

Solihull Local Plan Review

Draft Submission Plan

Summary of Main Issues Raised in Representations

March 2021

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Contents

Introduction	6
Forward.....	10
Introduction	11
Our Borough.....	12
Challenges	13
Vision.....	15
Spatial Strategy	16
Sustainable Economic Growth	17
Policy P1 UK Central Solihull Hub Area	19
Policy P1A Blythe Valley Business Park.....	21
Policy P2 Maintain Strong, Competitive Town Centres	22
Policy P3 Provision of Land for General Business and Premises.....	23
Providing Homes for All	25
Policy P4A Meeting Housing Needs – Affordable Housing	26
Policy P4B Meeting Housing Needs – Rural Exceptions.....	28
Policy P4C Meeting Housing Needs – Market Housing.....	29
Policy P4D Meeting Housing Needs - Self and Custom Housebuilding.....	30
Policy P4E Meeting Housing Needs – Housing for Older and Disabled People	31
Policy P5 Provision of Land for Housing.....	32
Policy P6 Provision of Accommodation for Gypsies and Travellers.....	35
Improving Accessibility and Encouraging Sustainable Travel	36
Policy P7 Accessibility and Ease of Access	37
Policy P8 Managing Travel Demand and Reducing congestion	38
Policy P8A Rapid Transit.....	39
Protecting and Enhancing our Environment.....	40
Policy P10 Natural Environment	43
Policy P11 Water and Flood Risk Management	44
Policy P12 Resource Management	45
Policy P13 Minerals.....	46
Policy P14 Amenity	47
Policy P14A Digital Infrastructure and Telecommunications	48
Promoting Quality of Place	49
Policy P15 Securing Design Quality.....	50
Policy P16 Conservation of Heritage Assets and Local Distinctiveness	51

Policy P17 Countryside and Green Belt	52
Policy P17A Green Belt Compensation	53
Health & Supporting Local Communities	54
Policy P18 Health & Health and Wellbeing.....	55
Policy P19 Range and Quality of Local Services	56
Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure	57
Delivery & Monitoring	58
P21 Developer Contributions and Infrastructure Provision	59
Balsall Common	60
Policy BC1 Barratt’s Farm.....	62
Policy BC2 Frog Lane	63
Policy BC3 Windmill Lane/Kenilworth Road	64
Policy BC4 Pheasant Oak Farm	65
Policy BC5 Trevallion Stud.....	66
Policy BC6 Lavender Hall Farm.....	67
Blythe	68
Policy BL1 West of Dickens Heath.....	70
Policy BL2 South of Dog Kennel Lane.....	72
Policy BL3 Whitlocks End Farm	74
Hampton in Arden.....	75
Policy HA1 Meriden Road	76
Policy HA2 Oak Farm.....	77
Hockley Heath.....	78
Policy HH1 School Road	79
Knowle Dorridge and Bentley Heath	80
Policy KN1 Hampton Road, Knowle	81
Policy KN2 South of Knowle (Arden Triangle).....	82
Meriden.....	84
Policy ME1 West of Meriden	85
North of Borough	86
Solihull Town Centre & Mature Suburbs	87
Policy SO1 East of Solihull	88
Policy SO2 Moat Lane Depot	89
UK Central	90
Policy UK1 HS2 Interchange.....	92
Policy UK2 Land at Damson Parkway.....	94

Policies Map.....96

Introduction

This document provides a summary of the main issues raised in the representations made to the Draft Submission Plan which was published on 30th October 2020.

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

Published alongside this summary are the following documents:

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

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

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

Policy P14 Amenity	2	7	9
Policy P14A Digital Infrastructure and Telecommunications	0	5	5
Promoting Quality of Place	0	0	0
Policy P15 Securing Design Quality	6	13	19
Policy P16 Conservation of Heritage Assets and Local Distinctiveness	2	7	9
Policy P17 Countryside and Green Belt	2	47	49
Policy P17A Green Belt Compensation	2	24	26
Health & Supporting Local Communities	0	0	0
Policy P18 Health and Wellbeing	4	17	21
Policy P19 Range and Quality of Local Services	1	3	4
Policy P20 Provision for Open Space, Childrens Play, Sport, Recreation & Leisure	6	12	18
Delivery & Monitoring	0	1	1
Policy P21 Developer Contributions and Infrastructure	2	9	12
Balsall Common	6	68	74
Policy BC1 - Barratt's Farm	4	46	50
Policy BC2 - Frog Lane	0	18	18
Policy BC4 - Pheasant Oak Farm	0	15	15
Policy BC5 - Trevallion Stud	0	22	22
Policy BC6 - Lavender Hall Farm	0	10	10
Policy BC3 - Kenilworth Road/Windmill Lane	1	202	203
Blythe	2	92	94
Policy BL1 - West of Dickens Heath	6	148	154
Policy BL2 - South of Dog Kennel Lane	4	97	101
Policy BL3 - Whitlock's End Farm	2	42	44
Hampton-in-Arden	1	7	8
Policy HA1 - Meriden Road	1	9	10
Policy HA2 - Oak Farm	1	11	12
Hockley Heath	3	17	20
Policy HH1 - Land South of School Road	4	18	22

Knowle, Dorridge & Bentley Heath	10	33	43
Policy KN1 - Hampton Road	4	36	40
Policy KN2: South of Knowle (Arden Triangle)	43	54	97
Meriden	0	11	11
Policy ME1 - West of Meriden	2	6	8
North of the Borough	0	4	4
Solihull Town Centre & Mature Suburbs	0	8	8
Policy SO1 - East of Solihull	29	41	70
Policy SO2 - Moat Lane Depot	1	10	11
Policy UK1 - HS2 Interchange	2	15	17
Policy UK2 - Land at Damson Parkway	6	79	85
Schedule of Allocations	1	0	1

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

Forward

Key issues raised in representations received:

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

Introduction

Key issues raised in representations received:

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

Our Borough

Key issues raised in representations received:

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

Challenges

Key issues raised in representations received:

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

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

Vision

Key issues raised by representations:

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

Spatial Strategy

Key issues raised by representations:

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

Sustainable Economic Growth

Key issues raised in representations received:

General comments

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

Matters relating to employment land supply and need

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

Matters relating to housing land supply and need

- There is inconsistency in housing figures at Arden Cross in relation to the master plan. The housing proposed at Arden Cross is inadequate in terms of the contribution to the housing market area.
- Policy P1 should be amended to specify the quantum of growth which the hub will deliver over the plan period, and be linked to clear plans showing where the residential growth will be delivered within the hub boundaries in order to show deliverability.

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

Policy P1 UK Central Solihull Hub Area

Key issues raised in representations received:

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

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

General comments on policy and allocations

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

Housing delivery and master planning across the site

- Further information is needed to confirm the quantum of housing which will be provided on the site, the trajectory for the delivery of housing on the site and clear plans to show where residential development will be delivered on the site. It is unclear why North Solihull, the Town Centre and Blythe Valley are not included as they are also stated to be UKC.
- The rate of delivery is unrealistic even if the necessary infrastructure was achieved to allow housing completions. At the NEC development would not start before 2030 and at Arden Cross is dependent on HS2. A very high level of delivery will be required to develop out 2,740 units across the UKC Solihull Hub area to 2036. The nature of the developments being largely apartment based means it is more likely, the whole amount will be delivered at the end of the plan period leaving a shortfall early on in meeting OAN and housing delivery in the first 5 years of the Local Plan period.

