



Sustainability Appraisal Addendum Report

Final

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Solihull Metropolitan
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1. INTRODUCTION

1.1 Local Plan

- 1.1.1 This document is the Sustainability Appraisal Addendum Report that accompanies the Submission Draft Local Plan being prepared by Solihull Metropolitan Borough Council ('the Council'). It follows from the Sustainability Appraisal Report prepared on the Emerging Policies¹ and the Sustainability Appraisal Report² of the Draft Local Plan issued for consultation on 23rd January 2012.
- 1.1.2 Following closure of the consultation period on the 5th March 2012, the Council considered the responses and made changes to both the policies and site allocations presented within the Draft Local Plan. The rationale for the changes to the Consultation draft Local Plan issued in January 2012 is presented in the Council's Response to Representations and Recommendations for the Draft Local Plan³ issued in June 2012.
- 1.1.3 While the Council is now under a duty to cooperate with neighbouring planning authorities as a consequence of the 2011 Localism Act, in practice the Council has participated in an extensive array of joint planning arrangements. Such cooperation extends from work on the Regional Spatial Strategy through to engagement with the Local Enterprise Partnership, the Highways Agency and Centro on the Transport Infrastructure Assessment to name a few aspects of cooperation. As a result of such cooperation, no further changes to the Local Plan are proposed that are a direct result of the duty⁴.
- 1.1.4 No changes were made to the strategy. Additions or amendments were made to twelve policies (P2, 4, 5, 6, 9, 10, 11, 12, 15, 16, 17 and 20) to reflect the representations, new evidence and issues raised in the Fair Treatment Assessment of the draft Local Plan. Other changes are largely to assist understanding, ensure conformity with the NPPF, reflect updated evidence and address drafting errors:
- Increase in size of extension to Birmingham Business Park – justification provided in paragraph 7.2.14 of the revised Draft Local Plan;
 - Reduction in size and capacity of housing site 1 – to address concerns of local community and potential impact on the adjacent listed building (in Birmingham);
 - Addition to Policy P2 to address gap in policy relating to out of centre retailing;
 - Reduced housing land supply figures in Policy P5 to reflect the reduced capacity in North Solihull, lower density achieved on Moat House Farm, Marston Green planning permission (formerly site 16 but deleted now planning permission granted);
 - Changes to Policy P6 to reflect evidence in updated Gypsy & Traveller Accommodation Assessment 2012.
- 1.1.5 As well as additions or amendments to twelve policies, a new policy P21 was introduced to address Developer Contributions and Infrastructure Provision consolidating text provided in the Delivering and Monitoring chapter of the Draft Local Plan as a policy.
- 1.1.6 In terms of the site allocations, there were no new sites or locations introduced as a consequence of the consultation process. However, consideration of the representations, evidence and Fair Treatment Assessment lead to changes to the following sites: Site 1 Foxglove Crescent, Site 10 Blythe Valley Park, Site 11 Powergen, Site 16 Moat House Farm, Site 31 Land adjacent Birmingham Business Park.

¹ The Draft Sustainability Appraisal Report is available at:
http://www.solihull.gov.uk/Attachments/Challenges_and_Choices_Sustainability_Report.pdf

² The Sustainability Appraisal Report is available at:
[http://www.solihull.gov.uk/Attachments/Sustainability_Appraisal_Report_-_A4_pdf_\(2\).pdf](http://www.solihull.gov.uk/Attachments/Sustainability_Appraisal_Report_-_A4_pdf_(2).pdf)

³ Solihull Council, (2012): Solihull Draft Local Plan: Shaping a Sustainable Future (Pre-Submission Draft) Council's Response to Representations and Recommendations for the Draft Local Plan
http://www.solihull.gov.uk/Attachments/Responses_to_Local_Plan_representations.pdf

⁴ Further details of the Council's application of the duty to cooperate is to be published by the Council in due course.

- 1.1.7 As Local Development Documents must undergo a Sustainability Appraisal incorporating a Strategic Environmental Assessment that considers the environmental consequences of the plan⁵, this Sustainability Appraisal Addendum Report documents the findings of the appraisal of the changes detailed above.
- 1.1.8 Alongside the Sustainability Appraisal, preparation of the Plan has also involved consideration of the following:
- **Impacts on European wildlife sites:** A ‘Habitats Regulations Assessment’ Screening Report has been prepared⁶ and a further screening of four sites outside the Borough published⁷;
 - **Health Impact Assessment:** As with the Sustainability Appraisal Report, health issues are dealt within this Sustainability Appraisal Addendum Report;
 - **Equalities Impact Assessment:** A Fair Treatment Assessment (an Equalities Impact Assessment) was undertaken on the Emerging Core Strategy that included scoping of the need for an assessment of policies. The Fair Treatment Assessment is published to support the Submission draft Local Plan⁸.

1.2 Structure of the Report

- 1.2.1 This Sustainability Appraisal Addendum Report documents the appraisal of the Submission Draft Local Plan to be lodged with the Secretary of State in August 2012.
- 1.2.2 While the appraisal focuses upon those elements that have been modified since the consultation draft Local Plan, the importance of providing a coherent view of the sustainability appraisal to readers instead of having to consider the previous appraisal reports has been recognised. Consequently this Appraisal Report re-presents material from the earlier Appraisal Report only insofar as it is necessary to interpret the current findings.
- 1.2.3 This Appraisal Report focuses upon the appraisal of the Submission draft Local Plan policies and site allocations insofar as they may give rise to significant effects that are different to that previously reported. For ease of reference changes introduced to the policies since the Consultation draft Local Plan are highlighted in a red font. As there remains the necessity to meet the requirements of the SEA Directive Table 1.1 outlines how these have been met below.
- 1.2.4 The key aspect to note is that reference should be made to chapters 3 and 4 of the Sustainability Appraisal Report for the Consultation draft Local Plan to gain an appreciation of both the current state of the environment and the policy context within which the draft Local Plan has been prepared.

Table 1.1 Meeting the SEA Directive Requirements

Environmental Report Requirements	Sustainability Appraisal Report	Sustainability Appraisal Addendum Report
a) Outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	Chapter 3	See Sustainability Appraisal Report Chapter 3
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 4	See Sustainability Appraisal Report Chapter 4
c) The environmental characteristics of areas likely to be significantly affected.	Chapters 4	See Sustainability Appraisal Report Chapter 4 for the sustainability context

⁵ European Parliament and Council of the European Union (July, 2001) *Directive 2001/42/EC on the assessment of certain plans and programmes on the environment* (Official Journal of the European Community – OJ No L197, 21.7.2001, p.30) as implemented by The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004, no. 1633).

⁶ http://www.solihull.gov.uk/Attachments/HRAA_Screening_SMBC.pdf

⁷ <http://www.solihull.gov.uk/Attachments/HRA - Further Screening April 2012.pdf>

⁸ To be available from the Council

d) Any existing environmental problems which are relevant to the plan or programme, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Chapter 4	See Sustainability Appraisal Report Chapter 4 for the sustainability context
e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 3 & Appendix B	See Sustainability Appraisal Report Chapter 3 and Appendix B
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Chapters 5, 6 & 7	See Sustainability Appraisal Addendum Report Chapter 3 for appraisal of revised policies. Chapter 4 of the Addendum Report details the changed site allocations.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 5,6,7 & 8	Chapter 3 of the Sustainability Appraisal Addendum Report documents the measures proposed for each policy throughout the appraisal process. Recommendations associated with the site allocations can be found in Chapter 4 of the Addendum Report. A summary of all mitigation and monitoring proposals are presented in Sustainability Appraisal Addendum Report Chapter 5.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 2 & 4	A summary of the methodology is provided in Chapter 2 of the Sustainability Appraisal Addendum Report. See Sustainability Appraisal Report Chapter 4 for the sustainability context and technical difficulties.
i) A description of the measures envisaged concerning monitoring in accordance with Article 10.	Chapter 8	See Sustainability Appraisal Addendum Report Chapter 5 for mitigation and monitoring
j) A non-technical summary of the information provided under the above headings.	Accompanies the draft plan	Accompanies the submission Draft Local Plan

1.2.5 The remainder of this report is structured as follows:

- **Chapter 2** – Summarises the methodology used in undertaking the sustainability appraisal;
- **Chapter 3** – Presents the appraisal of the Draft Local Plan policies along with the conformity of the proposed policies with those of the sustainability appraisal framework;
- **Chapter 4** – Documents the findings of the appraisal of the site allocations;
- **Chapter 5** – Presents the mitigation and monitoring proposals.

1.2.6 Reference ought to be made to following technical appendices prepared alongside the Sustainability Appraisal Report as these provide supporting information:

- **Appendix A:** Statutory body comments on 2008 Scoping Report;
- **Appendix B:** Policies, plans and programmes;
- **Appendix C:** Countryside Strategy and Woodland Strategy Council commitments;
- **Appendix D:** Selected Ward Profiles;
- **Appendix E:** Evolution of sustainability objectives;
- **Appendix F:** Compatibility of Objectives;
- **Appendix G:** Policy Appraisal Tables;
- **Appendix H:** Appraisal Tables for Allocation Sites

1.2.7 Appendix G has been revised to reflect the changes introduced in the Submission draft Local Plan.

1.2.8 URS was commissioned to work alongside officers from the Council to prepare this Sustainability Appraisal Report.

1.3 Scope of the Appraisal

1.3.1 A Sustainability Appraisal incorporating a Strategic Environmental Assessment (SEA) has been undertaken in accordance with the regulations⁹ implementing European Directive 2001/42/EEC on the assessment of the effects of certain plans and programmes on the environment is required for Development Plan Documents. The intention is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans [...] with a view to promoting sustainable development' (SEA Directive, Article 1).

1.3.2 The Directive's definition of 'environment' includes not only the natural environment and historic environment, but also effects such as human health and material assets. It also requires a thorough analysis of a plan's effects including secondary, cumulative and synergistic effects¹⁰. Mitigation and monitoring measures are recommended to address significant effects.

1.4 Limitations of the Appraisal

1.4.1 This appraisal has relied upon the data and information recorded in the appendices to the Sustainability Appraisal Report. The evidence has not been updated since the Sustainability Appraisal Report was published in January 2012.

1.4.2 It is acknowledged that at the current time, there is considerable uncertainty associated with many aspects of national and local economy that have a considerable bearing upon the future development activity and the Council's ability to manage such activities. Such uncertainty affects both the projections on what a future without a plan might look like as well as the assessment of the alternative strategies.

1.5 Habitats Regulations Assessment

1.5.1 The HRA Screening Report¹¹ concluded that the policies and strategies described in the Plan do not give rise to direct or in-combination effects and hence the Plan was screened out from requiring an Appropriate Assessment.

1.6 Health Impact Assessment

1.6.1 While there is no statutory requirement to undertake a Health Impact Assessment, there is a requirement to consider the effects on human health of the plan under SEA. As part of this requirement the following approach has been adopted:

- Account is taken of health issues identified in the Joint Strategic Needs Assessment;
- Collation of information on the health plans, baseline data, health issues;

⁹ *The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004, no. 1633).*

¹⁰ The Directive refers to 'effects' rather than 'impacts', since plans can have beneficial effects as well as negative effects. 'Impacts' are sometimes incorrectly seen as only being adverse.

¹¹ SMBC, 2008: Core Strategy Appropriate Assessment Screening Report

- Assessment of the health consequences of the Plan proposals and how they may be distributed across different groups;
- Recommendations to enhance the health outcomes;
- Consultation on the health outcomes;
- Consideration of the issues raised following consultation; and
- Consideration of the need for monitoring of impacts.

1.7 Equalities Impact Assessment

- 1.7.1 Local authorities have a duty under race, disability and gender legislation¹² to carry out an EqIA of their Plans. An EQIA encompasses race, gender, disability, age, religion/belief and sexual orientation.
- 1.7.2 The Fair Treatment Assessment (an Equalities Impact Assessment) will be available for review on the Council website.

1.8 Delivery Processes

- 1.8.1 The timetable set for the production of the Local Plan is set out below:
- Submission – August 2012;
 - Examination – November 2012;
 - Adoption of Local Plan – April 2013.

¹² Race Relations (Amendment) Act 2000, requirement to produce and publish a Race Equality Scheme. Disability Discrimination Act 2005, requirement to produce a Disability Equality Scheme. Equality Act 2006 requirement to produce a Gender Equality Scheme.

2. METHODOLOGY

2.1 Introduction

- 2.1.1 Reference should be made to the description of the methodology provided in the Sustainability Appraisal Report as this section provides a brief summary to aid interpretation of the subsequent appraisal.
- 2.1.2 Readers who wish to understand the steps undertaken in defining the scope of the appraisal and the testing of the plan objectives against the sustainability objectives ought to make reference to chapter 2 of the Sustainability Appraisal Report.
- 2.1.3 This chapter provides a summary of the methodology employed in the forecasting and appraisal of the effects and the subsequent stages of the appraisal process.

2.2 Sustainability Appraisal Framework

- 2.2.1 The Sustainability Appraisal Framework employed in the appraisal is presented in Table 2.1.

Table 2.1: Updated 2011 Sustainability Appraisal Framework

Solihull Draft Local Plan Sustainability Appraisal Framework	
Sustainable consumption & production	
<ol style="list-style-type: none"> 1. To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups: <ol style="list-style-type: none"> a. To provide a quality of life able to help retain well-educated members of the work force. b. To enable the provision of offices and premises able to meet the needs of business start-ups as well as larger businesses attracted by the transport-hub and knowledge-hub that exists. 2. To reduce the number of people experiencing difficulties in accessing employment, education and training opportunities. 3. To ensure that the location of development makes efficient use of existing physical infrastructure and helps to reduce the need to travel. 4. Minimise the use of natural resources, such as land, water and minerals, and minimise waste, increase reuse and recycling and manage within the Borough/Sub-region: <ol style="list-style-type: none"> a. Deliver reductions in the quantity of water used in the Borough. b. Deliver reductions in the waste arising and to move up the waste hierarchy. c. To use previously developed sites where appropriate where there is no net loss of ecological value. d. To promote resource efficiency. 	
Climate change & energy	
<ol style="list-style-type: none"> 5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation: <ol style="list-style-type: none"> a. To deliver quantified reductions in greenhouse gas emissions by 2020 that contribute to the national 34% reduction target. b. To encourage reduced energy use, use of distributive energy systems and renewable energy. 6. To assist in the adaptation businesses need to become more resource efficient and also to deliver more sustainable products and services better equipped to a changing market place caused by climate change. 7. Manage, maintain and where necessary improve the drainage network to reduce the economic losses from flooding. 8. To ensure that development provides for adaptation to urban heating, the effects of high winds and assists in promoting behaviour change. 	
Natural resource protection & environmental enhancement	
<ol style="list-style-type: none"> 9. To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species. 10. To manage the landscape effects of development in recognition of the European Landscape Convention as well as the risks and opportunities associated with measures to address climate change. 11. To facilitate the delivery and enhance the quality of areas providing green infrastructure. 12. To enhance, conserve and protect buildings, sites, and the setting of historic assets in the urban 	

Solihull Draft Local Plan Sustainability Appraisal Framework
<p>environment as part of development projects.</p> <p>13. To deliver improvements in townscape and enhance local distinctiveness.</p> <p>14. Minimise air, soil, water, light and noise pollution:</p> <ol style="list-style-type: none"> a. To continue to deliver reductions in particulate and nitrogen dioxide levels. b. To manage drainage network to ensure no detriment to surface water quality. c. To reduce the intrusion of urban and highway lighting. d. To deliver reductions in road traffic noise focusing upon those areas identified as First Priority Locations by Defra under the Environmental Noise Directive. e. To conserve soils thereby supporting other objectives.
Sustainable communities
<p>15. To improve community capital and reduce isolation across the social gradient in the Borough:</p> <ol style="list-style-type: none"> a. Ensure that the pattern of development helps reduce imbalances across the Borough. b. Promote employment opportunities and improve access to employment, education and health services. c. Improve the public realm and community facilities. <p>16. Improve the supply and affordability of housing in those areas of greatest need:</p> <ol style="list-style-type: none"> a. Ensure supply of housing appropriate to local needs especially in relation to affordability. b. Ensure urban design and layout contributes towards reducing the potential for crime. c. Make provision for the accommodation needs of Travellers & Gypsies. <p>17. Ensure the Borough's regional assets reflect wider needs and that their development is not compromised.</p> <p>18. To fully integrate the planning, transport, housing, cultural, recreational, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles:</p> <ol style="list-style-type: none"> a. To design the urban fabric and services to meet the needs of an elderly population particularly one less able to rely upon private transport. <p>19. Reduce crime, fear of crime and anti-social behaviour.</p> <p>20. Enhance public safety.</p> <p>21. Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all.</p>

2.3 B3/B4 – Forecasting and Appraisal of Effects

2.3.1 In appraising the effects of the plan, the following factors have been considered:¹³

- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- The probability, duration, frequency and reversibility of the effects;
- The cumulative nature of the effects; and
- The potential for effects to occur upon valued or vulnerable areas.

2.3.2 Carrying out the appraisal involves considering, for each policy, spatial strategy and site allocation, the following:

- Is it clear what is proposed?
- Who/what is likely to be affected?
- Where is the effect likely to occur?
- Is the effect likely to affect an area or population that is vulnerable or particularly valued?
- Will any social group be disproportionately disadvantaged / affected by the alternative?

¹³ This approach to determining significance is a requirement of the SEA Directive.

- What is the magnitude of the impact based on duration, scale, uncertainty, direct, indirect, cumulative, reversible?
- Is the strategy likely to have a significant effect on the objectives?
- If so, can the effect be enhanced, avoided or its severity reduced?
- If the effect cannot be avoided, e.g. by conditions or changes to the way it is implemented, can the proposal be changed or eliminated?

- 2.3.3 Significance criteria capture duration, geographic scale, probability as well as whether the effect would be direct, indirect or cumulative. While the potential for an impact to be reversible is recorded, since there would not necessarily be a guarantee that resources would be available to reverse the impact, the assessment significance assumes a worst case outcome. The reversibility of the impact is then considered in making recommendations to avoid, minimise or offset its effects.
- 2.3.4 To aid consistency a sustainability assessment tool has been used that records the selection of the analyst against each of the assessment criteria identified above. This provides an audit trail against which the findings can be checked.
- 2.3.5 The assignment of significance is via rule-based criteria drawing on instruction provided by the SEA Directive. The rule-based criteria can be manually overridden by the assessor if the need arose, although this required justification and agreement by the project director.
- 2.3.6 To assist in judging the significant effects of policies and proposals for the Draft Local Plan, the following set of significance criteria have been prepared to guide the assessment process (see Table 2.2).

Table 2.2: Significance Criteria

Minor	Cause and effect likely affecting local areas for over 3 years but effects are unlikely to be reversible and do not cause district scale cumulative effects.
	Cause and effect either clearly not clearly established but limited to district wide effects lasting for less than 10 years. Anticipated that effects may or may not be reversible.
	Potential effects of less than 3 years duration at a regional scale which may or may not be reversible.
	Permanent local scale potential or likely direct or indirect effects that may or may not be reversible.
Moderate	Cause and effect likely to occur at a district scale extending between 3-10 years and that are unlikely to be reversible but do not affect regional or national resources.
	Cause and effect can be likely to or certain to occur but there will be district effects that extend for over 10 years that are unlikely to be reversible and do not affect regional or national resources.
	Cause and effect not clearly established but potential for effects upon regional or national interests for any duration that may or may not be reversible

Major	Cause and effect directly attributable to change of more than 10 years to the existing conditions likely to occur over a wide area at a district scale that is unlikely to be reversible.
	A potential cause and direct effect with a duration of more than 3 years that may cause cumulative effects upon regional or national interests that may not be reversible.
	A cause and effect is likely or would occur with national or regional interests being affected that may or may not be reversible

2.3.7 To assist in the communication of significant effects a traffic-light based scoring system is used (see Table 2.3).

Table 2.3: Impact Significance

Scoring Symbol	Label
Maj+ve	Major positive outcome
Mod+ve	Moderate positive outcome
Min+ve	Minor positive outcome
Neut	Neutral
Min-ve	Minor negative outcome
Mod-ve	Moderate negative outcome
Maj-ve	Major negative outcome

2.4 Uncertainties

2.4.1 Some uncertainties are associated with the appraisal of plans reflecting questions over funding, the timing of major projects and new housing as well as changes to the national policy framework. The appraisal identifies where uncertainties exist that have a bearing upon whether significant effects are likely to occur.

2.4.2 While it is recognised that there have been revisions to some of the datasets reported in chapter 4 of the Sustainability Appraisal Report these are not considered to bring about a change in the sustainability objectives or context against which the policy and site allocations are appraised.

2.5 Reporting

2.5.1 Spider diagrams have been used to present the findings in a clear manner (see Box 2.1). **Essentially, the greater the footprint of the shaded area, the better the option or policy performs in sustainability terms.** A sliding scale of 3 to -3 that has been used whereby 3 is a major positive effect, 0 is a neutral effect, and -3 is a major negative effect.

2.5.2 In the example above the option / policy is likely to have a major positive on health and well being and a moderate negative outcome for water and biodiversity. The majority of the remaining effects are either minor positive or negative, or neutral.

2.6 Secondary and Cumulative Effects

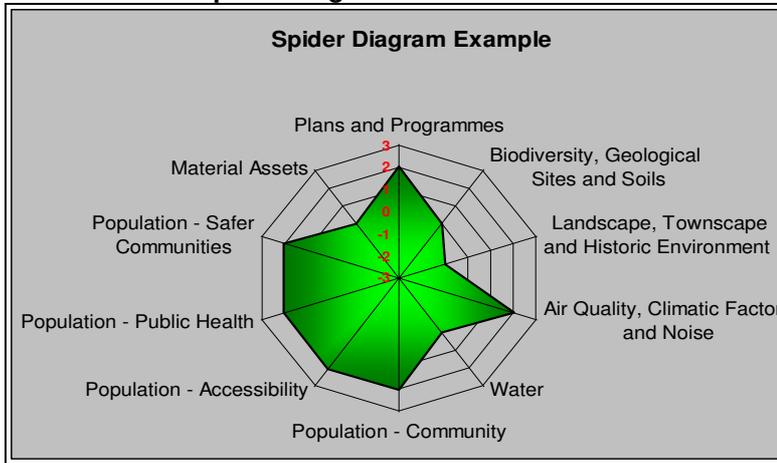
2.6.1 Secondary or indirect effects occur at some distance or time from the original effect of the plan. Such non-cumulative effects are identified and assessed mainly by considering potential links between various objectives.

2.6.2 Cumulative effects arise where several proposals that may or may not individually be significant, but in combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals

and actions and repeated removal or addition of resources due to proposals and actions. Such effects can be additive; neutralising or synergistic.

2.6.3 During the appraisal receptors have been identified that may experience cumulative effects.

Box 2.1: The Spider Diagrams



2.7 B5 - Mitigation and Enhancement

2.7.1 Annex I of the SEA Directive requires the Environmental Report to include measures to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan or programme. Mitigation can take a wide range of forms, including:

- Changes to the plan proposals or policies;
- Identification of issues to be addressed in project EIAs; and
- Proposals for changing other plans and programmes at their next revision.

2.7.2 Where potential significant adverse effects are identified mitigation measures are proposed. Also, opportunities to provide enhancement have been identified. Mitigation recommendations have been made, where appropriate, for each policy/site allocation within the Draft Local Plan.

2.7.3 As the Draft Local Plan sets the framework for projects that may fall under the requirements to undertake an Environmental Impact Assessment (EIA), an opportunity exists while considering mitigation and enhancement measures to identify measures that are more appropriately undertaken at that stage.

2.8 B6 - Monitoring

Article 10 of the SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are to be monitored in order, *inter alia*, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.

2.8.1 Where likely significant effects are identified, and especially where these are adverse effects or where uncertainties are identified, proposals to monitor such effects are presented in chapter 8. This allows an evidence base to be built up for future appraisals to inform the further plans and projects as well as potentially to address uncertainties where appropriate.

2.8.2 Measures by which significant positive and negative effects can be monitored are (Stage C). These are then confirmed in the Adoption Statement (Stage D). Monitoring will be incorporated into Authority Monitoring Reports.

2.9 Stage C: Sustainability Appraisal Report

2.9.1 Stage C involves documenting the process and findings in an Environmental or, in this case, Sustainability Appraisal Addendum Report to accompany the Submission Draft Local Plan. A Non-Technical Summary has also been prepared.

2.10 Stage D: Consultation

2.10.1 The Sustainability Appraisal Report has been published alongside the Draft Local Plan providing information on:

- How the Plan was developed;
- Challenges and opportunities;
- Alternatives considered;
- Consequences of the preferred option; and
- Proposals for mitigation and monitoring.

2.10.2 The Sustainability Appraisal Addendum Report is published alongside the Submission Draft Local Plan to aid those who may wish to make representations as part of the Examination in Public proceedings that lead towards adoption of the Draft Local Plan.

2.11 Stage E: Adoption

2.11.1 If the sustainability appraisal finds that adoption of the Plan has the potential to result in significant sustainability effects then proposals on how such effects are monitored are to be agreed.

2.11.2 The Adopted Plan will have taken account of responses to consultation on the published draft Plan and on the published Sustainability Appraisal Report. An adoption statement would record:

- How sustainability considerations were integrated into the plan;
- How the Sustainability Appraisal Report has been taken into account;
- How the opinions and consultations have been considered;
- The reasons for selecting the alternatives underpinning the final plan; as well as
- The measures to be taken to monitor the effects of the strategy.

2.11.3 SEA guidance indicates that the existing monitoring arrangements of the plan and for other plans can be used to obtain the required information. Particular attention will be paid to the monitoring proposals to ensure that they are practical and within anticipated resource constraints.

2.11.4 Monitoring that will be undertaken by the Council or other organisation as identified in the Adoption Statement that will be published during April 2013.

3. APPRAISAL OF LOCAL PLAN POLICIES

3.1 Introduction

- 3.1.1 Based on consideration of the representations, evidence and Fair Treatment Assessment changes were introduced to Submission draft Local Plan.
- 3.1.2 As no changes have been made to the draft Local Plan objectives there has been no need to revisit their compatibility with sustainable development principles. However for the sake of completeness, the appraisal of the Consultation draft Local Plan objectives is represented in section 3.2.
- 3.1.3 A discussion of the ‘reasonable alternatives’ considered as part of the revisions to the Submission Draft Local Plan is presented in section 3.3.
- 3.1.4 The chapter then considers the sustainability performance of each of the 21 Submission Draft Local Plan policies set out under the following themes:
- **Sustainable Economic Growth:** Support economic success (policy 1); Maintain a strong, competitive town centre (policy 2); Provision of land for general business & premises (policy 3);
 - **Providing Homes for All:** Meeting housing needs (policy 4); Provision of land for housing (policy 5); Provision of sites for Gypsies and Travellers (policy 6);
 - **Improving Accessibility and Encouraging Sustainable Travel:** Accessibility and ease of access (policy 7); Managing demand for travel and reducing congestion (policy 8);
 - **Protecting and Enhancing our Environment:** Climate change (policy 9); Natural environment (policy 10); Water management (policy 11); Waste management (policy 12); Minerals (policy 13); Amenity (policy 14);
 - **Promoting Quality of Place:** Securing design quality (policy 15); Conservation of heritage assets and local distinctiveness (policy 16); Countryside/Green Belt; (policy 17);
 - **Supporting Local Communities:** Health and Well Being (policy 18); Range and quality of local services (policy 19); Provision of open space, children’s play, sport, recreation and leisure (policy 20).
- 3.1.5 Policy 21 has been introduced to the Submission draft Local Plan and deals with developer contributions and infrastructure provision.
- 3.1.6 For each of the policies, the chapter sets out an appraisal of the forecast effects against the sustainability framework together with a perspective on the uncertainties associated with implementation as well as possible mitigation and enhancement measures.
- 3.1.7 Towards the end of the chapter a section draws together the mitigation and enhancement measures to identify any synergies across the policy areas.

3.2 B1: Compatibility of Core Strategy Objectives with Sustainability Objectives

- 3.2.1 As noted above, this section provides a summary of the appraisal provided in the Sustainability Appraisal Report of the Consultation Draft Local Plan.
- 3.2.2 Each of the Local Plan objectives was “scored” against each of the twenty-one sustainability objectives grouped into four themes – as “compatible” or “incompatible” or as having an “uncertain link” or “no link”.
- **Theme 1 - Sustainable consumption and production;**
 - **Theme 2 - Climate change and energy;**
 - **Theme 3 - Natural resource protection and environmental enhancement;**
 - **Theme 4 - Sustainable communities.**
- 3.2.3 The results of the assessment are presented in Table 5.2 and Appendix F of the Sustainability Appraisal Report. A brief summary is provided below.

- 3.2.4 The plan objective with the highest **consistency** was Objective 2: accommodate housing needs (57%). Other plan objectives that perform well against sustainability objectives include: Objective 26: Improve accessibility (52%); Objective 12: Maintain green belt (48%); and Objective 20: Green infrastructure (48%). All of these plan objectives show a strong overall synergy with sustainability objectives for the reason that they perform well in terms of *both* socio-economic and environmental sustainability objectives.
- 3.2.5 The plan objectives with the fewest synergies were Objectives 15: Decentralised energy and 33: Mineral resources reflecting that both narrowly focus upon a specific topic. Objectives 5, 24, 31 and 32 also show synergy with relatively few sustainability objectives (14%). All four are relatively focused objectives with Objectives 5 and 24 addressing a social issue (the needs of older people and those with disabilities), which do not have implications for any environmental sustainability objectives. Similarly, Objectives 31 and 32 address waste management, and so do not have implications for social sustainability objectives.
- 3.2.6 A total of 22 Plan objectives are shown to have ‘**uncertain**’ compatibility with one or more sustainability objectives as illustrated in Table 3.1. In some instances, an uncertain score has been recorded to reflect the fact that there could be some potential for *inconsistency*, depending on the approach that is taken to achieving the objective. In other instances, an uncertain score has been recorded to reflect the fact that there could be some potential for *synergy*, depending on the approach that is taken to achieving the objective.

Table 3.1: Uncertain Compatibilities

Plan Objective	Uncertainty
Objective 2: Accommodate additional development to help meet the housing needs in the Borough whilst ensuring high quality places across the Borough through continuing to improve the quality of the environment in the North Solihull Regeneration Area and the mature suburbs and, conserving the qualities of the mature suburbs and rural settlements that make those places attractive areas to live.	<ul style="list-style-type: none"> Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.
Objective 4: Address constraints in supply including the inability to deliver affordable housing in recent years through windfall development by reducing site thresholds.	<ul style="list-style-type: none"> Regeneration & spatially targeted economic development to reduce inequalities.
Objective 6: Ensure high quality design and development which integrates with its surroundings and creates safer, inclusive, adaptable and sustainable places which make a positive contribution to the Borough’s sense of place, attractiveness and to people’s quality of life.	<ul style="list-style-type: none"> Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.
Objective 9: Support the continued success of key regional economic assets such as Birmingham International Airport, National Exhibition Centre, Birmingham and Blythe Valley Business Parks and Land Rover whilst maintaining the quality of the environment and managing congestion.	<ul style="list-style-type: none"> Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation.
Objective 10: Support the continued success of Solihull Town Centre whilst maintaining the quality of its environment and managing congestion.	<ul style="list-style-type: none"> To deliver improvements in townscape and enhance local distinctiveness
Objective 11: Encourage investment into Shirley and Chelmsley Wood Town Centres to improve competitiveness and the shopping environment.	<ul style="list-style-type: none"> Minimise air, soil, water, light and noise pollution. To deliver improvements in townscape and enhance local distinctiveness.
Objective 14: Reduce the Borough’s greenhouse gas emissions, so as to contribute to the national target for reduction, through a range of measures such as the location and design of development, provision of renewable and low carbon energy schemes, and promoting opportunities for low carbon travel.	<ul style="list-style-type: none"> Regeneration & spatially targeted economic development to reduce inequalities.

