange Area and the Meriden Gap.

• The Council has recognised the potential for growth in the UK Central Hub area through the UK Central Master Plan, the initial proposal for a Local Area Plan for the HS2 Interchange and adjoining area, and its inclusion as a growth option in the Scope, Issues & Options consultation document.

• The NPPF reflects the Government’s commitment to securing economic growth and boosting the supply of housing and the Review will need to be consistent with these priorities.

• The North Solihull Primary Schools Programme is transforming primary schools in the area with 10 newly built or remodelled schools replacing 15 Junior and Infant schools.

• The North Solihull Green Space Review seeks to ensure that there is no net loss in green space value. The impacts of growth on the transport network and the environment will be considered, and mitigated where appropriate.

• Growth will need to be supported by the provision for necessary infrastructure, including improvements to local facilities where appropriate.

• The Solihull Green Belt Assessment will provide a comprehensive assessment of the whole of the Green Belt in the Borough, including North Solihull, and will provide evidence to support the establishment of new Green Belt boundaries.

• An update of the Level 1 Strategic Flood Risk Assessment for Solihull is being commissioned.

• The criteria for assessing sites have yet to be agreed but the Council will seek to ensure that with those with least environmental value are brought forward.

• Whilst this option would contain growth west of M42, so would a number of the other growth options in the Scope, Issues & Options consultation document.
• It is acknowledged that this option could address needs for both market and social housing.
Q20 – Option D – Shirley Town Centre & A34 Corridor

Do you believe that focusing development in Shirley town centre and along the A34 corridor is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (79):

Key Issues raised by Representations:

- General support for the option as infrastructure already in place and accessibility to services, facilities and employment. Also some strategic benefits. Some concerns, mainly from development industry that would not meet growth needs in terms of quantity and type of development without significant incursion into Green Belt in/near corridor or would need to be supported by other options.

- Some opposition because of increased congested A34 or lack of facilities such as open space. Also some concern over possible loss of Green Belt creating sprawl and less sustainable.

- Insufficient capacity to meet overall growth needs, particularly in Shirley Town Centre. Reasons sited include: lack of suitable sites without intruding into Green Belt, type/choice of housing (likely to be apartments/small households), harm to established housing areas, road congestion/insufficient infrastructure.

- Overall support for option as: infrastructure exists, development could bring improvements/protect communities elsewhere or enable better use of services/facilities and assist regeneration, connectivity good, land available, proximity to employment, supports sustainability or vitality/viability of centre.

- Support for use of Green Belt/Green Belt review in/near A34 corridor to support/increase scope of option. Reasons include: would not harm Meriden Gap, enables sustainable developments, could support public transport, significant opportunities south west of A34 (near BVP).

- Option needs the support of other options or combination of options to meet growth needs.

- Specific opposition to option because: A34 congested/pollution and planned development will worsen matters (e.g. BVP, TRW Solihull Business Park). Insufficient provision already open space. Large areas not a transport hub.

- Option would benefit from development/redevelopment of employment or commercial sites for housing or mixed use, Suggestions include; Solihull Gate, TRW, Blythe Valley Park, Fore.

- Supports option from a transport perspective: Will support connectivity for Warwickshire residents/Metro along A34 could alleviate traffic congestion/Shirley needs good public transport.

- Option should form part of an aim to focus development in urban areas. Reasons include existing services/infrastructure (including transport), accessibility to Birmingham.
• Concern over loss of Green Belt in/near A34 corridor. Reasons include urban sprawl, remoteness from facilities, not sustainable

• Should consider DfT Circular 02/2013 regarding development in Shirley Town Centre and along A34 noting impacts at Junction 4 of M42.

Other issues

• Opposed to option because need to resolve traffic/pedestrian conflict to ensure both sides of A34 flourish. Study needed on whether focus of activity west of A34 is not more practical and overcomes access issues on east side.

• Recent developments weighted towards elderly but need is for starter homes.

• Can’t consider option without evidence. Consultation worthless on low housing figure.

• Opposes employment land use to support this limited option. Sector approach needed that embraces Dickens Heath area/Land at Earlsmere House, Warings Green Road would contribute to this option and help meet housing need/. Development around NEC and Airport more important.

• Develop windfall opportunities around Town centre/corridor.

• Town centre boundary needs review. Should embrace high profile businesses. Should include Sainsbury’s in centre. A strategic plan is needed for centre.

• Supports option if development conducted sensitively.

• Should use multi-storey development to increase density subject to design/noise.

• Supports option subject to need for parking & similar facilities and should not result in increased car use to reach hubs.

• Release land from the Green Belt to meet housing need. Distribute growth to the main settlements with access to services and facilities. Allow for proportionate growth of smaller settlements.

• Few sites designated as significant nature conservation sites along A34 corridor. Options that avoid harm to natural assets/contribute to enhancement of natural assets should score positively for biodiversity and be considered favourably.

• Supports options D and G given high concentration of jobs in the area.

• Flood risk from Cole and Kingshurst Brook should be taken into account. Update SFRA including level 2 if needed to explore management options.

• Select sites of least environmental value governed by policies that address concerns.

• SEA all options. Intensify urban area, then developments along corridors, and ultimately reduce sprawl and car based low density traffic generating developments.