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

Representations in support

- Natural England supports section 3iv and 3v as core policy requirements relating to sustainable travel and delivery of a 'high quality strategic green and blue infrastructure network across the Hub area to enhance natural assets'.
- UGC supports the allocation and policy for the UKC Hub. Highlights work being undertaken to progress an alternative arrangement for car parking to release land for development to deliver the masterplan for Arden Cross and to bring forward a scheme to redevelop Birmingham International Station to accommodate additional passenger movement and increase passenger capacity to meet the forecast growth associated with the UK Central Hub.
- Supportive of the Fore business park as an allocation but it is largely built and it is unlikely further floorspace will come forward due to adjacent green belt.
- Birmingham City Council supports approach of the policy particularly in relation to land at Arden Cross and at the NEC and the promotion of the site for high quality, high density mixed use development.
- Coventry City Council supports concept of UK Central Hub and proposed developments in that locality, especially around HS2 and Arden. The proposals as currently drafted allow for overall economic growth, particularly around HS2 and UK Central, whilst ensuring the continued protection of the Meriden Gap and wider Green Belt. CCC continue to be committed to ongoing work around highway modelling and mitigation measures in partnership with TfWM and Highways England to support measures to promote modal shift across the area, which will also contribute to improvements in air quality and public health outcomes.
- Warwickshire County Council will work with Solihull MBC to develop a joint UKC Surface Access Strategy.

Policy P1A Blythe Valley Business Park

Key issues raised in representations received:

- Policy should demonstrate the importance of transport master plans and through these the opportunities to reduce car dependence and fully promote sustainable transport. Sustainable transport should play a major role for sites in the green belt. This is important for employment sites such as Birmingham Business Park, Blythe Valley Business Park and Damson Parkway, where currently these sites do not reflect sustainable commuting patterns.
- Policy should provide maximum flexibility to reflect market demand. The broad range of the types of uses that could be brought forward in the policy should not be seen as an exhaustive list. It should be made clear within the policy wording that a wide range of employment activities will be supported including offices, industrial and warehousing, but also including research and development and other 'non-traditional' employment uses.
- The residential part of the site is now subject to reserved matters approvals. It may therefore be appropriate to remove reference to "the residential element of Blythe Valley Park" from this policy.
- Reference is made at Paragraph 110 to an area of land of some 7 ha remaining to be developed. This figure is incorrect, and should instead read 3 hectares. Amendments should be made to the Plan in this regard to ensure that it is sound, and any references within the Council's evidence base updated accordingly.
- Paragraphs 111 and 112 of the supporting text make reference to various expectations that the Council have of any development at BVP. Given the extent of development that has now been brought forward, we consider that this supporting text should be updated to better reflect the current position with the site.
- Land to the east of the M42 bound by the BVP estate road to the south, the A3400 to the east, and the M42 to the west should be included in BVP to meet additional employment needs. It is a suitable location for further employment uses due to proximity to the motorway network and the cluster of high quality employment uses that have developed in this location. It was assessed as a 'good' site in terms of market attractiveness in the SHELAA and the HEDNA identifies that further land of this type is needed.
- Criteria 3 is not enforceable as the level of competition, and the geographical extent are not defined.
- Criteria 4 – for Blythe Valley Business Park to become viable it would need to allow for bus routes to travel through. Development should not be permitted to threaten the Site of Special Scientific Interest directly or indirectly.
- Public transport improvements are needed to ensure people can access the site sustainably.
- New developments should be designed with off grid energy networks.
- Natural England support the requirement to protect and enhance natural environment
- Comments also expressed ongoing support for development of Blythe Valley.

Policy P2 Maintain Strong, Competitive Town Centres

Key issues raised in representations received:

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

Policy P3 Provision of Land for General Business and Premises

Key issues raised in representations received:

General comments

- There is no employment land provision to provide for balanced communities rather than commuter villages. Sites at Balsall Common and in Knowle are identified as potential employment allocations to address this.
- The Birmingham business park allocation is directly adjacent to a designated Local Wildlife Site, the policy wording does not refer to a buffer or consideration of any impact.
- Policy P3 compromises established businesses and the community with the vast amount of traffic and pushing out smaller community businesses. Planning policy should encourage small independent businesses rather than large chains.
- The loss of Green Belt due to the amount of land made available for office space is unnecessary.
- There is only a shortfall of B8 uses. Developers will be able to submit applications for B1, B2 or B8 usage. Without protections to ensure needed development is delivered, there will be increased redundancy of older office space which isn't suitable for repurposing as residential.
- There is no protection against employment land being used for other business purposes such as car dealerships such as on the A34.

Employment land supply

- Evidence should be provided as to the availability and deliverability of the proposed allocations and the trajectory for their delivery
- Employment Land Supply table should be amended to provide the developable areas - Land at HS2 Interchange (UK1) C140 (gross) c30 (net available) Land at Damson Parkway (UK2) c94 (gross) c39(net available).
- Policy does not match the spatial strategy of the Plan, it has no regard to the evidence of the HEDNA in relation to supply and demand along the A34 corridor.
- It is unsound for the Council to suggest that an early review of the Plan is an appropriate response in addressing unmet needs and deferring cross-boundary strategic matters.
- The land currently available on the five existing allocations is less than what is stated within the Plan. The existing supply amounts to 6.4ha of employment land on three sites, but soon to fall to 3.4ha on two sites. The delivery of two large employment allocations is uncertain and their trajectory is likely to be much later in the plan period.

HEDNA and employment land requirement

- Other factors need to be taken into consideration in informing the employment land requirement- the existing stock available, pattern of supply, and evidence of market demand.
- The employment requirement should be set out within the plan.
- The employment requirement should be increased to reflect past performance, the market evidence of supply and demand, the Local Industrial Strategy for the West Midlands Combined Authority and the unmet needs of the Black Country Authorities.
- Policy P3 is unsound as it fails to provide an employment land supply to meet the needs of the borough for industrial and warehousing land. Policy P3 should plan for a higher amount of industrial floorspace (between 22.1 and 60.7ha).

- The HEDNA underestimates the amount of land needed for industrial and warehousing and the plan does not address the acknowledged need for strategic employment sites based on the 2015 study. It ignores clear market signals which show a significant imbalance between demand and supply. The supply of sites to meet local need is wholly insufficient, both quantitatively and qualitatively. It provides a very restricted offer to companies looking to expand or invest in Solihull
- There are shortcomings in the method used in the HEDNA, a five year rather than two year margin should have been included. There is insufficient justification for the dismissal of recent evidence of much stronger growth in the industrial stock. Last years data (2019/20) shows a new record level of growth, a continuation of the short-term trend would see more pronounced growth and a greater need than the 16ha concluded in the HEDNA. If flexibility of 5 years take up was included it would be sensible to plan for between 22.1 and 60.7ha.
- The Submission draft should provide and plan for at least 80 hectares of employment land for industry and warehousing to provide for both local need and the need for large scale logistics (44 hectares to meet local needs and 35ha for large scale logistics). The developable areas for UK1 and UK2 set out in the policy should be clarified as 30ha and 39ha.
- The HEDNA sets out the assumed employment floorspace figures derived from the UGC and Arden Cross masterplanning work

Strategic Employment Land

- The plan is unclear as to the extent to which Land at Damson Parkway is intended to meet local or strategic needs.
- Land has been put forward adjacent to M42 Junction 4 to meet strategic employment land need.
- The amount of strategic warehousing accounted for as part of UKC is modest. The plan does not provide for large scale logistics and take account of the sub-regional shortage of strategic employment sites set out in the 2015 West Midlands Strategic Employment Sites Study¹³ (WMSESS) and in the forthcoming second stage of this study. There is a identified shortfall in sites along the M42 corridor. It is a failure in the duty to cooperate that the main authorities in the area are not providing for this need and there has been little engagement between Birmingham and Solihull despite being within the same LEP.
- Association of Black Country Authorities state that the Plan has made no contribution to the Black Country in respect of employment land. The reasoning behind the lack of a contribution to meeting employment land needs arising in the Black Country, equivalent to housing needs, is unclear, and at this stage this represents a failure to meet the requirements of the Duty to Co-operate.