Plan Objective	Uncertainty
Objective 15: Promote decentralised energy and heating networks within the Mature Suburbs and North Solihull Regeneration Area, and the generation of energy from on-site renewable sources.	<ul style="list-style-type: none"> To deliver improvements in townscape and enhance local distinctiveness. Regeneration & spatially targeted economic development to reduce inequalities.
Objective 18: Ensure that new development does not increase, and where possible reduces risks such as flooding and urban heating.	<ul style="list-style-type: none"> Manage landscape effects of development and to address climate change. Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species. Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel.
Objective 19: Ensure new development, and where possible existing communities have resilience to the effects of future climate change.	<ul style="list-style-type: none"> Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel. Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 21: Encourage the mitigation and adaptation of existing buildings to climate change.	<ul style="list-style-type: none"> Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species. Facilitate delivery and enhance the quality of areas providing green infrastructure. Enhance, conserve and protect historic assets in the urban environment as part of development projects. To deliver improvements in townscape and enhance local distinctiveness.
Objective 23: To provide an adequate amount and variety of homes which are affordable by local people including homes for rent, for purchase and intermediate tenure.	<ul style="list-style-type: none"> Regeneration & spatially targeted economic development to reduce inequalities.
Objective 28: Manage transport demand and reduce car reliance.	<ul style="list-style-type: none"> Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 29: Enable and increase the modal share of all forms of sustainable transport.	<ul style="list-style-type: none"> Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 30: De-couple economic growth and increase in car use.	<ul style="list-style-type: none"> Facilitate delivery and enhance the quality of areas providing green infrastructure. Ensure the Borough's regional assets reflect wider needs and that their development is not compromised.
Objective 32: To address the capacity gap between waste arising and capacity of facilities by taking advantage of opportunities to provide facilities for recycled materials, organic and residual waste.	<ul style="list-style-type: none"> Minimise air, soil, water, light and noise pollution.
Objective 33: To provide for a total of 7.5 million tonnes of primary sand and gravel resources from sources within Solihull for the plan period to 2028, including the maintenance of a minimum 7 year landbank, whilst ensuring that provision is made to encourage the use of secondary and recycled aggregates, that sand and gravel resources are safeguarded from possible sterilisation by non-mineral development, and that environmental, restoration and aftercare criteria are met.	<ul style="list-style-type: none"> Minimise air, soil, water, light and noise pollution. Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species. Manage landscape effects of development and to address climate change.

Plan Objective	Uncertainty
Objective 34: Create healthier, safer neighbourhoods.	<ul style="list-style-type: none"> Enhance ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species. Manage landscape effects of development and to address climate change. Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 35: Enable people to pursue an active lifestyle and make healthier choices.	<ul style="list-style-type: none"> Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 36: Meet local housing and employment needs whilst facilitating the provision of appropriate health care services.	<ul style="list-style-type: none"> Reduce difficulties accessing employment, education & training. Locate development to make efficient use of existing physical infrastructure and helps to reduce the need to travel.
Objective 37: Ensure that development does not have an adverse impact on physical and mental health and well being.	<ul style="list-style-type: none"> Facilitate delivery and enhance the quality of areas providing green infrastructure.
Objective 39: Promote a landscape scale approach to protecting and restoring the landscape of the Borough and its characteristic features.	<ul style="list-style-type: none"> Enhance, conserve and protect historic assets in the urban environment as part of development projects.

3.2.7 There were no sustainability objectives that were not supported by at least one Draft Local Plan objective. The least supported sustainability objectives were:

- Objective 17 - Ensure the Borough's regional assets reflect wider needs and that their development is not compromised (5%); and
- Objective 4 - Minimise the use of natural resources, increase reuse and recycling and manage within the Borough/Sub-region (10%).

3.3 B2: Alternatives

3.3.1 Under the regulations, assessing the likely significant effects of implementing the plan or programme must include consideration of "*and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*". There is also a requirement to provide "*an outline of the reasons for selecting the alternatives dealt with*". This means that an audit trail is required that explains and justifies the shortlist of alternatives that have been selected for assessment.

3.3.2 Section 5.3 of the Consultation draft Local Plan Sustainability Appraisal Report sets out the alternatives explored in the plan development process. It included a business as usual scenario; the options considered for the growth and delivery of development as well as policy alternatives considered within Table 5.4 of the Sustainability Appraisal Report.

3.3.3 Table 3.2 below sets out, where appropriate, the alternatives that were considered by the Council in preparing the Submission Local Plan. As noted in the table, several of the changes do not affect the direction or intent of the policy and hence did not stimulate a need to consider an alternative approach.

3.3.4 The Strategic Housing Land Availability Assessment published in September 2010 considered the alternative site allocations which were then considered by the Council taking account of the sustainability appraisal findings and the responses to the Emerging Core Strategy consultation, as well as the Strategic Housing Land Availability Assessments.

Table 3.2: Alternative Policies – Strategic Perspectives

Policy	Strategic Alternatives
Sustainable Economic Growth	
P2 - Maintain strong, competitive town centres	<ul style="list-style-type: none"> Option of providing separate guidance for strategically important Solihull town centre, and greater or lesser restrictions on uses. The change to the policy increases the emphasis on the Town Centre first policy. The alternative of not changing the Consultation Local Plan policy could have the effect of opening opportunities for less sustainable edge of town development. No other alternatives were considered.
Providing Homes for All	
P4 – Meeting housing needs	<ul style="list-style-type: none"> Alternative approach would be a range of affordable housing targets and thresholds. Retaining a minimum target of 40% affordable housing requirement although this could impede the ability to negotiate on a site by site basis, and thus compromise the achievement of other sustainability and planning objectives. The alternative of including permanent residential moorings within policy P4a) was considered not to be appropriate and thus consideration was given to whether permanent residential moorings ought to be viewed as low cost market housing thereby making a requirement for all new moorings to include a proportion of permanent residential moorings. A decision has been taken to address the subject of Affordable Housing within a Supplementary Planning Document alongside policy P4.
P5 - Provision of land for housing	<ul style="list-style-type: none"> Over 200 sites considered and assessed, summarised in the Strategic Housing Land Availability Assessment. An alternative of compromising upon the good accessibility to public transport may deliver additional sites, but would reduce delivery against the Council's Challenge A priority. The inclusion of housing at Birmingham Business Park was rejected following dismissal of an Appeal. Considered removal of housing site 1 – Foxglove Crescent, but no suitable site alternatives currently available. Considered addressing shortfall on sites where additional capacity was possible including at the Solihull Town Centre site but this was rejected due to uncertainties over delivery. Providing lower housing densities may risk a situation of being more inefficient in the use of land with a risk of delivering larger properties when the need is for smaller dwellings. Alternatives considered to the re-balancing of Phase 1 at Blythe Valley Park risks delaying provision of supporting facilities at the site.

Policy	Strategic Alternatives
P6 - Provision of sites for gypsies and travellers	<ul style="list-style-type: none"> Alternative approach would be to include site allocations in local plan. Updated to reflect evidence of need. Clarification of the policy criteria was introduced with the alternative being potentially reduced certainty for those proposing new sites. Failure to make reference to the historic environment as a criterion would then not accord with national policy.
Protecting and Enhancing our Environment	
P9 - Climate change	<ul style="list-style-type: none"> Alternative approaches include identifying specific locations for decentralised networks and setting a specific renewable energy target. The changes proposed clarify the intent of the Council to take account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. An alternative may cause a lack of clarity as to whether the Code for Sustainable Homes and BREEAM were additional or a contribution towards the policy. It also recognises the need to ensure that all sections of the community, but particularly older people, children and disabled people are more resilient to the effects of climate change.
P10 - Natural environment	<ul style="list-style-type: none"> Could combine with open space policy to cover green infrastructure. An alternative would have been not to bring the policy in line with the Natural Environment White Paper and the National Planning Policy Framework risking a lack of clarity.
P11 - Water management	<ul style="list-style-type: none"> Originally considered incorporating in climate change policy to cover mitigation and adaptation. An alternative would be to potentially affect the viability of development and not enabling consideration of the different means by which the policy objectives can be attained.
P12 - Resource management	<ul style="list-style-type: none"> Alternative approach could identify specific industrial areas where specific waste management activities would be encouraged. An alternative of not making reference to existing buildings and uses could lead to the loss of opportunity to encourage waste minimisation for applications involving a change of use rather than new build. An alternative of not making reference to high quality design might risk situations where the relevance of policy P15 to resource management may be disputed.
Promoting Quality of Place	
P15 - Securing design quality	<ul style="list-style-type: none"> Alternative approach could integrate design within other relevant policies. Making reference to specific design guides, however as guidance would evolve this approach could risk causing the policy becoming inappropriate. Removing reference to Life Time Homes, although this could compromise the challenge of addressing housing needs of an increasingly ageing population.

Policy	Strategic Alternatives
P16 - Conservation of heritage assets & local distinctiveness	<ul style="list-style-type: none"> • Could address asset types or provide more detailed guidance on the Borough's characteristics. • An alternative would have been not to bring the policy in line with the legislation and the National Planning Policy Framework risking a lack of clarity.
P17 - Green belt /countryside	<ul style="list-style-type: none"> • Alternative approaches include restricting expansion of major businesses as with other development or providing a more liberal framework for investment. • The policy considered character and quality that are matters not relevant to Green Belt policy. The alternative may give rise to a lack of clarity.
Supporting Local Communities	
P20 - Provision for open space, children's play, sport & recreation	<ul style="list-style-type: none"> • Could combine with natural environment policy to cover green infrastructure. • The alternative of not providing the amendments may risk a lack of attention on the needs for children's play while not also linking the provision of open space, sports & recreation to securing design quality and the natural environment could lead to a lack of clarity should conflicting objectives arise.
Delivery and Monitoring	
P21 – Developer contributions and infrastructure provision	<ul style="list-style-type: none"> • The alternative of not including policy 21 was to address the subjects through supporting text however this might reduce the weight of argument to address the cumulative impacts of development.

3.4 Appraisal of Policy 1: Support Economic Success

Introduction

- 3.4.1 This section presents a review of the appraisal of the Draft Local Plan policy on support economic success against the sustainability objectives. There is no change to the policy or the appraisal presented for the Consultation Local Plan.
- 3.4.2 The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Draft Local Plan. The specific policy commitments are highlighted below with the alternatives considered at the end of the chapter.

Policy 1 – Support Economic Success

Solihull's key economic assets and growth drivers are located near the M42 in the area between junctions 4 to 6 that forms the M42 Gateway. This area supports more than 100,000 jobs and has strong potential for further sustainable growth that can create employment and contribute to regeneration.

- i) NEC and Birmingham Airport

The Council will support the continued development of the NEC and Birmingham Airport within their respective boundaries defined in this Draft Local Plan to enable them to meet their future aspirations.

National Exhibition Centre (NEC)

The NEC is a key economic driver of the local and regional economy and, located adjacent Birmingham Airport, is at the Region's international gateway. The role of the NEC is as a major events, tourism and leisure venue, serving business and leisure markets. The NEC aims to encourage visitors to stay longer on site through enhanced attractions, provide a stronger sense of arrival, strengthen its brand and be attractive to all ages and cultures. To enable the NEC to meet its future aspirations and to drive economic and employment growth, **the Council will enable a broad range of developments to enhance visitor offer, diversify facilities and increase international competitiveness.**

Development the Council will support and encourage will include that needed for operational purposes such as new or refurbished/ replacement exhibition halls, transport facilities and other development needed to enable the NEC to enhance its international competitiveness.

The Council will also support a broad range of ancillary and complementary facilities needed to enhance visitor experience and support operational needs. These will include hotels, administrative offices, warehouses, catering, meeting space, appropriate leisure and other supporting development, provided it is justified in terms of scale, its support for the NEC as a whole and is appropriately located within the NEC.

Birmingham Airport

Birmingham Airport is the principal international gateway into the region and an important part of the national airports infrastructure. It is vitally important in the local and regional economy, attracting investment and supporting business growth and international trade in key sectors.

The Council will support and encourage further development including the extension to the main runway south of the A45, in accordance with the approved planning application, and development needed for operational purposes such as passenger and freight facilities, terminals, transport facilities and other development that supports operational needs.

The Council will also support a broad range of ancillary/ complimentary facilities including hotels, administrative offices car parks and other appropriate facilities needed to serve the needs of air travellers using the Airport. Proposals should be justified including in terms of scale and in terms of supporting the Airport function and are appropriately located within the Airport so as not to detract from Airport function.

ii) Birmingham Business Park

The Council will support and encourage the development of Birmingham Business Park within its boundary defined in this local plan to support its role prime employment location and enhance its important role as a high quality, managed business park.

Development that will be supported and encouraged is as follows:

Business development for uses falling in the Business Use Classes (B1, B2, B8 of the Use Classes Order). The Council will expect development to progress in a well planned, managed way that will maintain the attractiveness of the business park to investors and that will protect and enhance the environment including the natural environment.

The Council will support a broad range of supporting ancillary or complimentary uses needed to enhance the attraction of the business parks to occupiers These could include hotels, health and fitness, leisure, childcare facilities and local facilities falling within use classes A1 to A5 (of the use Classes Order) of a scale that does not compete with existing or planned facilities outside of Birmingham Business Park.

The Council will support the expansion of Birmingham Business Park to the south-west as indicated on the Proposals Map. The Council will expect the land to be developed as an integrated part of the business park and in a way which facilitates access by public transport.

iii) Blythe Valley Business Park

The Council will support and encourage the development of Blythe Valley Business Park within its boundary defined in this local plan to support its role as a prime employment location and enhance its important role as a high quality, managed business park.

Development that will be supported and encouraged is as follows:

Business development for uses falling in the Business Use Classes (B1, B2 and B8 of the Use Classes Order). The Council will expect development to progress in a well planned way and that will maintain the attractiveness of the business park to investors and that will protect and enhance the environment including the natural environment.

The Council will also support a broad range of supporting ancillary or complementary uses needed to enhance the attraction of the business park to occupiers. These could include hotels, health and fitness, leisure, childcare facilities and local facilities falling within use classes A1 to A5 (of the Use Classes Order) of a scale that does not compete with existing or planned facilities outside the business park.

At Blythe Valley Business Park the Council will support and encourage the delivery of a major quantity of employment floorspace by improving the attractiveness of the park to investors through an improved range of amenities, supported by well planned residential development that will creates overall sense of place a more sustainable location.

The Council will expect new facilities, including the residential element of Blythe Valley Park, to be developed within the context of a masterplan to demonstrate how integration would be achieved between existing and planned facilities and with the network of villages that lie nearby.

iv) Jaguar Land Rover (JLR)

JLR is important to the national, regional and local economy and is a major employer. JLR remains committed to the Lode Lane plant in Solihull and has the opportunity to develop advanced manufacturing, the low carbon economy and technology that will stimulate new skills and new opportunities.

The Council will support and encourage the development of Jaguar Land Rover within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of Jaguar Land Rover as a major manufacturer of vehicles. The reasonable expansion of the site into the Green Belt will be given positive consideration where economic need can be demonstrated and appropriate mitigation can be secured.

v) Council considers that the above key economic assets represent an important opportunity to improve access to employment. It is also important that economic growth does not harm the quality of the environment.

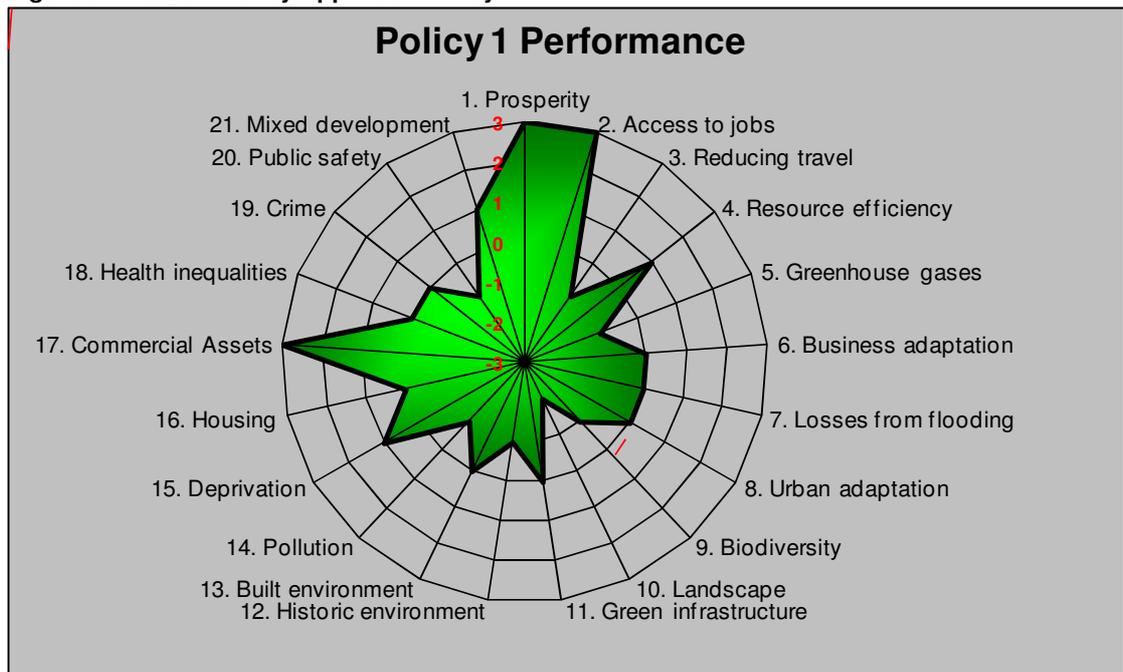
The Council will expect development proposals that generate significant numbers of jobs to demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre. This could, for example, include public transport improvements and practical support for partnership working arrangements that will enable residents to take advantage of training arising from developments.

Applicants for development are expected to have regard to other relevant policies of the Local Plan, including those referring to design, climate change, access and amenity.

Forecast Effects

3.4.3 This policy performs in a slightly positive manner with six beneficial outcomes comprising three major positives and four minor positives as illustrated in Figure 3.1 and Appendix G. To offset the positives are seven of the twenty-one sustainability objectives that report an adverse outcome (one moderate positive, and six minor negative).

Figure 3.1: Sustainability Appraisal: Policy 1



SA Objective	Likely Significant Effects	Rationale
1. Prosperity	Maj+ve	Policy supports BIA, NEC, Birmingham and Blythe Valley Business Park and provides for controlled diversification of employment opportunities.
2. Access to jobs	Maj+ve	Policy has the potential to reduce the number of people with difficulties in accessing employment as proposals that generate significant numbers of jobs demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre.
17. Commercial Assets	Maj+ve	Policy is specifically designed to enhance the regional assets.

SA Objective		Likely Significant Effects				Rationale			
10. Landscape		Mod-ve				General requirement to protect and enhance the natural environment only in the case of the business parks. Potential for adverse effects upon urban fringe landscapes.			
Local	9	Unlikely	0	Direct	7	Positive	6	Maj +ve	3
District	1	Potential	7	Indirect	5	Negative	7	Mod+ve	0
Regional	3	Likely	4	Cumul	1			Min+ve	3
National	0	Definite	2					Neutral	8
								Min-ve	6
								Mod-ve	1
								Maj -ve	0

- 3.4.4 The effects arising from the policy are anticipated to extend over the medium to long term (i.e. typically longer than 3 years and some times greater than 10 years). While most of the effects are at a local scale there are four at a district or regional scale that reflect the importance of the sites and commercial activities being undertaken.
- 3.4.5 The majority of the impacts are direct (seven) with five being indirect one cumulative effects being on greenhouse gases. The indirect effects are all minor positive relate to the potential consequences that could arise from the requirement to prepare sustainability reports and the indirect risks to biodiversity along with requirements to minimise environmental impacts.
- 3.4.6 The policy was considered to have the potential for beneficial effects upon deprivation, since diversifying the range of business activities is likely to provide some opportunities for residents from North Solihull. Enhanced revenues from successful business areas could also support measures to reduce deprivation.
- 3.4.7 The number of people with difficulties in accessing employment potentially may be reduced as proposals that generate significant numbers of jobs are to demonstrate measures to improve access to employment from parts of the Borough where unemployment persists, in particular North Solihull or where economic opportunity can be taken, for example, Solihull Town Centre. However it remains unclear what is meant by “significant numbers of jobs”.
- 3.4.8 In parallel with the increased employment opportunities, the policy does not provide for measures to promote travel plans, sustainable travel or to take account of the impacts on the highway network. Consequently, the policy is likely to deliver a minor adverse impact against the reducing the need to travel objective.
- 3.4.9 In terms of the climate change and energy sustainability theme the policy does not provide any reference to the requirement to reduce greenhouse gas emissions, business adaptation, measures to reduce economic losses from flooding or urban adaptation to climate change.
- 3.4.10 The proposed policy performs poorly under the natural resource protection and environmental enhancement theme with the potential for moderate adverse effects upon landscape and biodiversity. Only in the case of the Business Parks is there a requirement to “*protect and enhance the environment including the natural environment*”. There is no similar measure to protect the natural environment from the development to be encouraged south of the A45. In a similar manner there may be adverse effects upon the historic environment.
- 3.4.11 As the policy does not seek to promote exemplar design standards few enhancements to local distinctiveness will be required. Also as the policy places a requirement to “*have regard to*” other policies, so there is no requirement to minimise and mitigate environmental impacts, traffic noise and emissions, drainage and site runoff as well as light pollution affecting the rural fringe.
- 3.4.12 The policy makes little reference to the delivery of sustainable communities, although the creation of additional jobs may provide opportunities for some able to travel from the regeneration areas. Generally, the development promotes car based travel and given the regional scale of the employment opportunities, employees may well be drawn disproportionately from beyond the boundaries of the Borough.

- 3.4.13 Only when development proposals generate “*significant numbers of jobs*” are measures to improve access to employment from parts of regeneration areas. The opportunity for residents of North Solihull is that development at the Birmingham Business Park is to “*facilitate access*” by public transport. There is no requirement to contribute towards achieving increased public transport use. Access to Blythe Valley Business Park and the JLR site is not required to assist in addressing deprivation through enhanced accessibility by public transport or other sustainable travel modes and no travel plan is to be required.

Managing Uncertainty

- 3.4.14 Six of the thirteen effects were considered to be likely or certain to be delivered suggesting positive outcomes. Of these a definite minor negative effect upon greenhouse gas emissions and a minor positive for mixed use development is expected. Of the four likely outcomes, there are two major positive outcomes (prosperity and commercial assets) that are likely to result along with a moderate adverse effect for landscape and a minor adverse effect on reducing travel demand also being likely (See Appendix G).
- 3.4.15 The policy results in seven potential outcomes one of which is a major positive for access to jobs.
- 3.4.16 A key element of the policy that undermines the remaining policies of the Local Plan is that “*Applicants for development are expected to have regard to other relevant policies of the Local Plan, including those referring to design, climate change, access and amenity*”. Hence all other policies are of a lesser status than that of the policy of supporting economic success.

Mitigation and Enhancement

- 3.4.17 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies for each of the four sustainability themes.
- 3.4.18 Policy 1 has addressed some of the mitigation/ enhancement proposals provided for emerging policy 9. Of particular note in relation to sustainable consumption and production is the non-adoption of the following:
- High exemplar standards of sustainable construction;
 - A requirement for a sustainability report;
 - High standards for the public realm at the NEC/BIA;
 - Development of local distinctiveness at Birmingham and Blythe Valley Business Parks.
- 3.4.19 An aspect where further attention is recommended is in enhancing links between wealth and employment generation with the needs of the North Solihull Regeneration Area in order that direct and indirect benefits from the economic success are experienced by this community.
- 3.4.20 The policy specifically neglects consideration of the effects of development on the congested highway network either directly or in terms of the pollution and safety/community severance issues that can be generated. With the absence of a requirement for travel planning for these major destinations, impacts associated with transport are unlikely to be managed through this policy. A key enhancement would be to introduce a requirement upon developers to contribute towards enhanced public transport accessibility and to require provision of travel plans.
- 3.4.21 There is no requirement for developers to either reduce greenhouse gas emissions or deliver exemplar standards of construction and with the absence of a requirement to deliver a sustainability report, many of the opportunities to deliver climate change and energy efficiencies fall outside the influence of the Local Plan.
- 3.4.22 There are no measures identified to address either the potential for indirect effects upon the River Blythe SSSI or positive measures to enhance ecological connectivity, habitats or conserve soils. Nevertheless there is a general requirement to protect and enhance the natural environment, but only in the case of the business parks. Considerable potential for further adverse effects upon urban fringe landscapes with

encouragement being given to further development including the extension to the main runway south of the A45.

- 3.4.23 There is no requirement for high quality design nor to minimise or mitigate potential environmental impacts, traffic noise and emissions, drainage and site runoff as well as light pollution affecting the rural fringe.
- 3.4.24 In terms of delivering sustainable communities objectives, several measures that could be taken that would accord with the Local Plan's first objective – to reduce inequalities.
- 3.4.25 The policy update does not provide for actions on climate change and energy, or seek the development of local energy and heating networks (see Table 3.4).
- 3.4.26 The policy does not promote the development of low carbon business clusters and adaptation to a low carbon economy. This may put at some future disadvantage these areas since their success has been founded upon carbon based; accessible private travel that could well experience increasing costs in future years.

Table 3.3: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Consider a requirement for regionally important sites to be designed to exemplar standards of sustainable construction. 	<ul style="list-style-type: none"> • See Policy P9, P15 and para 11.2.2 of the Local Plan. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Consider the actions that will be undertaken to ensure targets are achieved. 	<ul style="list-style-type: none"> • Supporting text expresses requirement for travel plans. 	<ul style="list-style-type: none"> • Make the preparation of travel plans for each business park dealing with all movement patterns explicit within the policy.
<ul style="list-style-type: none"> • Consider requiring major developers to provide a sustainability report demonstrating how their designs deliver sustainable development across the range of economic, materials, social and environmental factors. 	<ul style="list-style-type: none"> • Policy P9 requires energy or sustainability statements. Requirements to cover sustainability issues are also included in Policy P7, P8 and P15. See also final paragraph of P1. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Promote the development of super-fast broadband along with the integrated connection of technologies within main retail centres. 	<ul style="list-style-type: none"> • No longer relevant to policy given focus upon regional business sites. • Covered in Policy P15 bullet 3 • See also para 7.7.13 and 11.2.3 of the Draft Local Plan. 	<ul style="list-style-type: none"> • None.

Table 3.4: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require all new development in the major business parks to make provision for distributed heating and energy networks. 	<ul style="list-style-type: none"> See Policy P9 	<ul style="list-style-type: none"> Consider explicit requirement that major development proposals should demonstrate how they could link to local heat or energy networks when viable. Consider inclusion of a policy to avoid sterilisation of sites for distributed heat and energy networks adapted from policy 3.
<ul style="list-style-type: none"> Require major development to achieve the reductions in total CO₂ emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable. The percentage reductions in CO₂ emissions should be based on the estimated CO₂ emissions of the development after the installation of energy efficiency measures related to either the, BREEAM or equivalent method has been applied. 	<ul style="list-style-type: none"> See Policy P9 and P15 	<ul style="list-style-type: none"> Consider use of policy guidance from PPS1 on provision of local heat/energy networks to supplement policy with area wide approach to low carbon solutions under policy 1. Make provision for reduced CO₂ emissions under policy 1.
<ul style="list-style-type: none"> Consider require a proportion of development area to be prioritised for low carbon businesses. 	<ul style="list-style-type: none"> Most of the employment land in the plan is already committed and is in the process of development. Unlikely to be able to enforce such a requirement. Also ambiguity over what is a low carbon business. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Introduce policy for developers to make space for water and to manage flood risk within policy 1. Consider requirement upon development to demonstrate adaptation to climate change within policy 1.

3.4.27 In considering opportunities to mitigate and enhance Policy 1 in relation to natural resources protection and environmental enhancement, there is no requirement to provide for high standards of design and promote local distinctiveness. The policy does not aid secure key sites that may be important to deliver sustainable development, nor promote the use of green roofs.

Table 3.5: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider how requirement for local distinctiveness could be delivered in the Regional Investment Areas. 	<ul style="list-style-type: none"> See Policy P15. Seeks to promote high quality design that will contribute to a sense of place. 	<ul style="list-style-type: none"> None.

3.4.28 The proposed policy does not provide measures to address the sustainable community objectives presented in the sustainability framework. For example, there are no measures by which the Council is to encourage key economic assets to deliver clear benefits across the entire community rather than to those who commute into the sites.

3.4.29 It is noted that only in the case of significant numbers of jobs being created would there be an obligation to demonstrate measures to improve access to employment.

Table 3.6: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider encouraging new businesses to adopt local sourcing of materials and labour including through the provision of training programmes to help those with weaknesses in some skills. 	<ul style="list-style-type: none"> See P1 (v). Insistence on local sourcing of material is beyond the scope of the Plan 	<ul style="list-style-type: none"> None.

Alternatives

3.4.30 A more prescriptive approach was considered in terms of uses that might be enabled within Policy P1 to support key assets. However, it is important not to be over restrictive to enable key assets to meet aspirations that will support the Region's economy and generate employment. As a consequence the Policy aims to be as flexible as possible having regard to sustainability requirements, the need for strong design principles and the need to protect the environment and amenity.

3.4.31 Consideration was given to thresholds for development that constitute 'significant' numbers of jobs and to the nature of links to areas of need, but different types of development would have different potential impacts on employment in areas of greatest need that may not be strongly related to the number of jobs created. Also, the links are potentially numerous and very broad in scope and nature. The adopted approach is flexible, enabling the Council to consider 'significant' in each case and provides two quite different types of link to demonstrate that these are very broad ranging i.e. public transport and other links that could lead to relevant training.

3.4.32 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.5 Appraisal of Policy 2: Competitive Town Centre

Introduction

- 3.5.1 The proposed policy on delivering a competitive town centre is assessed in this section against the sustainability objectives. This policy was modified by the inclusion of the additional text presented in red font below. As such the change reinforces the town centre first approach with the supporting text noting that proposals for main town centre uses elsewhere, that do not accord with the policies and proposals of this local plan, will be considered in the light of the requirements of the National Planning Policy Framework. Elsewhere there is a presumption against development unless it is promoted by the policies and proposals of the Plan.
- 3.5.2 The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below, while the alternatives considered are presented at the end of this section.

Policy 2 – Maintain a Strong, Competitive Town Centre

The Council will maintain strong and competitive Town Centres. Town Centres will be the focus for all new developments including retail and other commercial development in line with Town Centre first approach of the National Planning Policy Framework.

SOLIHULL TOWN CENTRE

Solihull Town Centre will be developed and sustained as a place of quality and distinction. It will provide the civic heart of the Borough and the principal focus of commercial activity and public transport. It will be shaped and managed to ensure continued economic growth and success.

The character and quality of the town will be protected and enhanced through the promotion and careful control of new development which is sensitive to its context but adds a new dimension to visual interest, activity and economic success.

The Town Centre Strategy Map establishes:

- The extent of the town centre to focus commercial activity, facilitate effective and efficient patterns of movement and public transport and to provide a clear identity.
- A public realm framework as a focus for pedestrian movement and activity. New building will be required to front onto this network and focus their public activity to that frontage
- A pattern of retail frontages to ensure the effective, efficient, convenient vital and successful functioning of the town as a shopping centre
- Opportunity Sites for new development at Touchwood, Mell Square West, Lode Lane and Herbert Road/Station Road: and indicative opportunities elsewhere including Mell Square East, Lode Lane and Homer Road.

In total, new development in the town centre will provide:

- **Up to an additional 34,000m² of comparison floorspace by 2021: and a further 23,000m² 2021 to 2026**
- **Up to an additional 35,000m² of new office floorspace**
- **Residential development, both on freestanding sites and as part of mixed use development or refurbishment schemes, will be encouraged in & around the town centre. Larger scale sites additional to the Opportunity Sites listed above will include:**
 - **Monkspath Hall Road**
 - **Station Approach**

The development of Monkspath Hall Road shall be designed to allow for the relocation of Solihull Railway Station though such a proposal is not being put forward at this time.

The timing of new development will pay due regard to the need to ensure a balance of activity throughout the town centre during the whole of the plan period. A particular concern will be to ensure the continued success of both sides of High Street without either side becoming overly

dominant in terms of floor space or activity.

The timing of development will also need to pay due regard to the need to ensure the effective provision of public transport, walking and cycling routes and to avoid unacceptable levels of traffic congestion within, or on routes to and from, the town centre.

All new development will be expected to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary town centre infrastructure, especially for walking and cycling access, public transport, the public realm and on key highway links & junctions within & serving the town centre.

The provision of private parking within the town centre will be accepted for housing development and where there is clear operational need.

The provision of additional public parking will only be accepted where it can be shown that there is insufficient public parking already available to serve the development proposed.

SHIRLEY TOWN CENTRE

Shirley Town Centre will be developed and sustained as a focus of commercial activity & services for the local community. It will be shaped and managed to secure its regeneration and economic success.

The extent of Shirley Town Centre is defined on the proposals map. The boundary focuses commercial activity south of the junction between Stratford Road and Haslucks Green Road and in a new development west of Stratford Road which creates a new heart of the centre and better links into Shirley Park.

Retail activity will be focused within the town centre boundary and will be required to front onto Stratford Road or the new public realm between Stratford Road and the Park. No substantial retail development will be granted planning permission elsewhere. in Shirley.

The former Powergen Building on the Stratford Road North of Haslucks Green Road will be developed in a manner which effectively connects to and complements the town centre that is a mix of residential, office, hotel, leisure or community uses but shall not include any substantial retail floorspace.

All new development should be sensitive to local character and enhance the public realm.

CHELMSLEY WOOD TOWN CENTRE

Chelmsley Wood Town Centre will be developed and sustained as a focus of commercial activity, services and public transport. It will be shaped and managed to secure its regeneration and economic growth and to provide a focus for the local community and an identity of which it can be proud.