• Consider brownfield developments.

• Improved transport links to Dickens Heath. Potential at TRW for mixed development. Need to consider natural environment and landscape quality of A34 to improve public realm and encourage active transport modes.

• Supports option for Shirley Town Centre but Monkspath, Dickens Heath, Blythe Valley Park and Cheswick Green are less well connected to public transport.
Council’s Response to Issues raised:

- Agree that Option D is unlikely on its own to meet overall growth needs without using Green Belt land release. The option would need to be supplemented by another options or options.
- Agree that Option D has benefits relating to connectivity and infrastructure and support for Shirley Town Centre.
- A borough-wide Green Belt assessment will be part of the evidence base to the Review process.
- Significant development in the A34 corridor, including in Shirley Town Centre, would need to be carefully planned in order to avoid harm to the environment and ensure development was properly provided for.
- Existing/allocated employment sites will be reviewed to assess whether they remain appropriate for business/commercial purposes and whether other uses or mixed uses may be appropriate.
- Agree that Option D could potentially support transport connectivity, support public transport and alleviate congestion.
- Agree that urban areas should be a focus for development but Green Belt land releases may be needed to meet overall development needs.
- The amount of development and its distribution/location will be determined through the Review process, and this will include considering Green Belt land off the A34 corridor.
- DfT Circular 02/2013 is part of the evidence base to the Review and will be taken into consideration.
- Further development in the A34 corridor, including Shirley Town centre, would need to be carefully planned in order to avoid harm to the environment and to resolve A34 access issues.
- Option D is capable of providing a broad range of housing, particularly in locations outside Shirley Town Centre.
- An appropriate evidence base will support the Review and the level of development needed to be planned for.
- Location of development will be determined through the Review process.
- Windfall opportunities may occur around Shirley Town centre and in the A34 corridor and do not necessarily rely on the Review process to come forward.
- The Shirley town centre boundary and policies needed to support the town centre will be determined through the Review process.
- Agree that development should be implemented sensitively.
- Agree that carefully designed multi storey development may be appropriate in some localities within Option D.
- The Review will be focussed on sustainable and accessible development and car parking will be viewed in this context.
• Green Belt land releases may be needed to help meet overall development needs. The quantity of development to be planned for and its distribution will be determined through the Review process.

• As a general principle the Review is likely to seek to protect natural assets and biodiversity.

• Options D (and G) enables access to employment areas.

• Flood risk will be taken into account in determining where development should be located.

• Sustainable development will be a key focus for the Review. Choosing sites of least environmental value would need to be in this context.

• SA/SEA will be carried out in accordance with regulatory requirements. The location of development will be determined through the Review process.

• Brownfield development will generally be preferred to greenfield development where possible and depending on circumstances.

• Agree that improved public transport links to Dickens Heath and other rural areas would be desirable.

• The suitability for allocated purpose of TRW and other business sites will be considered through the Review process.

• Agree that natural environment and landscape quality and transport accessibility are important issues in improving public realm and in providing opportunities for development.

• Agree that some locations beyond Shirley Town Centre are less well served by public transport.
Q21 – Shirley Town Centre – How Should Centre Evolve & Key Projects

How should Shirley town centre evolve over the plan period, and what key projects do you think may be necessary to support any changing role that it may serve?

Representations received (32):

Key Issues raised by Representations:

- Broad range of mainly positive suggestions put forward. Strong focus on improving the general environment that is influenced by the congested A34. Also support for more residential development around the centre, particularly in mixed use schemes.

- A number of suggestions made on improving centre’s vitality and viability through more leisure facilities, including boosting the evening economy. Need for improved parking facilities also an issue linked particularly linked with a need for modern retail/commercial development.

- Improve centre’s general environment to create a better place to visit/improve viability. Suggestions include: improve public realm, more pedestrian space, resolve hostile ambiance for pedestrians/cyclists, more open space with housing, better use community space, provide a central focus, better natural/built environment.

- Support for creating space for/using brownfield sites for new housing developments including in mixed commercial/retail/ housing schemes.

- Support for more or improved leisure/entertainment facilities to strengthen/improve the centre (examples forwarded include swimming pool, velodrome and creating a strong evening economy).

- Support for improved and convenient/safe car parking facilities, examples include, integrated parking in retail/commercial schemes, decked car-parking.

- Resolve the harmful/divisive affects of the A34. Specific suggestions include: resolve pedestrian/traffic conflict, measures to improve traffic flow.

- Create improved retail facilities/shopping experience, examples: build a major retail scheme, redevelop centre to create upmarket niche shopping, modernise smaller shops, and encourage small independent shops.

- Detailed study of uses and needs to see what is needed then identify appropriate locations for development/evolve as a growing service centre with retail and other services that support housing development.

- Alleviate threats to the centre such as from out of centre retail parks, develop Powergen and other unused sites attractively, avoid development in the park, rationalise extent of retail.

- Improve transport/improved transport links relating to the centre, including: links to business parks, improved connection to Solihull Rail Station.

- Make more provision for housing of the right type (affordable, for young) or for start up business units/other business.