Providing Homes for All

Key issues raised in representations received:

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

Policy P4A Meeting Housing Needs – Affordable Housing

Key issues raised in representations received:

- Support for policy P4A affordable housing including the high affordable housing need pressure and 40% affordable requirement.
- The Council does not meet the 40% affordable housing target, currently delivering under 30%. This will remain an ambition unless it is increased.
- The scale of the affordable housing need identified in the HEDNA highlights Solihull needing to deliver additional housing over and above the standard method baseline and the requirement currently being proposed.
- The viability and deliverability of development sites should not be compromised by over ambitious requirements to deliver 40% affordable housing.
- The Policy fails to take into account potential changing needs over the plan period. Tenure, type and size should be in the form of guidance or supporting text rather than prescription. This will allow flexibility to respond to emerging Government Policy such as First Homes and other discount market tenure in annex 2 of NPPF. The HEDNA highlights the requirement for both social and affordable rent but recommends that the Council does not propose a rigid mix on the split. The policy does not allow for a suitable amount of weight to be applied to the tenure type, and size mix on a site by site basis. A more detailed explanation need to be given on the range of house types and sizes.
- References to SPDs and guidance are inappropriate and non-compliant with the Regulations. NPPF and PPG confirm scope and nature of SPDs and that they should not introduce new planning policies nor add unnecessary financial burdens on development. The definition of 'affordable' should be set out in the policy and not left to the Meeting Housing Needs SPD.
- The Policy fails to differentiate between different types of housing, specifically between C2 and C3 developments, as well as establishing a difference between self-contained housing units and institutional facilities such as care homes. Including C2 Use Class makes it in conflict with NFPPF and PPG.
- The policy states that in circumstances where the provision of affordable housing would prejudice the realisation of other planning objectives the affordable obligation will be reduced, it is difficult to envisage any circumstances where other planning objectives take precedence over the delivery of affordable housing.
- The more social rent and affordable housing provided in the north of the borough, and the less provided in other parts, will worsen inequalities.
- Policy P4A does not address occupation by households with a strong local connection and there is a failure to recognise the presence of neighbourhood plan policy dealing with local needs affordable housing on allocated housing sites.
- The continuing use of Housing Associations as the principal provider of such accommodation should be reduced to avoid the effect of 'staircasing'. This results in a permanent reduction in the number of affordable homes.
- The policy fails to recognise and potentially excludes almshouses as form of affordable housing and excludes almshouse charities as providers of affordable housing.
- The Viability Study does not take into account the full burdens of all the policies and potential policies in SPD's contained within the Local Plan.
- Welcome the flexible wording of the policy, including references to viability.

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

Policy P4B Meeting Housing Needs – Rural Exceptions

Key issues raised in representations received:

- Support for Policy P4B.
- Not planning sufficiently for affordable housing as part of an increased housing requirement at the necessary strategic scale will place more pressure upon local communities to allow exceptions sites.
- ‘Exceptions’ should be just that - occasional sites to meet a particular local need, not further sites to address deficiencies in a strategic borough-wide plan.
- Text should be added to Policy P4B or to the supporting text accompanying the policy, which allows for the delivery of affordable housing through cross-subsidy where it can be demonstrated that affordable housing development cannot be achieved without an element of open market housing.
- The Policy fails to recognise and potentially excludes almshouses as form of affordable housing and excludes almshouse charities as providers of affordable housing.
- The draft submission Plan fails to identify if the green belt land referred to includes the land that the plan is seeking to release from the green belt or whether this is additional green belt to meet a Local Need for housing.
- The Policy conflicts with Neighbourhood Plans e.g. Brownfield sites should be considered first.
- The Policy fails to reference and include Community-Led Housing.

Policy P4C Meeting Housing Needs – Market Housing

Key issues raised in representations received:

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

Policy P4D Meeting Housing Needs - Self and Custom Housebuilding

Key issues raised in representations received:

- Support for policy.
- The Council should provide a robust assessment of demand including an assessment and review of data held on the Council's self-build register. The register may provide an indication of the level of interest, but this needs to be analysed at a deeper level to uncover the specific requirements of respondents. The policy is not supported by the HEDNA.
- An individual showing of interest via a Housing and Custom Build Register rarely equates to a genuine desire/ability to build on a Self/Custom Build plot. The actual demand is likely to be significantly lower.
- There is no robust evidence provided as to how the threshold of 100 dwellings was calculated nor the provision of 5%.
- A more refined approach to the location of self and custom build plots across the Borough is needed, to reduce reliance on allocated housing sites delivering specific self and custom build plots. The Council should consider providing specific site/allocations to meet this need, in line with Paragraph 61 of the NPPF.
- National guidance does not require allocated sites to contribute land for self and custom build plots, which seeks local authorities to "engage" with landowners and "encourage" them to consider self-build and custom housebuilding.
- The provision of such plots on strategic size housing sites is unlikely to be what those on the register are seeking, meaning they are left empty which could delay the delivery of housing.
- The local authority cannot simply rely upon developers to provide for all self and custom-build housing in fulfilment of its legal duty and should be exploring other options for delivery. Without evidence of other options having been thoroughly explored, including local authority owned land.
- The nature of self and custom build is that it is better related to smaller more individual sites to reflect individual and unique design rather than being part of larger housing developments
- Serviced plots on larger developments adds complexity and slows delivery and is makes it difficult to coordinate different construction logistics.
- Where plots are unsold, policy should be clear that these revert to the original developer. Reversion timescale should be as short as possible as it is also harmful to the visual and residential amenity of those living in close proximity to them, 12 months is too long.
- Disagree with the viability evidence on self-build plots. This does not take into account all the cost.
- Policy will cause delay to processing planning applications, slow housing delivery and have implications for the housing land supply.
- There are practical issues to consider in providing self and custom building such as the day to day operation of such sites, consideration of potential health and safety issues of having multiple individual construction sites within one development and the subject of a design code.
- The policy makes no differentiation for flatted schemes, where this is unlikely to be feasible. There should be an additional clause of exemption (vii) where the type of development proposed makes this unfeasible, for example whether flatted development, or specialist housing proposals.