The extent of the Town Centre is defined on the Proposals Map and retail activity will be focused within it.

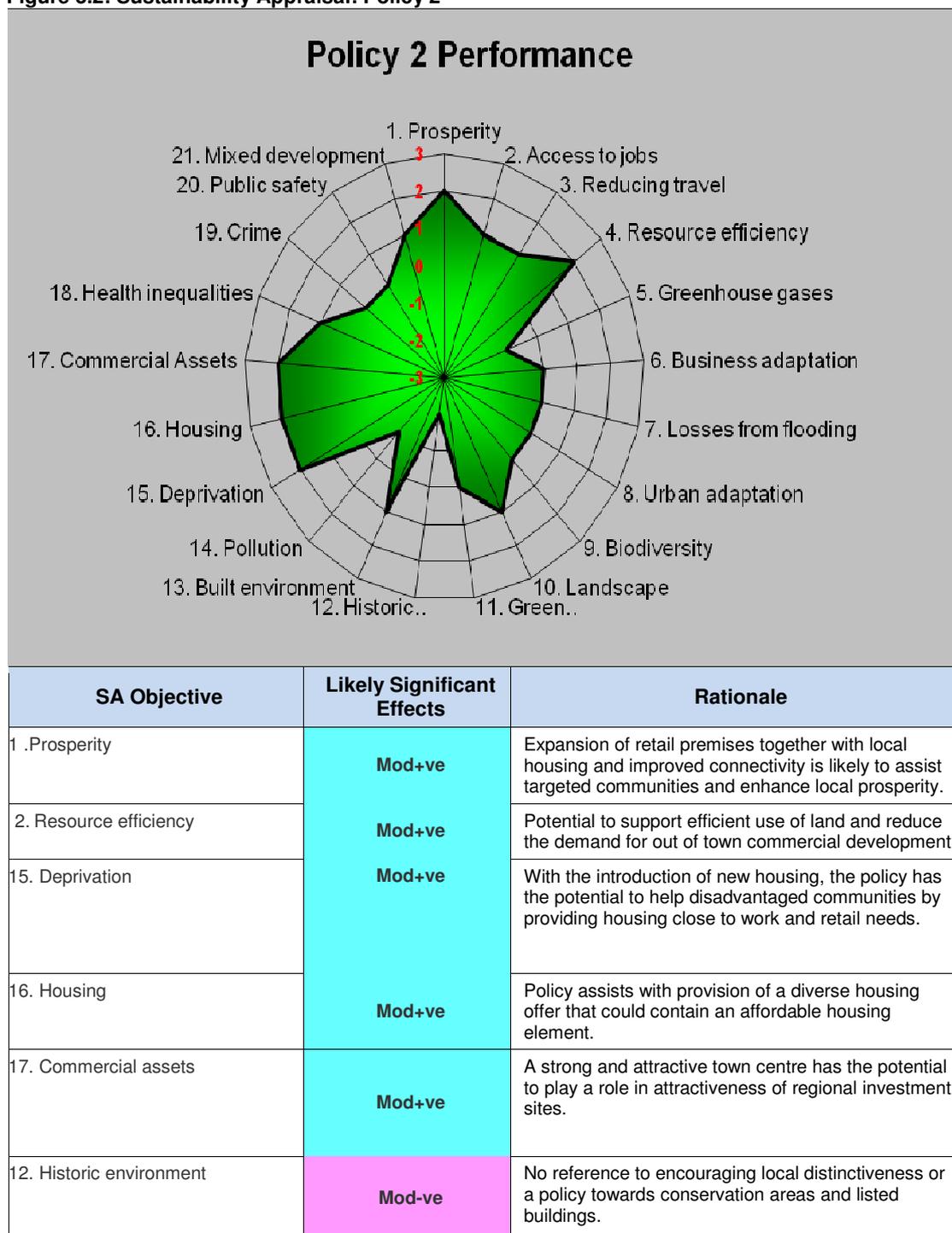
New development on the edge of the town centre will be encouraged to assist regeneration of both the town centre and the wider area of North Solihull. It will also be encouraged to better link the town centre and its interlink to Meriden Park and Cole Valley and enhance the public realm in and around the centre.

Forecast Effects

- 3.5.3 The amendment has not given rise to a substantive change in the appraisal beyond increasing the likelihood of the efficient use of demand and reducing demand for out of town commercial development from a “potential” outcome to a “likely” outcome.
- 3.5.4 This town centre policy is expected to give rise to five moderate beneficial outcomes and seven minor beneficial effects (see Figure 3.2 and Appendix G). This is accompanied by one moderate adverse (historic environment). The remaining objectives deliver neutral outcomes with two minor negative effects associated with the absence of measures dealing with greenhouse gas emissions and potentially negative effects from noise and air pollution affecting local residents.
- 3.5.5 In terms of the sustainable consumption and production theme, the policy offers a beneficial outcome with two moderate beneficial outcomes (prosperity and resource efficiency, as well as minor beneficial effects

on access to jobs and reducing travel). In terms of the latter objective, private parking in the town centre is accepted where there is an operational need. Additional public parking is accepted where there is insufficient public parking. This suggests parking capacity will expand to meet need and hence do little to reduce the need to travel, although the location of town centre development would make efficient use of existing infrastructure.

Figure 3.2: Sustainability Appraisal: Policy 2



Local	9	Unlikely	0	Direct	8	Positive	11	Maj +ve	0
District	5	Potential	4	Indirect	5	Negative	3	Mod+ve	5
Regional	0	Likely	10	Cumul	1			Min+ve	6
National	0	Definite	0					Neutral	7
								Min-ve	2
								Mod-ve	1
								Maj -ve	0

- 3.5.6 The policy offers a negative outcome for climate change and energy with no measures being provided for reducing CO₂ emissions with expanding car parking potentially leading to increased emissions. Also, there are no drivers provided to deliver urban adaption to climate change.
- 3.5.7 The sustainability theme on natural resource protection & environmental enhancement receives mixed support from the policy. The requirement to enhance the public realm in Shirley Town Centre and Chelmsley Wood may deliver some landscape improvements although there is little indication that the landscape effects of development are to be considered or the opportunities to address climate change.
- 3.5.8 There is no requirement for a Master Plan for Solihull Town Centre or a requirement upon developers to demonstrate high quality design to deliver enhanced public safety, crime reduction and high quality public realm. The absence of encouragement for local distinctiveness and a range of business unit sizes means that the built environment is to be driven by the policy upon developers to make a “reasonable and proportionate contribution to the cost of providing and maintaining the public realm” in the case of Solihull Town Centre. In the case of Shirley Town Centre development is to be sensitive to local character and enhance the public realm while at Chelmsley Wood development is to enhance the public realm. Overall, it is likely that some enhancement to the built environment would result.
- 3.5.9 The sustainable communities theme is supported through three moderate beneficial outcomes (deprivation, housing and commercial assets) and one minor beneficial outcome (mixed development). However the policy fails to provide measures to “design out” crime or to address public safety or the needs of an elderly population.
- 3.5.10 The effects are judged to be mainly local (nine) with five being district-wide in scale (see Appendix G). Eight outcomes were considered to be direct with five being indirect and one (greenhouse gases) being cumulative in nature. Overall there were eleven positive outcomes and three negative.

Managing Uncertainty

- 3.5.11 Ten of the outcomes are regarded as being likely to occur, with four considered to have the potential to result in a significant effect. One of the potential effects was judged to give rise to moderate beneficial effects (Resource efficiency and Commercial assets).

Mitigation and Enhancement

- 3.5.12 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies for each of the four sustainability themes.
- 3.5.13 Policy 2 has not addressed most the mitigation/ enhancement proposals provided for emerging policy 9. Of particular note in relation to sustainable consumption and production is failure to adopt the following:
- Promoting sustainable construction techniques;
 - Requiring submission of a Sustainability Report;
 - Promoting reductions in carbon dioxide emissions;
 - Making the town centres a place attractive to all ages.
- 3.5.14 The Local Plan objectives under challenge C (attractiveness of the Borough for people who live, work and invest in Solihull) and those under Challenge F (Climate Change) are considered to have been only partly

or inadequately met by this policy hence a series of mitigation/enhancement measures are proposed in Tables 3.7 to 3.10).

- 3.5.15 The potential enhancements to the climate change and energy sustainability theme are in making provision for local heat/energy networks and the integration of green infrastructure and green roofs (See Table 3.8).
- 3.5.16 In considering opportunities to mitigate and enhance policy 2 in relation to natural resources protection and environmental enhancement, it is noticeable that there is no requirement to provide for high standards of design and promote local distinctiveness. Also, the policy does not set any challenging environmental or natural resource objectives beyond a simple mitigation of impacts which is likely to mean that residual adverse impacts will result.

Table 3.7: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> • Consider how the phasing of the development might impact upon sustainable construction techniques, maximising opportunities to reuse/ recycle materials and the impact of construction traffic. 	<ul style="list-style-type: none"> • Timing of development is focussed on the need to provide a balance of activity either side of the High Street. Sustainable development impacts are covered in the Policy and elsewhere such as P7, P8, P9 and P15 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Consider the extent to which re-development activities could provide for efficient delivery and waste management practices including through the use of consolidation centres to maximise retail floor space and manage delivery activities, potentially through a low carbon local delivery fleet operating from a consolidation centre (8). 	<p>See Policy P12 on waste management that seeks to promote and control development to prevent the production of waste.</p>	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Consider requiring major developers to provide a sustainability report demonstrating how their designs deliver sustainable development across the range of economic, materials, social and environmental factors. 	<p>No specific requirement for a sustainability report but requirements to cover sustainability issues are included in Policy P7, P8, P9 and P15 (see also final paragraph of P1)</p>	<ul style="list-style-type: none"> • None.

Table 3.8: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> • Require major development to achieve the reductions in total CO₂ emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable. • The percentage reductions in CO₂ emissions should be based on the estimated CO₂ emissions of the development after the installation of energy efficiency measures related to 	<ul style="list-style-type: none"> • See Policy P9 and P15. 	<ul style="list-style-type: none"> • None.

Mitigation/Enhancement Proposal	Response	Proposals
either the BREEAM or equivalent method has been applied.		
<ul style="list-style-type: none"> Consider a requirement for the provision of a green roof to new major retail development proposals to a) reduce energy consumption; b) reduce the heat island effect c) reduce runoff and d) provide new habitat. 	<ul style="list-style-type: none"> See Policy P9. Issue covered in a more flexible way that could include green roofs as a measure. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Could make reference to need for design to reduce energy consumption and address heat island effect. 	<ul style="list-style-type: none"> See Policy P9 and P15 	<ul style="list-style-type: none"> None.

Table 3.9: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> Consider a requirement for the provision of a green roof to new major retail development proposals to a) reduce energy consumption; b) reduce the heat island effect c) reduce runoff and d) provide new habitat . 	<ul style="list-style-type: none"> See Policy P9 and P15 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Could identify the achievement of an effective green infrastructure as a priority within the town centre. 	<ul style="list-style-type: none"> See Policy P2 and P15. The Town Centre is to be developed as a place of quality and distinction. This includes consideration of green infrastructure Draft Local Plan para 7.4.6 seeks to improve links to open space as part of improved urban design. P15 covers requirements for designing-in green infrastructure. 	<ul style="list-style-type: none"> Consider referencing green infrastructure within P2.
<ul style="list-style-type: none"> Could consider specific design measures for retail outlets to support local distinctiveness. 	<ul style="list-style-type: none"> See Policy P15 that requires all developments to conserve and enhance local character, distinctiveness and streetscape. This includes town centre proposals. 	<ul style="list-style-type: none"> None.

3.5.17 The proposed policy makes reference to the inclusion of residential development within mixed-use developments. Provided a portion of the houses are assigned as affordable housing then there are benefits to the sustainability objectives under sustainable communities.

3.5.18 It is not necessarily evident that the design of the urban fabric and services will be such as to meet the needs of an elderly population or deliver designs that seek to reduce crime. Also, there is no reference to the need for development to help provide for a diverse evening economy and that will be attractive to a broad age range of residents.

Table 3.10: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> Consider the extent to which the re-development of the town centre caters for all ages across the community and is designed in manner to enhance public safety and reduce crime. 	<ul style="list-style-type: none"> See Draft Local Plan para 7.4.11 and Policy P15 that promotes inclusive design and the creation of attractive, safe, active streets and public spaces that reduce the fear of crime. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider reference to affordable housing or cross reference to other policies P2 to P4.

Alternatives

- 3.5.19 The Council considered dealing with Solihull Town Centre under a separate Policy to reflect its importance as a sub-regional centre. However, Shirley and Chelmsley Wood town centres are also important more locally and are important for enabling access to a broad range of goods and services by sustainable travel modes. They are also important economically in providing access to employment and there is some inter-relationship between main centres in terms of future planning. Town Centres are therefore dealt with in one policy and the remaining hierarchy is dealt with in Policy P19.
- 3.5.20 The phasing of development in terms of leading with sustainable construction techniques was considered. In order to develop the Town Centre as a place of quality and distinction however, it was considered important to encourage, through timing of development, a balance of activity either side of the High Street as an important main thoroughfare. Development north of the High Street is generally more dated and in greater need of improvement. Sustainability issues are however, important and requirements are included in the Policy (under design principles) and in other policies such as P7, P8, P9 and P15.
- 3.5.21 The alternative of not changing the Consultation Local Plan policy could have the effect of opening opportunities for less sustainable edge of town development. No other alternatives were considered.
- 3.5.22 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.6 Appraisal of Policy 3: Provision of Land for General Business and Premises

Introduction

- 3.6.1 The proposed policy on employment land is examined in this section against the SA objectives. There has been no change to the policy from that of the Consultation Draft Local Plan. The change introduced is that of an increase in the amount of readily available allocated land at Fore, Stratford Road from 0.5 to 2.0 ha and an increase in the available allocated land adjacent to Birmingham Business Park from 5.0 to 8.5 ha. In neither case does this affect the sustainability appraisal findings for this policy.
- 3.6.2 The aim of the appraisal is to establish the policy’s sustainability performance and to identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below.
- 3.6.3 The alternatives considered are examined at the end of this section.

Policy 3 – Provision of Land for General Business and Premises
<p>Sustainable economic growth is important to Solihull’s success as an attractive place to live, work and invest. It will enable increased prosperity, opportunity, well being and quality of life and will potentially provide a better quality of life for individuals and communities experiencing high unemployment.</p> <p>To encourage sustainable economic growth and provide a broad range of employment opportunities the Council will plan for a continuing supply of employment land. Figure 14¹⁴, below, identifies the strategic sites that comprise the Council’s supply of main employment land for this purpose, adopting a plan monitor and manage approach to avoid over allocating land for this purpose that may lead to unnecessary loss of Green Belt land.</p> <p>The Council will support the allocated sites for purposes set out in Figure 14. Small-scale supporting facilities may be allowed where needed to specifically enhance/complement business use in the particular business locality and is compatible with sustainable development principles.</p> <p>To ensure that an adequate supply of land remains available for employment purposes, sites will be protected for their allocated purposes. Non-allocated employment sites will also be protected for employment use (Classes B1, B2, B8 and, where appropriate, waste management). Alternative uses may be allowed where the following criteria are met:</p> <ul style="list-style-type: none"> a) The site is relatively isolated from other business premises or is out of place in the context of other neighbouring uses, such as residential, or b) It is clearly demonstrated that there is no longer a need to retain the site/premises for their intended business class purpose, or c) In the case of vacant premises, there is no longer a reasonable prospect of attracting business development in market terms and, d) The alternative use will support sustainable development principles and will directly support employment locally. e) There is no conflict with other policies of the Core Strategy or the National Planning Policy Framework. <p>The Council will encourage the retention of small and medium sized enterprises, and the creation of new ones, both in urban and rural areas as a key economic driver and to help facilitate growth in a broad variety of locations, including North Solihull as a priority, subject to the following criteria:</p> <ul style="list-style-type: none"> a) Form, use and scale are appropriate to character of the particular location. b) There is no significant harm to the local environment, including landscape quality and character.

¹⁴ See Table 3.11 below

- c) **Proposals for home-working are compatible with the character of the local environment and are consistent with the amenity policies of this Local Plan.**
- d) **The land/premises are not in the green belt or are compliant with green belt policy.**
- e) **In the case of development in rural areas, it is consistent with the Council’s countryside policies and does not undermine the quality and character of the natural environment.**

The Council will expect development proposals on business sites to include the necessary infrastructure to accommodate high capacity digital communication where technically feasible.

In order to encourage sustainable access to business developments and reduce the need to travel, applicants for planning permission for business use will be expected to demonstrate the anticipated level of employment that will be generated and how this will be of benefit to meet local employment needs.

Employment development will not be allowed where it sterilises natural resources or key sites needed to secure sustainable development, particularly in regard to provision for distributed heat and energy networks.

Table 3.11: Allocated Employment Sites

Site	Remaining Land (Ha)	Readily Available Land (Ha)	Preferred Use Class
TRW, Stratford Road	18.5	18.5	B1, B2, B8
Solihull Business Park	7.0	6.0	B1, B2, B8
Fore, Stratford Road	2	2.0	B1
Chep / Higginson, Bickenhill Lane	4.0	0.0	B1, B2, B8
North of Clock Interchange, Coventry Road	2.0	1.0	B1
Land adj. B’ham Business Park	8.5	0.0	B1, B2, B8
Total	42.0	27.5	

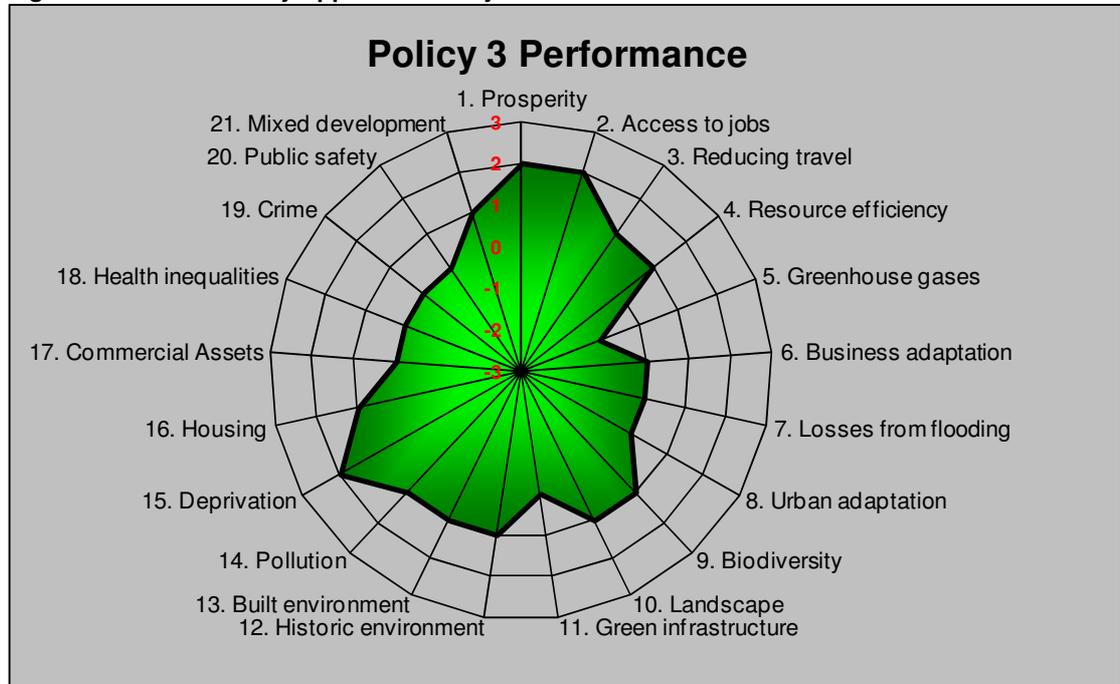
Forecast Effects

- 3.6.4 This policy is envisaged to give rise to three moderate beneficial effects and nine minor beneficial effects and one minor negative effect (greenhouse gases). The remaining eight objectives are neutral (see Figure 3.3 and Appendix G). The outcomes give rise to eight direct effects and four indirect with one cumulative effect (greenhouse gases). The majority of the impacts are local in scale with three being considered district-wide. The effects typically extend for more than 10 years.
- 3.6.5 The policy is likely to provide moderate beneficial outcomes (prosperity and access to jobs but only has the potential to reduce the need to travel. The climate change and energy sustainability theme is not addressed with nor are measures promoted to reduce greenhouse gas emissions or adaptation to climate change.
- 3.6.6 The outcome of the policy upon the natural resource protection and environmental enhancement sustainability objective is broadly positive with five minor positive outcomes. It is noted that this outcome is due to the requirement not to undermine the quality and character of the natural environment, i.e. to prevent adverse effects. There are no positive obligations to enhance biodiversity, contribute towards the provision of green infrastructure or to protect/enhance the historic and build environment.
- 3.6.7 As the policy makes reference to supporting small and medium sized businesses, support to employment locally and meeting local employment needs with North Solihull as a priority, it is likely to deliver a moderate beneficial outcome for the deprivation objective but does not provide any support to address health inequalities, crime and public safety (see Appendix G).

Managing Uncertainty

3.6.8 Of the significant effects assumed to arise seven are potential effects and six are considered to be likely outcomes. Of the potential effects all are associated with minor beneficial outcomes.

Figure 3.3: Sustainability Appraisal: Policy 3



SA Objective		Likely Significant Effects		Rationale					
1. Prosperity		Mod+ve		Policy provides for the potential to allow small-scale supporting facilities as well as specific measures to encourage the small and medium sized enterprises.					
2. Access to jobs		Mod+ve		Identifies the importance of access to business development with developers having to demonstrate how the generated employment will help meet local needs, support employment locally and help sustain small and medium sized businesses.					
15. Deprivation		Mod+ve		References to demonstrating support for small & medium sized businesses. Also, support to employment locally and meeting local employment needs.					
Local	10	Unlikely	0	Direct	8	Positive	12	Maj +ve	0
District	3	Potential	7	Indirect	4	Negative	1	Mod+ve	3
Regional	0	Likely	6	Cumul	1			Min+ve	9
National	0	Definite	0					Neutral	8
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

Mitigation and Enhancement

3.6.9 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies, the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies for each of the four sustainability themes (see Tables 3.12 to 3.15).

3.6.10 Policy 3 has addressed some of the mitigation/ enhancement proposals provided for emerging policy 6. Of particular note in relation to sustainable consumption and production is the adoption of the following:

- A requirement to demonstrate development proposals contributes towards meeting local employment needs;
- Encouragement given to the retention and creation of small and medium sized enterprises across the Borough.

3.6.11 Tables 3.12 to 3.15 provide a summary of the measures proposed for the Emerging Core Strategy policies, the Council's response and additional proposals that stem from the Local Plan policies.

Table 3.12: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Ensure that employment premises make adequate provision for waste segregation and recycling. 	<ul style="list-style-type: none"> • See Policy 12 that seeks to prevent waste. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • This policy ought to note how it supports the regeneration initiatives in the North Solihull Regeneration Zone as two sites are Bickenhill easily accessible from the regeneration zone. 	<ul style="list-style-type: none"> • Policy requires developers to demonstrate how they meet local needs and support local employment. 	<ul style="list-style-type: none"> • None.

3.6.12 The policy does not improve upon the Emerging Core Strategy policy in addressing the climate change and energy sustainability objective. In particular it recognises the need to protect sites needed for local energy or heat networks. However the policy does not promote adoption of renewable energy technologies or the avoidance of sterilising natural resources.

Table 3.13: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Consider prioritising the release of employment land where opportunities to link with local energy or heat distribution networks would be more likely. 	<ul style="list-style-type: none"> • Policy protects sites needed for local energy or heat networks. • See Policy P9 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Consider whether priority ought to be assigned to sites able to offer growth of a cluster of low carbon businesses. 	<ul style="list-style-type: none"> • Most of the allocated employment sites are ongoing existing sites that are part developed. Not practical to prioritise as suggested. 	<ul style="list-style-type: none"> • Consider encouragement to low carbon businesses in text to P3.

3.6.13 An amendment to the policy has been made to avoid unnecessary sterilisation of natural resources with reference to waste being considered within policy 12 – waste management.

Table 3.14: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Consider a requirement that employment developments propose measures for avoiding unnecessary sterilisation of natural resources or key sites needed to secure the sustainable development of a locality particularly in regard to the provision of distributed heat and energy networks. 	<ul style="list-style-type: none"> • Policy amended to include proposal. See final paragraph of Policy P3. 	<ul style="list-style-type: none"> • None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Could make it transparent that sites selected for waste recycling businesses would reflect potential pollution and traffic management issues. 	<ul style="list-style-type: none"> Waste issue addressed in policy 12. 	<ul style="list-style-type: none"> None.

3.6.14 In addressing the sustainability objectives under the sustainable communities theme, the policy perhaps could have included a desire to encourage major employers to demonstrate how they intend to support local small and medium sized companies; particularly those located within disadvantaged communities (see Table 3.15).

3.6.15 Sustainability objective 21 seeks the encouragement of development that helps deliver an enhanced balance between jobs, housing and services in the local area, with easy and equitable access to opportunities for all. In this context, while policy provides for alternative uses under certain conditions, this is focused upon alternative uses of the development site. The intention behind the sustainability objective was to encourage development delivering a balance between employment, housing, services and community facilities and amenities across local areas. As such the intention was to view employment development proposals in the context of the wider community needs.

3.6.16 Policy 3 states that small-scale supporting facilities may be allowed where needed to enhance/complement business use in the locality and is compatible with sustainable development principles. The uncertainty raised by the policy is whether this would extend to address the sustainability objective described above.

Table 3.15: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Perhaps the provision of flexibility could be qualified such that provision reflects the needs of the local community thus contributing towards the potential for a reduced need to travel and increasing the employment opportunities appropriate to the local community. 	<ul style="list-style-type: none"> Flexibility in the type of development qualified to be compatible with sustainable development principles. Need to reduce the need to travel addressed by requirement on developers to demonstrate the level of employment generated and the benefit to meet local employment needs. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Encourage major employers to demonstrate how they intend to support local SMEs and adopt local supply chains and employment, particularly among those from disadvantaged communities. 	<ul style="list-style-type: none"> Policy amended to recognise role of small and medium sized enterprises. Beyond scope of plan to require adoption of local supply chains. P3 requires applicants to demonstrate level of employment generated and the benefit in meeting local employment needs. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider the role of mixed use development within the employment land policy. 	<ul style="list-style-type: none"> Development is to be compatible with the sustainable development principles. See 3rd paragraph of Policy P3 	<ul style="list-style-type: none"> Consider making explicit a desire to encourage development that achieves enhanced local balance between jobs, housing, services and accessibility.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider mechanisms to maximise local recruitment to the new employment areas rather than inward commuters. 	<ul style="list-style-type: none"> Addressed through the requirement to demonstrate employment generated and the benefit to local employment needs. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.6.17 The Council considered matching local employment needs to the type of development to be enabled on allocated business sites however, this was considered difficult to enforce and could discourage investment. Preferred approach is for broad flexibility in the type of business use enabled with measures to encourage sustainable transport links and training and for developers to show benefits for meeting employment needs locally.
- 3.6.18 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.7 Appraisal of Policy 4: Meeting Housing Needs

Introduction

- 3.7.1 This section presents the appraisal of the draft Local Plan policy on housing with the aim being to establish the sustainability performance of the policy and to identify potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the draft Local Plan. The specific policy commitments are highlighted in the table below.
- 3.7.2 Three changes have been made to this policy as highlighted by the red within the policy presented below. The first involves the deletion of the words “at least” preceding the 40% affordable housing requirement, which may affect the ability to deliver higher levels but reflects viability concerns. The consequence of other changes are essentially to clarify the status of permanent residential moorings, extending the provision of an unspecified proportion of all new moorings to be permanent residential. Deletion of the reference to “approved” neighbourhood plan would not change the intent as the neighbourhood development plan would need to have been passed following a local referendum that would then require the Council to bring the plan into force.
- 3.7.3 Note that the policy addresses housing traded on the open market, low cost and affordable housing as well as rural and supported housing.
- 3.7.4 The alternatives considered to this policy are presented at the end of this section.

POLICY P4 – Meeting Housing Needs

(a) Affordable Housing

The Council will require developers of allocated and unidentified sites to make a contribution to affordable housing on residential sites of 0.2 hectares or more, or housing developments of 3 or more net homes.

Affordable housing includes social rented, affordable rented or intermediate - tenure housing which is available at below market price or rent and which is affordable to households whose needs are not met by the market.

The local definition of ‘affordable’ is set out in an Affordable Housing Supplementary Planning Document (SPD) which will be updated periodically to reflect changes in local incomes and house prices.

Contributions will be expected to be made in the form of ~~at least~~ 40% dwelling units on the development site, but will take into account:

- i. **Site size;**
- ii. **Accessibility to local services and facilities and access to public transport;**
- iii. **The economics of provision, including particular costs that may threaten the viability of the site;**
- iv. **Whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;**
- v. **The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and**
- vi. **The need to achieve a successful housing development.**

Where on site provision is not feasible or viable there will be a financial contribution towards the provision of affordable housing that would not otherwise be provided, elsewhere within the Borough.

This policy applies to all qualifying sites across the Borough and includes Gypsy and Traveller sites. ~~and residential moorings.~~

In addition to requiring a proportion of the homes to be ‘affordable’ the Council will identify the tenure, mix and type of the homes and any requirements for homes to be designed to meet specific needs such as those of older or disabled people.

The mechanisms and criteria for delivery of Policy 4 are set out in an Affordable Housing Supplementary Planning Document.

(b) Rural Exceptions

The provision of affordable housing developments on green belt land will be supported in circumstances where,

- i. The development proposal is consistent with the ~~approved~~ Parish or Neighbourhood Plan; or
- ii. There is evidence that people with a local connection to the parish area have a housing need that cannot be met through affordable housing provision on an allocated housing site and the proposed development is supported by the Parish Council or Neighbourhood Group.

(c) Market Housing

Where the Council issues a development brief for a site this will include details of the likely profile of household types requiring market housing, e.g. multi-person, including families and children (x%), single persons (y%) and couples (z%), as identified by the latest Strategic Housing Market Assessment. In assessing the housing mix of allocated and unidentified sites, the Council will, in negotiations, have regard to:

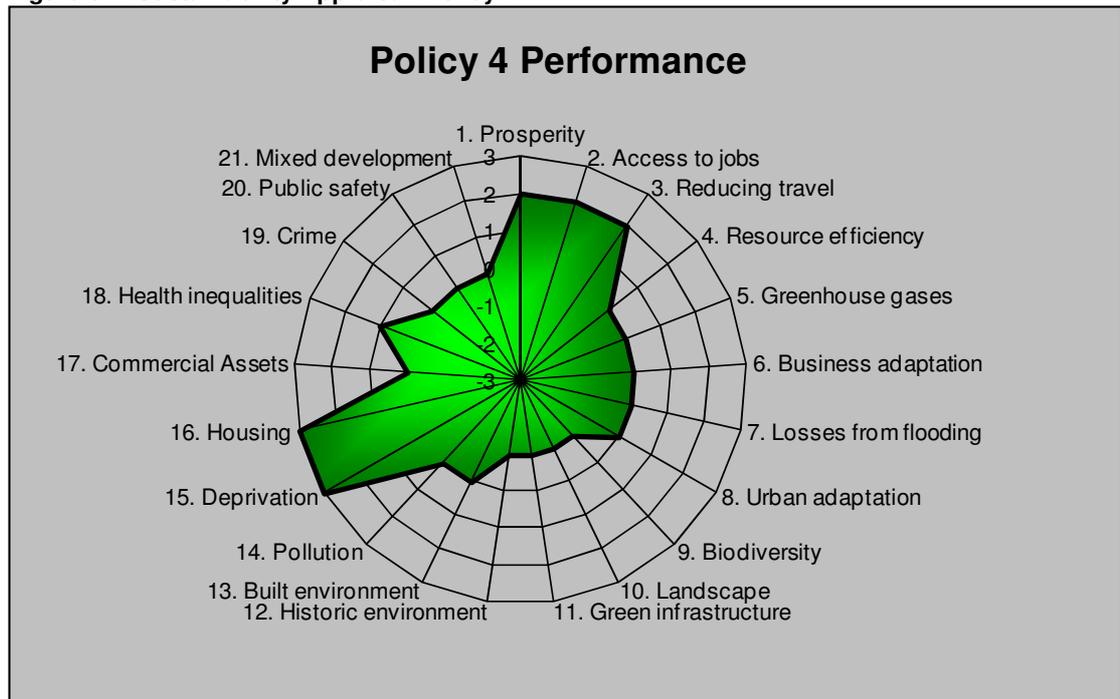
- i. Site size;
- ii. The existing mix of market housing and local housing demand in the area as guided by the Strategic Housing Market Assessment;
- iii. Accessibility to local services and facilities and access to public transport;
- iv. The economics of provision, including particular costs that may threaten the viability of the site;
- v. The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and
- vi. The need to achieve a successful housing development.