- Major growth should be resisted/should only be modest growth.
• Concern that Parkgate has impacted negatively on the centre (High St viability issue).
• DfT Circular 02/2013 should be considered in regards the evolution of the centre noting impacts on Junction 4 of M42.

Other issues

• Provide a coordinated marketing plan for the centre.
• Flexibility over business rates needs incentives to encourage greater occupancy.
• Reduce the number of charity shops.
• Provide more housing behind the A34 corridor.
• Consultation is important where transport links poor.
• Poor turnout on local issues.
• SEA all options. Adopt hierarchy of development locations from intensification of urban areas to low density car based solutions.
• Part of a strategy with other options/combination of options needed.

Council’s Response to Issues raised:

• Agree that brownfield sites in Shirley Town Centre may be appropriate for mixed use schemes.
• The NPPF encourages competitive town centre environments and seeks to locate. Main town centre uses, including leisure uses, within them.
• May be scope for improved parking through redevelopment sites.
• Agree that harmful affects of A34 need to be resolved. Developments may enable improvements.
• Further retail development would rely on redevelopment or change of use.
• The Review will be supported by its evidence base that will inform the process of determining the quantum and location of growth to be planned for and services required to support housing development.
• Policies may be needed in the Review to ensure Shirley Town Centre retains or improves its vitality and viability and to ensure it remains an attractive place to visit/shop.
• Agree there is scope for improving connectivity/transport links.
• Agree that provision for housing should aim to meet need through an appropriate range of dwelling types, including affordable housing.
• The level of development to be planned for will be determined through the Review process.
• Parkgate has provided modern shopping units in a centre that lacked modern units.
• DfT Circular 02/2013 will form part of the evidence base that will inform the Review.
• A marketing plan is outside the scope of the Review.
• Business rates are outside the scope of the Review.
• Directly controlling the number of charity shops is outside the scope of the Review.
• Broadening the A34 corridor to include greenfield sites would increase scope to provide more housing. Level and distribution of development will be determined through the Review process.
• The Review process will be the subject of consultation as required by regulation.
• The Review aims to consult broadly by a variety of means and to try and encourage responses from harder to reach groups.
• SA/SEA will be undertaken as required by regulation. Provision for sustainable development will be a main focus of the Review process.
• Agree that Shirley Town Centre will not be able to meet overall development needs.
Q22 – Option E – HS2 Interchange

Do you believe that focussing development in the area around the HS2 Interchange is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (97):


Key Issues raised by Representations:

- Substantial support for this option with more than a third of representations in favour and a small proportion against.
- Highly appropriate location due to proximity of employment growth & opportunities for planned community encompassing a range of infrastructure needs.
- Represents major opportunity for significant growth & will generate significant movements, so essential to ensure minimises need to travel, maximises use of sustainable travel modes & does not exacerbate congestion.
- Plan should be ambitious & should not be tightly constrained on Interchange, but should include wider UK Central Hub area focussing on needs & potential of key economic assets, & include land to south of A45 at the Motorcycle Museum & for Airport needs.
- Landowning Consortium for HS2 Interchange site working closely with Solihull MBC to prepare a mixed-use scheme which meets three pillars of sustainability.
- Recognise that will make more effective use of Green Belt land assuming HS2 goes ahead, but should be investigated regardless.
- Plan should not target growth to single location, so essential option is part of a wider range of growth options spread across the Borough.
- Significant concerns that location not sustainable as car based & more suited to employment use, or deliverable within Plan period, as dependent on HS2 timetable & will require significant infrastructure, so any housing will be at tail end of period & mostly long-term.
- Plan should focus on meeting needs arising from growth around UK Central Hub, with wider Borough needs across the whole UK Central master plan area.
- Inappropriate as in Meriden Gap & extends Birmingham conurbation closer to Packington & Hampton.
- Should only consider if HS2 proceeds, if not restrict development to west side of M42 along transport corridors.
- Need to understand & mitigate growth beyond HS2 Related development on strategic road network, especially increased trips on M42 & A45, & consider wider implications for highway improvements, such as reinstatement of Balsall Common bypass line.
- Should consider transport links to North Solihull to ensure accessibility to jobs/workforce.
• Housing should include both social & affordable housing & meet local needs rather than those of London commuters.

• Should be included in Green Belt Review & establish firm Green Belt boundaries that can endure whilst protecting the Meriden Gap & nearby settlements.

• North Warwickshire BC conveyed significant local concerns over the potential impact of this proposal on the local, rural highway network and rural settlements from increased traffic flows and levels. Measures need to be considered to address any potential adverse impacts, in parallel with maximising connectivity to the HS2 Interchange station.

Other issues:

• NEC is an important location for growth regardless of options selected & could accommodate broader range of uses, including residential, on brownfield land with more efficient use of car parks.

• Location has a number of environmental concerns as adjacent major roads & rail line, Airport & waste facilities.

Council’s Response to Issues raised:

• The Scope, Issues & Options consultation document indicates that this option could provide a sustainable pattern of development, but that it requires complex infrastructure needs and would require mitigation of effects on the wider transport network. Solihull Connected recognises the importance of minimising the need to travel and maximising the use of sustainable travel modes, and the Review will need to support and be consistent with the transport strategy.