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

Key issues raised in representations received:

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

Policy P5 Provision of Land for Housing

Key issues raised in representations received:

Housing Supply

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

Housing requirement

- Although generally agreed that standard methodology is starting point and minimum assessment for LHN, Council need to be mindful of Government's consultation on changes to standard methodology.

- View that HEDNA does not sufficiently forecast employment growth at UKC Hub, nor accurately estimate commuting ratios from within Solihull/out of boundary.
- Growth in UKC Hub Area under-estimated in HEDNA when compared with other documents, e.g. Midlands HS2 Growth Strategy, UGC Growth and Infrastructure Plan, Viability Study.
- 25% in-commuting ratio for jobs at UKC Hub Area is far too low.
- UK Central Hub will generate migration demand different from that in the 2014 household projections; comparable to extraneous migration at Ebbsfleet on the HS1 route, which is much higher than historic demand. Needs to be factored into housing projections.
- Historic in-commuting to jobs in the Borough likely a result of constrained housing supply in previous years.
- Barton Willmore conducted own demographic modelling that concludes the between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario; or 16,570-19,975 dwellings over plan period.
- Furthermore, need to increase housing requirement to meet affordable housing need – 40% affordable housing of LHN figure does not meet annual need of 578 dpa.
- Lack of Statement of Common Ground at publication stage to commit to resolving the GBBCHMA shortfall, contrary to NPPF.
- Several HMA authorities questioned level of contribution to HMA shortfall (Birmingham CC, Lichfield, South Staffordshire, North Warwickshire).
- Barton Willmore Housing Need paper state that GBBCHMA Position statement (July 2020) underestimates HMA shortfall and overestimates supply up to 2031. Birmingham actual shortfall estimated to be 11,294-13,010 dwellings up to 2031.
- Council not considering to meet post-2031 HMA shortfall; note Black Country Authorities state they expect a shortfall of 27,000 homes to 2038, and a shortfall of 287-567ha employment land.
- Barton Willmore estimate that post-2031 need is greater than stated (17K – 18.4K for 2031-2040).
- No evidence provided to justify why 2,105 homes contribution to HMA is sufficient.
- Developer view that Council's contribution should follow methodology used by Staffordshire authorities, i.e. based on commuting patterns. Therefore at least 11,500 additional homes should have been tested, not 2,000.
- Concern that early review will be required to meet additional HMA shortfall in the Black Country, for which Green Belt boundaries will have to be altered again, which is contrary to NPPF.
- Should provide for safeguarded land on alternative sites to protect Green Belt boundaries in the future.
- Housing requirement is same as housing supply, does not provide any flexibility or buffers other than lapse rate on proportion of sites.
- Additional housing buffers proposed, up to 20%.
- 15,017 dwellings should be stated as a minimum requirement.
- Views that housing requirement (or at least UK Hub contribution), stepped trajectory, HMA contributions should be in the Policy P5 itself.
- Local Plan period should be extended to 2037 as likely adopted in 2022.
- Stepped trajectory is contrary to Government's aim to boost housing supply e.g. Planning White Paper.
- Objection to Neighbourhood Requirement from KDBH as relies on allocations.
- 20% uplift to housing requirement should be made (4,077 dwellings) to increase small-medium sized sites in sustainable settlements.

- Table at Para. 220 should use latest ONS household projections.
- Overall, developer view that more land should be allocated, and Green Belt released for development (on a range of alternative sites), as housing supply is over-estimated and housing requirement is under-estimated.
- Alternative view that less land should be allocated, especially in the Green Belt and environmentally sensitive areas, and capacities on brownfield land should be increased.
- Alternative view that Council should not release Green Belt to accommodate HMA needs, and/or should base housing need on ONS demographic projections only, with no further affordability or employment uplift.

Other Main Issues raised

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

Policy P6 Provision of Accommodation for Gypsies and Travellers

Key issues raised in representations received:

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

Improving Accessibility and Encouraging Sustainable Travel

Key issues raised in representations received:

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

Policy P7 Accessibility and Ease of Access

Key issues raised in representations received:

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

Policy P8 Managing Travel Demand and Reducing congestion

Key issues raised in representations received:

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

Policy P8A Rapid Transit

Key issues raised in representations received:

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

Protecting and Enhancing our Environment

See individual policies for representations made.

Policy P9 Mitigating and Adapting to Climate Change

Key issues raised in representations received:

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

vehicles; replacement with zero emission alternatives; zero-C bus fleets; decarbonise road freight; shift to more rail/water freight alternatives.

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

Policy P10 Natural Environment

Key issues raised in representations received:

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

Policy P11 Water and Flood Risk Management

Key issues raised in representations received:

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

Policy P12 Resource Management

Key issues raised in representations received:

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

Policy P13 Minerals

Key issues raised in representations received:

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

Policy P14 Amenity

Key issues raised in representations received:

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

Policy P14A Digital Infrastructure and Telecommunications

Key issues raised in representations received:

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

Promoting Quality of Place

See individual policies for representations made.

Policy P15 Securing Design Quality

Key issues raised in representations received:

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

Policy P16 Conservation of Heritage Assets and Local Distinctiveness

Key issues raised in representations received:

- Strong support for the inclusion of recognising the importance of the historic environment to the Borough.
- Support for the need for applications to be supported by appropriately informed heritage statements.
- Concern raised that the qualities and characteristics of rural settlements will not be conserved by the plan. The nature of rural settlements will be adversely impacted by disproportionate developments.
- Historic England have noted that Policy should be refined to reflect the NPPF section on heritage. The proposed policy wording does not differentiate between harm and substantial harm, as set out in the NPPF, and HE are of the view that this should be addressed within the policy.
- Suggestion that desk-based assessments alone may not be sufficient, therefore recommend that Policy P16 acknowledge that further field evaluation may also be necessary.
- Highlights that section 4 of this policy only references known heritage assets, without acknowledging that a proposed development site may contain as yet unknown non-designated heritage assets, such as previously unidentified buried archaeological features.
- View that Criterion 3 is imprecise and requires greater clarity on the recognised process. The hierarchical approach set out in the NPPF (paragraphs 195, 196 and 197) is more precise and provides more clarity in a development management context. This should be included or referenced.

Policy P17 Countryside and Green Belt

Key issues raised in representations received:

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

Policy P17A Green Belt Compensation

Key issues raised in representations received:

- Policy does not provide guidance on the scope or type of compensation required in order to justify the removal of a site from the Green Belt.
- Policy P17A(4) should incorporate reference to viability given the possible tension with other costs associated with delivering physical and social infrastructure via CIL and/or Section 106 obligations.
- Green Belt compensation is a matter to be tested as part of the justification for providing the exceptional circumstances to release sites from the Green Belt at the plan making stage. The Council needs to demonstrate compensatory provision relative to the Green Belt release, it is not for the developer to undertake this exercise at the planning application stage.
- No indication of how commuted sums for Green Belt compensation will be determined what will be required or how it will be spent. A formula or calculation should be provided to allow developers to plan for this requirement on top of the other contributions sought.
- Council's viability work does not take Green Belt compensation into account.
- Compensatory improvements are not possible where gaps between distinct settlements are reduced to minimal distances.
- Policy is unsound on the basis that no evidence, methodology, sustainability appraisal or viability assessment has been provided to justify the strategy proposed in the policy and linked site allocation policies.

Health & Supporting Local Communities

See individual policies for representations made.