The Council considers permanent residential moorings to be low cost market housing and will require a proportion of all new moorings to be permanent residential and not solely provision for touring, leisure and holiday moorings.

Forecast Effects

- 3.7.5 This policy performs in a positive manner with two of the twenty one sustainability objectives reporting a major beneficial outcome (deprivation and housing) and three moderate beneficial outcomes (see Figure 3.4 and Appendix G). There are four minor adverse outcomes. The majority of the consequences across the sustainability objectives (eleven) are considered to be neutral.
- 3.7.6 The effects arising from the policy are anticipated to be long term (greater than 10 years), with five occurring at a Borough-wide scale with five at a local scale. There are six direct impacts and four indirect effects.
- 3.7.7 The policy performs well on the sustainable consumption and production theme with two potential and one likely indirect beneficial outcomes, while the consequences for the climate change and energy theme are neutral as it is unclear how the costs of sustainable construction and provision of renewable energy are to be considered in tests of viability.
- 3.7.8 Delivery against the sustainable communities theme is strongly positive in terms of the effects on deprivation and housing, whereas the policy fails to deliver against the objectives of designing out crime or providing for public safety.
- 3.7.9 There are no changes to the appraisal as a result of the addition of a policy towards permanent residential moorings.

Figure 3.4: Sustainability Appraisal: Policy 4



SA Objective		Likely Significant Effects		Rationale					
15. Deprivation		Maj+ve		Supports the delivery of housing to meet the needs of low income households and potentially for those with special needs.					
16. Housing		Maj+ve		Seeks to address identified needs for affordable housing as well as provision of a range of housing sizes and types. Policy also provides for rural exceptions. In particular, it seeks to address the needs of those seeking low cost market housing, affordable housing and housing in the rural area					
1. Prosperity		Mod+ve		Affordable housing could potentially assist people to locate closer to employment or have resources to travel to work.					
2. Access to jobs		Mod+ve		Increased affordable housing provision is likely to help people find accommodation closer to areas with job opportunities.					
3. Reducing travel		Mod+ve		Suitability of sites for affordable housing judged on accessibility to local services, facilities and public transport potentially reducing travel needs.					
Local	5	Unlikely	0	Direct	6	Positive	6	Maj +ve	2
District	5	Potential	6	Indirect	4	Negative	4	Mod+ve	3
Regional	0	Likely	3	Cumul	0			Min+ve	1
National	0	Definite	1					Neutral	11
								Min-ve	4
								Mod-ve	0
								Maj -ve	0

Managing Uncertainty

3.7.10 The uncertainty associated with the forecast outcomes varies across the sustainability appraisal framework. Four of the effects are considered to be likely or definite to occur (two major positive, one moderate positive and one minor positive).

Mitigation and Enhancement

- 3.7.11 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies for each of the four sustainability themes (see Tables 3.16 to 3.19).
- 3.7.12 The measures proposed in the Sustainability Appraisal of the Emerging Core Strategy have only been partly taken forward within the revision to the policy. Indeed, as a standalone policy, it does not provide for consideration of a range of design issues, climate change and energy or urban cooling.
- 3.7.13 As there are some 11,745 people on the housing waiting list as of April 2010¹⁵ so a housing issue exists to be addressed. This situation may well become further polarised as forecasts suggest that between 2008 to 2033 some 2000 households between the ages 65-74 and 5000 aged above 85+ will create new housing needs¹⁶.
- 3.7.14 Alongside changing housing needs, issues of affordability is also important as Solihull is reported to have a high ratio of house price to income (10.6)¹⁷.
- 3.7.15 Given the above there may be an increasing challenge to match market housing with local needs and hence a need for an expansion of the subsidised housing sector delivered through housing associations. To this end, there may be merits in encouraging new delivery vehicles combining public and private sector initiatives to deliver more affordable housing.

Table 3.16: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> Consider opportunities for the refurbishment of housing in the vicinity of a housing development proposal in areas where energy consumption and community needs could be enhanced through a single construction programme. 	<ul style="list-style-type: none"> Too detailed for the draft Local Plan, could not be applied to private housing. Solihull Community Housing and the Housing Associations already meet the Decent Homes Standards. Policy 9 proposes an SPG on allowable solutions. 	<ul style="list-style-type: none"> Consider exploring whether refurbishment schemes that deliver reduced carbon emissions could be eligible under the Allowable Solutions approach.
<ul style="list-style-type: none"> Ensure housing provides appropriate facilities for waste management. 	<ul style="list-style-type: none"> Policy 12 requires that non-waste development will be required to accommodate facilities for the storage and sorting of waste arising from the development. 	<ul style="list-style-type: none"> None.

- 3.7.16 The proposals for the climate change and energy sustainability theme are not addressed within the housing policy, but are addressed in policy 9.
- 3.7.17 The policy does not provide for measures to deliver urban cooling through vegetation, when the benefits from such cooling may well result to the elderly and young who potentially are more likely to occupy the affordable housing stock. As a result potential health benefits from designs that reduce fuel poverty and provide a cooling environment could be overlooked.

¹⁵ Communities and Local Government, 2011: Live Tables – Table 600 Rents, lettings and tenancies
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/livetables/>

¹⁶ Communities and Local Government, 2011: Live Tables – Table 414 Household Projections by Age and District
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/227222/>

¹⁷ National Housing Federation, 2011: Home Truths 2011: West Midlands

Table 3.17: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> Consider requiring the developer to maximise the number of properties that are orientated so to minimise energy demand and are designed to prevent over-heating. 	<ul style="list-style-type: none"> Policies 9 and 15 require new development to achieve the highest possible standard of environmental performance, including location and layout. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Major development shall achieve the reductions in total CO₂ emissions (regulated and unregulated energy use) from renewable energy or low/zero carbon energy generation on site or in the locality of the development as long as a direct physical connection is used, unless it can be demonstrated that such provision is not technically or economically viable. The percentage reductions in CO₂ emissions should be based on the estimated CO₂ emissions of the development after the installation of energy efficiency measures related to either the Code for Sustainable Homes or equivalent method. 	<ul style="list-style-type: none"> Policy 9 requires new development to incorporate decentralised energy and heating networks where feasible and viable In locations where decentralised networks do not exist and are shown to be unviable or unsuitable, Policy 9 requires low or zero carbon energy to be provided to meet a minimum of 20% of predicted energy requirements. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider requiring the developer for a given scale of housing development to demonstrate the viability of ground source heat pumps and local grey water capture and reuse for their proposals. 	<ul style="list-style-type: none"> Policy 9 requires developers to incorporate decentralised energy and heating networks where feasible and viable. Policy 11 requires developers to demonstrate the highest possible standards of water efficiency including recycling grey water. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider an action to review public and private housing assets in the context of the residential heat demand map, the distribution of elderly or low income families with properties of low thermal efficiency to designate housing action areas allied to measures to tackle health inequalities. 	<ul style="list-style-type: none"> Not a matter for the Local Plan. Housing Strategy has a Home Energy Efficiency and Affordable Warmth Strategy (2009). 	<ul style="list-style-type: none"> Consider links to a design guide to address potential for the thermal comfort of those occupying affordable housing.

Table 3.18: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> Consider a requirement for developers to provide for a given number of trees per ha of development to maximise the cooling value to residential areas. 	<ul style="list-style-type: none"> Policy 10 will ensure the full value and benefits of the natural environment will be taken into account in considering development proposals, including the contribution to the potential for reducing the impacts on climate change. 	<ul style="list-style-type: none"> None.

3.7.18 The policy sets out that the Council will have regard to the need to secure a range of housing types and sizes in the locality in order to help achieve socially balanced and mixed communities. It was considered that Draft Local Plan policy could benefit from clarity on the meaning of “local” and consideration be given to design issues associated with the needs of an elderly population in order to deliver safety by design. The measures proposed to further enhance the policy are presented in Table 3.19 below.

Table 3.19: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Proposals
<ul style="list-style-type: none"> In terms of providing an appropriate mix of housing, clarify the basis on which “local” is to be defined and the extent to which the type of housing to be provided is intended to deliver the existing community need or to cater for a new community to be attracted on the basis of a changing economic profile of the area. 	<ul style="list-style-type: none"> The draft Local Plan has been amended throughout to specify when “local” refers to the specific village/neighbourhood housing need or the Borough housing need. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider whether there ought to be a requirement for housing proposals to be designed to cater for healthy and sustainable communities. 	<ul style="list-style-type: none"> Policy notes that the Council will have regard to achieving socially balanced and mixed communities Policy 5 requires design that recognises the public health agenda, 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider requiring the design of housing developments to cater for the needs of an increasingly elderly population through a proportion of Lifetime homes for example. 	<ul style="list-style-type: none"> Policy 15 encourages residential development proposals to be built to Lifetime Homes Standard and to demonstrate at least the gold/silver Building for Life design standard. Specific requirements to be included in development briefs. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> New residential development should seek to create a high quality living environment and incorporate crime reduction measures to achieve “Secure by Design” certification. 	<ul style="list-style-type: none"> Policy 15 requires applicants to adhere to the urban design principles set out in established current design guidance, including Secured by Design. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Clarify the understanding of “The need to achieve a successful housing development”. In what terms is a development to be considered successful?

Alternatives

3.7.19 Alternatives were considered in relation to the housing land provision target and the affordable housing threshold. These were:

- Housing Land Provision Target** – Lowering the target was considered, but considered financially unviable, this is being tested further through the Local Plan viability appraisal
- Affordable Housing Threshold** - A range of targets at different site size thresholds were considered and discussed at the pre-production consultation sessions. In the interests of maximising affordable housing due to the high level of housing need the decision was taken to propose Policy P4 Meeting Housing Needs.
- Affordable Housing Threshold** - Retaining a minimum target of 40% affordable housing requirement could impede the ability to negotiate on a site by site basis, and thus compromise the achievement of other sustainability and planning objectives.

- 3.7.20 The alternative of including permanent residential moorings within policy P4a) was judged not to be appropriate and thus consideration was given to whether permanent residential moorings ought to be viewed as low cost market housing thereby making a requirement for all new moorings to include a proportion of permanent residential moorings.
- 3.7.21 A decision has been taken to address the subject of Affordable Housing within a Supplementary Planning Document alongside policy P4.
- 3.7.22 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.8 Appraisal of Policy 5: Provision of Land for Housing

Introduction

- 3.8.1 Following from policy 4, this section focuses upon the implications arising from the allocation of land for housing. The aim is to establish the policy’s sustainability performance and to identify any potential improvements that may strengthen its sustainability credentials. Changes have been made to this policy as highlighted by the red font within the policy presented below. These changes focus upon a revision to the number of additional homes reflecting the progression into 2012.
- 3.8.2 The effect of the changes are to reduce the number of houses provided within the North Solihull Regeneration Area while increasing the density and area allocated to housing at Blythe Valley along with an increase at the Powergen site. These changes maintain the overall number of houses allocated within phase 1 at 1,890 units which will contribute towards housing land supply in this phase. Justification for the policy is presented in the Draft Local Plan.
- 3.8.3 The specific policy commitments are highlighted in the table below with Table 3.20 providing a review of the sites for immediate release, while Tables 3.21 and 3.22 detail the release of sites in the medium and longer term. A brief statement on the consideration of alternatives is presented at the end of this section.

POLICY P5 – Provision of Land for Housing
<p>The Council will allocate sufficient land for 3,960 4,040 net additional homes to ensure sufficient housing land supply to deliver 8,665 8,930 additional homes in the period 2012 2011-2028. The allocations will be part of the overall housing land supply detailed in the table below.</p> <p>The annual housing land provision target is 500 525 net additional homes per year (2006-2028). A trajectory showing how this target will be delivered from all sources of housing land supply is included in the Strategic Housing Land Availability Assessment and will be subject to annual review.</p> <p>The housing sites are phased to ensure a continuous supply of housing provision throughout the Plan period and a continuous supply of affordable housing. Sites will not be released for development before they reach their specified phase, unless existing housing land supply falls below five years and the annual monitoring process has reviewed site deliverability and indicates that the trajectory is unlikely to recover over the next five years without additional land releases.</p> <p>New housing will be supported on unidentified sites in accessible locations where they contribute towards meeting identified borough-wide housing needs and towards enhancing local character and distinctiveness. Unless there are exceptional circumstances, new housing will not be permitted in locations where accessibility to employment, centres and a range of services and facilities is poor.</p> <p>The density of new housing will make the most efficient use of land whilst providing an appropriate mix and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations.</p> <p>Development briefs will be prepared for each site in consultation with communities and developers and will set out the Council’s expectations for the development of each site. Each brief will provide criteria and principles for development. Development briefs will be a material consideration in planning applications and will inform pre-application discussions.</p>

- 3.8.4 Note there are other sources of land supply in addition to the allocations that will contribute towards housing land supply. The Strategic Housing Land Availability Assessment (SHLAA) provides estimates of how much new housing will be delivered where and in each phase¹⁸. Other sources of land supply include sites with planning permission for 1,200 dwellings that are likely to be delivered in phase 1, sites for 1,029 dwellings within the regeneration area which will be delivered during Phases 1 and 2 and 2,550 dwellings from windfall sites that will be delivered in Phases 1-3 and the majority of which will be delivered in the urban areas (see Table 3.20).
- 3.8.5 The overall estimated capacity exceeds 8,665 to provide flexibility in the event of under-provision from any source of housing land supply.

¹⁸ Available at: http://www.solihull.gov.uk/Attachments/SHLAA_Report_Jan2012.pdf

Table 3.20: Solihull Housing Land Supply 2006-2028¹⁹

Source		Estimated Capacity
1	Housing completions (2006-2012)	2,335
Future Housing Land Supply		
2	Sites with planning permission	1,200
3	Sites identified in the SHLAA	158
4	Sites within the North Solihull Regeneration Area	981
5	Local Plan Proposed Sites	3,960
6	Windfall housing land supply	2,400
Sub-total Housing Land Supply to meet the overall target of 8,665 additional dwellings (2012 - 2028)		8,699
Total Estimated Capacity		11,034

Table 3.21: Sites for Immediate Release

Site		Site Area (ha)	Capacity Estimate
North Solihull Regeneration Area			
1	Foxglove Crescent (35 dwellings per ha)	1.98	70
2	Conway Road (45 dwellings per ha)	1.65	75
3	Simon Digby Chelmsley Wood (45 dwellings per ha)	4.57	200
4	Bishop Wilson and St. Andrews Scout Hut (45 dwellings per ha)	3.09	140
5	Lowbrook Phase II (45 dwellings per ha)	1.72	75
6	Chester Road/Centurion PH and adjoining land (45 dwellings per ha)	1.06	35
7	Birmingham Road (45 dwellings per ha)	1.50	70
Major Urban Area			
8	Solihull Town Centre – Mixed Use	43.40	300
9	Chelmsley Lane/Coleshill Road (40 dwellings per ha)	1.96	80
10	Powergen - Mixed use	3.84	130
Rural Area – 40 dwellings per ha			
11	Blythe Valley Park (46 dwellings per ha)	7.5	350
12	Four Ashes Road Bentley Heath	3.62	150
13	Hampton Road Knowle	2.55	100
14	Middlefield, Knowle	2.86	115

Table 3.22: Phase 2 Sites – for Release on 1st April 2018

Site		Site Area (ha)	Capacity Estimate
Major Urban Area			
15	Solihull Town Centre (Mixed use)	43.4	350
16	Aqueduct Road Solihull Lodge (30 dwellings per ha)	10.31	300
17	Moat House Farm consented	-	-
Rural Area (40 dwellings per ha)			
18	Blythe Valley Park (50 40 dwellings per ha)	5.0	250
19	Braggs Farm/Brickiln Farm Dickens Heath	2.63	105
20	Griffin Lane Dickens Heath	1.19	50
21	Riddings Hill Balsall Common	1.61	65

¹⁹ The figures presented in this table may be subject to some slight adjustment.

Table 3.23: Phase 3 Sites – for Release on 1st April 2023

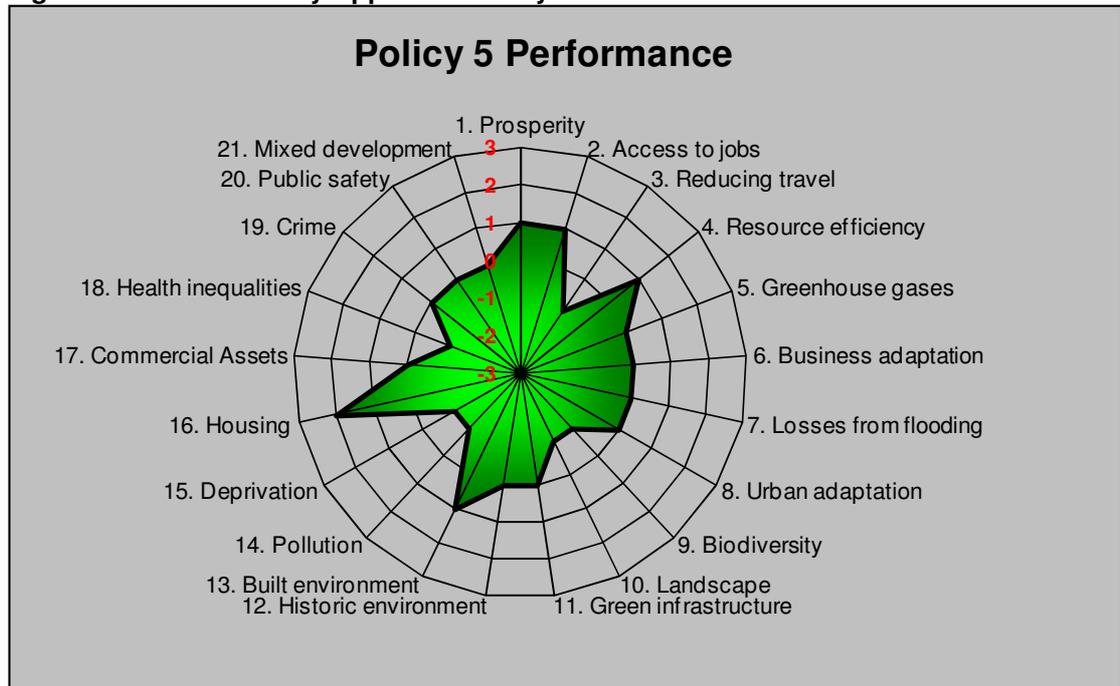
Site		Site Area (ha)	Capacity Estimate
Major Urban Area			
22	Solihull Town Centre (Mixed use)	43.4	300
Rural Area (40 dwellings per ha)			
23	Land at Cleobury Lane Dickens Heath	4.59	185
24	Land at Moat Dairy Farm Tanworth Lane	10.98	200
25	Land fronting Kenilworth Road	2.67	110
26	Land between Kenilworth Road/Windmill Road	1.17	45
27	Land off Meriden Road Hampton in Arden	2.79	110
Total Capacity			3,960

- 3.8.6 A large number of objections were received from the local community to the provision of housing on the Foxglove Crescent site. Loss of open space and part of a local nature reserve were among the reasons for the objections.
- 3.8.7 As no suitable replacement sites were identified, to maintain the housing numbers, sites beyond North Solihull were examined to determine whether their capacity/density could be increased within phase one. Site 10 – Blythe Valley Park phase one would permit an increase in capacity and density that would enable improved facilities to make the site more attractive for business investment while also avoiding additional land take from the Green Belt.
- 3.8.8 The Local Enterprise Partnership's 'City Deal Proposal' (5th July 2012) anticipates the creation of about 36,000 jobs in the M42 Gateway area. Based on maximising the potential of the cluster of key economic assets in the Gateway area, new jobs are likely to comprise a broad mix potentially providing an impetus for demand for the housing element at Blythe Valley Park supplementing the impetus that will be given through significant further business development at the site.

Forecast Effects

- 3.8.9 The policy is envisaged to have the potential for a slightly adverse outcome as the previous major beneficial effect (housing) has been downgraded to moderate beneficial to reflect the uncertain effect that reduced supply within North Solihull Regeneration Area may have. Four minor beneficial effects are anticipated along with six minor adverse effects and. Nine of the eleven outcomes are judged to be direct with eight outcomes being expressed at a local scale and three at a district scale (access to jobs, pollution and housing). The forecast consequences of the policy upon the sustainability objectives are presented in Figure 3.5 below and Appendix G.
- 3.8.10 The policy is envisaged to have the potential to provide a minor beneficial outcome under the sustainable consumption and production theme. Housing is to focus upon the urban area in the early phases with rural housing increasing in later phases. This approach has the potential to assist in helping with the affordability of housing and mobility for those where access to employment could otherwise be restricted
- 3.8.11 The reduced density of housing at Foxglove Crescent could potentially introduce increased diversity in the housing stock in North Solihull increasing the affordability of housing at the proposed density. However the transfer of 100 units from North Solihull to Blythe Valley is unlikely to benefit the affordability of housing overall in the regeneration area unless new sites can be identified for the first phase. The increased density of housing at Blythe Valley could aid the prosperity of younger professionals working in the M42 Economic Gateway through the provision of more affordable housing.
- 3.8.12 While there remains a focus on urban areas which potentially reduces the need to travel, the third phase of housing is focused upon rural provision and is likely to increase travel needs. Although the policy requires that exceptional circumstances would be needed to allow unidentified sites to proceed where accessibility is poor, the submission Local Plan policy extends the policy to all settlements.

Figure 3.5: Sustainability Appraisal: Policy 5



SA Objective		Likely Significant Effects			Rationale				
16. Housing		Mod+ve			It is unclear that the identified housing needs for North Solihull are to be met. While the overall needs would be met.				
Local	9	Unlikely	0	Direct	9	Positive	5	Maj +ve	0
District	2	Potential	8	Indirect	2	Negative	5	Mod+ve	1
Regional	0	Likely	2	Cumul	0			Min+ve	4
National	0	Definite	1					Neutral	10
								Min-ve	6
								Mod-ve	0
								Maj -ve	0

- 3.8.13 The transfer of 130 housing units from North Solihull Regeneration Area to the edge of town Blythe Valley site and to the Powergen site is envisaged to have the potential to reduce accessibility to jobs. Although the loss of 130 housing units represents 16% of the previous provision in North Solihull, the policy could lead to increased housing pressures. In turn this may cause some to seek homes in places where public transport may not aid access to jobs to the same extent as North Solihull.
- 3.8.14 The reduction in the housing land supply figure does not affect the ability to deliver the identified housing need across the Borough because:
 - The revised figure still exceeds the target, although the level of flexibility is reduced;
 - The policy includes a mechanism to bring sites forward from later phases to address any shortfall, non-delivery of sites;
 - The plan identifies sites for years 10-15, although this is not strictly necessary, so provides greater flexibility.
- 3.8.15 The businesses attracted to the M42 Economic Gateway are expected to recruit across the higher socio-economic groups with younger professionals potentially being served by the proposed housing. However, it is not clear that likely community choosing to locate in Blythe Valley would be provided with appropriate local employment opportunities in the M42 corridor, although some suitable jobs may well be created in the service sector.

- 3.8.16 Equally, a rural, albeit edge of town allocation in contrast to the urban allocations in North Solihull, implies increased reliance upon private transport and use of the M42 corridor thus works against the objective of reducing the need to travel.
- 3.8.17 In terms of the climate change and energy sustainability theme, the policy is neutral as it is not clear that positive outcomes would be delivered via the site development briefs.
- 3.8.18 With 37% of the new housing allocations being in the rural areas, (it will be less than 25% overall when other land supply sources are taken into account), there is a potential that both biodiversity and landscape objectives would be adversely affected. No provision is made in the policy to contribute towards green infrastructure or to consider the historic environment although these objectives may be delivered via the other policies and site development briefs. Although biodiversity and landscape may also be affected with any site, hence policy 10 is in place to ensure mitigation.
- 3.8.19 A minor positive outcome occurs for the built environment objective as the policy states that new housing is to contribute towards maintaining local character and distinctiveness, whereas housing on unidentified sites is to contribute wards "*enhancing local character and distinctiveness*".
- 3.8.20 The sustainable communities theme is where the housing policy might be expected to deliver most of the beneficial outcomes. However, the policy provides one potentially moderate beneficial outcome (housing) and two minor adverse outcome (deprivation and health inequalities).
- 3.8.21 While provision of new housing may create capacity to enable refurbishment/demolition of the Radburn housing areas, this is not evident from the policy. Also, while there is potential for the new housing to improve public safety via the development briefs, but this is not evident from the policy, although it is addressed by Policy 15.
- 3.8.22 The first phase sites provide the largest number of dwellings in the major urban area (510) closely followed by the North Solihull Regeneration Area (665). There is no subsequent provision in the regeneration area within the second phase.
- 3.8.23 During the third phase a total of 950 dwellings are proposed, these being predominantly in the rural areas (650) dwellings. This suggests that rural areas are likely to experience change with 1,235 dwellings being allocated in contrast to 2,725 in the regeneration and urban area. Any housing on sites that are currently unidentified would not be limited to North Solihull, the Urban West and the three large villages, but are most anticipated to be in the main urban area according to the Council.

Managing Uncertainty

- 3.8.24 Of the twenty one objectives, three were assessed as being likely or expected to achieve the anticipated outcome, a further eight had the "potential" to deliver the anticipated outcome. Hence there is some uncertainty in how the policy would perform in practice. It should be noted that the one moderate beneficial effect is considered to have the potential to be delivered while two of the four minor beneficial outcomes were considered to be a potentially beneficial outcome and two were considered likely to be beneficial.

Mitigation & Enhancement

- 3.8.25 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission Local Plan policies for each of the four sustainability themes.
- 3.8.26 Given the high degree of uncertainty in the forecast outcomes, mitigation and enhancement measures identified have been identified under all four sustainability themes.
- 3.8.27 Essentially, the uncertainty being addressed by the mitigation measures reflect the reliance upon site development briefs to consider the sustainability objectives; the uncertain consequences of the reduced supply of housing in North Solihull and the increased higher density provision at Blythe Valley Park. Key issues include:

- Whether the reduced provision at North Solihull contributes towards increasing deprivation and health inequalities.
- The extent to which the housing allocations support local services, give rise to adverse landscape and biodiversity impacts and increase car based travel. This is addressed by Policies 7 and 10.
- The manner in which site layout and links to energy/heat networks are considered from an energy and adaptation to climate change perspective. This is addressed by Policy 9.
- The extent to which site development guides deliver safety by design and reduce crime. This is addressed by policy 15.

3.8.28 Tables 3.24 to 3.26 record the Council's response to the proposals following the appraisal of the Emerging Core Strategy. They also record the additional proposals resulting from the appraisal of the Consultation and Submission draft Local Plan.

Table 3.24: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Would the housing proposals compromise the ability of local communities to grow their own food and access open space? 	<ul style="list-style-type: none"> • Addressed by Policy 20. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Potential of focusing upon major urban area to either aid delivery of mixed use schemes could be promoted. 	<ul style="list-style-type: none"> • Total of 1100 dwellings proposed in the town centre and at the Powergen site as part of a mixed development. 	<ul style="list-style-type: none"> • The allocation of 100 units from North Solihull to Blythe Valley Park reducing the urban focus suggests a need for a further review of housing demand and provision in North Solihull.
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • Consider additional transport needs associated with rural housing allocations.
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • Explore the extent to which employment policies can encourage provision of local employment suitable for the community attracted to Blythe Valley Park and also reduce reliance upon the private car.

Table 3.25: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Constraining windfall housing in small villages may contribute to the loss of local village services where the critical population to support such facilities has been lost, thus potentially leading to increased travel and carbon dioxide emissions as well as greater social isolation. Perhaps consideration should be given to introducing a test to judge whether such windfall housing would contribute to the sustainability of local village services. 	<ul style="list-style-type: none"> Removal of constraint on windfall housing in small villages. 	<ul style="list-style-type: none"> Extent to which support for local distinctiveness and local character can be taken as enabling contribution to the support of local village services could be clarified.
<ul style="list-style-type: none"> There is a need to clarify what is meant by 'suitable' locations outside the main urban area. It is recommended that suitable locations should be those that will not foster car dependency. 	<ul style="list-style-type: none"> Constraint on location of windfall housing to "suitable locations" has been removed. 	<ul style="list-style-type: none"> Requirement for sites to be in accessible locations is included, this links to Policy 7.
<ul style="list-style-type: none"> Should the suitability of sites consider the ease to which the development could in the short or medium term be connected to a local energy or heat distribution network? 	<ul style="list-style-type: none"> The policy makes reference to high energy standard. 	<ul style="list-style-type: none"> It is not clear that connectivity to local energy or heat networks would be a consideration in the prioritisation of sites.
<ul style="list-style-type: none"> Concentrating development has the potential for increasing the magnitude of the urban heat island. 	<ul style="list-style-type: none"> Required by Policy 9. 	<ul style="list-style-type: none"> Consider use of development briefs to provide urban cooling measures.

Table 3.26: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> The manner in which the most suitable sites are prioritised could benefit from a robust set of criteria based on key sustainable development criteria. 	<ul style="list-style-type: none"> Too detailed for the Draft Local Plan. This is included in the SHLAA site appraisals document. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Addition housing may lead to increased congestion with the potential to lead to adverse effects on air quality unless measures to promote public transport are locked in. 	<ul style="list-style-type: none"> Site development briefs would examine local effects upon air quality and public transport. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider reference to prioritised use of previously developed land when sites are of equal worth across other priorities. 	<ul style="list-style-type: none"> Considered in the SHLAA site appraisals document 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> As the policy may cause loss of existing green infrastructure (or erosion of quality) and equally help its delivery by developer contributions, 	<ul style="list-style-type: none"> Policy 20 requires appropriate compensatory measures where loss of existing facilities is necessary. 	<ul style="list-style-type: none"> Development proposals for North Solihull Regeneration Area could demonstrate net improvement in the quality of open space.

Alternatives

- 3.8.29 Over 200 sites have been surveyed, appraised and considered for allocation, The most suitable sites have been selected. Assessments of each site are summarised in the Strategic Housing Land Availability Assessment site assessments document. The following alternatives were explored when considering revisions to the policy following consultation:
- An alternative of compromising upon the good accessibility to public transport may deliver additional sites, but would reduce delivery against the Council's Challenge A priority.
 - The inclusion of housing at Birmingham Business Park was rejected following dismissal of an Appeal.
 - Considered removal of housing site 1 – Foxglove Crescent, but no suitable site alternatives are currently available.
 - Considered addressing shortfall on sites where additional capacity was possible including the Solihull Town Centre site but this was rejected due to uncertainties over delivery.
 - Providing lower housing densities may risk a situation of being more inefficient in the use of land with a risk of delivering larger properties when the need is for smaller dwellings.
 - Alternatives considered to the re-balancing of Phase 1 at Blythe Valley Park risks delaying provision of supporting facilities at the site.
- 3.8.30 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.9 Appraisal of Policy 6: Provision of Sites for Gypsies & Travellers

Introduction

- 3.9.1 The proposed policy on gypsies & travellers is examined in this section with the aim of identifying measures that may be taken to strengthen its performance against the sustainability appraisal framework. Justification for the policy is presented in the Draft Local Plan. The specific policy commitments are highlighted in the table below with the changes introduced in the Submission Local Plan presented in red.
- 3.9.2 The alternative approaches to the policy are noted at the end of this section.