• The Review will need to provide the spatial planning framework for growth across the UK Central Hub area including that needed for the Borough’s key economic assets. The boundaries will depend on the extent of growth to be provided and evidence, such as the Green Belt Assessment.

• The current position of the HS2 project indicates that it is likely to be implemented, and this option has been developed on this basis. However, the UK Central Master Plan is not dependent on HS2 proceeding and provision will have to be made for the Borough’s housing and employment needs whether or not HS2 is delivered.

• The Review is likely to be based on a number of the growth options in the Scope, Issues & Options consultation document, but the distribution will be determined as part of the development of the Draft Local Plan.

• The Scope, Issues & Options consultation document indicates that this option could provide a sustainable pattern of development and the “Interchange – Prospectus for a Garden City Approach” demonstrates how a combination of employment and housing development might be accommodated. The consultation document acknowledges that delivery would be towards the end of the Plan period, and this will be taken into account in the distribution of housing growth.

• The UK Central Master Plan recognises that the Hub is the area with the greatest potential for growth although other parts of the Master Plan area will be investigated as part of the development of the Draft Local Plan.
• The HS2 Interchange area is in the Green Belt and exceptional circumstances will have to be demonstrated to justify adjustments to the Green Belt boundary. The Green Belt Assessment will consider the contribution of the area to the purposes of including land in the Green Belt.

• The current position of the HS2 project indicates that it is likely to be implemented, and this option has been developed on this basis. Provision will still have to be made for the Borough’s housing and employment needs whether or not HS2 is delivered.

• It is acknowledged in the Scope, Issues & Options consultation document that the Review will need to consider the impacts of growth on the wider transport network and the need for infrastructure improvements. Until the distribution of growth is determined it is not possible to indicate whether improvements will be required in specific locations.

• It is agreed that local transport links to the employment opportunities at the HS2 Interchange from North Solihull will be important, if its residents are to be able to access the jobs available.

• Policy P4 of the adopted Local Plan seeks to ensure that 40% affordable housing is provided on development sites subject to local circumstances. The Scope, Issues & Options consultation document indicates amendments to this policy to reflect Starter Homes policy may be necessary. The policy also makes clear that tenure, mix and type of new homes can be identified (to reflect local needs), although it is not possible to limit to local occupancy.

• The Solihull Green Belt Assessment will provide a comprehensive assessment of the whole of the Green Belt in the Borough. The Green Belt Assessment will provide evidence to support the protection of the Green Belt where it contributes significantly to the purposes of including land in the Green Belt, and the establishment of new Green Belt boundaries.

• The NEC is part of the UK Central Hub area and the Master Plan indicates that this area has significant potential for growth. Policy P1 of the adopted Local Plan indicates that the Council will support continued development of a broad range of uses at the NEC. The Scope, Issues & Options consultation document recognises that an appropriate policy can also support appropriate mixed use opportunities.

• The impacts of existing and proposed infrastructure on potential occupiers of the businesses and housing will be considered as part of the development of the Preferred Option/Draft Local Plan.

• An update of the Level 1 Strategic Flood Risk Assessment for Solihull is being commissioned and the Water Cycle Study will be updated.

• The growth option relating to transport corridors and hubs is one of a number of options along with the UK Central Hub area and HS2 Interchange area, and the scale of growth likely to be required means that a number of options will have to be considered.

• Policy P2 of the adopted Local Plan indicates that town centres, especially Solihull town centre will be the focus for new retail and commercial development. The Scope, Issues & Options consultation document envisages minor amendments only to this policy whilst recognising the need to reflect the relationship to the UK Central area.
• This option is one of a number of growth options including limited expansion of rural settlements and large scale urban extensions significant expansion of settlements, and the scale of growth likely to be required means that a number of options will have to be considered.

• The Infrastructure Delivery Plan will be updated to support the Draft Local Plan.
Q23 – Option F – Limited Expansion of Rural Settlements

Do you believe that focussing development based on a limited expansion of rural settlements is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (115):


Key Issues raised by Representations:

• Considerable support for Option F from housebuilders and landowners with the following caveats:
  o Considered alongside other options, scale of housing need will require more significant extensions as well.
  o Small developments may be insufficient to lever the necessary infrastructure to support new housing.
  o Support to focus development around high frequency public transport hubs/corridors in rural settlements.
  o Development may make some rural areas more sustainable.

• Significant number of sites around settlements submitted for housing and some mixed use as part of Call for Sites SHELAA exercise.

• Concern from local residents and representatives that Option F will:
  o Result in unacceptable loss of Green Belt and erode the Meriden Gap.
  o Exacerbate existing road congestion and traffic issues and increase car dependency.
  o Be unsustainable due to lack of suitable infrastructure, services and amenities to support this level of growth.

• Some support from local residents and representatives for infilling and small sites in rural settlements, e.g. Knowle, Dorridge and Bentley Heath.

• View that excessive building has already taken place in rural areas, especially south-west of Borough.

• Concern regarding poor public transport connectivity of some rural areas to town centres and employment hubs.

• Less impact on the Green Belt than Option G.

Other issues:

• Development should be steered towards sites of least environmental value and away from areas of flood risk and high biodiversity.