Policy P18 Health & Health and Wellbeing

Key issues raised in representations received:

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

Policy P19 Range and Quality of Local Services

Key issues raised in representations received:

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

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

Key issues raised in representations received:

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

Delivery & Monitoring

See individual policies for representations made.

P21 Developer Contributions and Infrastructure Provision

Key issues raised in representations received:

- SMBC's viability testing does not take into account digital infrastructure, it should be evidenced that this will not render development unviable.
- Policy P21 does not make reference to the Infrastructure Funding Statement to help inform judgements regarding the use of planning obligations and pooling.
- Support for policy P21 and the provision of strategic infrastructure and developer contributions, further support for the inclusion of the Infrastructure Delivery Plan and the Infrastructure Funding Statement and their roles in guiding delivery.
- The policy should make reference to the tests set out in CIL regulation 122.
- There is poor consideration of infrastructure provision, including demand on health services and loss of sports facilities.

Balsall Common

Key issues raised in representations received:

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

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

Policy BC1 Barratt's Farm

Key issues raised in representations received:

- Contrary to commitment to retain Meriden Gap and its strategic importance as Green Belt.
- Not justified by Green Belt Assessment which requires more detailed assessment, or SHELAA that is out of date.
- Site is partly higher performing Green Belt.
- Fails to take account of Green Belt growth in Coventry and fact this is the narrowest part of Meriden Gap.
- No obvious suggestion of required Green Belt compensation.
- Alternative strategic options not investigated.
- Does not meet requirements for access to facilities, so will create congestion and parking problems.
- Requires commitment to construct Relief Road in one to avoid increase of traffic on rural lanes.
- Need for improvements for equestrians.
- Site performs poorly in Sustainability Appraisal and incorrectly categorised in Site Selection process.
- Dependent on 2 major infrastructure projects, HS2 and Relief Road, making delivery uncertain within Plan period.
- Fails to provide adequately for primary school before major housebuilding or for health services and other facilities.
- Policy should include funding commitment for primary school and information on delivery.
- Location of primary school at junction of Relief Road and Station Road not appropriate.
- No evidence of collaborative working by multiple landowners to ensure delivery.
- Significant noise impacts from HS2 and lack of mitigation.
- Unclear how biodiversity enhancement will be delivered.
- Fails to take opportunity to address settlement-wide deficiency in public open space, as no site for sports hub, no buffer between existing and new housing and Central Park proposal by residents not incorporated.
- Concept masterplan should identify Hall's Wood as of ecological value and provide connectivity between public open spaces.
- Fails to take account of ecological significance of habitats or access to ponds for drainage purposes.
- Fails to comply with NDP requirements for open space buffer between existing and new housing or for density of new development to respect existing.
- Concept masterplan should identify land shown for open space/heritage protection for housing and access from Meeting House Lane.
- Concept masterplan should identify land at Old Waste Lane for housing as ecological restriction not justified.
- Site should be extended to include land at Old Waste Lane (Site 101) and Waste Lane (Site 102) for housing.
- Should include Secured by Design and be cross-referenced to Policy P15.
- Support allocation.

Policy BC2 Frog Lane

Key issues raised in representations received:

- Disagree with Green Belt Assessment as parcel 59 performs highly important role for Green Belt Purpose 1 and Balsall Street provides defensible boundary.
- Poorly related to centre and station/public transport.
- Access unsuitable/better from Frog Lane/flexibility on location of access required.
- Access road and junction will require traffic management and protection for residential amenity.
- Need for footpath link across adjacent playing fields or at eastern end of site to Balsall Street and improvement for equestrians.
- Impact on flooding, ecology, heritage and rural character.
- Inadequate infrastructure.
- Site incorrectly categorised in site selection process.
- Capacity should be flexible.
- Criteria 2ii and iii should be combined, 2iv to 2vii and 3iii deleted and 4i justified given designation of playing fields a Local Green Space in NDP.
- Fails to comply with NDP as density does not reflect existing housing and no open space separation provided.
- Does not comply with open space requirement of 0.9ha and playspace.
- Reference to Holly Lane recreation ground incorrect as education playing fields not public open space.
- Concept masterplan should retain strong hedgerow boundary to playing fields.
- Zone of significance around listed buildings arbitrary and should be amended.
- Base mapping used is out of date.
- Should include Secured by Design and be cross-referenced to Policy P15.

Policy BC3 Windmill Lane/Kenilworth Road

Key issues raised in representations received:

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

Policy BC4 Pheasant Oak Farm

Key issues raised in representations received:

- Inappropriate as higher performing Green Belt and results in indefensible boundary to east.
- Should retain open space in Green Belt.
- Low accessibility and poorly served by public transport.
- Will lead to increased traffic on surrounding roads.
- Reliant on by-pass which is uncertain.
- Lack of reference to equestrian access.
- Performs poorly in Sustainability Appraisal and incorrectly categorised in site selection process.
- Impact on overlooking, flooding, rural character and wildlife.
- Inadequate infrastructure.
- Infrastructure requirements should meet CIL tests.
- Multiple ownership and complex land assembly means delivery uncertain.
- Site should be restricted to brownfield land area.
- Inconsistency between Plan and Concept Masterplan in respect of Green Belt boundary and open space to east, and alignment of by-pass.
- Site capable of delivering greater capacity ca. 270 dwellings.
- Concept masterplan incorrectly shows field to north-west as semi-improved grassland and should be used for housing.
- Should include Secured by Design and be cross-referenced to Policy P15.

Policy BC5 Trevallion Stud

Key issues raised in representations received:

- Adverse impact on openness of Green Belt and sprawl.
- Identified as high visual sensitivity in Landscape Character Assessment.
- Wootton Green Lane unsuitable for use for access points.
- Concept masterplan fails to take account of changes to A452.
- Site not accessible to schools and poorly related to employment.
- Performs poorly in Sustainability Appraisal.
- Impact on tranquillity, flooding, rural character and wildlife.
- Inadequate infrastructure/amenities.
- Multiple ownership and complex land assembly means delivery uncertain, and less than comprehensive development will result in indefensible Green Belt boundary.
- Site inappropriately designated as brownfield land.
- Site capable of delivering greater capacity ca. 300 dwellings.
- Requirement for public open space to south of site in Part 4(i) not evidenced.
- Concept masterplan should not identify Stoneycroft mainly for open space.
- Object to proposal for retail park as not based on community's needs.
- Area for commercial or mixed use should be identified for Class E or residential development.
- Should include Secured by Design and be cross-referenced to Policy P15.
- Support as sustainable settlement with good range of facilities.

Policy BC6 Lavender Hall Farm

Key issues raised in representations received:

- Unsuitable for allocation as in highest performing Green Belt, contributes to sprawl and breaches defensible Green Belt boundary for settlement.
- Poorly related to settlement and facilities.
- Should not rely on HS2 as not yet constructed.
- Should include provision for footway/cycleway to nearest school, Berkswell Primary and improvements for equestrians.
- Performs poorly in Sustainability Appraisal and incorrectly categorised in site selection process.
- Significant noise impacts from HS2/West Coast mainline railways and lack of mitigation.
- Designation of whole site as brownfield is inappropriate.
- Site more appropriately allocated for employment purposes to meet needs of settlement.
- Should include Secured by Design and be cross-referenced to Policy P15.
- Concept masterplan does not take account of water mains crossing site.
- Site currently permitted for landfill and design/development will need to take account of landfill and ensure operational permit surrendered.