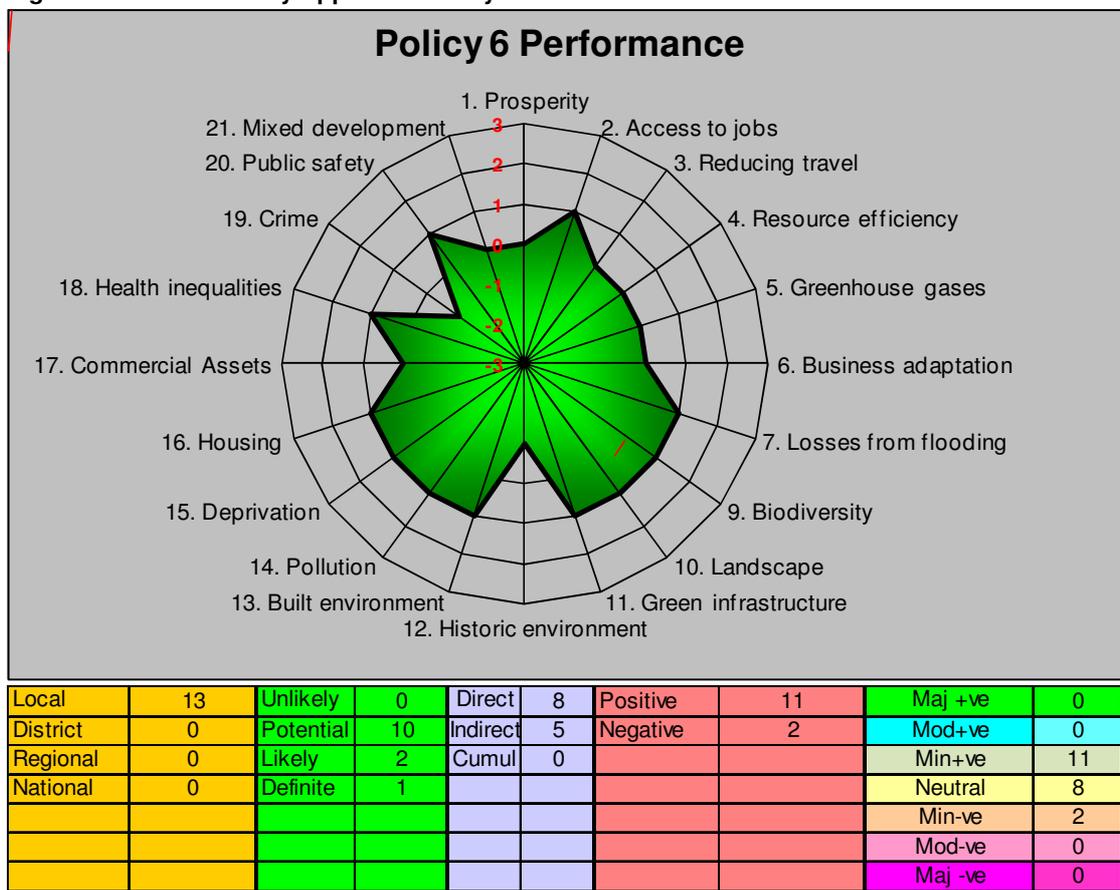
Policy P6 – Provision of Sites for Gypsies and Travellers
<p>The Council will meet the identified need for 38 permanent residential pitches by 2027 as set out in the 2012 Gypsy and Traveller Accommodation Assessment. The provision of pitches to meet this need will be determined through a Gypsy and Traveller Site Allocations Development Plan Document.</p> <p>The following criteria will be used in the allocation of future sites and subject to compliance with other policies in the plan, applications which perform well against the criteria and which contribute to meeting any identified unmet need, will be considered favourably.</p> <p>The priority will be to meet the immediate need for 17 residential pitches by the end of 2012 as identified in the 2008 Gypsy and Traveller Accommodation Assessment. The Council will assess the suitability of existing, well-established sites which do not have a permanent planning permission against the following criteria:</p> <ul style="list-style-type: none"> i. Whether The size and scale of the site and the number of caravans stationed is appropriate to the size and density of the local settled community; ii. Whether Any unacceptable adverse visual impact can be adequately minimised; iii. Whether The site is not in an area prone to flooding; iv. Whether The site has unacceptable any adverse impact on landscape or local nature conservation designations, ecology, and biodiversity or the historic environment, that cannot be mitigated; v. Whether There is no unacceptable any adverse impact on privacy and residential amenity for both site residents and neighbouring land uses; vi. Whether The site has safe and convenient access to the highway network; vii. Whether Local services and facilities such as schools, health facilities, fresh food and employment are accessible by walking, cycling and public transport, or it can be demonstrated that and whether the site is sustainable in other ways. <p>Subject to compliance with other policies in the plan, applications which perform well against the above criteria and which contribute to meeting any remaining identified unmet need to the end of 2012, will be considered favourably.</p> <p>Sites in the Green Belt will not be permitted unless other locations have been considered and only then in “very special circumstances”.</p> <p>The above criteria will also be used in the allocation of any future site (post 2012) and in the determination of any future planning applications that would contribute to meeting any identified unmet need.</p> <p>Provision of pitches beyond 2012 will be determined through a Gypsy and Traveller Site Allocations Development Plan Document in the light of up to date evidence.</p>

Forecast Effects

- 3.9.3 The changes to the policy provide clarity in terms of quantifying the identified need for residential pitches and for establishing the role of the Gypsy and Traveller Site Allocations Development Plan Document.

- 3.9.4 The principle change that has been introduced is to require a site to be considered favourably, when impacts that are considered to be “unacceptable” can be mitigated. The changes introduce greater clarity regarding how the policy would be applied rather than causing a change to the policy intent. Introduction of the term “unacceptable”, raises the question as how this term is to be judged.
- 3.9.5 Given the above, it is considered that there is no material change to the policy and thus the appraisal remains unchanged.
- 3.9.6 This policy was assessed as giving rise to eleven minor positive, eight neutral and two minor negative significant effects (see Figure 3.6). Given the relatively small areas involved and their highly localised influence, effects of minor significance dominate. All of the anticipated effects occur at a local-scale with eight being direct effects and five indirect. The indirect effects focus upon effects upon the natural resource production and environmental enhancement theme and also on community deprivation. Typically there is a low level of certainty surrounding these effects (see Appendix G).

Figure 3.6: Sustainability Appraisal: Policy 6



Managing Uncertainty

- 3.9.7 Ten of the significant effects are associated with potential effects and a further three outcomes are likely or expected to occur. Hence there is considerable uncertainty over the outcome of the appraisal of this policy.

Mitigation & Enhancement

- 3.9.8 The following tables summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies under the themes of natural resource protection and sustainable communities (see Table 3.27 and 3.28).

Table 3.27: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Include provision for the protection of historic assets. 	<ul style="list-style-type: none"> Policy P6 refers to the need for compliance with other policies in the plan. Reference to provision for the protection of historic assets is covered in Policy P16 of the plan. 	<ul style="list-style-type: none"> Consider inclusion of historic assets within clause d) of the policy or within the Gypsies & Travellers DPD.

Table 3.28: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider how the fear of crime in neighbouring communities may be addressed. 	<ul style="list-style-type: none"> The size and scale of Gypsy & Traveller sites and the number of caravans stationed should be appropriate to the size and density of the local settled community will ensure that sites are not a dominant presence. The need for sites to be accessible to local facilities will also help to facilitate integration with neighbouring communities. 	<ul style="list-style-type: none"> Consider these issues within the Gypsies & Travellers DPD.

Alternatives

- 3.9.9 Although site allocations for Gypsy and Traveller accommodation could be included within the Local Plan, it was considered that the level of detail required to address Gypsy and Traveller related development warranted the production of a separate Gypsy and Traveller Site Allocations Development Plan Document.
- 3.9.10 The alternatives available to the Submission draft Local Plan were:
- Not to update to reflect the latest evidence of need;
 - Not to clarify the policy criteria potentially reducing certainty for those proposing new sites;
 - Not making reference to the historic environment as a criterion and not being in accordance with national policy.
- 3.9.11 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.10 Appraisal of Policy 7: Accessibility and Ease of Access²⁰

Introduction

- 3.10.1 The proposed policy on accessibility is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Draft Local Plan.
- 3.10.2 The specific policy commitments are highlighted in the table below. There were no changes introduced for the Submission Local Plan. A summary of the alternatives considered is presented at the end of this section.

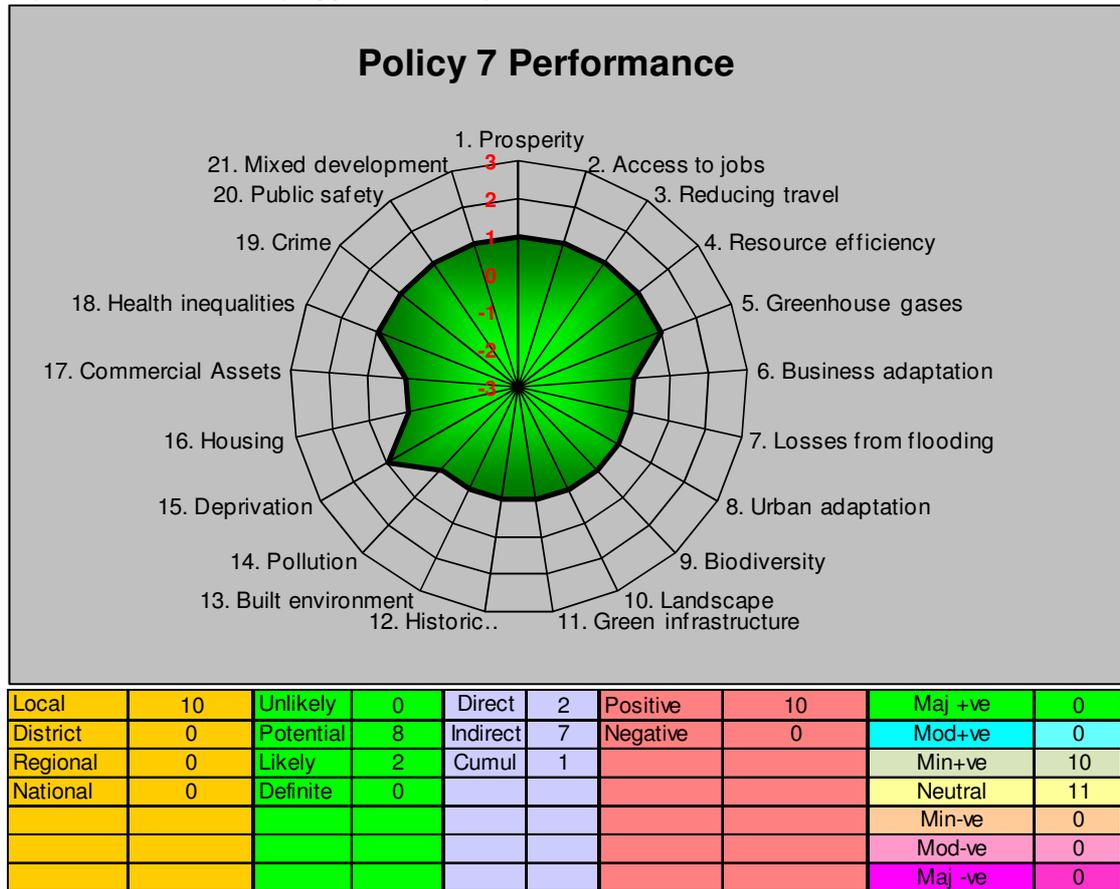
Policy P7 – Accessibility and Ease of Access
<p>All new development should be focussed in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access.</p> <p>Development will be expected to meet the following accessibility criteria, unless justified by local circumstances.</p> <ul style="list-style-type: none"> • Proposed housing development should be: <ul style="list-style-type: none"> ○ Within an 800m walk distance of a primary school, doctor's surgery and food shop offering a range of fresh food; and ○ Within a 400m walk distance of a bus stop served by a commercial high frequency bus service (daytime frequency of 15 minutes or better) providing access to local and regional employment and retail centres; and / or ○ Within an 800m walk distance of a rail station providing high frequency services (3 or more per hour during peak periods) to local and regional employment and retail centres. • Proposed offices, retail and leisure development should be located in town centres, or other established locations including Birmingham Business Park, Blythe Valley Business Park, Birmingham Airport and NEC, as defined in Policies P1, P2 and P19. Here and elsewhere they should be within a 400m walk distance of a bus stop served by a commercially run high frequency bus service. • Proposed education, health and other public service facilities should be located where they are easily accessible on foot, by bicycle and bus by the local community they serve. • Proposals for change of use are likely to be resisted if they reduce accessibility to levels below those listed in this policy. <p>Investment in improvements to local public transport provision, cycling and / or walking measures will be sought in association with development proposals which do not meet the accessibility criteria set out by this policy.</p> <p>Residential development proposals for fewer than 3 dwellings in urban areas west of M42 and within rural settlements will be exempt from the criteria set out above. Investment in improvements to local public transport provision, cycling and / or walking measures will continue to be sought in association with such proposals where considered necessary.</p> <p>Access to development from the strategic walk, cycle, public transport and road network will be expected to be:</p> <ul style="list-style-type: none"> • Safe, attractive, overlooked and direct on foot, by bicycle and from public transport. • Safe for those vehicles which need to access the development. • And assessed in accordance with Policy P15 'Securing Design Quality' in the Local Plan.

²⁰ Formerly was Emerging Core Strategy Policy 2.

Forecast Effects

3.10.3 This policy performs in a slightly positive manner with ten of the twenty one sustainability objectives reporting a minor beneficial outcome with 1 minor negative effect (see Figure 3.7 and Appendix G). All of the effects are considered to be of a local scale reflecting the manner in which the accessibility criteria are applied to individual development sites.

Figure 3.7: Sustainability Appraisal: Policy 7



3.10.4 The majority of the effects associated with the sustainability objectives are indirect (8) occurring primarily under the sustainable consumption and production theme where minor positive outcomes are anticipated for prosperity, access to jobs, reduced travel and resource efficiency.

3.10.5 The policy supports development in the most accessible locations, however the distance criteria proposed for residential development ought to be reviewed in the context of the housing allocations to confirm their applicability, particularly the distance to commercial high frequency bus services. It does not directly contribute towards regeneration as the policy does not highlight areas where improved accessibility may provide the greatest returns such as the North Solihull Regeneration Area. Nevertheless, improved accessibility for those reliant upon public transport may enhance access to employment and training and hence prosperity.

3.10.6 Should the policy be effective in promoting development in those areas with high levels of accessibility then there is a potential that this could contribute towards lowering greenhouse gas emissions. There are no other outcomes envisaged for the climate change and energy or natural resource protection and environmental enhancement themes.

3.10.7 In terms of the sustainable communities theme, the policy focuses upon the location of development and also provides for the enhancement of other facilities or measures to improving accessibility. It is concluded that the sustainability outcomes of policy are dependent upon local circumstances.

Managing Uncertainty

3.10.8 Eight of the ten positive outcomes all were viewed as having the potential to occur. Two likely positive outcomes were associated with crime and public safety. There were no likely or definite outcomes. This uncertainty results from the focus of the policy upon the location of development which represents only part of the equation in causing behavioural change that improved accessibility and ease of access could deliver.

Mitigation and Enhancement

3.10.9 The following tables (Tables 3.29 to 3.32) summarise the suggestions presented in the Sustainability Appraisal of the Emerging Core Strategy Policies; the response from the Council and further observations that emerge from the appraisal of the Consultation and Submission draft Local Plan policies for each of the four sustainability themes.

Table 3.29: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require accessibility and development measures to avoid or compensate for the loss of sites or premises providing important local facilities that are the last of the kind for the local community? 	<ul style="list-style-type: none"> Policy seeks to avoid reduced accessibility levels, and Policy 18 resists the loss of community and social infrastructure. 	<ul style="list-style-type: none"> None.

3.10.10 While the policy focuses on accessibility by people, it is suggested that there is a potential to influence accessibility to decentralised energy and heat networks. Over the longer term, where development is located could affect the viability of local energy and heat networks. Hence amongst the criteria by which development could be judged could be its proximity to existing or potential energy and heat networks.

Table 3.30: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider prioritising development that enhances accessibility to decentralised/energy or heat networks. 	<ul style="list-style-type: none"> Policy 9 promotes the development of decentralised networks through a sequential approach. 	<ul style="list-style-type: none"> It is suggested that development that enhances the accessibility to energy and heat networks should be encouraged.

3.10.11 The Emerging Core Strategy policy 2 sought to improve accessibility to key local services in the North Solihull Regeneration Zone. The current policy extends the requirement to contribute to improving accessibility to key local services across the entire Borough. The relationship between housing density and access to employment and other services is also now considered under policy 5.

Table 3.31: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Explore the potential conflict between delivering housing at the highest density with access to green space and the ability to grow local food. 	<ul style="list-style-type: none"> The importance of green space is recognised in Policies 11, 15 and 20, whilst Policy 18 supports proposals with good access to healthy food. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider clause to ensure that higher densities does not implies loss of valued open space and impaired townscape qualities. 	<ul style="list-style-type: none"> Policy 15 seeks to ensure high quality design and Policy 20 protects important open space. 	<ul style="list-style-type: none"> None.

3.10.12 The Draft Local Plan policy provided support for high density housing where access to health, fresh food, education and employment. Accessibility has been defined in the Draft Local Plan policy as a 800m walk distance.

3.10.13 The policy establishes distance thresholds for currently viable public transport services. Consequently any additional public transport use that might contribute towards the viability of a service appears not to be relevant. Consideration could be given to the potential for new development proposals to improve the viability of non-commercial public transport services and thus sites may then be regarded as being acceptable where they improve the viability of subsidised public transport services.

Table 3.32: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider importance of accessibility to those currently disadvantaged by poor levels of access to employment. 	<ul style="list-style-type: none"> Covered in overall strategy and justification to policy, whilst P1 seeks to improve access to jobs. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider the accessibility needs of an increasingly elderly population with reduced mobility and increased reliance upon public or community transport. 	<ul style="list-style-type: none"> Ease of access and accessibility for all users within the community is emphasised in the policy. The Accessibility SPD will give greater detail on how the accessibility criteria could be met. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider the extent to which new development may provide a critical mass that supports/ enables viable public transport networks to be established. 	<ul style="list-style-type: none"> This has been considered as part of the site allocations, and accessibility is one of the prime criteria in choosing the sites. The running of these services, however, is the responsibility of public transport operators 	<ul style="list-style-type: none"> Consideration could be given to whether new development proposals could improve the viability of non-commercial public transport services.
<ul style="list-style-type: none"> Promote accessibility without the need for non-motorised users to traverse busy roads. 	<ul style="list-style-type: none"> Policy 8 requires that routes to the site from nearby services and local public transport stops are good quality, direct and attractive to use for all users. Policy 7 states "Access to development from the core walking, cycling, public transport and road networks will be expected to be safe, attractive, overlooked and direct on foot, by bicycle and from public transport." The potential for relieving severance will be considered in Development Briefs and through the development management process. 	<ul style="list-style-type: none"> All forms of severance should be considered when examining individual development proposals.
<ul style="list-style-type: none"> Consider if housing sites compromise small employment sites or whether employment sites compromise longer term housing needs. 	<ul style="list-style-type: none"> Addressed through Policies 1, 3 and 5. 	<ul style="list-style-type: none"> None.

Alternatives

3.10.14 More specific criteria were considered for the location of proposed offices, retail and leisure development. However, these were thought to be overly restrictive.

3.10.15 Not all development will be feasible in the most accessible locations, hence the clause that investment in improvements to local public transport provision, cycling and / or walking measures will be sought in

association with development proposals which do not meet the accessibility criteria set out by the policy. More detail will be provided in the Accessibility SPD.

- 3.10.16 Residential infill development (less than 3 dwellings) west of the M42 and rural settlements will be exempt from the policy. Initially all residential development would have needed to comply with the policy.
- 3.10.17 A policy on 'Ease of Access' was to be included separately, but it was decided to merge Accessibility (location of development) and Access (getting to and around development) as they both form key elements of managing travel demands and influencing travel behaviour.
- 3.10.18 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.11 Appraisal of Policy 8: Managing Demand for Travel and Reducing Congestion

Introduction

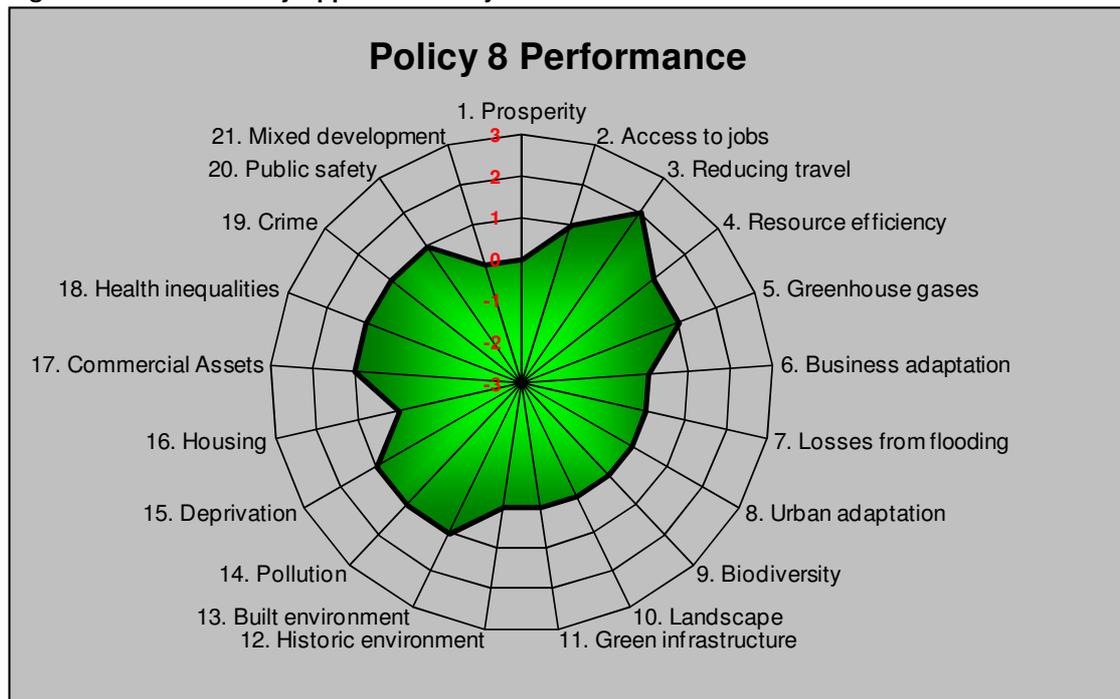
- 3.11.1 The proposed policy on transport demand and congestion is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the draft Local Plan. No changes were introduced for the Submission Local Plan.
- 3.11.2 At the end of this section a summary of the alternatives considered is provided.

Policy P8 – Managing Demand for Travel and Reducing Congestion
<p>All development proposals should have regard to transport efficiency and improved highway safety for all users:</p> <ul style="list-style-type: none"> • Development will not be permitted which results in a significant increase in delay to vehicles, pedestrians or cyclists or a reduction in safety for any users of the highway or other transport network. • Travel demands associated with development should be managed to minimise detrimental impact to the efficiency of the highway network; • Ensure new development reduces the need to travel e.g. by promoting linked trips and encouraging mixed use development where appropriate; • Provision for parking and servicing will be required in accordance with an SPD on managing travel demands associated with development. • The Council will support proposals for local Park and Ride at appropriate railway stations subject to other policies in the Local Plan; • Off-site parking provision proposed in association with economically important sites will be supported, subject to other Policies in the Local Plan, where sustainable transport links between those sites and the parking provision are of a good quality, direct and attractive to use. <p>The use of sustainable modes of transport, i.e. walking, cycling and public transport, shall be promoted and encouraged in all developments by:</p> <ul style="list-style-type: none"> • Ensuring the design and management of the development enables and encourages the use of sustainable modes of transport; • Ensuring transport planning measures are implemented to help and encourage people accessing the development to use sustainable transport modes; • Ensuring the routes to the site from nearby services and local public transport stops are good quality, direct and attractive to use for all users.

Forecast Effects

- 3.11.3 Tacking both transport demand and congestion gives rise to one major potential positive outcome (reducing the need to travel although this is tempered by the policies requirement to have regard to improved transport efficiency and safety which contrasts with the need to promote and encourage sustainable modes. This sets up a potential contradiction as increased highway traffic leading to delay and reduced safety is envisaged to impede the promotion of sustainable transport modes.
- 3.11.4 The other impacts are either neutral or minor beneficial (see Figure 3.8) and localised in their geographic extent with typically impacts having a three to ten year duration. The six direct benefits are associated with Access to jobs; Reducing travel; Resource efficiency, Built environment, Crime and Public safety (see Appendix G).

Figure 3.8: Sustainability Appraisal: Policy 8



SA Objective		Likely Significant Effects				Rationale			
3.Reducing travel		Mod+ve				The policy has the potential to reduce the travel demands of development and manage the amount of parking provided.			
Local	9	Unlikely	0	Direct	6	Positive	11	Maj +ve	0
District	2	Potential	10	Indirect	2	Negative	0	Mod+ve	1
Regional	0	Likely	1	Cumul	3			Min+ve	10
National	0	Definite	0					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

- 3.11.5 In term of the sustainability theme of sustainable consumption and production, the revised policy no longer makes reference to the need to encourage journeys to be made by train and public transport in North Solihull. Consequently, the policy no longer provides support for the sustainability objective “To contribute to regeneration and economic development initiatives spatially targeted towards on specific community groups”. The policy also dispenses with an emphasis upon promoting north-south public transport connections suggesting any potential benefits of improved accessibility in areas of deprivation would not be as strategic and structured as with the former policy.
- 3.11.6 While the policy has the potential to assist with reducing greenhouse gases, and reducing pollution as noted above, these outcomes are uncertain due to the need for development proposals to “have regard to transport efficiency”.
- 3.11.7 The outcomes across the sustainable communities theme are a mixture of direct, cumulative and indirect minor beneficial outcomes being dependent upon local circumstances for delivery.

Managing Uncertainty

- 3.11.8 Overall the policy provides increased uncertainty in the delivery of outcomes since development proposals are required to “have regard to” rather than “to promote” transport efficiency and highway safety. However, in contrast, all development proposals are to promote and encourage all forms of sustainable transport. As noted earlier this may give rise to some contradictions in the application of the policy.

3.11.9 Ten of the eleven beneficial effects are considered to be potential outcomes; the remaining likely outcome being that of enhancements to the built environment as a result of promoting and encouraging sustainable modes that are of good quality, direct and attractive.

Mitigation and Enhancement

3.11.10 Mitigation and enhancement measures identified under all four sustainability themes are identified below.

3.11.11 It is noted that the revised policy no longer provides support for measures to increase access to train services in North Solihull or address the importance of north/south transport links. Essentially the policy now lacks the spatial focus of the Emerging Core Strategy. The absence of this focus reduced the performance of the policy against the prosperity and access to jobs sustainability objectives.

3.11.12 It is noted that the policy does not consider the safeguarding of land needed for transport infrastructure. A further observation concerning performance across the sustainable consumption and production theme is that the transport policy perhaps could be tied more directly towards enhancing prosperity and reducing inequalities across the Borough through a focus on accessibility to jobs.

3.11.13 Table 3.33 sets out specific comments and some additional proposals based upon the Consultation and Submission draft Local Plan policy as well as the proposals made for the Emerging Core Strategy policies.

Table 3.33: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> The basis for determining a reduction in the need to travel and the promotion of linked trips as a result of new development requires clarification. 	<ul style="list-style-type: none"> Emerging policy 13 has been clarified such that reductions in the need to travel are from measures such as promoting linked trips and encouraging mixed use development where appropriate. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require significant planning applications to produce 'Green Travel Plans'. 	<ul style="list-style-type: none"> The policy requires all developers to have regard to transport efficiency and improved highway safety. See also Draft Local Plan para 9.3.11 that requires Transport Assessments and Travel plans in accordance with details in SPD. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Clarify the benefit of locating Park and Ride facilities at railway stations. 	<ul style="list-style-type: none"> See Policy P8 - Support for Park and Ride is about promoting transport efficiency and highway safety. 	<ul style="list-style-type: none"> Ensure that the park & ride proposals do not lead to increased traffic movements leading air quality issues.
<ul style="list-style-type: none"> Consider how potentially conflicting objectives between supporting development in locations well served by public transport or in locations minimise the need to travel and the protection of open space or the natural environment. 	<ul style="list-style-type: none"> See Policy 20 – Seeks to protect/ enhance open space. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Development proposals that generate significant quantities of freight could be directed to areas close to inter-modal freight facilities. 	<ul style="list-style-type: none"> See Draft Local Plan para 9.3.12 to 9.3.14. 	<ul style="list-style-type: none"> None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Opportunities to develop freight consolidation centres could be explored in association with the re-development of Solihull Town Centre. 	<ul style="list-style-type: none"> Solihull Town Centre will not be extensively redeveloped. Unlikely to provide scope for freight consolidation centres. 	<ul style="list-style-type: none"> None.

3.11.14 It is noted that the policy does not provide a mechanism for helping to deliver the legislated reduction on greenhouse gas emissions. Indeed it does not make any reference to reducing emissions or adaptation to climate change directly or provide links with policy 9 – climate change.

3.11.15 Table 3.34 below provides a summary of the measures proposed in the earlier Sustainability Report for the Emerging Core Strategy along with additional proposals to address the climate change and energy sustainability theme.

Table 3.34: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> In evaluating options for the Hockley Heath bypass, Knowle Relief Road and Balsall Common bypass and route improvements to the A34, A41 and A452 consider assessing not only the carbon dioxide emissions of the highway and network, but also the embodied energy used as a result of their alignment and construction practices. 	<ul style="list-style-type: none"> Proposals removed from policy. See Draft Local Plan para 9.3.15 to 9.3.19 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consideration could be given to the use of consolidation centres with town centre deliveries using dedicated low carbon vehicles. 	<ul style="list-style-type: none"> See Policy P9. Could be one of the 'adaptation measures' (7th para) 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider a policy requiring the adoption of cool pavement surfaces that reflect rather than absorb the sun such as light coloured cement, reinforced grass pavement, as well as the use of shading trees. 	<ul style="list-style-type: none"> Policy P15 requires developments to achieve 'highest possible standard of environmental performance'. This could include, where appropriate, the measures suggested. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Provide policy support that facilitates car-pooling, electric vehicle use as well as digital connectivity and infrastructure. 	<ul style="list-style-type: none"> See Policy P9. Could be one of the 'adaptation measures' (7th para). 	<ul style="list-style-type: none"> Consider requiring major development proposals with large parking capacity to set aside dedicated car pool and electric vehicle charging points or address through a Parking SPD. Consider requiring developers providing on-site car parking to demonstrate why renewable energy generation would not be viable or address through a Parking SPD.

3.11.16 It is not evident how the Council's biodiversity duty is being addressed through the policy. Other proposals can be found below in Table 3.35.

Table 3.35: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider the extent to which sustainable urban drainage and ecological enhancement measures can be incorporated into transport projects to be delivered during the plan period. 	<ul style="list-style-type: none"> Requirements for Sustainable Urban Drainage are set out in Policy 11. 	<ul style="list-style-type: none"> None.

- 3.11.17 Under the revised policy the cumulative effects of enhanced sustainable transport with an emphasis upon north-south connections and links with North Solihull as provided by the Emerging Core Strategy policy is no longer present to support other measures reducing deprivation.

Table 3.36: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider establishing policies to address the community severance and the pedestrian environment to promote public safety in areas of traffic congestion. 	<ul style="list-style-type: none"> Severance is an amenity issue Policy P14 seeks to minimise amenity impacts. Policy 7 requires access to development to be safe whether on foot or by vehicle and to accord with Policy P15 on design. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Explore whether the communities in North Solihull likely to be those that would benefit from improved train services or whether the HS2 line would give rise to social forces leading to the displacement of the existing communities through inward migration. 	<ul style="list-style-type: none"> The impacts, mitigation of and benefits of HS2 will be dealt with through an Action Area Plan or other mechanism at the appropriate time. See Draft Local Plan para 9.3.20 to 9.3.22 	<ul style="list-style-type: none"> None.

Alternatives

- 3.11.18 The Emerging Core Strategy included three transport related policies – Policy 2: Accessibility, Policy 13: Managing Traffic Demand and Reducing Congestion and Policy 14: Supporting Sustainable Transport, which provided the directional basis for the development of firm policies within the Local Plan.
- 3.11.19 Consideration was given by the Council to retention of three separate policies. It was decided however, that the substance of Policies 13 and 14 (managing traffic demand, reducing congestion and supporting sustainable transport) could be more succinctly and precisely catered for in a single policy – Policy P8: Managing Demand for Travel and Reducing Congestion.
- 3.11.20 Retention of Balsall Common, Hockley Heath and Knowle Bypass Improvement Lines was considered when developing the Local Plan, concluding that the need for such improvement lines no longer exists. Furthermore, transport policy is now focussed more towards the management of traffic demands, encouraging a shift away from car use and towards public transport, walking and cycling. Consideration was given as to whether or not reference should be made to the Improvement Lines within Policy P8 or within related supporting text, the latter option being chosen.
- 3.11.21 In consideration of past events, the Council does not consider that justification exists to make specific provision in the Local Plan for Motorway Service Areas. Reference to MSAs is therefore made within the supporting text to Policy P8 rather than the policy itself.
- 3.11.22 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.12 Appraisal of Policy 9: Climate Change

Introduction

- 3.12.1 This section presents a review of the appraisal of the Draft Local Plan policy on climate change against the SA objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below. Justification for the policy is presented in the Draft Local Plan.
- 3.12.2 The changes proposed clarify the intent of the Council to take account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. It also recognises the need to ensure that all sections of the community, but particularly older people, children and disabled people are more resilient to the effects of climate change. As such there is no change to the policy.
- 3.12.3 In July 2010 the Government confirmed its commitment to ensure that from 2016 new homes can be zero carbon. Zero carbon homes are achieved through Carbon Compliance consisting of building design measures and reducing CO₂ emissions on-site through low and zero carbon technologies and connected heat networks. The remaining carbon emissions are to be mitigated through "Allowable Solutions", which secure carbon savings beyond the site.
- 3.12.4 For the 2016 Building Regulations there is to be a change from design to building performance in terms of energy for new houses. As a result, the focus is turning from theoretical energy savings and towards the delivery of actual savings. Consequently, it is appropriate that the policy set out below provides for the systematic monitoring of energy use and carbon emissions linking into a Borough-wide monitoring system.