• Concern that local character and identity of rural settlements will be adversely impacted and could lead to sprawl/merging of settlements.

• DfT Circular 02/2013 should be considered in regards to the development of rural settlements.
• Small-scale sites should be brought forward by Neighbourhood Planning.
• Need to SEA all options to provide a hierarchy of preferred growth options.
• Noise impact if build within flight path and close to HS2.

**Council’s Response to Issues raised:**

• The information provided under Call for Sites will be addressed in a separate report.
• An independent Green Belt Assessment is being prepared for the Local Plan Review.
• The Council will be considering all options for the distribution of growth and agree that a combination of option elements will be required.
• The Council is working with Parish Councils and local communities in bringing forward Neighbourhood Plans.
• The SHELAA will take account of infrastructure capacity issues, environmental constraints, the Green Belt assessment, local character and distinctiveness as well as site deliverability and viability.
• Dft Circular 02/2013 will be taken into consideration as appropriate.
• SEA is a statutory part of developing the Local Plan and will guide the overall sustainable development spatial strategy.
• Noise impacts will be taken into account.
• Public transport connectivity in rural areas is being addressed through Solihull Connected. New development can enable transport schemes and/or render services more viable.
Q24 – Option G – New Settlement, Large Scale Urban Extension or Significant Increase of Rural Settlements

Do you believe that focusing development in a new settlement, through a large scale urban extension or via a significant increase of a rural settlement is an appropriate option? If not, why not? Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?

Representations received (103):


Key Issues raised by Representations:

- Considerable support for Option G from housebuilders and landowners.
- Provides opportunity for improvements to local infrastructure.
- The Option is one that should be considered. It could also be taken forward alongside other Options.
- Option may be the only way long term growth can be accommodated.
- More support for urban extensions and expansion of larger rural settlements, rather than expansion of smaller rural settlements, as this will be more sustainable.
- Some support for a new settlement, including suggestion that reclaimed quarry land off Cornets End Lane is used.
- Significant number of sites around settlements submitted for housing and some mixed use as part of Call for Sites SHELAA exercise.
- Concern from local residents and representatives that Option G will:
  - Exacerbate existing road congestion and traffic issues, increase car dependency and harm village character.
  - Be unsustainable due to lack of suitable infrastructure, services and amenities to support this level of growth.
  - Be unnecessary given expansion at UK Central and HS2 Interchange.
- View that excessive building has already taken place in rural areas, especially south-west of Borough.
- This Option will have most impact on the Green Belt and the gaps between settlements.

Other issues:

- Development should be steered towards sites of least environmental value and away from areas of flood risk and high biodiversity.
- DfT Circular 02/2013 should be considered in regards to the development of rural settlements.
- Infrastructure requirements will need to be given significant consideration.
Council’s Response to Issues raised:

- The Council recognises that the Option may provide opportunities for improvements to local infrastructure and the viability of existing services and facilities.

- The Council considers it unlikely that a single Option will provide the long-term solution to where growth and development should take place in Solihull, but that a mix of Options incorporating elements of each is likely to be required.

- The Council recognises the advantages that extensions to urban areas and larger rural settlements can have in terms of utilising existing services and facilities. However, smaller rural settlements can also benefit from development in terms of improvements to local infrastructure, supporting existing services and providing new facilities.

- The Council will consider the opportunities for the reuse of brownfield land, although land that has been used for mineral extraction where provision for restoration has been made is excluded from the definition of previously developed land in Annex 2 of the NPPF.

- The Strategic Housing & Employment Land Availability Assessment will consider the availability of land and the opportunities for growth across the Borough, and the distribution will be determined as part of the development of the Draft Local Plan.

- An update of the Strategic Accessibility Study will be undertaken to help inform the distribution of growth and to ensure it pays dues regard to the desirability of not exacerbating congestion or increasing car dependency. The Local Plan spatial strategy and policies will be consistent with and support the Council’s transport strategy Solihull Connected.

- At least 4000 additional dwellings will need to be identified in the review of the plan. As this figure should be seen as a minimum, UK Central Hub and HS2 will not be able to accommodate this level of development alone. Therefore, other Options will need to be considered.

- The Green Belt and other constraints will be assessed and considered before any option, or combination of options is developed further or taken forward.

- National policy guidance, including circulars will be considered when developing a preferred option. Similarly, infrastructure requirements will also be given significant consideration through the updating of the Infrastructure Delivery Plan.

- The potential for a new settlement off Cornets End Lane will be assessed, along with other sites suggested through the ‘Call for Sites’, including whether it would be developable within the meaning of the NPPF.
Q25 – Additional Options

Are there any additional options you believe should be considered? If so, what are they and what do you believe are the opportunities and challenges that they may provide?

Representations received (54):


Key Issues raised by Representations:

- A combination of Options will be required to deliver all of housing need.
- More evidence is required on the housing figure and sustainability appraisal of all the options and alternatives.
- Need to explore brownfield options including redundant office and industrial office space, redevelopment of older buildings in town and village centres, car parking at NEC and brownfield sites in other parts of the West Midlands.
- Considerable response to SHELAA Call for Sites, which could result in significant expansion of existing settlement or provide new settlement.