Blythe

Key issues raised in representations received:

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

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

Policy BL1 West of Dickens Heath

Key issues raised in representations received:

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

- Loss of substantial number of sport pitches with no alternative facilities provided prior to adoption of the Plan is contrary to NPPF.
- Site is surrounded by Local Wildlife Sites, 9 within 1km and 4 within immediate vicinity. Although sites are not proposed for development, their value and connectivity will be harmed by adjacent development. Insufficient buffers have been proposed with ancient woodland at Little Tythebarn Coppice on north-east corner. Contrary to Government's 25-year Environment Plan. Appropriate Assessment has not been carried out for the site, contrary to NPPF.
- Warwickshire Wildlife Trust raised concerns in relation to site due to proximity of Local Wildlife Sites and objections from supporters. Policy requires stronger wording to ensure appropriate buffers are provided on Local Wildlife Site edges.
- Site promoters support the principle of the site allocation, and timing of its delivery. It is an available, suitable and deliverable site for housing at one of the larger settlements within Solihull Borough which sits on a public transport corridor and has a range of facilities. Two landowners will collaborate on masterplan, however, promoters of parcel north of Tythe Barn Lane state their land can come forward ahead of replacement of playing pitches. Therefore, propose some modifications to provide some flexibility.
- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Policy BL2 South of Dog Kennel Lane

Key issues raised in representations received:

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

- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.
- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.

Policy BL3 Whitlocks End Farm

Key issues raised in representations received:

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

Hampton in Arden

Key issues raised in representations received:

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

Policy HA1 Meriden Road

Key issues raised in representations received:

- The site's significant archaeological potential and the need for further archaeological assessment in advance of the submission of any planning application are not referenced in this policy.
- The red line boundary of HA1 on the Illustrative Concept Masterplan is unclear and needs to accord with the boundary of the existing Arden Woods Shavings site.
- Para 643 – there is concern that the Sustainability Appraisal has not been taken in to account.
- Site's availability uncertain due to its current use as a storage depot
- Viability of allocation in question due to potential contamination making the site's deliverability uncertain.
- WM police suggest utilising the guidance set out in the 'secured by design' standards and adding that applicants are encouraged to engage with WM Police early on.
- Policy HA1 considered sound by the site promoter Stansgate Planning subject to minor modifications

Policy HA2 Oak Farm

Key issues raised in representations received:

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

Hockley Heath

Key issues raised in representations received:

- Additional housing is not required in Hockley Heath, there is a good range of affordable housing available.
- The provision of facilities in Hockley Heath will not be able to support growth proposed, there is no health centre or post office, and bus services are poor and infrequent.
- The increase in the size of the village is not limited or proportionate
- Some general support for the amended Green Belt boundary. Support given for the potential development of the two areas either side of School Road as it would appear to fulfil the Council's criteria for limited and proportionate expansion of the settlement. Removing land to the north of School Road from the Green Belt would conform with the Council's intention to address anomalies in Green Belt boundaries across the Borough (Paragraph 420 of the DSP).
- The land to be removed from the Green Belt (partially formed by CFS 49, referenced in paragraph 671) should be formally allocated for housing development, or be provided with more certainty on the site's development prospects. CFS 49 is available now, offers a suitable location for development and has realistic prospect that housing will be delivered within five years.
- The proposed settlement boundary amendment at Hockley Heath (as shown on the Policies Map) is unsound as it does not include any amendment to the boundary south of the settlement, contrary to national planning policy.
- Alternative view from developers that village could cope with further expansion, over and above allocation of Site HH1.
- Alternative sites proposed at following locations, considered to perform as well or better than HH1:
 - CFS 121 (r/o 2241 Stratford Road)
 - CFS 503 (Stratford Road)

Policy HH1 School Road

Key issues raised in representations received:

- Site promoters support principle of allocation and introducing speed reduction and pedestrian safety measures, as well as retention of trees and hedgerows and flood risk mitigation. Can confirm early delivery of the site is achievable.
- Local objection to site HH1 as an allocation and amendment of Green Belt boundary. Brownfield land should be utilised in the Borough to maintain existing Green Belt boundaries as much as possible.
- The addition of 90+ homes will have a detrimental impact on road congestion and safety.
- Concerns raised regarding the impact of development proposals on local environment and infrastructure in terms of noise, air pollution, local wildlife, canal damage, landscape character, utilities supply, sewer system and flooding.
- Loss of Green Belt and intrusion into countryside
- The Green Belt boundary to the north of School Road should not be amended. By removing the land to the north, windfall infill development will be permitted and will set a precedent for poor development
- The number of houses to be provided at HH1 differs between the Policy (90 houses) and the Concept Masterplan (100 houses). It is not clear which is correct.
- Insufficient account has been taken of the Hockley Heath Neighbourhood Plan Resident Survey Results Report (2018), which showed significantly less opposition to any new development being directed south of the settlement boundary, along the Stratford Road.
- Paragraph 658 states that is a bus service that links to Birmingham, this is incorrect.
- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.
- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Knowle Dorridge and Bentley Heath

Key issues raised in representations received:

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

Policy KN1 Hampton Road, Knowle

Key issues raised in representations received:

- The policy and supporting text should not prejudice whether very special circumstances will be likely to be demonstrated for the relocation of Knowle Football club into the Green Belt.
- The policy should make clear that the replacement sports provision includes pitches and ancillary provision (floodlighting, clubhouse and car parking), including a 3G pitch in line with the Council's Playing Pitch Strategy and the Football Foundations Local Facilities Football Plan.
- Re-provision of the sports pitches should be secured prior to allocation.
- Some concerns with the Concept Masterplan including from the site promoter, the Knowle, Dorridge and Bentley Heath Neighbourhood Forum and Sport England
- Objection to the extent of the heritage buffer proposed between Grimshaw Hall and built development.
- Wording in Policy KN1 requires alteration in line with NPPF requirements for harm.
- Unclear what is meant by 'zone of significance on the setting of the listed building' on the Concept Masterplan.
- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.
- The nature and development of site KN1 is out of character for Knowle and the density is too high.
- Lack of evidence to demonstrate the viability and deliverability of this allocation, including the ability of the football club to relocate.
- Development of the site will add to the already congested road network around Knowle.
- Impact of development on existing transport and other social and community infrastructure has not been considered.
- The Green Belt boundary should be the canal, which would allow the site to deliver additional dwellings.
- The site is subject to flooding and drainage issues.
- Concern about the impact on the Local Wildlife Site.
- Objections to the site, loss of Green Belt and lack of consideration of brownfield sites
- Adverse impact on Knowle Conservation Area.
- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Policy KN2 South of Knowle (Arden Triangle)

Key issues raised in representations received:

- Objection to the site and to the loss of Green Belt. More suitable sites are available and more brownfield land should be utilised.
- Scale of development is out of character with the village and out of proportion with Knowle
- Insufficient regard given to the Neighbourhood Plan. Concern that densities and layout does not reflect the character the area or reflect the policies in Neighbourhood Plan. Densities should be no higher than medium density.
- The southern portion of the site is sensitive in Green Belt, ecology, heritage and landscape character terms. This area should be kept free of development and should remain in the Green Belt, which would allow Green Belt compensation to be provided at source.
- Proposed access arrangements from the South are difficult and will adversely impact on the sensitive landscape and heritage on this part of the site.
- Green Belt compensation measure will be difficult to achieve on this site, given the scale of development.
- No evidence to a demonstrate that a comprehensive and co-ordinated approach to delivery of the whole site can be achieved. The site faces complex issues meaning that much of the housing will not be delivered until the later in the plan period.
- No evidence to support or justify the relocation of Arden Academy. No evidence to demonstrate that it is financially viable, deliverable or whether it is a necessary infrastructure requirement arising from the development.
- Landowner support for removal of the site from the Green Belt and support for many of the requirements in the Policy.
- No comprehensive agreement from landowners on the concept masterplan as proposed in the Submission Draft Plan. An alternative Masterplan has been proposed and submitted through the representations process.
- Development will exacerbate congestion in the settlement and parking issues in the village centre and at Dorridge Railway station.
- Insufficient consideration given to the impact on existing and future infrastructure requirements, including transport and parking, health and other community infrastructure requirements. Concern that infrastructure mitigation measures will not be effective.
- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.
- Loss of wildlife and natural features
- Support for retention of the LWS but the site would be surrounded by built development, noise, light pollution etc, which would affect species using the site, habitats and biodiversity.
- Support inclusion of biodiversity offsetting on site, although this should only be considered as a last resort. The policy requirements in Point 4 are vague and would be hard to effectively enforce on a meaningful level.
- Support for relocation and redevelopment of Arden Academy. Existing facilities at the school are poor and not appropriate for the needs of the community.
- The Policy should refer to the site having capacity for at least 600 dwellings to allow for flexibility at the planning application stage.
- Some anomalies between the Concept Master Plan and Policy KN2.
- Provision of social and affordable housing should be prioritised as the Council has some ownership.

- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Meriden

Key issues raised in representations received:

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

Policy ME1 West of Meriden

Key issues raised in representations received:

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

North of Borough

Key issues raised in representations received:

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

Solihull Town Centre & Mature Suburbs

Key issues raised in representations received:

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

Policy SO1 East of Solihull

Key issues raised in representations received:

- The site has significant archaeological potential and an archaeological assessment is required in advance of the submission of any planning application.
- Concerns that development will have an impact on designated heritage assets and the natural environment.
- Development will increase traffic congestion and road safety issues.
- Brownfield land and infill sites should be prioritised and there are no special circumstances to remove the site from the Green Belt.
- The existing infrastructure does not have the capacity to cater for additional residents.
- The scale of development proposed is inappropriate and the site capacity should be reduced.
- Development would have an impact on the openness of the Green Belt and would threaten coalescence between settlements.
- The site is located within the parish of Catherine de Barnes and Hampton-in Arden. It is misleading for this allocation to be in the Solihull section of the Local Plan.
- Concerns that development would have an impact on pollution and air quality.
- The site is sustainable and located in close proximity to local services and facilities.
- Lugtrout Lane is prone to flooding.
- All landowners and their representatives have agreed a masterplan for the allocation.
- The site could deliver a higher number of dwellings.
- The loss of accessible recreational sports facilities is unacceptable.
- Development would lead to an adverse visual impact.
- West Midlands Police suggest that developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Policy SO2 Moat Lane Depot

Key issues raised in representations received:

- Some support for the allocation, stating that the allocation of Site SO2 is sound, positively prepared, justified, effective and consistent with the National Planning Policy Framework. The allocation is accessible, in a sustainable location and will contribute to the Borough's housing land supply.
- SO2 Moat Lane (and the Summary Table at para 226) and the Concept Masterplan Document, should refer to the site's capacity being 'at least' 90 dwellings.
- Moat Lane Depot is a currently licensed site and therefore the permit will need to be surrendered prior to redevelopment. There is a concern over relocation of the current uses on the site and the timing of such a relocation is an issue.
- There are issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.
- Appropriate provision has not been made in the Local Plan for sites for expanding religious, cultural or social clubs that make up a balanced community. Site SO2 could provide space for this.
- West Midlands Police suggest that developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.
- Policy SO2 fails to set out how the playing pitch demand generated from the site will be met with no reference to the Playing Pitch Strategy/Playing Pitch Mitigation Strategy.

UK Central

Key issues raised in representations received:

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

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

Other matters

- Insufficient evidence has provided on the deliverability of 2,740 dwellings from the UK Central Hub within the Plan period and it is unclear where the housing is being provided. The housing contribution from the Hub area should be clearly defined.
- The figure of 2,240 dwellings to be built at the NEC is not justified based on the evidence. This level of growth will be dependent on the establishment of a new sub-housing market and on the delivery of HS2. It is unclear whether it's realistic to expect the provision of apartment accommodation proposed to deliver the amount of affordable housing required.
- The definition of the 'UK Central Hub Area' is imprecise and inconsistently applied within the Plan and supporting evidence. Some definitions include land at Blythe Valley Park, North Solihull, Solihull Town Centre which are areas not included within the UK Central Solihull Hub documents provided as evidence.
- The delivery of the UK Central Hub requires co-ordination of several landowners and the implementation of necessary social, transport, utilities and flood risk management infrastructure. The policy and/or Concept Masterplan should set out details of this including delivery. There is no evidence of a legally binding Memorandum of Understanding/ agreement amongst landowners.
- Development of Arden Cross requires the removal of land from the Green Belt with no compensatory measures being identified which is in conflict with national and local planning policy.
- The NEC site should be fully assessed for its suitability for development, the quantum and location of housing to be provided is not specified, it appears that the housing area was not subject to a Sustainability Appraisal and it would likely have scored low against certain

objectives. The NEC proposals will be delivered as apartments in a relatively small residential community, with no opportunity for future growth and limited housing types likely to appeal to a narrow demographic.

- Arden Cross should be fully assessed for its suitability as a site, there is no site specific policy or concept masterplan to identify the quantum or location of residential development, the site scores poorly in the Sustainability Appraisal, if it had been assessed as part of a larger green belt parcel assessment it would have scored poorly, proposals will likely have a significant negative archaeological impact, there does not appear to have been an ecological assessment, Delivering the necessary infrastructure will be a challenge. There are major constraints to development, including managing the construction land-take and impacts of construction works, there are issues with provision of social infrastructure such as schools and health care facilities.
- The figure of 2,240 dwellings to be built at the NEC is not justified based on the evidence. This level of growth will be dependent on the establishment of a new sub-housing market and on the delivery of HS2. It is unclear whether it's realistic to expect the provision of apartment accommodation proposed to deliver the amount of affordable housing required.
- The policy and/ or concept masterplan should identify relevant details of coordination of landowners and implementation of necessary infrastructure, including quantum of development and timetable.
- An area should be designated as Arden Ecopark for industrial uses and an Energy from waste facility to serve the Arden Cross Development – the Council has not dealt with this submission made as part of the Call for sites.
- Plan appears to support encroachment of commercial and industrial activity into residential areas.
- Supports recognition of the NEC site in the plan but that the content could be strengthened to acknowledge the scale of the opportunity at the NEC site for residential development and there is sufficient flexibility to enable the economic role of the NEC site to evolve.