Policy P9 - Climate Change

The Council will take full account of national and local targets for reducing greenhouse gas emissions and increasing the generation of energy from renewable and low carbon sources, when considering the location and design of new development. It will support the establishment of Renewable Energy Service Companies and community-led initiatives to reduce energy use and exploit renewable energy sources within the Borough. Where appropriate, improvements to the energy standards of existing buildings through national and local initiatives such as the Affordable Warmth strategy for Solihull and the Government's Green Deal will be promoted.

Developers will be expected to follow a sequential approach to carbon reduction for all new development. Where feasible and viable, new development should incorporate decentralised energy and heating networks. Where it is demonstrated that decentralised networks are not feasible or viable, development should achieve the necessary carbon reduction through on-site measures incorporating design, energy efficiency and renewable energy generation, **taking account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. Where it is demonstrated that carbon reduction through on-site measures is not feasible or viable, a financial contribution toward off-site carbon reduction will be required, in the form of allowable solutions.**

Proposals to develop decentralised energy and heating networks in the Borough will be encouraged and should be based on the latest available evidence. Any impacts from infrastructure, including on-site low carbon and renewable energy installations, on the surrounding natural, built and historic environment, including ground and surface water quantity and quality, or on residents or businesses will be considered, with significant weight to be given to the reduction of greenhouse gas emissions to be achieved. Where adverse impacts are identified, these should be minimised, or be subject to appropriate mitigation. In locations where decentralised energy and heating networks or off-gas networks exist, or have the greatest potential, such as Solihull, Shirley and Chelmsley Wood town centres, North Solihull Regeneration Zone hubs, and major business parks and developments, **developments of an appropriate scale, density and/or mix will be encouraged and developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible.**

Where lower cost solutions such as decentralised networks are viable, developers should aim to achieve zero carbon for all new developments in excess of 50 dwellings or 1,000 square metres, unless it is demonstrated that this is not feasible or viable. Where decentralised networks are not feasible or viable at the time of application, developers will be expected to show evidence in the design of the development to enable future adoption of decentralised networks.

In locations where decentralised networks do not exist and are shown to be unviable, or where the scale or nature of the development is unsuitable, on-site energy efficiency measures and low or zero carbon energy generation shall be provided to meet a minimum of 20% of predicted energy requirements. Developers will be expected to demonstrate the highest viable energy efficiency standards through the location and layout of developments and the use of materials and construction techniques that minimise emissions. Where viable, higher level standards of the Code for Sustainable Homes will be encouraged.

Where ‘allowable solutions’ are used to offset carbon emissions, the Council will give priority to the funding of projects within the Borough.

This policy aims to ensure that all sections of the community are more resilient to the effects of climate change, particularly older people, children and disabled people. Developers should ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development through consideration of a range of adaptation measures, including the location, design, materials, build and operation of developments, and the provision of green infrastructure. Further guidance will be provided to assist the delivery of sustainable design and construction in a Sustainable Design and Construction document, which will include appropriate ‘allowable solutions’.

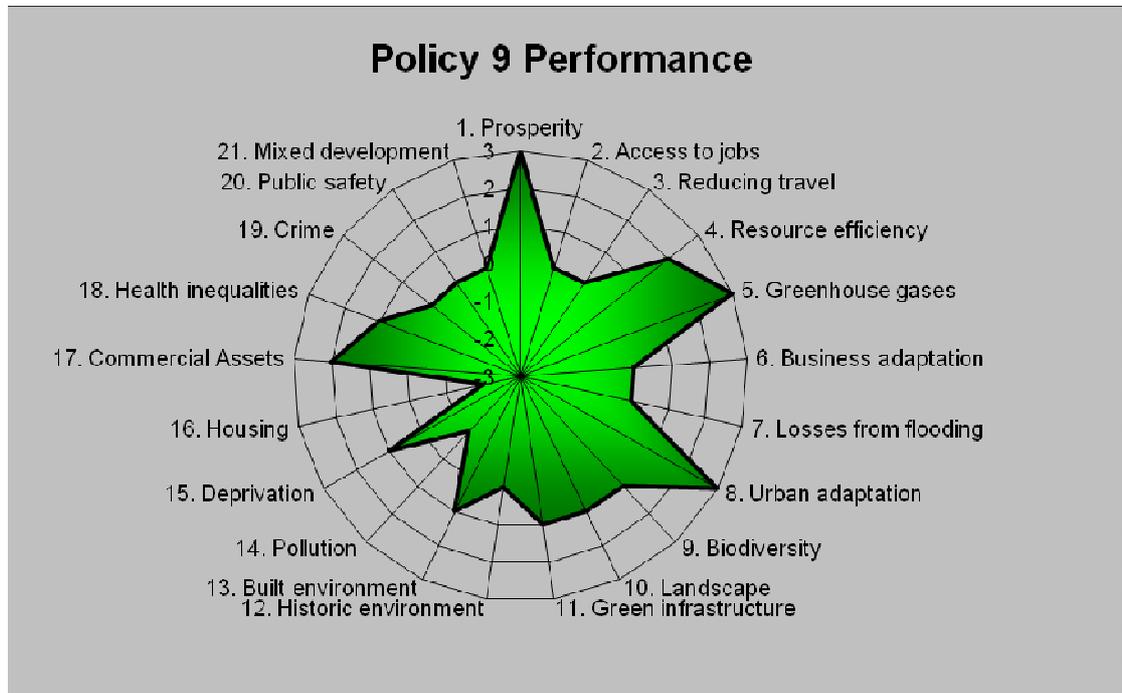
All new developments shall provide for systematic monitoring of the energy use and carbon emissions with the capability of linking into a Borough-wide monitoring system, unless it is demonstrated that such monitoring is unnecessary. All applications shall include evidence to show compliance with this policy in the form of an energy or sustainability statement and/or within the format of the West Midlands Sustainability Checklist or an agreed equivalent.

Forecast Effects

- 3.12.5 The proposed policy represents a major advance on the policy provided in the Emerging Core Strategy. However the policy does not address directly the role that water conservation plays in the reduction in carbon emissions, although this could be addressed the housing site development briefs.
- 3.12.6 This policy performs in a positive manner with eleven of the twenty-one sustainability objectives reporting beneficial outcome, three major positive (prosperity, greenhouse gases and urban adaptation) and two moderate positive outcomes as illustrated in Figure 3.9 and Appendix G. The policy potentially risks a contribution towards a moderate negative effect upon the viability of housing schemes in the context of the 2016 Building Regulations with the zero carbon requirements.
- 3.12.7 Apart from a moderate adverse effect upon housing due to issues of viability, one minor adverse effect is associated with potential effects due to possible air/odour effects associated with certain renewable energy systems.
- 3.12.8 While the potential effect upon the regional business park assets could have been the only effect of regional scale, Policy 1 exempts the regional assets from the climate change policy.
- 3.12.9 The effects arising from the policy are anticipated to be long term (greater than 10 years) although resource efficiency, biodiversity, deprivation and health inequalities) are considered to occur over a 3 to 10 year period based upon the potential for other external factors to affect the outcomes.
- 3.12.10 A total of five indirect effects are anticipated, all related to the potential for consequences upon the natural resource protection and environmental enhancement theme and the commercial assets and health sustainable communities objectives. These consequences are indirect since they are a product of how the policy is complied with on individual projects rather than due to the policy itself.
- 3.12.11 There are seven direct and one cumulative effect that are anticipated. The direct effects are associated with the prosperity, resource efficiency; landscape, green infrastructure and deprivation (see Appendix G).
- 3.12.12 In terms of the sustainable consumption and production theme, the policy is envisaged to be likely to give rise to a major beneficial outcome focusing energy and heat networks in areas where benefits to businesses and local communities may provide energy savings. Also, the delivery of affordable solutions within the Borough is also likely to provide employment opportunities.

- 3.12.13 The policy is envisaged to give rise to moderate beneficial outcome for resource efficiency.
- 3.12.14 Being focused upon climate change, the policy is expected to deliver reductions in greenhouse gas emissions and also aid urban adaptation, in both cases resulting in major beneficial outcomes.

Figure 3.9: Sustainability Appraisal: Policy 9



Objective	Likely Significant Effects	Rationale
1. Prosperity	Maj+ve	This policy identifies the North Solihull Regeneration Zone, town centres as well as major business parks as locations where decentralised energy and heating networks will be encouraged. It also promotes the establishment of Renewable Energy Service Companies. The savings being made by residents should help offset increasing energy costs and thereby aid prosperity as well as securing employment in the energy market. The policy also sets out that Allowable Solutions fund projects are to be prioritised for delivery within the Borough. Capitalising on opportunities could result in the location becoming an attractive area in which to invest.
5. Greenhouse gases	Maj+ve	The minimisation of greenhouse gas emissions is a key focus of this policy. It is suggested that the approach taken to the promotion of decentralised energy and heating networks is strong. A 20% standard for energy efficiency, low carbon or renewable energy has been set.
8. Urban adaptation	Maj+ve	Developers are to ensure resilience in the development to the impacts to climate change through a range of measures. Allowable solutions will permit adaptation measures within the Borough.
4. Resource efficiency	Mod+ve	The policy ought to lead to the more efficient use of energy particularly within new homes and potentially in existing homes via distributed heat networks.

Objective		Likely Significant Effects			Rationale				
17. Commercial assets		Mod+ve			This policy promotes decentralised energy and heat networks in 'major business developments' or where not viable onsite low or zero carbon energy is to meet 20% of predicted energy demand. This policy would have the potential to encourage regional assets to reflect wider needs while not compromising their own development were it not for Policy 1 to exempt the regional assets from the Local Plan policies.				
16. Housing		Mod-ve			A viability test is to be applied in seeking higher level standards of the Sustainable Homes. Viability tests are also to be applied for decentralised networks such that negative effects upon housing provision are unlikely. However the 2016 Zero Carbon Standard for new homes will pose additional costs which unless other factors change will impact on the viability of new housing schemes.				
Local	7	Unlikely	0	Direct	7	Positive	11	Maj +ve	3
District	5	Potential	8	Indirect	5	Negative	2	Mod+ve	2
Regional	1	Likely	3	Cumul	1			Min+ve	6
National	0	Definite	2					Neutral	8
								Min-ve	1
								Mod-ve	1
								Maj -ve	0

- 3.12.15 In terms of the effect of the policy upon the natural resource protection & environment theme, four of the outcomes are judged to be minor positive with the a minor negative outcome for pollution and neutral for the historic environment.
- 3.12.16 By recognising that certain community groups have the potential to benefit from the policy and given the importance of income deprivation and domestic heating, particularly to the elderly and those with long term illness, the policy has the potential to contribute to reducing deprivation and health inequalities.
- 3.12.17 Though not referenced in this policy, the value of green infrastructure in reducing the urban heat island effect is addressed in policy 12.

Managing Uncertainty

- 3.12.18 The policy, alongside the 2016 Building Regulations, is expected to contribute to reduced emissions and enhanced adaptation to the effects of climate change. The policy is anticipated to either definitely or likely to contribute towards five sustainability objectives three of which are assessed as being major beneficial, with the other two being moderate and minor beneficial.
- 3.12.19 A total of four potential outcomes are anticipated across the natural resource protection and sustainable communities themes. The judgement that the policy results in these potential outcomes is a reflection of the fact that the consequences upon biodiversity, green infrastructure, historic environment, built environment, pollution, housing and commercial asset sustainability objectives can only be determined at a project level when the specific circumstances that dictate the outcome are known.
- 3.12.20 The potential for beneficial effects upon deprivation and health inequalities is a reflection of the uncertainty on how the application of the policy would be targeted to benefit those groups with the greatest potential to benefit.

Mitigation and Enhancement

- 3.12.21 The appraisal of the Emerging Core Strategy policy on climate change (policy 1) gives rise to proposals for mitigation/ enhancement across the four sustainability themes. A large number of these proposals have been adopted in the Consultation and Submission draft Local Plan policy. In addition, several aspects are addressed through policy 11 - water management. It is suggested that perhaps cross referencing to these policies could avoid any potential uncertainty.

3.12.22 Most recommendations under the Sustainable Consumption and Production theme have been incorporated into revised policy which relies on a Sustainable Construction and Design document (see Table 3.37).

Table 3.37: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require developers of major sites to demonstrate how their design has considered options for reducing operational energy consumption and carbon emissions including by making reference to the main energy intensive operational activities to be undertaken on site. 	<ul style="list-style-type: none"> All applications will be required to include evidence to show compliance with this policy in the form of an energy statement. 	<ul style="list-style-type: none"> Larger businesses within the M42 corridor are to have “regard to” this policy.
<ul style="list-style-type: none"> Require developers to demonstrate that they have considered the use of materials and construction techniques that minimise carbon emissions. 	<ul style="list-style-type: none"> Policy requires consideration of materials and construction techniques to minimise emissions. 	<ul style="list-style-type: none"> As above.
<ul style="list-style-type: none"> Require developers to provide evidence that durability and low maintenance of structures and components have been actively considered in design and specification. 	<ul style="list-style-type: none"> Resilience to the impacts of a changing climate for the anticipated lifespan of the development, including the location, design, materials, build and operation of the development is to be considered. 	<ul style="list-style-type: none"> The Sustainable Design and Construction document will need to be kept relevant to emerging building technologies.
<ul style="list-style-type: none"> Develop a policy aimed at the establishment of Renewable Energy Service Companies to exploit the renewable energy sources available to the Borough. 	<ul style="list-style-type: none"> A Renewable Energy Service Company is to be promoted. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Promote the location and layout of new development so as to deliver the highest viable energy efficiency, including through the adoption of decentralised energy, reduce the need to travel and secure the highest possible share of trips made by sustainable travel. 	<ul style="list-style-type: none"> The location and layout of development are recognised as important considerations in enhancing energy efficiency and reducing emissions. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Adopt a sequential test for major development once locations offering viable energy strategies are identified. 	<ul style="list-style-type: none"> Developers are expected to adopt a sequential approach to carbon reduction for new development. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Explore integration of waste management with the provision of decentralised energy. 	<ul style="list-style-type: none"> Policy 12 includes a criterion to reduce greenhouse gas emissions. 	<ul style="list-style-type: none"> Potentially addressed in the Sustainable Design and Construction document.
<ul style="list-style-type: none"> Promote the co-location of potential heat suppliers and major users. 	<ul style="list-style-type: none"> Decentralised networks to be based on evidence, including location of major heat users. 	<ul style="list-style-type: none"> Potentially covered by the policy but could be made clearer.
<ul style="list-style-type: none"> Support existing and new shops and services within walking distances of people’s homes. 	<ul style="list-style-type: none"> Addressed in Policies 7 and 19. 	<ul style="list-style-type: none"> None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Promote the adaptation of businesses to both the direct effects of climate change and the indirect effects on the price of carbon and the economic drivers for low carbon goods and services. 	<ul style="list-style-type: none"> Developers are required to ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development through consideration of a range of measures. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Review the role of Sustainable Design and Construction document in relation to all major development and also clarify the intended scope/contents.

3.12.23 In responding to the climate change and energy sustainable development theme enhancement proposals, the proposed policy adopts the majority of the measures put forward for consideration.

3.12.24 While the main task to emerge is to address some of the detailed enhancement proposals within the Sustainable Construction and Design document, the revised policy raises a further set of enhancement measures to be considered as set out in Table 3.38. There are some key recommendations set out dealing with Carbon Compliance, Allowable Solutions, monitoring and enforcement.

Table 3.38: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider the adaptation measures that are appropriate for building and urban design such as brown/green roofs, urban cooling areas to lessen thermal stress for the elderly, flexibility in the use of buildings. 	<ul style="list-style-type: none"> Consideration of adaptation measures is required. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require developers agree run-off rates within flood risk zone 1 with the Environment Agency. 	<ul style="list-style-type: none"> Policy 11 provides for restriction of runoff rates to Greenfield situations. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require new major development to demonstrate contributions towards national greenhouse gas emission targets. 	<ul style="list-style-type: none"> A key aspect of the policy. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require developers seeking consent for projects of a given size to a) submit evidence that they have considered the extent to which local heat sources could be networked into their proposal or b) that they have considered the practicality of making provision for future decentralised energy networks. 	<ul style="list-style-type: none"> Developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible. Developers will be expected to show evidence in the design of the development to enable future adoption of decentralised networks. 	<ul style="list-style-type: none"> Could add a sentence to P9 to ensure development s do not sterilise sites for distributed heat and energy networks.
<ul style="list-style-type: none"> Require developers to show consideration of the application of green/brown roof solutions particularly as part of sustainable urban drainage solutions. 	<ul style="list-style-type: none"> Policy allows flexibility in choice of solutions. Guidance to be provided in SPD. 	<ul style="list-style-type: none"> Include green/ brown roofs and SUDs within the Sustainable Construction and Design document.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require developers to provide for systematic monitoring of the energy use and carbon emissions with the capability of linking into a Borough-wide monitoring system. 	<ul style="list-style-type: none"> Proposal adopted. 	<ul style="list-style-type: none"> Consider including this element within the Authority Monitoring Report once the system is established.
<ul style="list-style-type: none"> Require developers to show evidence of giving consideration to the use of energy from renewable/low carbon sources. 	<ul style="list-style-type: none"> Zero or low carbon sources are required to deliver 20% of predicted energy requirements where no connection to decentralised heat or energy network is in place. 	<ul style="list-style-type: none"> Consider whether the 20% requirement should reflect the type of housing being provided.
<ul style="list-style-type: none"> To minimise the impact of overheating, new commercial and residential development should demonstrate reduced reliance on air conditioning systems, integrate green infrastructure and where feasible provide an accessible green roof. 	<ul style="list-style-type: none"> Consideration of adaptation measures is a requirement. 	<ul style="list-style-type: none"> Consider including suitable measures within the Sustainable Construction and Design document.
<ul style="list-style-type: none"> Require developers to show evidence of providing flexibility in their design for the future adoption of renewable energy technologies. 	<ul style="list-style-type: none"> To be captured through the Sustainable Construction and Design document. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require developers to consider the impacts of climate change when planning the location, design, build, and operation of their development. This should include requirements that will ensure steps are taken to provide for adaptation to high winds. 	<ul style="list-style-type: none"> Developers are required to ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development. 	<ul style="list-style-type: none"> Explore adaptation measures within the Sustainable Construction and Design document.
<ul style="list-style-type: none"> Adopt a policy that caters for the replacement, decommissioning and site restoration when current renewable technologies become outdated. 	<ul style="list-style-type: none"> Policy requires impacts of infrastructure to be considered. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Encourage new developments with parking facilities to be designed to provide for the charging of electric vehicles. 	<ul style="list-style-type: none"> Opportunity may be addressed within the Sustainable Construction and Design document. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider establishing with the power utility companies measures to ensure efficient operation of installed low carbon technologies by residential users.
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider preparation of a schedule of Allowable Solutions measures capable of delivering benefits.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider application of the policy for major housing schemes delivered over several years.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider the training needs of officers and the enforcement actions that may be practical for poorly performing energy systems.

3.12.25 In seeking to reduce carbon emissions after energy efficiency measures have been incorporated, on-site low/zero carbon energy and connected heat deliver the Carbon Compliance quotient. Beyond this Allowable Solutions are required to achieve zero emissions from regulated energy use.

3.12.26 Allowable Solutions involve the following:

- Developer payments to secure emissions reductions through (largely) near-site or off-site, carbon-saving (Allowable Solutions) projects;
- An aggregation of Allowable Solutions payments independent of the developer enable delivery of large scale carbon-emission reduction projects;
- Allowable Solutions would be affordable and (per unit of carbon) would cost, at least initially, less than Carbon Compliance;

3.12.27 Wherever possible, Allowable Solutions would be linked with local projects that would bring local benefits²¹.

3.12.28 The Government has made no formal announcements on what will constitute an acceptable 'Allowable Solution', however the following near-site and far site options have been recognised²²:

Near-site

- Export of low carbon heat from site based district heating scheme (i.e. support for cost of pipe-work);
- Retro-fitting of low/zero carbon technologies to local communal buildings;
- Investment in creation or expansion of locally planned sustainable energy infrastructure (e.g. district heating or on-site wind turbines)
- Investment in local electric vehicle charging infrastructure;
- Investment in low carbon street lighting for local area;
- Local micro-hydro schemes;
- Communal waste management solutions;
- Local energy storage solutions.

Off-site

- Anaerobic Digestion and Pyrolysis/Gasification plants;
- Investment in low carbon electricity generation assets up to a maximum determined scale e.g. excluding large scale off shore generation;
- Investment in district heating pipe-work to connect new loads to existing schemes or support new schemes;
- Investment in retro-fitting of low carbon technologies to communal buildings;

²¹ Zero Carbon Hub, 2011: Allowable Solutions for Tomorrow's New Homes.

²² Zero Carbon Hub, 2011: Allowable Solutions for Tomorrow's New Homes.

- Investment in embodied carbon reduction initiative;
 - Investment in low carbon cooling;
 - Investments in energy storage and demand-side management/ flexible demand projects to counter intermittent renewable.
- 3.12.29 Allowable Solutions could play an important role in helping to rebalance the overall economy by increasing manufacturing output and exports through supporting green innovation. However, if not designed correctly, the framework could lead to society missing out on potential green jobs and green growth which could have been stimulated by investment of Allowable Solutions capital²³.
- 3.12.30 Carbon compliance measures can be regarded as offering greater guarantee of carbon savings than off-site measures under Allowable Solutions, since it is not necessarily clear that off-site measures are truly additional to what otherwise would have been delivered.
- 3.12.31 It may be appropriate for the Council to consider the preparation of a schedule of feasible measures to be funded under Allowable Solutions resources at an early date to inform developers at an early stage in their viability assessments of housing proposals. It is also recommended that a system be put in place to determine the quantity of additional carbon savings that are achieved through such Allowable Solutions.
- 3.12.32 Local Allowable Solutions projects can be developed to maximise benefits to local communities. In this context the Borough may consider establishing a Community Energy Fund potentially offering a mechanism to lever in further investment in carbon saving projects potentially with links to other Local Planning Authorities to further increase the scale of future projects²⁴.
- 3.12.33 To develop an Allowable Solutions approach, policies are required that inform the delivery of such measures. The Zero Carbon Hub (2011) identified the following components of such policies:
- A mechanism for approving particular Allowable Solutions within the overall local plan;
 - Evidence that Allowable Solutions included in the local plan represent the most cost effective ways of delivering carbon emissions reduction in the Local Planning Authority area.
 - A clearly stated pricing policy for Allowable Solutions with a charge less than the national price ceiling for carbon.
- 3.12.34 Should the Borough decide to establish a Community Energy Fund, then it may wish to use Community Infrastructure Levy (CIL) or Section 106 (S106) to collect and pool payments. It would then be necessary to incorporate within the CIL charging schedule a component which referred to the locally set price of CO₂ which must be less than the market ceiling price.
- 3.12.35 CIL must be in place by 2014 in order for strategic infrastructure projects that contribute towards carbon emissions reductions to be progressed or pooled contributions from a more than four developments are to be sought.
- 3.12.36 A concern in using S106 to collect funds is the requirement that planning obligations should be directly related to the development, including a 'geographical or functional link' between the development and the item being provided. It would need to be argued that geographical proximity is not critical to achieving the aim of the obligation - delivering reductions in CO₂ emissions²⁵.
- 3.12.37 With a focus upon actual rather than design carbon performance, it is suggested that monitoring be organised in a similar manner to that in London with smart technology being used to report renewable energy generation. Also, there may be merits in working with the power utilities to ensure that residents remain properly informed on the effective use of low carbon systems so that the anticipated benefits are delivered.

²³ Zero Carbon Hub, 2011: Allowable Solutions for Tomorrow's New Homes.

²⁴ Zero Carbon Hub, 2011: Allowable Solutions for Tomorrow's New Homes.

²⁵ Zero Carbon Hub, 2011: Allowable Solutions for Tomorrow's New Homes.

- 3.12.38 Linked with any monitoring system is the need to ensure that development control and enforcement officers have the skills to identify both poor and high quality installations. There then needs to be consideration of the practical measures that can be delivered as part of any enforcement action.
- 3.12.39 As larger developments are phased over several years, the Council may wish to consider how the requirements of the policy are to be met along with intermediate compliance checking and monitoring that would be required.
- 3.12.40 Table 3.39 provides a review of the previous and current proposals to enhance the effects of the policy upon natural resource protection and environmental enhancement. A key aspect is the link between this policy and that of Policy 11 – Water Management.

Table 3.39: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Require applications for major development proposals to show how sustainable urban drainage systems also contribute towards supporting local biodiversity objectives but do not create areas where insect borne vectors and pests could become established. 	<ul style="list-style-type: none"> • Addressed by policy 11. 	<ul style="list-style-type: none"> • Future health implications not addressed by Policy 11. Perhaps the health implications would be best addressed in the Sustainable Construction and Design document.
<ul style="list-style-type: none"> • Consider a policy that supports the protection and enhancement of wildlife corridors to aid adaptation to climate change for mobile species. 	<ul style="list-style-type: none"> • Policy 10 provides for the landscape scale approach to the natural environment and the potential for reducing the impacts of climate change. 	<ul style="list-style-type: none"> • Consider the preparation of a landscape scale plan for the natural environment defining a strategy to define and reduce the impacts of climate change.
<ul style="list-style-type: none"> • Consider a policy towards provision being made for capturing run-off for beneficial use on the development or nearby. 	<ul style="list-style-type: none"> • Policy 11 requires recycling of rain water. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Give consideration to the landscape, historic environment and townscape effects and opportunities associated with measures to address climate change and decentralised heating/energy systems. 	<ul style="list-style-type: none"> • Policy requires consideration of such effects. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Promoting sustainable urban drainage systems without reference to urban biodiversity could potentially result in negative effects, as could the installation of decentralised energy/ heat networks. 	<ul style="list-style-type: none"> • Policy requires impacts of infrastructure to be considered. Policy 11 requires sustainable drainage systems to contribute toward conservation of biodiversity. 	<ul style="list-style-type: none"> • None.
<ul style="list-style-type: none"> • Localised elevated noise and gaseous emissions, as well as potentially traffic impacts could be associated with decentralised energy generation. 	<ul style="list-style-type: none"> • Impacts arising from decentralised energy systems are to be assessed. 	<ul style="list-style-type: none"> • None.

- 3.12.41 Opportunities for enhancement within the sustainable communities theme are presented in Table 3.40. It is considered that the proposed Draft Local Plan policy is not clear on the extent to which adaptation measures are to be delivered beyond the confines of the development to make contributions to the needs of a wider community.

3.12.42 The potential effect of the policy along with that of the 2016 Building Regulations zero carbon requirement suggests that measures may be required to ensure that the policy does not have a negative effect upon the supply of housing, particularly affordable housing. It is acknowledged that viability tests are incorporated into the policy. However it is recommended that the appropriateness of the 20% low carbon energy generation requirement is set out in the justification for the policy.

Table 3.40: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require developers to demonstrate that the immediate and longer term risks of the project to the local community have been identified and a plan developed with the local community to manage risks into the future. 	<ul style="list-style-type: none"> The local community impacts of climate change are to be understood by developers to arrive at their proposals. 	<ul style="list-style-type: none"> While developers will be required to consider the impacts of energy and heat network infrastructure on residents, it is proposed that issues of resilience to climate change ought to refer to community resilience and not just resilience of the proposed development. Primarily this is envisaged to relate to flood risks.
<ul style="list-style-type: none"> Require developers to contribute to increasing the local resilience to severe weather conditions such as provision of trees or amenity water areas to contribute to urban cooling. 	<ul style="list-style-type: none"> The policy requires resilience to impacts of changing climate. 	<ul style="list-style-type: none"> Allowable Solutions measures may be capable of supporting local resilience measures. Perhaps CIL or S106 funds could be used to contribute to resilience measures where provision is driven by other CIL/S106 requirements.
<ul style="list-style-type: none"> Encourage community-led initiatives to reduce energy use and deliver renewable and low carbon energy. 	<ul style="list-style-type: none"> The policy supports establishment of Renewable Energy Service Companies and community-led initiatives. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Set out the basis for the 20% low / zero carbon compliance figure and consider the implications for different housing type.

Alternatives

3.12.43 In exploring alternative policy configurations to address this subject area, the following were considered:

- Identifying specific locations for decentralised networks, but a more flexible approach recognises that these will change over the plan period.
- Setting a specific renewable energy requirement, but policy allows flexibility for developers to choose from a range of energy efficiency and low or zero carbon energy generation measures.
- Consolidating energy and design in a single policy but the latter covers a much broader remit, including local character and distinctiveness.

- 3.12.44 The changes proposed following the responses to the Consultation draft Local Plan clarify the intent of the Council to take account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. An alternative of retaining the existing policy may cause a lack of clarity as to whether the Code for Sustainable Homes and BREEAM were additional or a contribution towards the policy.
- 3.12.45 The revision recognises the need to ensure that all sections of the community, but particularly older people, children and disabled people are more resilient to the effects of climate change.
- 3.12.46 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.13 Appraisal of Policy 10: Natural Environment

Introduction

- 3.13.1 The proposed policy on the natural environment is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below. The text in red highlight the changes included within the Submission Local Plan following the responses received to the Consultation Local Plan.
- 3.13.2 Justification for the policy is presented in the Draft Local Plan. At the end of this section a summary of the alternatives to the policy is presented.

Policy P10 Natural Environment
<p>The Council recognises the importance of a healthy natural environment in its own right, and for the economic and social benefits it provides to the Borough. The full value and benefits of the natural environment will be taken into account in considering all development proposals, including the contribution to the green economy and the health of residents, and the potential for reducing the impacts of climate change. Joint working with neighbouring authorities will be supported, recognising the need for a landscape scale approach to the natural environment and conservation of biodiversity.</p> <p>The Council will seek to protect, enhance and restore the diverse landscape features of the Borough, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness. Development should take full account of national and local guidance on protecting and restoring the landscape and the areas in need of enhancement, including guidance relating to the countryside. Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible or necessary.</p> <p>The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new native woodlands and other habitats and to protect, restore and enhance semi-natural ancient woodland and green infrastructure assets across the Borough. Protection of semi-natural ancient woodland, designated sites and priority habitats shall include the establishment of buffers to any new development. Development should be informed by the latest information on habitats and species, and take full account of national and local guidance on conserving biodiversity, opportunities for biodiversity enhancement and for improving and restoring the Borough’s green infrastructure. When appropriate, development should seek to enhance accessibility to the natural environment, especially for disabled people.</p> <p>The Council will protect areas of national and local importance for biodiversity and geodiversity, where it is reasonable, proportionate and feasible to do so. Development likely to have an adverse affect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if the reasons for the development clearly outweigh the nature conservation value of the site and the national policy to safeguard such sites. Where development may have an adverse affect on a Site of Special Scientific Interest, developers will be expected to incorporate measures to enhance the condition of the site, unless it is demonstrated that it is not feasible.</p> <p>Development likely to have an adverse affect on a Local Nature Reserve or a Local Wildlife or Geological Site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives. Where development would have an adverse affect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites in accordance with the Green Infrastructure study, unless it is demonstrated that it is not feasible.</p> <p>Outside designated sites, developers will be expected to take full account of the nature conservation or geological value, and the existence of any habitats or species included in the Local Biodiversity Action Plan, or sites in the Local Geological Action Plan. Developers will be required to undertake a full ecological survey and to deliver a net gain or enhancement to biodiversity, unless it is demonstrated that it is not appropriate or feasible. In considering the need for green space improvements associated with new development, developers should have</p>

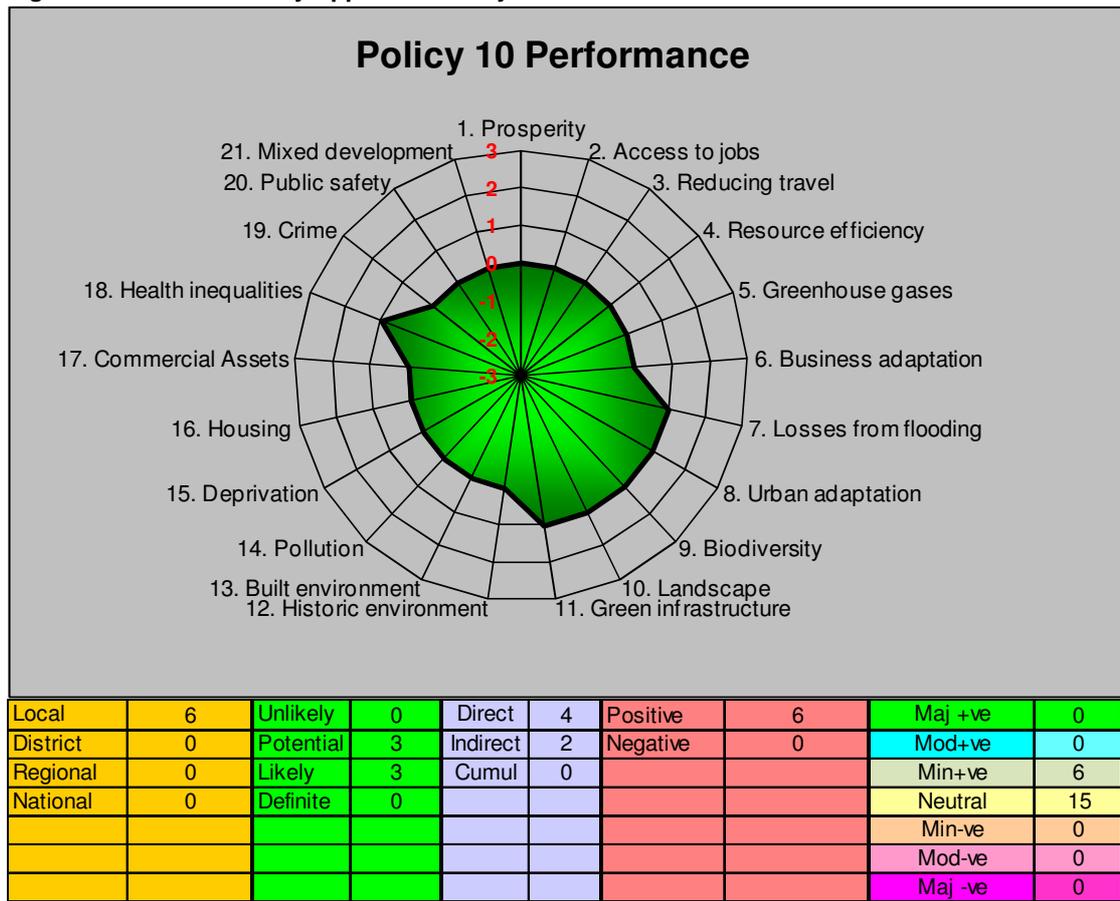
regard for the standards and priorities in the Green Spaces Strategy in relation to accessible natural green space.