Council’s Response to Issues raised:

- Agreed that a combination of options will be required to deliver housing needs.
- A Strategic Housing Market Assessment has been commissioned which will provide a full objectively assessed housing need figure for Solihull, and the GBSLEP Spatial Plan for Growth will set out how the wider unmet housing needs across the housing market area will be managed. A sustainability appraisal was published to support the Scope, Issues & Options consultation document, and will be updated to support the Preferred Option/Draft Local Plan.
- The Council is exploring brownfield options and will consider those that have been put forward during the Call for Sites process, but the Strategic Housing Needs Study recognises that there are insufficient brownfield land opportunities to meet the level of housing needs across the housing market area.
- The Strategic Housing & Employment Land Availability Assessment will consider the availability of land and the opportunities for growth across the Borough, and the distribution will be determined as part of the development of the preferred option in the Draft Local Plan.
12. Infrastructure Requirements

Q26 – Infrastructure Requirements

What infrastructure requirements do you believe are necessary to support the level of growth, or the options for growth identified in this consultation?

Representations received (63):


Key Issues raised by Representations:

- Significant local concern that schools, GPs, dentists and other services are at capacity.
- Concern about exacerbation of existing parking and congestion issues in urban and rural parts of borough.
- Highways England state reference should be made to Junction 6 improvements of M42, motorway service area, impacts of Blythe Valley Park development on Jn 4 of M42, potential extensions to the Metro and Sprint Bus network amongst other public transport improvements.
- ITA recommends delivery of infrastructure and accessibility measures to overcome severance from HS2. Emphasise integrated public transport links, especially at Solihull and Birmingham International train stations. Keen to develop comprehensive infrastructure plan based on Strategic Transport Plan.
- Should align with Solihull Connected Green Paper.
- Need to improve public transport, including integrating rail-links and bus services and providing sufficient park-and-ride to facilitate mode shift.
- Take account of cross-boundary transport issues, e.g. extending cycleways beyond the Borough boundary.
- Need for health and social care provision, and accommodating needs of the significant elderly population.
- Need for recreation and open space facilities for new and existing population.
- Focus on delivering multi-functional infrastructure; with biodiversity incorporated wherever possible. Should seek to deliver opportunities in Green Infrastructure Study and Nature Conservation Strategy.
- Opportunities to reduce flood risk should be sought, and a strategic approach to safeguarding flood risk sites from future development should be undertaken. EA unable to further comment until an updated Strategic Flood Risk Assessment and Water Cycle Study have been carried out, and a Preferred Option is brought forward.

Other issues:

- Superfast broadband provision should be considered and needs a policy.
- Develop existing facilities in the built-up area.
- Capitalise on transport improvements associated with HS2 development.
• Need to review capacity to guide quantum and phasing of growth.

• Limited public transport, especially bus links, in the rural areas.

• JLR have specific concerns in respect of Jn 6 of the M42, and consider interim improvements could be required. Could improve links between JLR and main UKC Hub area. Strategic road network needs to operate as efficiently as possible to ensure efficient running of businesses.

• Not clear how transport strategy for Combined Authority will align with Local Plan Review.

• Concern that UKC and HS2 will have adverse impact on traffic and highway safety through Hampton-in-Arden, especially the B4102.

• Infrastructure costs and delivery implications are a key factor in bringing development forward.

**Council’s Response to Issues raised:**

• An updated Infrastructure Delivery Plan will be commissioned to support the next stage of the Local Plan Review. This will consider strategic infrastructure requirements such as education, health and community services, transport links and green infrastructure. An Accessibility Study has also been commissioned, which will consider sustainable patterns of development as well as measures to overcome constraints.

• The Council welcome local evidence on challenges to and opportunities for delivering the necessary infrastructure to facilitate development. These can also be addressed through Neighbourhood Plans.

• The Council is working with Highways England and partners in UK Central on the transport and other infrastructure implications of growth, particularly around HS2 and the Hub/Arden Cross.

• The Council’s Transport Policy team is working with partners at WMITA and neighbouring highway authorities on the emerging sub-regional and regional transport strategies, such as Midlands Connect.

• Site deliverability, capacity and enabling works, such as strategic and local highway improvements, will be key concerns in putting forward preferred options and proposed site allocations.

• The Council will consider policies to support digital connectivity, especially in the context of potentially using CIL funds towards digital infrastructure.

• The Local Plan Review will be aligned with Solihull Connected.

• An updated Strategic Flood Risk Assessment and Water Cycle Study will be commissioned to inform the preferred options within the Draft Local Plan. We welcome the input from the Environment Agency.

• We will take into account the Joint Strategic Needs Assessment, the findings of the Strategic Housing Needs Assessment with respect to housing needs of the elderly and work with the Public Health and Adult Social Care teams within the Council to identify local needs for different sectors in the population.
- A Joint Playing Pitch Assessment and Strategy is being prepared on behalf of Birmingham and Solihull, which will update evidence in the 2012 Assessment and Strategy.

- The Council’s Green Infrastructure Study and Nature Conservation Strategy will be taken into account when assessing sites and overall spatial distribution of growth.
13. General Comments

Q27 - General Comments

Do you have any other comments regarding the consultation document?