Policy Support

- Support site and opportunity to work with stakeholders to identify an appropriate well located site to meet the future needs of Solihull Moors Football club.
- HS2 Ltd is fully supportive of aims to maximise potential development opportunities that help support the HS2 Growth Strategy aspirations for employment, skills, environment and infrastructure in both Solihull Borough and wider West Midlands region.
- HS2 Ltd wishes to clarify that existing high-level assessments of impacts shown in the Arden Cross Masterplan have excluded any analysis of highways, vehicular capacities, site wide drainage, inclusivity and pedestrian modelling impacts.
- The Plan should reflect recent schedule 17 submissions for the HS2 station, automated people mover and surface car parking.
- Sport England welcomes the identification of the provision of leisure and community infrastructure though the needs for the site should be informed by a Playing Pitch Strategy and Indoor Needs Assessment. Welcomes the retention of the existing sports provision site until a suitable alternative site, agreed with Sport England and national governing bodies, being provided and ready for use. Highlights the need for a site specific leisure and playing pitch needs assessment to inform the requirements for the site.

Policy UK1 HS2 Interchange

Key issues raised in representations received:

- Specific policy for the allocation is supported but text should be reviewed to avoid overlap with P1.
- A review of the quoted figures for the amount of housing to be provided on the site should be undertaken as different figures appear throughout the plan.
- A review of the place making and development principles referred to in the policy should be undertaken to align with the Arden Cross Masterplan which should provide the guiding principles for the policy.
- The role and purpose of the SPD for the UKC Hub area should be clarified, it is unclear why it is referred to in P1 and not UK1.
- Site is too close to existing residential areas, Damson Parkway is already busy, this will create extra traffic issues and pollution and a loss of green belt. It will have a negative impact on quality of life.
- The plan fails to set out a detailed, site-specific housing trajectory outlining the anticipated delivery rates of all the strategic allocations. It fails to demonstrate the rate at which UK Central Hub will deliver the housing allocation. The likely build rates anticipated by the Council are unrealistic. The assumed delivery by the Council of 2,740 dwellings by 2036 should therefore be decreased to a more realistic rate equating to 160 dpa from 2029, or 1,120 dwellings.
- Objection to the use of greenbelt land to build homes at the Arden Cross development as it is beyond the budget of local people. This will result in the loss of valuable wildlife habitat and corridor between Catherine De Barnes and Chelmsley Wood. It will impact on climate change removing carbon absorbing trees and vegetation.
- The Arden Cross site should be fully assessed for suitability. It would perform poorly as part of a wider green belt parcel, proposals are likely to have a significant archaeological impact, there appears to be no ecological assessment and delivering the necessary infrastructure to support development will present a challenge.
- References to garden community principles is misleading.
- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.
- Developer contributions to police infrastructure should be made to ensure an appropriate level of service can be maintained.

Comments in support

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

Birmingham International Station to accommodate additional passenger movement and increase passenger capacity to meet the forecast growth associated with the UK Central Hub.

- The Environment Agency welcome the proposals in relation to flood risk and water quality. Welcomes the policy commitment to promote 'sustainable movement patterns to enable site wide and beyond connectivity', but not been explicitly referenced within the plan. Therefore must be included within The Hub Framework Plan and Arden Cross Masterplan to be effective. The Local Plan should carry through the aspiration of BREEAM Excellent rating for the HS2 station, and extend to wider area. A key element is sustainable transport, with non-car travel solutions such as a cycle route over the M42 being integral to the success of the station.

Policy UK2 Land at Damson Parkway

Key issues raised in representations received:

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

- The site should be removed from the plan.
- The construction and operation of the centre would cause noise, pollution, odour, disruption and visual intrusion to the residents of the Damson Parkway estate and adjacent areas. It would have an impact on the levels of harmful emissions, both from the plant itself and the vehicles accessing it. It would have a detrimental impact on the quality of life of adjacent residents and is contrary to the Council's commitment to residents' health and wellbeing. It would create further traffic congestion in addition to the existing traffic problems resulting from the operations of JLR. It would result in further loss of green belt and increased flood risk. The plan already proposes significant residential development in this area. The existing site at Bickenhill should be developed or an alternative site away from residential areas.
- With the government initiatives towards a Zero Waste economy, difficult to believe that the waste for Solihull is going to increase by 52%.
- This is already a flood risk area development here will increase the severity and occurrence of these events
- Warwickshire Wildlife Trust has serious concerns of the impact on breeding species and on the biodiversity and protected species on adjoining designated sites- Elmdon Grange wood LWS and Elmdon Wood Nature Park and part of Castle Hill Meadows LWS, and adjoining Hampton and Elmdon Coppice.
- The HWRC proposal is not legally compliant and contrary to the Statement of Community Involvement as this is the first time the proposal has been published and no evidence has been provided to justify the location and allow scrutiny. There is no information on the exact location and potential access points. The plan should justify the need for the improved facilities and provide potential options including expanding the site. There is no evidence of traffic / environmental assessments of the site. There is no evidence the local planning authority has sought to engage constructively, actively and on an ongoing basis with the neighbouring authorities. Opportunities to brief key stakeholders were not taken.
- JLR specifically object to the relocation of the HWRC on the site due to the potential impact on the future site expansion of JLR, the potential impact on the future aspirations of creating direct access to the new M42 Junction 6 road link; and the non-compliance with adopted Policy P3 Provision of Land for General Business and Premises.
- The site is largely constrained and the proposal would result in the total enclosure of Jaguar Land Rover's Lode Lane facility, developing the last area of land available as a natural extension. There should be flexibility in the policy to accommodate the dual carriageway proposal and allow for future rail freight capacity.
- References to the Household Waste and Recycling Centre and Council Depot should make it clear that the Council has not yet made a decision on this issue and other sites are still in consideration.

Other matters

- The site has significant archaeological potential. The need for further archaeological assessment in advance of the submission of any planning application should be referenced in the Policy.

- More clarity should be provided on how the concept masterplan for the Hub area will be developed and the role of stakeholder and landowner engagement including how it will be recorded and addressed, suggests changes to the wording of the policy to clarify this.
- Environment Agency consider that the Level 2 SFRA adequately considers the risk posed to and from these sites, and that the recommendations from this assessment have been carried forward into the plan, namely to provide flood risk reduction wherever possible and not locate any built development within Flood Zone 2 and 3.
- Objection to the amount of land allowed for the operations of JLR.
- Objection to the policy as the area is predominately residential and there has already been too much industrial development.
- References to 'local' employment needs should be removed. The term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this, which will be a highly attractive location for business relocating from within the District but also from new inward investment and businesses relocating from within the wider region.
- The list of acceptable development in the allocation area should generally be set out more clearly.
- The opportunity should be taken in the supporting text to clarify the scale of the available allocated land.
- There is no need for duplication of the special circumstances case for Green Belt release in the plan text. Solihull Moors Football Club is supportive in principle of Site UK2 and welcome the opportunity to work with Council and key stakeholders to find an appropriate well-located site to meet the Football Club's long term vision and ambitions.
- Sport England seek amendment to ensure that the leisure provision and playing pitch demand generated for the site is met the policy/supporting text should make reference to the need to undertake a site specific leisure and playing pitch needs assessment to inform the requirements for the site.

Policies Map

Key issues raised in representations received:

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