Where development is likely to have significant harmful effects on the natural environment, as a result of the development itself, or the cumulative impact of developments, developers must demonstrate that all possible alternatives that would result in less harm have been considered. Where development is permitted, appropriate mitigation of the impacts and compensation where relevant will be required to deliver a net gain in biodiversity, landscape character and local distinctiveness. Enhancements should be undertaken either on the site, or in its vicinity, but where it is demonstrated that this is not possible, offsetting in alternative strategic locations within the biodiversity or green infrastructure network, to deliver biodiversity or other objectives may be considered. Where appropriate, developers should demonstrate compliance with this policy through an ecological statement or by relevant information in the West Midlands Sustainability Checklist.

Forecast Effects

3.13.3 This policy is slightly beneficial as there are six minor positive outcomes across the twenty one objectives comprising the sustainability framework (See Figure 3.10 and Appendix G). All other objectives report neutral outcomes.

Figure 3.10: Sustainability Appraisal: Policy 10



3.13.4 The policy gives rise to six positive outcomes across the climate change, natural resource protection and the sustainable communities themes.

3.13.5 The policy does not perform as highly as it might since its positive intentions are predicated upon development occurring that causes a need for mitigation measures. Thus the benefits are traded for losses caused by development proposals. It is not clear whether the clause “Where development is permitted, appropriate mitigation of the impacts and compensation where relevant will be required to

deliver a net gain in biodiversity, landscape character and local distinctiveness” applies to any development not having an effect upon a designated site.

- 3.13.6 With the change introduced for the Submission Local Plan recognising the need to create new habitat and improve accessibility an additional beneficial outcome is anticipated for health inequalities, since Natural England recognises, and evidence exists to illustrate, the health benefits of access to the natural environment.

Managing Uncertainty

- 3.13.7 Of the six beneficial effects three are considered to result in a likely outcome, the other three having the “potential” to deliver a beneficial outcome.

Mitigation and Enhancement

- 3.13.8 It is evident that there is no certainty that enhanced biodiversity, landscape or other aspects of the natural environment such as soils; would result from the policy. For example, the policy states that:

- Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible or necessary;
- Development should take full account of opportunities for biodiversity enhancement and for improving and restoring the Borough’s green infrastructure;
- Where development may have an adverse affect on a Site of Special Scientific Interest, developers will be expected to incorporate measures to enhance the condition of the site, unless it is demonstrated that it is not feasible;
- Where development would have an adverse affect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites in accordance with the Green Infrastructure study, unless it is demonstrated that it is not feasible;
- Outside designated sites developers will be required to deliver a net gain or enhancement to biodiversity, unless it is demonstrated that it is not appropriate or feasible.

- 3.13.9 The policy contains numerous separate clauses and there may well be merit in separately identifying them as a series of bullet points to aid clarity. Such formatting would aid clarity as to whether a net gain in biodiversity is to occur across all development proposals.

- 3.13.10 Proposals were made to enhance the Emerging Core Strategy policies, although the focus was only upon the natural resource protection and environment theme. The response of the Council to the previous proposals is presented along with new proposals that arise in relation to the policy as currently presented are presented in Table 3.41 below.

- 3.13.11 A further aspect from the revised policy is for the Council to consider whether sufficient guidance is in place to help developers in their exploration of interventions contributing towards landscape-scale measures directed towards natural environment and biodiversity. Such evidence may also be of use within the evidence base for CIL considerations.

Table 3.41: Natural Resource Protection & Env. Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> • Consider limiting the amount of housing that can be serviced via quiet lanes to preserve local character and protect natural resources. 	<ul style="list-style-type: none"> • Reflected in choice of sites and avoiding remote rural locations. 	<ul style="list-style-type: none"> • None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Require that net gain in biodiversity is achieved at an appropriate geographic scale. 	<ul style="list-style-type: none"> The policy requires that a net gain in biodiversity where feasible for non-designated sites. A requirement upon developers to enhance designated sites unless it can be demonstrated not to be feasible also exists. 	<ul style="list-style-type: none"> Consider clarifying the term “feasible”. Perhaps there would be merit in separating ecological and engineering delivery and management issues from financial viability. Consider applying the requirement to all major development proposals regardless of the impact on biodiversity of the proposals.
<ul style="list-style-type: none"> The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health. 	<ul style="list-style-type: none"> These measures can be examined as part of enhancement measures to be explored by developers. Policy 11 provides for the opening of culverts. 	<ul style="list-style-type: none"> Consider whether the 2006 GI strategy meets the Natural Environment White Paper expectations and defines measures for delivery of a landscape scale strategy for biodiversity & GI enhancements.

Alternatives

- 3.13.12 The Council has given consideration to combining with green space in a Green Infrastructure policy, but rejected in favour of separate policies, recognising the differences in policy approach.
- 3.13.13 An alternative to amending the policy in the Submission draft Local Plan would have been not to bring the policy in line with the Natural Environment White Paper and the National Planning Policy Framework risking a lack of clarity.
- 3.13.14 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.14 Appraisal of Policy 11: Water Management

Introduction

- 3.14.1 This policy on water management is essentially a new policy, although the Emerging Core Strategy policy on climate change did include a clause addressing the importance of water efficiency. The aim of the appraisal of the draft Local Plan policy is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted below with the changes introduced following the Consultation draft Local Plan being presented in red. Justification for the policy is presented in the draft Local Plan. At the end of this section a brief review of the alternatives considerations is provided.

Policy P11 Water Management
<p>All new development should have regard to the actions and objectives of appropriate River Basin Management Plans in striving to protect and improve the quality of water bodies in and adjacent to the Borough, including the Rivers Blythe and Cole and their tributaries. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary. Developers shall engage in early discussions with water companies to ensure that appropriate sewerage infrastructure is provided in a timely manner to serve any proposed development.</p> <p>The Council recognises the need for water efficiency in all new development. Developers shall demonstrate the highest possible standards of water efficiency through the use of water efficient fittings and appliances, and where appropriate, recycling of potable, grey water and rainwater in order to minimise consumption.</p> <p>All new development shall incorporate sustainable drainage systems, unless it is demonstrated that such techniques are not technically feasible or prohibitively expensive shown to be impractical to do so. Developers shall ensure that adequate space is made for water within the design layout of all new developments to support the full use of sustainable drainage systems, and shall demonstrate that improvements to the water environment will be maximised through consideration of a range of techniques. Wherever possible, sustainable drainage systems will be expected to contribute towards wider sustainability considerations, including amenity, recreation, conservation of biodiversity and landscape character, as well as flood alleviation and water quality control.</p> <p>Developers shall explore opportunities to contribute towards the objectives of relevant Catchment Flood Management Plans. Wherever possible, development should promote the reduction of flood risk by seeking to reinstate the natural floodplain, the de-culverting of watercourses and the limiting of surface water runoff to green field rates via the use of sustainable drainage techniques. On all development sites larger than 1 hectare, surface water discharge rates shall be limited to Greenfield rates of 5 litres per second per hectare. Developers will be expected to demonstrate that the layout and design of a development takes account of the surface water flows in extreme events so as to avoid flooding of properties, both within and outside the site. Applications for new development where there is a flood risk issue should be accompanied by a site flood risk assessment. Developers are encouraged to secure reduction of flood risk by the provision or enhancement of green infrastructure, wherever possible.</p> <p>Existing flood defence infrastructure will be protected and development that would compromise the flood defence function will be permitted only if it is demonstrated through a flood risk assessment that the risk both within and outside the site, and to sites further downstream is not increased.</p> <p>New development will not normally be permitted within areas at risk of flooding. Where it is clearly demonstrated that there are no other viable sites at lower risk of flooding, consideration will be given to development in such locations, providing that it is designed to be safe from the effects of flooding and will minimise flood risk on the site and reduce risks elsewhere.</p>

Forecast Effects

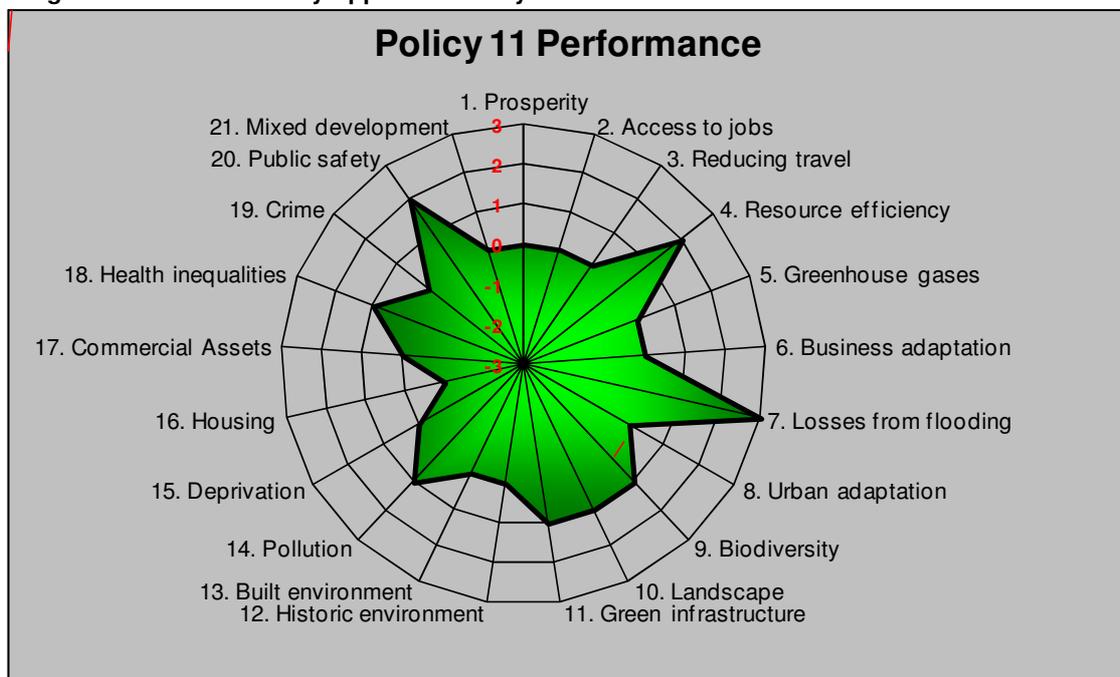
- 3.14.2 The amendments introduced for the Submission draft Local Plan recognise that it is not always practical to deliver the recycling of grey and rain water, not least of which because the pumping of water could

increase energy consumption and carbon emissions for potentially little return in terms of water conservation.

3.14.3 The second change to the Consultation draft Local Plan policy encourages the reduction in flood risk by the provision or enhancement of green infrastructure. It is presumed that such contributions would need to be beyond the development site boundary in order to be effective and hence would be secured by Section 106 or CIL contributions.

3.14.4 It is considered that this policy would have a positive contribution towards the sustainability objectives as it delivers one major beneficial and two moderate beneficial outcomes and a further five that are minor beneficial (see Figure 3.11 and Appendix G). Only one minor adverse effect is considered to be possible, namely an adverse effect upon the viability of housing schemes where the setting aside of land for water potentially could reduce the amount of development on the site and hence may adversely affect the viability of the proposed development.

Figure 3.11: Sustainability Appraisal: Policy 11



SA Objective	Likely Significant Effects	Rationale
7. Losses from flooding	Maj+ve	The policy focuses upon sustainable urban drainage, controls on runoff rates, requires that site with the lowest risk of flooding where no alternatives exist will only be considered when safety measures are taken and measures to reduce flood risk on site and elsewhere are in place.
4. Resource efficiency	Mod+ve	Developers are required to demonstrate the highest possible standards of water efficiency including recycling of potable, grey water and rainwater where practical.
20. Public safety	Mod+ve	Cumulatively the effect of the policy is likely to reduce the risk to public safety as a result of flooding.

Local	6	Unlikely	0	Direct	6	Positive	8	Maj +ve	1
District	3	Potential	2	Indirect	1	Negative	1	Mod+ve	2
Regional	0	Likely	5	Cumul	2			Min+ve	5
National	0	Definite	2					Neutral	12
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

- 3.14.5 The policy is envisaged to give rise to only one outcome for the sustainable consumption and production theme with a likely moderate beneficial outcome on resource efficiency. While a major beneficial outcome for flooding is the only outcome anticipated under the climate change and energy theme.
- 3.14.6 Four minor positive outcomes are likely to arise under the natural resource protection theme (biodiversity, landscape, green infrastructure and pollution).
- 3.14.7 Within the sustainable communities theme there is likely to be a moderate beneficial outcome for public safety, as well as a potential minor positive outcome for health inequalities due to the integration of amenity and recreational elements within the sustainable urban drainage measures. A potential minor negative outcome is anticipated for housing since the requirement to ensure adequate space for water may have adverse effects upon the viability of development sites.

Managing Uncertainty

- 3.14.8 Of the eight beneficial outcomes all but one are considered to be likely or definite outcomes. The only potential beneficial outcome is that of health inequalities. It is judged that the integration of amenity and recreational elements of Green Infrastructure within sustainable urban drainage schemes have the potential to provide some opportunities to reduce health inequalities where disadvantaged communities are served.

Mitigation and Enhancement

- 3.14.9 While Policy 11 is a new policy, in practice some elements were either a component of Emerging Core Strategy policies or emerged following mitigation/enhancement proposals that were made in the previous Sustainability Appraisal Report. Suggestions were put forward across the climate change and natural resource themes and these are represented below. The comments from the Council on the previous proposals are presented in Table 3.42, with no additional proposals being identified.

Table 3.42: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider requiring the developer for a given scale of housing development to demonstrate the viability of ground source heat pumps and local grey water capture and reuse for their proposals. 	<ul style="list-style-type: none"> The need to adopt renewable technologies is captured in policy 9. Specific technologies are a matter for the developers to explore supported by the Sustainable Construction and Design document. The efficient use of water is a requirement of policy 11. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Where cost, energy use and carbon costs feature in the decision not to adopt grey or rain water harvesting, then in the case of major development proposals, the calculations should extend beyond the site to include the savings associated with the entire water cycle.

Table 3.43: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Urban design policy should address issues such as provision of green or brown roofs and rainwater harvesting. 	<ul style="list-style-type: none"> Rain water harvesting is one measure that developers may consider in establishing water efficiency. This aspect would be addressed in the Sustainable Construction and Design document. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health. 	<ul style="list-style-type: none"> Reinstatement of natural floodplains and de-culverting of watercourses forms part of the new policy. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Consider clarifying whether green infrastructure contributions to reducing flood risk can be required for beyond the development site boundary as this may increase cost effectiveness.

Alternatives

- 3.14.10 Water issues were originally covered under the Climate Change policy reflecting concerns around flooding and water efficiency associated with a changing climate. This has been widened to embrace water quality and quantity issues and current flood risk.
- 3.14.11 An alternative would be to potentially affect the viability of development and not enabling consideration of the different means by which the policy objectives can be attained.
- 3.14.12 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.15 Appraisal of Policy 12: Resource Management

Introduction

- 3.15.1 The proposed policy on waste management is examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold text below with the changes introduced for the Submission draft Local Plan presented in red. Justification for the policy is presented in the Draft Local Plan.

Policy P12 Resource Management
<p>The Council will promote and control new development to prevent the production of waste within the Borough wherever possible and will encourage prevention from existing buildings and uses. Where this is not feasible, waste shall be treated as a resource to be reused, recycled, or from which value will be recovered, with management to be as high up the waste hierarchy as possible. Disposal of waste shall be a last resort, to be considered only when all other options have been exhausted.</p> <p>Management of waste shall seek to maximise the contribution to economic development and employment in the Borough, especially within and accessible to the North Solihull Regeneration Zone. Waste operators will be expected to demonstrate that the greenhouse gas emissions from the operations involved and associated transport of waste from source to processing facility have been minimised.</p> <p>The Council will seek to address the waste capacity gap in the Borough through this policy, so that an equivalent tonnage is provided within waste management facilities to that arising by 2028, or if this is not feasible, will work towards self-sufficiency within the Coventry Solihull Warwickshire sub-region.</p> <p>Wherever possible, on-site management of waste shall be preferred, unless the activities would result in unacceptable harm through impacts on the environment, transport or on neighbouring uses, or it is demonstrated that management elsewhere would have wider sustainability benefits.</p> <p>Strategically important waste management sites within the Borough, where waste management activities will be supported in principle, are identified on the spatial strategy diagram. These sites include the site of the former Arden Brickworks in Bickenhill, which contains the household waste recycling centre, and a range of other waste management operations, the materials recovery facility at Meriden Quarry, the composting facilities in Berkswell, and the Moat Lane and Chapelhouse Depot waste transfer stations in the Urban West and North Solihull Regeneration Zone.</p> <p>When investigating the suitability of sites for waste management operations in the Borough, the potential for consolidating or expanding waste management facilities at the former Arden Brickworks site, for the co-location of complementary waste operations at Berkswell and Meriden quarries, and for locating waste management facilities on appropriate industrial sites within the Borough shall be considered. Where it is not possible or appropriate for new operations to be developed on-site or in these locations, developers shall consider the potential of sites within the Area of Search for waste management facilities identified on the spatial strategy diagram.</p> <p>The Council will have regard to the following criteria in considering the suitability of sites for waste management facilities:</p> <ul style="list-style-type: none"> • The contribution towards national and local waste management strategies, objectives and targets, including the Solihull Municipal Waste Management strategy 2010-2020; • The contribution towards economic development and employment in the Borough, particularly in or accessible from the North Solihull Regeneration Zone; • The contribution to national and local targets to reduce greenhouse gas emissions, taking account of those resulting directly from the operations (Policy 9), and those from the transport of wastes from the source of arisings to the end management; • The potential for on-site management associated with development and other uses; • The potential for the development of shared facilities for more than one waste planning authority where these would accord with this policy;

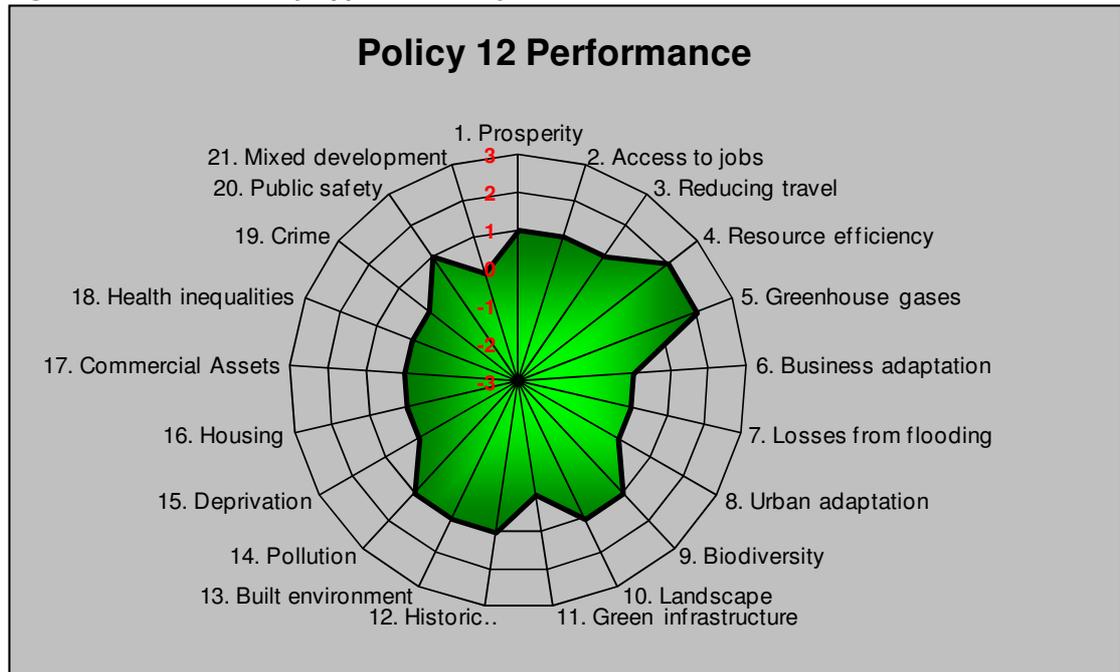
- The potential for the co-location of complementary activities where there are no adverse cumulative impacts;
- The contribution towards the restoration of former mineral workings in the Borough;
- The suitability of the site for the type of wastes and operations involved, including whether the activity can take place within a building or other enclosure;
- The impacts on transport infrastructure, including the potential for the use of alternative modes to road transport, and highway safety;
- The compatibility of waste management activities with neighbouring uses, including the nature of the wastes, operations, hours of working and any cumulative effects where waste management activities already exist;
- The availability of suitable previously developed land and/or redundant buildings;
- The impact on the Green Belt, taking account of policy in the NPPF and Policy 17 of this plan;
- The impact on the environment, including the protection of water resources and quality (Policy 11), conservation of biodiversity (Policy 10), **high quality design (Policy 15)**, the protection of the historic environment and built heritage (Policy 16), and on air quality from emissions and dust
- The impact on amenity and health, including visual intrusion, noise and vibration, litter, odour, vermin and bird attraction, including the impact on aerodrome safeguarding.

In considering non-waste management development proposals, the Council will take into account any adverse impact on the strategically important waste management sites and the potential of the Area of Search for waste management facilities identified in this plan. Non-waste development will be required to accommodate facilities for the storage and sorting of waste arising from the development, and developers will be expected to demonstrate satisfactory provision for waste management through a Site Waste Management Plan or similar supporting evidence.

Forecast Effects

- 3.15.2 This policy is a considerable advance on the Emerging Core Strategy policy although it is judged to give rise to two moderate beneficial outcomes (resource efficiency and greenhouse gases) it now delivers **nine** minor beneficial outcomes and no adverse effects (see Figure 3.12 and Appendix G). Principally by being explicit on the criteria for the location of waste management activities the potential for adverse effects has been managed. Indeed, the potential for moderate adverse effects upon historic features and the landscape been removed.
- 3.15.3 Within the sustainable consumption and production theme, the policy gives rise to positive outcomes across the four sustainability objectives. The prosperity and access to jobs outcomes are anticipated to be potential minor positive, while the outcomes upon reducing travel and resource efficiency are more certain generating a moderate beneficial outcome (resource efficiency) and a minor positive (reducing travel).
- 3.15.4 The policy has the potential to deliver a moderate beneficial outcome for the climate change and energy theme and the potential for three minor beneficial outcomes within the natural resource protection theme.
- 3.15.5 Enhancing public safety is the only outcome anticipated under the sustainable communities theme. Here the policy gives consideration of the health and safety issues of waste management activities including pollution, odour, vermin and bird attraction including the impact on aerodrome safeguarding.

Figure 3.12: Sustainability Appraisal: Policy 12



SA Objective		Likely Significant Effects		Rationale					
4.Resource efficiency		Mod+ve		By encouraging the prevention of waste and then to enable the recovery of value high up the waste hierarchy this policy is likely to deliver improved resource efficiency. Non-waste development will also be required to provide facilities that deliver satisfactory provision for waste management.					
5.Greenhouse gases		Mod+ve		Reducing the transport of waste as well as a requirement upon waste operators to demonstrate minimised greenhouse gas emissions from their operations is likely to lead to reduced emissions. Furthermore, minimising waste to landfill has the potential exists to reduce methane released from landfills.					
Local	9	Unlikely	0	Direct	11	Positive	11	Maj +ve	0
District	2	Potential	7	Indirect	0	Negative	0	Mod+ve	2
Regional	0	Likely	3	Cumul	0			Min+ve	9
National	0	Definite	1					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

Managing Uncertainty

3.15.6 Of the eleven beneficial outcomes against the sustainability objectives that this policy delivers, seven are considered to have the potential to occur with four being likely or a definite outcome (Reducing travel; Resource efficiency, Public safety and Built environment). The potentially beneficial outcomes for greenhouse gases and natural resource protection are driven by a requirement for the Council to give consideration to the effects of waste management proposals upon these sustainability objectives. As such beneficial outcomes are more likely but are not certain being determined at a project level.

Mitigation and Enhancement

- 3.15.7 A series of mitigation and enhancement measures were identified across the four sustainability themes during the appraisal of the Emerging Core Strategy. The majority of these recommendations have been incorporated into the revised policy (see Tables 3.44 to 3.45).
- 3.15.8 Only one new measure for consideration arose from the Consultation draft Local Plan appraisal and that focuses upon a potential link between low carbon waste management technologies and the potential opportunities that might emerge through the Allowable Solutions mechanism.

Table 3.44: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Explore the use of the public sector purchasing power to deliver reductions in the amount of material purchased that is then disposed of as waste. 	<ul style="list-style-type: none"> Does not come within remit of local plan. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Present measures to drive strategy up the waste management hierarchy. 	<ul style="list-style-type: none"> Revised policy seeks to drive the strategy up the waste management hierarchy. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> In determining locations for waste facilities consider the greenhouse gas emissions resulting from the movement of waste and recycled product as a factor. 	<ul style="list-style-type: none"> Waste operators required to demonstrate that emissions from operations and associated transport of waste from source to processing have been minimised. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Provide support for new technologies to deliver sustainable waste management. 	<ul style="list-style-type: none"> Policy provides flexibility to enable new technologies to contribute to resource management. 	<ul style="list-style-type: none"> Explore opportunities to promote waste management technologies via Affordable Solutions.

Table 3.45: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Determine implications of alternative waste management strategies upon greenhouse gas emissions across the Borough. 	<ul style="list-style-type: none"> Developers are required to demonstrate minimisation of greenhouse gas emission from both the movement of waste and site operations. 	<ul style="list-style-type: none"> None.

Table 3.46: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Establish site selection criteria that address the potential for adverse effects upon visual amenity and historic landscape. 	<ul style="list-style-type: none"> The revised policy addresses these aspects. 	<ul style="list-style-type: none"> None.

Table 3.47: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Ensure that all new developments make adequate provision for the segregation and storage of waste prior to collection. 	<ul style="list-style-type: none"> The revised policy addresses these aspects. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.15.9 Consideration was given by the Council to specifying industrial areas where waste management activities could be encouraged, but criteria based approach considered to offer greater flexibility to allow for technological developments.
- 3.15.10 In addressing the responses to the Consultation draft Local Plan, the following options were considered:
- Not making reference to existing buildings and uses could lead to the loss of opportunity to encourage waste minimisation for applications involving a change of use rather than new build.
 - Not making reference to high quality design might risk situations where the relevance of policy P15 to resource management may be disputed.
- 3.15.11 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.16 Appraisal of Policy 13: Minerals

Introduction

- 3.16.1 The proposed policy on minerals is examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold below. There was no change made to this policy for the Submission draft Local Plan.
- 3.16.2 Justification for the policy is presented in the draft Local Plan. A statement on alternatives is presented at the end of this section.

Policy P13 Minerals
<p><u>Mineral Safeguarding Areas</u></p> <p>Mineral Safeguarding Areas for important underground coal resources in the eastern part of the Borough, and for sand and gravel aggregate resources between Berkswell, Hampton and Meriden and east of the NEC and M42, including sites for important associated infrastructure and to meet potential needs are defined on the spatial strategy diagram/proposals map.</p> <p>The Council will permit the search for new minerals, including coal bed methane resources, whether within or outside the Mineral Safeguarding Areas, providing that the criteria for minerals development proposals are met. Permission for exploration will not necessarily imply that a subsequent consent for mineral extraction will be forthcoming.</p> <p>Within these MSAs, proposals for non-mineral development will only be permitted where it can be demonstrated that the development will not result in the sterilisation of mineral resources or the loss of important infrastructure or sites for potential infrastructure needs in the areas. Prior to development, developers will be expected to ensure that all safeguarded minerals that would be affected are extracted, unless it is demonstrated that the resources have no economic value, extraction is not feasible or would result in excessive costs or delays, or that there is an overriding need for the development that outweighs the need to safeguard the mineral resources.</p> <p><u>Alternative materials</u></p> <p>The Council will promote the use of alternative materials, such as secondary and recycled aggregates in all new development within the Borough. Provision for alternative materials will be encouraged on sites for significant development within the Borough, where appropriate. Permanent facilities will be encouraged within the area of search for appropriate waste management facilities defined on the spatial strategy diagram/proposals map.</p> <p><u>Provision for primary sand and gravel extraction</u></p> <p>Provision for primary sand and gravel resources will be made through a mixture of specific sites, preferred areas and/or areas of search to meet the identified requirement of 7.5 million tonnes over the plan period. These will include sites already granted planning permission where not included in the current sub-regional landbank.</p> <p>Preferred areas for primary sand and gravel extraction are identified at Marsh House Farm, Hornbrook Farm and west of Berkswell Quarry, which will provide around 2.5 million tonnes and are defined on the spatial strategy diagram/proposals map.</p> <p>Areas of search for primary sand and gravel extraction are identified between Berkswell, Hampton and Meriden and east of the NEC and M42 to meet the shortfall in provision, and are defined on the spatial strategy diagram/proposals map. However, inclusion within an area of search does not imply that all of the mineral resources are viable or that extraction would be acceptable. Sand and gravel extraction outside the areas of search may also be permitted, if there is evidence that insufficient mineral resources from the areas of search are likely come forward within the plan period, or that production targets will not be met.</p> <p><u>Mitigation, restoration, aftercare and after use</u></p> <p>Proposals for mineral working or related infrastructure will be assessed against the following criteria:</p> <ul style="list-style-type: none"> • Contribution towards national and local strategic objectives or wider needs including national and

local targets for minimising carbon emissions and using alternative materials;

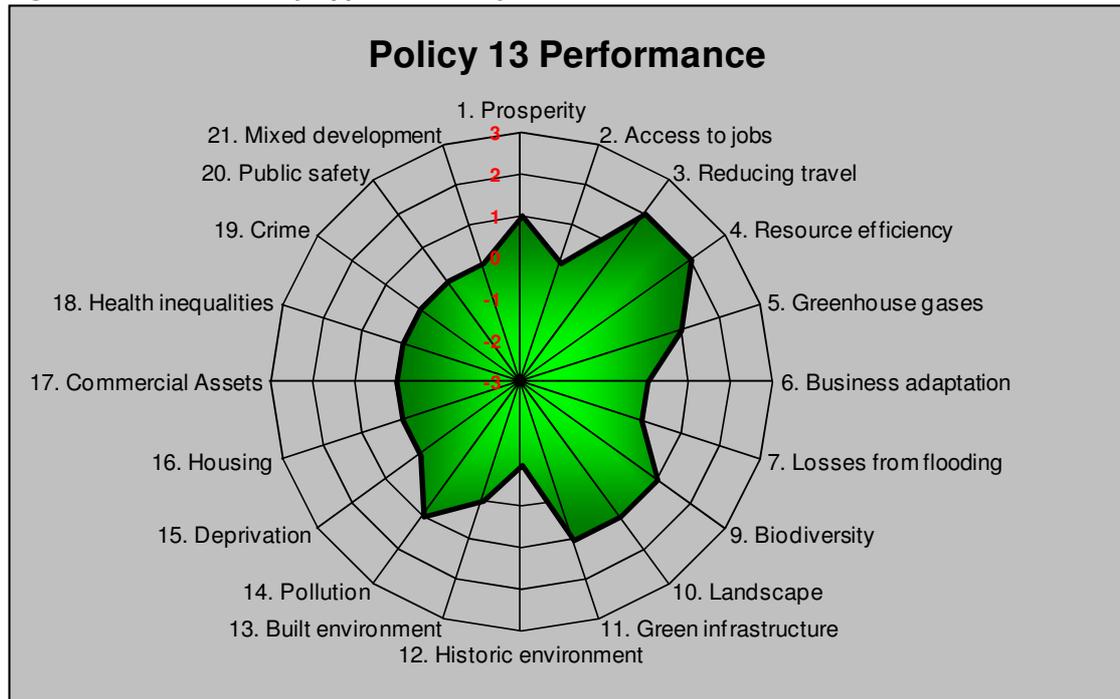
- Contribution towards the local and sub-regional economy and the regeneration of North Solihull;
- Opportunities for the co-location of related uses and wider benefits such as the production of secondary or recycled aggregates;
- Impact of the proposed activities, including any associated infrastructure, on surrounding land uses and amenity, taking account of the nature of the operations, duration, hours of operation, noise, dust vibration, air pollution, visual impacts and, in respect of underground extraction, the impact of subsidence;
- Impact on the local and sub-regional transport network, including the routing of lorries to and from the site and the potential for rail freight;
- Impact on the environment, landscape, built heritage and archaeology, nature conservation interests, ground and surface water quantity and quality, best and most versatile farmland, agricultural businesses and aerodrome safeguarding;
- Measures for mitigating any environmental, transport or other impacts or for compensation for loss or damage where appropriate, including the provision of appropriate buffers between extraction and environmental or other assets;
- The potential for subsidence, migration of gases and contamination of ground water associated with underground extraction;
- Restoration to a safe and high quality condition with appropriate aftercare in accordance with agreed restoration and aftercare schemes and within an agreed period following the cessation of extraction
- Reclamation to an agreed use, which should prioritise the contribution the site could make to green infrastructure, the conservation and enhancement of biodiversity, including Local Biodiversity Action Plans, the enhancement and restoration of the Arden landscape, flood risk management, appropriate recreation uses and agriculture, as well as the availability of suitable infill material if appropriate.