Representations received (62):

1, 2, 5, 6, 9, 11-16, 20, 23, 27-29, 31-33, 35, 38, 39, 41, 44, 45, 49, 57, 60-62, 64, 66-68, 70, 73, 74, 77, 82, 85, 86, 89, 91, 96, 125, 127, 129, 130, 140-143, 145, 146, 148, 149, 154, 156, 157, 168.

Key Issues raised by Representations:

- Responses broad ranging. A common element was protection of the countryside or Green Belt but others were seeking to promote development of a particular locality. Some wished to promote a full Green Belt review to identify land to meet development needs. There was some criticism of the document’s presentation but also some praise.

- Seeking to protect countryside/Green Belt generally or in particular location including: by developing urban brownfield sites, protecting small rural enclaves like Tidbury Green, Chadwick End, Catchems Corner, protecting Knowle/Dorridge/Bentley Heath, Hampton, Meriden, Balsall Common and green areas around North Solihull, protecting gaps between settlements (e.g. Meriden Gap). Reasons include: lack of infrastructure/services/public transport/jobs, loss of rural character, congestion/impact on local roads, would not provide the right type of housing and would encourage further development.

- Seeking to promote a site or location for development, including: Tidbury Green Golf Club, land at Netherwood Lane, Norton Lane, Damson Parkway (economic growth), land at Balsall Common and HS2 Interchange proposals

- Seeking clarification of issues relating to the Review or broader matters. These include: Green Belt and Meriden Gap, Tidbury Green, infrastructure and future policies in light of Strategic Housing Needs Study.

- Supports comprehensive Green Belt review with intent to meet housing or economic development needs (including to meet needs of key businesses)/release sustainable, non-strategic Green Belt sites.

- Seeking to criticise the document, including: document too broad to comment, document made too complex for ordinary people to discourage responses, poor publicity for the consultation, poor availability, too many acronyms, councillors not well briefed. Consultation flawed as library closed in consultation period. Options, maps and data have been used previously.

- Seeking to congratulate document including: Document well put together, well prepared helpful document that supports community groups in non-parish areas, commends recognition of evolving matters regarding housing, employment and infrastructure provision

- Combination of sustainable options required to meet needs (for example E, F, G) or options not mutually exclusive.
• Imaginative ways to deliver housing are needed to ensure developers meet plan targets. Significant development needed to meet needs.

• Some suggestions made regarding the centre of Balsall Common and the opportunity that could be available with redevelopment of the Partco building.

Other issues

• Will continue to work with Solihull on superfast broadband roll out.

• Will provide advice and guidance on national grid networks

• Berkswell Quarry should retain its local plan designation under P12. Consider adverse impacts of HS2 on minerals extraction.

• Questions what consultation there will be on new IDP. Questions desirability of changed landscapes. Mineral extraction a concern at mineral extraction at Cornets End Quarry. Describes adverse impacts of its operation.

• Welcomes commitment to protection of the historic heritage and to a strategy to enhance natural/built/historic environment.

• Engage KDBH in Review process. Recent development puts pressures on infrastructure. Policies need to remedy matters.

• Supports 2033 end date. Not all LPAs working on shortfall in housing are in GBSLEP. Para 51 wrong as numbers will be known before GBSLEP spatial strategy is produced. LPAs such as North Warwickshire are not in GBSLEP area and not a party to the strategy.

• Major review not needed because SLP is up to date.

• Disappointed at legal challenge. Review should meet Region’s wider needs. Sustainability should be central. Impact on communities needs to meet challenges such as HS2/flood risk.

• Supports Review generally. A number of policies require significant amendment (housing, employment and retail related) These should be informed by evidence. A combination of options will be needed.

• Questions timing of the consultation. Concerned by lack of strategic planning and how it relates to GBSLEP Spatial Plan for Growth. HS2 Interchange proposal opportunistic; questions why it has not been resisted. Considers it should be integrated with WCML, NEC, and Airport rather than isolated in Green Belt.

• If P18 amended should consider previous KFC comments.

• People do not necessarily wish to live near work. Transport requirements will differ across different levels of housing. Preserve Green Belt and gaps between settlements.

• Hampton has worked towards providing 5% of housing need.

• Enlarged medical practice on Cheswick Green Village Hall site is required. Relocate the hall adjacent to the school and redevelop shops incorporating flats.

• Need structured approach to assessing health impacts of large developments

• Need to embrace need for low carbon and a green prospectus. Plan-making/design review needs to be explored fully.

• Some anomalies exist (at a detailed level) with the location of the Green Belt boundary.
**Council’s Response to Issues raised:**

- Some greenfield land will likely be needed for development, the Review will continue to provide strong countryside/Green Belt protection.
- The overall level of development to be planned for and its distribution will be determined through the Review process.
- Some concerns may be answered as the review progresses to a stage that will include more detail on the amount of development to be planned for and in what locations.
- A Green Belt review will be undertaken and will be part of the evidence base to the Review.
- The content of an issues and options document will by nature be broad brush and the document was presented in as simple a way as possible. A broad range of consultation was carried out in accordance with regulatory requirements.
- Support for the issues and Options consultation noted.
- Agree that more than one option is likely to be needed to meet overall development needs and that options are not mutually exclusive.
- The Review will be an enabling document that will provide for planned development in a realistic way. It relies largely on the private sector to implement development.
- Review is likely to be supportive of retail centres, including local centres and to encourage proposals that support viability.
- Continued co-operation on superfast broadband is noted.
- Advice on national grid networks will help to inform the Review.
- Policy guidance will be provided in the Review relating to minerals and mineral extraction.
- The IDP will inform the Review process that will be open to regulatory consultation. The Review will retain a policy relating to mineral safeguarding and extraction.
- The Review will contain a commitment to protect the historic and natural environment.
- The Review process will engage stakeholders and the general public and those that represent the general public.
- Agree that 2033 is appropriate end date and acknowledge that not all LPAs involved in housing shortfall are in the GBSLEP area. The GBSLEP SPfG will set out the distribution of the housing shortfall.
- A broad Review is required to meet the scale of development needed over the Review period.
- Review, including the amount of development to be accommodated, will reflect the duty to cooperate. Sustainable development will be a central focus for the Review and will take into consideration affects on communities, HS2 and flood risk.
- Agree that more than one option is likely to be needed to accommodate development needs. Changes to policies will be informed by evidence.
- The Council is required to plan for future development needs, work collaboratively with other bodies/authorities and to keep the local plan up to date. These are factors that
have affected the timing of the Review and how it will relate to strategic considerations. HS2 and its station within the borough are proposals set by government.

- The Review process will determine whether further policy guidance is needed on hot food takeaways.

- The Review process will determine where development will be located in the context of sustainability. The Review will continue to protect land that it allocates as Green Belt.

- The extent of any development at Hampton in Arden will be determined through the Review process and will take into consideration any adopted neighbourhood plan.

- Redevelopment of shops at Cheswick Green and development/relocation of the village hall are a matter for the development management process rather than the Review process.

- The health impacts of large developments are a matter for the development management process in response to planning applications.

- Sustainable development will be a central focus of the Review which will take into consideration climate change and reducing CO\textsubscript{2} emissions.

- A word version of the response form was offered on request to enable responses to be compiled via keyboard. The Council will endeavour to ensure responses to future consultation documents can easily be completed by keyboard.

- As with the SLP, there is the opportunity to consider whether any apparent minor anomalies with the Green Belt exist that justify an amendment.
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65 Mr W Gamble |  
66 Rohan Torkildsen | Historic England  
67 Steve Lyle | Knowle, Dorridge and Bentley Heath Neighbourhood Forum  
68 Cllr Mark Tatum | Balsall Common PC  
69 KF Partnership | KF Partnership  
70 Wendy Wilson |  
71 Ann Marie Reohorn |  
72 Cllr Mark Wilson | SMBC  
73 Dorothy Barrett | North Warks BC  
74 Will Heard |  
75 Annie English | Warwickshire Wildlife Trust  
76 Nicholas Ager |  
77 Jean Walters | CPRE Warwickshire  
78 Jean Walters | Dickens Heath PC  
79 Terra Strategic | Terra Strategic  
80 U & I PLC | U & I PLC  
81 Belle Homes | Belle Homes  
82 Caroline Spelman MP | Caroline Spelman MP  
83 Cllr Howard Allen | SMBC  
84 Birmingham Airport | Birmingham Airport  
85 Mike Beasley | Catchems Corner residents assoc  
86 Jasbir Kaur | Warwickshire County Council  
87 Steve Myers | Genting Solihull  
88 UKLD -land Blue Lake Road | UK Land Development  
89 Nick Barlow | Barlow Associates  
90 David Hinsley |  
91 Richard Wilson | Berkswell PC  
92 Development Consortium | Development Consortium  
93 Chris Lambert | National Trust  
94 Mr P Benton & Mr T Neary | Mr P Benton & Mr T Neary  
95 Arden Woodshavings | Arden Woodshavings  
96 Margaret Ballard |  

Solihull MBC - 78 - April 2016
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158 | Shafim Kauser | Balsall Common PC |  |  |
159 | Martin Trentham |  |  |  |
160 | Dave Ellis | Balsall Common Village Residents |  |  |
161 | Lend Lease Retail | Lend Lease Retail | Simon Zargar | DP9 Ltd |
162 | Federated Scrap Ltd |  | Patrick Downes | Harris Lamb Limited |
163 | Mr M Wheeldon & Mr W Gooding |  | Nigel Gough & Gill Brown | Nigel Gough Associates Ltd |
164 | Mr J Maddock & Family |  | Nigel Gough & Gill Brown | Nigel Gough Associates Ltd |
165 |  | Panther Securities | Nigel Gough & Gill Brown | Nigel Gough Associates Ltd |
166 | Independent Order of Oddfellows |  | Paul Barton | Bruton Knowles |
167 | Ian & Caroline Hodgson |  | Paul Barton | Bruton Knowles |
168 | Landowning Consortium |  | Mike Best | Turley |
169 | Cllr David Bell | SMBC |  |  |
170 | Mr G Gilbert |  | Charles Robinson | Wilbraham Associates |
171 | Graham Burgess | Balsall Common Primary School Academy | Charles Robinson | Wilbraham Associates |
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