Proposals for ancillary uses will be permitted where they are located within the extraction site, are limited to the life of the permitted reserves and minimise the impacts on environmental assets, transport infrastructure and surrounding occupiers and uses. The Council will support proposals for complementary recycling facilities, which should be as close as possible to the point of extraction or disposal.

Forecast Effects

- 3.16.3 This policy gives rise to two moderate positive outcomes (reducing transport and resource efficiency) along with seven minor positive outcomes, with one minor negative outcome (see Figure 3.13 and Appendix G). The opportunity to convert the array of minor positive outcomes to moderate beneficial is constrained by the geographic scale of the effects being essentially local rather than across the Borough.
- 3.16.4 The policy has the potential to deliver positive outcomes across three of the four objectives under the sustainable consumption and production theme. While the moderate positive outcome on resource efficiency is considered to be a definite outcome, the minor positive outcome upon prosperity and the moderate beneficial outcome on reducing travel are both considered to be potential outcomes.
- 3.16.5 There is a possibility that the policy could give rise to a minor beneficial outcome for greenhouse gases under the climate change theme, whereas there are five minor beneficial and one minor adverse outcome for the historic environment under the natural resource protection theme. The negative outcome for the historic environment objective is as a result of the policy providing for the “assessment” of effects upon the historic environment rather than the delivery of a positive outcome.
- 3.16.6 No outcomes are anticipated against the sustainable communities theme.

Figure 3.13: Sustainability Appraisal: Policy 13



SA Objective		Likely Significant Effects		Rationale					
3.Reducing travel		Mod+ve		Local production minimises the importation of materials from elsewhere with consequential savings in transport that potentially benefit the entire Borough. The policy also encourages the co-location of recycling facilities and ancillary uses that may also contribute towards reducing travel.					
4.Resource efficiency		Mod+ve		Protects mineral resource from sterilisation, promotes the use of secondary aggregates and recycling of resources with efficiencies to emerge from the co-location of operations.					
Local	7	Unlikely	0	Direct	8	Positive	8	Maj +ve	0
District	2	Potential	6	Indirect	0	Negative	1	Mod+ve	2
Regional	0	Likely	0	Cumul	1			Min+ve	6
National	0	Definite	3					Neutral	12
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

Managing Uncertainty

3.16.7 Of the nine significant effects identified for the policy against the sustainability framework, there are three definite beneficial outcomes (resource efficiency, consideration of landscape and the minimisation of pollution risks.) The remaining outcomes are all considered to give rise to potential direct effects.

Mitigation and Enhancement

3.16.8 A series of mitigation and enhancement measures were identified under the sustainable consumption and production and natural resource protection themes during the appraisal of the Emerging Core Strategy. A large proportion of these measures have been incorporated into the revised policy as summarised in Tables 3.48 and 3.49.

- 3.16.9 Only two aspects for consideration emerge following a review of the current policy and both relate to setting out a vision of how mineral resource development ought to contribute to the longer term sustainability of the Borough. Hence the prospect of additional aggregate demand associated with High Speed 2 and the ancillary business development that could be associated with the proposed Interchange station may be capable of being provided for.
- 3.16.10 The other element for the longer term would be to set out a landscape scale strategy for the rural area that would provide a framework within which not only mineral operations could contribute but also provide one in which off-setting biodiversity measures could be delivered.

Table 3.48: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider introducing a policy on the management of recycled and secondary aggregates as part of the halving waste to landfill initiative. 	<ul style="list-style-type: none"> Policy provides for co-location of secondary or recycled aggregates with mineral sites and the location of permanent facilities within the Waste Management Facilities area of search. The contribution made by development to the use of alternative materials is also recognised. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider introducing a policy to promote the use of recycled and secondary aggregates in public building works. 	<ul style="list-style-type: none"> The policy provides for the use of alternative materials, such as secondary and recycled aggregates in all new development within the Borough. 	<ul style="list-style-type: none"> None.

Table 3.49: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Establish landscape scale mitigation strategy for biodiversity in accordance with the Natural Environment White Paper. 	<ul style="list-style-type: none"> Policy 10 addresses landscape scale approach, which will be pursued outside the local plan process. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider developing a long term landscape strategy within which individual mineral extraction operations are to take into account in their working and restoration strategies. 	<ul style="list-style-type: none"> This approach has been considered in the past but has not been pursued. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider making reference to the need to protect the historic environment of the area. 	<ul style="list-style-type: none"> The policy addresses the need to assess proposals in terms of the impact on built heritage and archaeology. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Examine the formulation of a strategy to protect villages from the cumulative effects of mineral extraction. 	<ul style="list-style-type: none"> Impacts on settlements included in criteria. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider the implications of High Speed 2 on mineral demand. 	<ul style="list-style-type: none"> Presents difficulties due to the uncertainty over the project and the timescales involved. Proposals recognise that there may be need to extract sand and gravel earlier in the plan period to avoid possible sterilisation. 	<ul style="list-style-type: none"> It is presumed that the 7.5 Mt excludes allowance for HS2 that is envisaged to impact at the end of the plan

<ul style="list-style-type: none"> Enhance the policy dealing with soils, restoration and after use to set out clear objectives as to the desired future state following mineral operations. 	<ul style="list-style-type: none"> Contributions of a restored site to green infrastructure, biodiversity, the Arden landscape, flood risk management, recreational use and agriculture is recognised. 	<ul style="list-style-type: none"> The policy covers all eventualities but perhaps could make reference to a landscape scale strategy for the rural area that sets the framework within which the objectives can be developed into measures.
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Alternatives

- 3.16.11 Options are limited by availability of viable resource and urban development, meaning reliance on areas of search.
- 3.16.12 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.17 Appraisal of Policy 14: Amenity Policy

Introduction

- 3.17.1 The proposed policy on amenity is examined in this section against the sustainability objectives to establish the policy's sustainability performance and identify potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold below. There was no change made to this policy for the Submission draft Local Plan.
- 3.17.2 Justification for the policy is presented in the Draft Local Plan. Details of the alternatives considered are briefly reviewed at the end of this section.

Policy P14 Amenity
<p>The Council will seek to protect and enhance the amenity of existing and potential occupiers houses, businesses and other uses in considering proposals for new development, and will:</p> <ul style="list-style-type: none"> • Permit development only if it protects and enhances the amenity of existing and proposed occupiers and would be a good neighbour • Consider the visual and other amenities of potential occupiers and users of new developments close to overhead power lines and substations. Developers will be expected to locate and design new developments so as to minimise the visual and other amenity impacts • Support the development of electronic communications networks including telecommunications and high speed broadband. The Council will have regard to the needs of telecommunications operators, any technical constraints on location of telecommunications apparatus, the potential for sharing sites, the impact of development on its surroundings, the sensitivity of the environment and the design and external appearance of telecommunications apparatus. Development in or adjacent to sensitive locations will be permitted only if there is no other technically suitable location that both meets operational requirements and causes less environmental harm and any mast is at a distance of at least twice its height from the nearest residential properties • Safeguard important trees, hedgerows and woodlands, encourage new and replacement tree and hedgerow planting and identify areas that may be suitable for the creation of new woodlands. Priority will be given to locations that enhance or restore the green infrastructure network and to the planting of species characteristic of the Arden Warwickshire landscape • Encourage better air quality in and around the Borough through the adoption of low emission zone initiatives such as those involving the use of electric vehicles for freight and public transport. Development that would contribute to air pollution, either directly or indirectly will be permitted only if it would not hinder or significantly harm the achievement of air quality objectives or any relevant Air Quality Management Plan, and it incorporates appropriate attenuation, mitigation or compensatory measures • Require proposals for development on land known or suspected to be contaminated to include appropriate information to enable the potential implications to be assessed and to incorporate any necessary remediation • Seek to minimise the adverse impact of noise. Development likely to create significant noise will be permitted only if it is located away from noise sensitive uses or it incorporates measures to ensure adequate protection against noise. Noise sensitive development will be permitted only if it is located away from existing sources of significant noise, or if no suitable alternatives exist, the development incorporates measures to reduce noise intrusion to an acceptable level • Protect the amenity of residential and shopping areas, community facilities and open space from bad neighbour uses. Development that would be seriously harmful because of

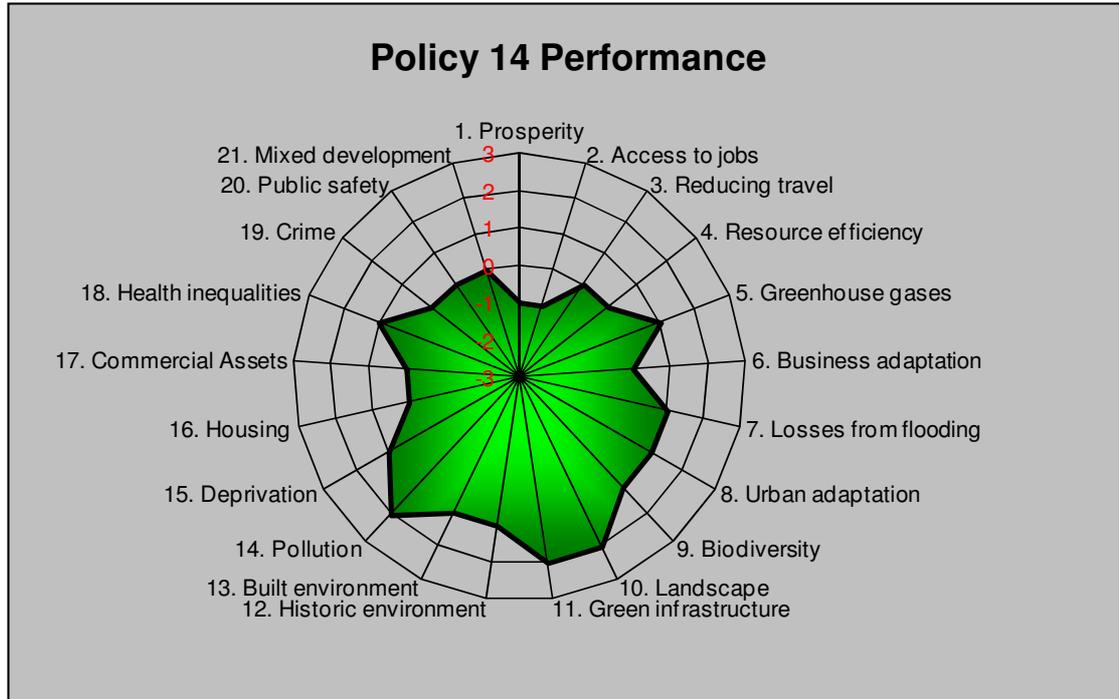
smell, noise or atmospheric pollution will not be permitted, whilst development that would be potentially harmful to such areas will be expected to incorporate appropriate attenuation, mitigation or compensatory measures. **In locations close to existing bad neighbour uses, the Council will not permit new residential or other sensitive development, unless the effects can be satisfactorily mitigated as part of the development**

- **Protect those parts of the countryside in the Borough that retain a dark sky from the impacts of light pollution. Development involving external lighting outside established settlements will be permitted only where significant lighting already exists, or the benefits of the development clearly outweigh the impact of the lighting on the countryside. Any lighting scheme should be the minimum required for the purposes of the development and should avoid light spillage and harmful effects on biodiversity**
- **Protect the tranquil and locally distinctive areas in the Borough by guiding new development, particularly those that will create significant noise**, either directly or through associated transport, to locations that will avoid or minimise adverse impacts.

Forecast Effects

- 3.17.3 This policy gives rise to three moderate positive outcomes (landscape, green infrastructure and pollution) along with eight minor positive outcomes, and two minor negative outcomes (see Figure 3.14 and Appendix G). The opportunity to convert the array of minor positive outcomes to moderate beneficial is constrained by the geographic scale of the effects being essentially local rather than across the Borough. Only three effects are considered to be likely to be Borough-wide – those identified as being likely to give rise to a moderate beneficial outcome,
- 3.17.4 In the context of the sustainable consumption and production theme, the policy is considered to have the potential to constrain employment opportunities by permitting development only if it protects and enhances the amenity of existing and proposed occupiers. The policy does however provide support for high speed broadband may mitigate this effect.
- 3.17.5 Within the climate change and energy theme, the policy is anticipated to give rise to three potential minor beneficial outcomes on greenhouse gases, flooding and urban adaptation. The adoption of a low emission zone should also contribute towards reducing greenhouse gas emissions, while the provision of green infrastructure should assist with reducing losses for the flooding and urban adaptation objectives.
- 3.17.6 Across the six objectives within the natural resource protection & environment theme, the policy provides three likely moderate beneficial outcomes (landscape, green infrastructure and pollution). In addition there are three minor beneficial outcomes (biodiversity, historic environment and built environment).
- 3.17.7 Only two objectives within the sustainable communities theme deliver potential minor beneficial outcomes (deprivation and health inequalities). Support for broadband may assist in access improvements to employment, education and health services and potentially reduce imbalances across the Borough. Also, the potential low emission zone as well as improved broadband may contribute towards reducing health inequalities particularly for those living in high trafficked areas.
- 3.17.8 Most of the outcomes from the policy are judged to be indirect and local reflecting the policy itself typically in the short to medium term duration although those outcomes within the climate change and energy theme were considered to occur over the longer term (see Appendix G).

Figure 3.14: Sustainability Appraisal: Policy 14



SA Objective		Likely Significant Effects		Rationale					
10. Landscape		Mod+ve		New development is to protect and enhance the existing amenity with safeguarding of important vegetation, the planting of species characteristic of the Arden Warwickshire landscape is likely to lead to improvements in the landscape and demonstrates that landscape issues are to be considered in development decisions.					
11. Green infrastructure		Mod+ve		The policy ought to contribute to the enhancement of green infrastructure.					
14. Pollution		Mod+ve		The policy provides for the protection of tranquil areas, protection from light pollution, controls on noise generating development, the adoption of a low emission zone and the avoidance of significant harm to the achievement of air quality objectives or an air quality management plan.					
Local	10	Unlikely	0	Direct	5	Positive	11	Maj +ve	0
District	3	Potential	9	Indirect	8	Negative	2	Mod+ve	3
Regional	0	Likely	4	Cumul	0			Min+ve	8
National	0	Definite	0					Neutral	8
								Min-ve	2
								Mod-ve	0
								Maj -ve	0

Managing Uncertainty

3.17.9 Of the 13 significant effects identified for the policy against the sustainability framework, only four generate likely outcomes (consideration of landscape, green infrastructure, built environment and the minimisation of pollution risks). The remaining outcomes are all considered to give rise to potential effects although the potential effects within the sustainable consumption and production as well as the climate change and energy themes are considered to be indirect effects.

Mitigation and Enhancement

- 3.17.10 Although this is a new policy, several mitigation/enhancement proposals made during the appraisal of the Emerging Core Strategy have some relevance to this new policy and are presented in Tables 3.50 to 3.53.
- 3.17.11 The outcomes from the policy remain subject to considerable uncertainty being mainly dependent upon the actions of others for their delivery. Perhaps the main aspect where mitigation/enhancement could be delivered would be in relation to the need for frequent reviews of open space requirements to ensure an up to date evidence base to inform the preparation of site development briefs.

Table 3.50: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> In determining that existing public open space is surplus to requirements, the Council ought to take into account future rather than existing needs to reflect the changing nature of the local community and future development activity. 	<ul style="list-style-type: none"> This topic is considered in policy 20 – open space. 	<ul style="list-style-type: none"> None.

Table 3.51: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Reference the need to protect and enhance open spaces within the most built up parts of the district to provide mitigation against the urban heat island effect. 	<ul style="list-style-type: none"> Policy 9 requires developers to ensure resilience to the impacts of a changing climate through a range of adoption measures including green infrastructure. 	<ul style="list-style-type: none"> None.

Table 3.52: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> The protection and planting of street trees ought to be encouraged to enhance amenity and mitigate urban heating effects. 	<ul style="list-style-type: none"> The policy provides for the protection of trees. 	<ul style="list-style-type: none"> None.

Table 3.53: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider the layout and the number of houses served by access roads for new housing areas so as to maximise the opportunity for safe play areas adjacent to housing for parental supervision. 	<ul style="list-style-type: none"> To be addressed through development briefs for each site. Policy 5 addresses open space, sports and recreation. Also policy 15 provides for creation of attractive, safe streets and spaces. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Make reference to the particular issues surrounding open space provision (and possibly also access to the countryside) associated with the North Solihull Regeneration Area. 	<ul style="list-style-type: none"> Open space covered in Policy 20. Access to River Cole valley of greater benefit given severance from countryside by roads. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Promote the adoption of green gyms in communities experiencing high levels of health inequalities. 	<ul style="list-style-type: none"> Issue is reflected in Policy 18, although specific reference considered to be too detailed for local plan. 	<ul style="list-style-type: none"> None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> The amenity value of watercourses, lakes and ponds are to be enhanced with the opening of culverts being encouraged where there is amenity benefit without adverse effects on water quality, drainage and public health. 	<ul style="list-style-type: none"> The de-culverting of watercourses and contributing towards amenity, recreation, biodiversity and landscape is recognised in policy 11. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.17.12 This policy addresses a range of amenity and environmental concerns not previously included as they were considered too detailed for a Core Strategy. Matters could be covered in a separate document but a single document is considered to offer greater benefits.
- 3.17.13 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.18 Appraisal of Policy 15: Securing Design Quality

Introduction

3.18.1 The proposed policy on design quality is examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify potential improvements to strengthen its sustainability credentials. The specific policy commitments are highlighted in bold below with changes introduced for the Submission draft Local Plan highlighted in red. Justification for the policy is presented in the Draft Local Plan.

Policy P15 – Securing Design Quality
<p>All development proposals will be expected to achieve high quality, inclusive and sustainable design, which meets the following key principles:</p> <ul style="list-style-type: none"> • Conserves and enhances local character, distinctiveness and streetscape quality and ensures that the scale, massing, density, layout, materials and landscape of the development respect the surrounding natural, built and historic environment; • Ensures that new development achieves the highest possible standard of environmental performance through sustainable design and construction and the location and layout of the development in accordance with the guidance provided in Policy 9 – Climate Change; • Secures the sustainable long-term use of new development through flexible, robust and future-proofed design e.g. digital connectivity; • Makes appropriate space for water within the development, using sustainable drainage (SuDS) principles, to minimise and adapt to the risk of flooding. Further guidance is provided in Policy 11 – Water Management; • Conserves and enhances biodiversity, landscape quality and considers the impact on and opportunities for green infrastructure at the earliest opportunity in the design process. Further guidance is provided in Policy 10 – Natural Environment; • Integrates the natural environment within the development through the provision of gardens, quality open space and/ or improved access to, enhancement or extension of the green infrastructure network Further guidance is provided in Policy 20 – Open Space, Sport and Recreation. • Creates attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce the fear of crime. <p>Development proposals will also be expected to contribute to and where appropriate, create a sense of place. Such measures may include; reflecting heritage assets and their setting in the design process, integrating landscape into the development, promoting diversity through a mix of uses within the site, or the installation of public art.</p> <p>All residential development proposals should be built to the Lifetime Homes standard and demonstrate at least the ‘Good/Silver’ Building for Life (BfL) design standard or its equivalent. However, the Council will take into account the economics of provision, including particular costs that may threaten the viability of the site. All residential development will be expected to adhere to the guidance set out in the New Housing in Context SPG until this has been updated and the Council will prepare Supplementary Planning Documents to provide necessary additional guidance.</p> <p>Applicants should adhere to the urban design principles set out in established design guidance; Urban Design Compendium 1 and 2 (2007), By Design (2000 and 2001), Manual for Streets 1 (2007) and 2 (2010), Car Parking: What Works Where (2006), Building for Life and Secured by Design principles, or their equivalents.</p> <p>Development at key economic assets within the M42 Economic Gateway; the National Exhibition Centre, Birmingham Airport, Birmingham Business Park and Blythe Valley Park, will be expected to be of the highest quality to reflect their strategic importance.</p>

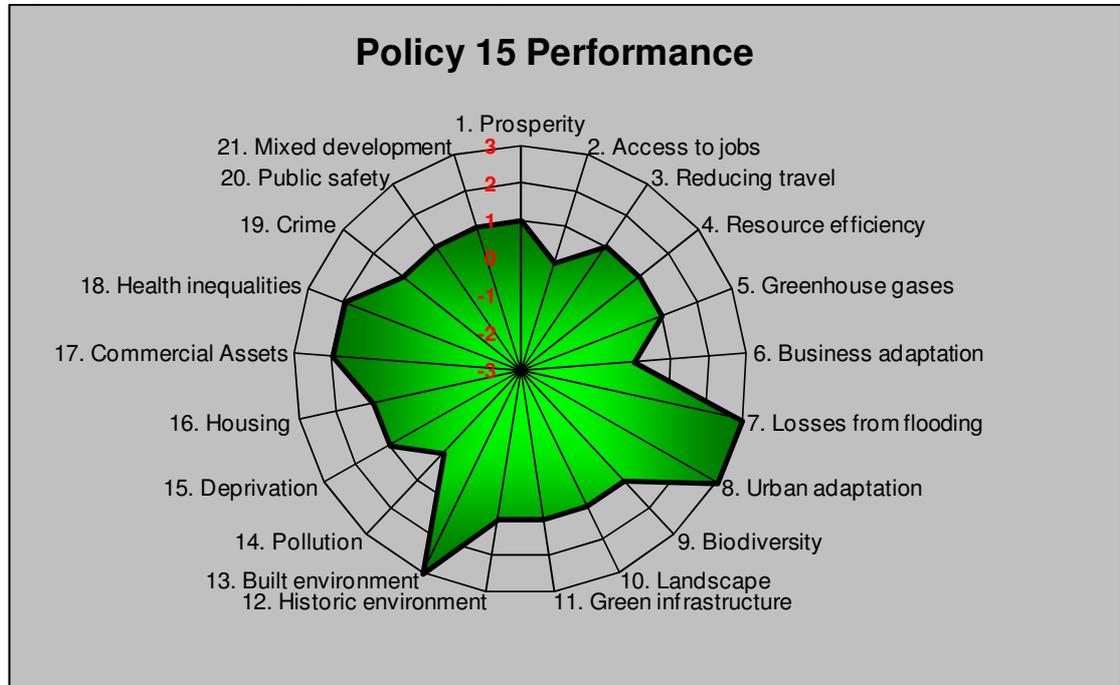
Applicants are encouraged to engage with Officers early in the design **process through pre-application discussions and will be required to demonstrate that they have followed the robust Assessment-Involvement-Evaluation-Design process outlined in the national guidance on Design and Access Statements. Major development proposals are required to demonstrate how the local community has been consulted and engaged in the design process. Significant development proposals will also be encouraged to engage with the national and regional design process.**

Forecast Effects

- 3.18.2 The policy performs in a positive manner across sixteen of the twenty one sustainability objectives and represents a major improvement upon the Emerging Core Strategy policy 3. As can be seen from Figure 3.15 there are three major beneficial outcomes, two moderate beneficial and thirteen minor positive outcomes.
- 3.18.3 The potential minor adverse outcomes identified in the Submission draft Local Plan policy arose from a risk that high design standards may adversely affect the viability of some housing projects. The potential for the negative effects upon prosperity and housing provision have been addressed in the Submission draft Local Plan policy that now states that the implications on project viability are to be part of the considerations. Consequently, the adverse effects are not now expected enabling a minor positive to be assigned.
- 3.18.4 In terms of the outcomes against the four sustainable consumption and production theme, two minor positive outcomes are likely (reducing travel and resource efficiency), with one neutral outcome (prosperity). This potential effect on the viability of development, particularly in areas less able to sustain development costs has been addressed by the policy change. Overall the policy should support “community capital” and thus deliver the improved public realm, community facilities and access improvements that form part of the sustainability objective.
- 3.18.5 Two major positive outcomes are likely (losses from flooding and urban adaptation) within the climate change and energy theme. This is accompanied by a potential minor positive outcome for the greenhouse gas emissions.
- 3.18.6 Four of the six natural resource protection objectives record likely minor positive outcomes (biodiversity, landscape, green infrastructure and the historic environment). While the policy records a neutral outcome against the pollution objective, it also delivers a definite major positive outcome for the built environment. It is noted however, that the policy states that “development at key economic assets within the M42 Economic Gateway; the National Exhibition Centre, Birmingham Airport, Birmingham Business Park and Blythe Valley Park, will be expected to be of the highest quality to reflect their strategic importance”. Hence there is uncertainty how this policy works in relation to policy 1 which states that development in these areas is to “have regard to other relevant policies”.
- 3.18.7 For the sustainable communities’ objective, policy 3 from the Emerging Core Strategy placed a focus upon raising the quality of the built environment in the North Solihull Regeneration Area. This revised policy no longer provides a focus upon the regeneration zone, but it seeks to deliver quality design across the Borough. A risk that the Consultation draft Local Plan policy could have a potential for adverse effects on investment, and thus adversely affect the interest of the regeneration areas has been addressed in the Submission draft Local Plan policy.
- 3.18.8 The issue of short term needs and longer term aspirations for sustainable well-designed developments is also a consideration in balancing the potential implications of the policy upon the prosperity, deprivation and housing sustainability objectives.
- 3.18.9 The outcomes from this policy are envisaged to last for over 10 years and extend over the major duration of the Core Strategy and beyond. Some of the outcomes are more likely to occur over the short to medium term (3-10 years) basically being affected by the uncertainties associated with how the sustainable communities’ objectives may perform as a result of wider economic trends.
- 3.18.10 As noted above, while ten of the outcomes are considered to be a direct consequence of the policy, and eight are considered to be either cumulative or indirect in nature. The cumulative effects arise for the

resource efficiency, greenhouse gases, losses from flooding, built environment and health inequalities objectives (see Appendix G).

Figure 3.15: Sustainability Appraisal: Policy 15



SA Objective		Likely Significant Effects		Rationale					
7. Losses from flooding		Maj+ve		Promotion of SuDS, adherence to urban design principles and guidance as well as green infrastructure should contribute towards reducing losses from flooding.					
8. Urban adaptation		Maj+ve		Highest possible standards of environmental performance including design, construction, location and layout and links with policy 9 on climate change.					
13. Built environment		Maj+ve		This policy seeks to maximise delivery of a quality built environment across the Borough.					
17. Commercial assets		Mod+ve		The design standards ought to assist in enhancing the status of the regional assets.					
18. Health inequalities		Mod+ve		With measures across the Borough, enhanced design and the creation of accessible public spaces with reduced crime, each cumulatively is likely to contribute towards helping to meet the needs of the elderly population and promote healthy lifestyles.					
Local	13	Unlikely	0	Direct	10	Positive	16	Maj +ve	3
District	5	Potential	3	Indirect	3	Negative	0	Mod+ve	2
Regional	0	Likely	14	Cumul	5			Min+ve	13
National	0	Definite	1					Neutral	3
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

Managing Uncertainty

3.18.11 Of the eighteen outcomes, fifteen are considered to be likely or definite outcomes. There are three minor positive that are considered to offer a potential outcome. Not surprisingly these also match up with the

indirect effects and a cumulative effect identified above (see Appendix G). The Supplementary Planning Documents could increase the certainty that beneficial outcomes can result from the policy.

Mitigation and Enhancement

- 3.18.12 This policy was originally presented as Policy 3 in the Emerging Core Strategy and the tables below summarise the mitigation/enhancement measures proposed in the earlier appraisal report.
- 3.18.13 It is noted that the policy is mainly focussed on the design of the external environment, with reference to the internal environment being extended to include design standards equivalent to Building for Life and Lifetime Homes standards. The policy does not explicitly consider design for the elderly or those with mobility impairments. Hence it is suggested that an additional element could be incorporated into the seventh bullet point within the policy (see Table 3.57).
- 3.18.14 The main aspect where mitigation is considered necessary is in relation to the potential for local adverse effects to occur in deprived areas where the policy may adversely impact on the delivery of regeneration projects. An element of flexibility in the application of the policy may be desirable when considering short term needs against longer term aspirations.
- 3.18.15 Tables 3.54 to 3.57 summarise the recommendations provided in the appraisal of the Emerging Core Strategy, the responses of the Council along with additional proposals from the revised policy.

Table 3.54: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Urban design policy could address issues such as use of recycled materials. 	<ul style="list-style-type: none"> Consider the requirement in Policy 15 for sustainable design and construction is sufficient to encourage use of recycled materials. Policy 15 also refers to Policy 9, which provides further detail 	<ul style="list-style-type: none"> Consider a SPD or Developer Briefs to provide for design for the segregated storage of waste.
<ul style="list-style-type: none"> Urban design policy could explicitly address promotion of mixed use of space through good design. 	<ul style="list-style-type: none"> Reference to the urban design principles set out in established guidance delivers this measure. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Require non-commercial development to demonstrate which BREEAM standard would be achieved. 	<ul style="list-style-type: none"> Policy 15 requires all development to achieve the highest possible standard of environmental performance. The policy justification clarifies that this should be evidenced by an appropriate national standard such as BREEAM. 	<ul style="list-style-type: none"> None.

Table 3.55: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Does the protection of mature residential suburbs compromise the delivery of decentralised/ community heating systems. 	<ul style="list-style-type: none"> Policy 15 requires all development Borough wide to conserve and enhance local character and distinctiveness as well encouraging the highest possible environmental standards. 	<ul style="list-style-type: none"> None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Design of the public realm ought to not just address public art but also provide for adaptation to climate change and provide features that assist in proving cooling areas particularly for the elderly as well as designing for more stormy winds conditions. 	<ul style="list-style-type: none"> Policy 15 requires development to be future proofed which includes considering adapting to the future effects of climate change. Bullet point 7 of the policy highlights the Council's requirements for well designed public realm. 	<ul style="list-style-type: none"> Consider a SPD to designing for extreme weather events.

Table 3.56: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Urban design policy should address issues such as provision of green or brown roofs and rainwater harvesting. 	<ul style="list-style-type: none"> To be addressed within the Sustainable Design and Construction SPD. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> The protection and planting of street trees ought to be encouraged to enhance amenity and mitigate urban heating effects. 	<ul style="list-style-type: none"> Policy 14 provides for the protection of trees. 	<ul style="list-style-type: none"> Consider the reference to conservation and enhancement of landscape quality in Policy 15 will give sufficient protection. The policy could also give a cross reference to Policy 14.

Table 3.57: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Would the design principles address the integration of sustainability objectives? 	<ul style="list-style-type: none"> Policy 15 strives to raise the standard of design across the Borough. This will also help to improve the quality of the environment in the North Solihull Regeneration Area 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Design principles should encompass designing out crime and enhancing public safety. 	<ul style="list-style-type: none"> The policy addresses the designing out of crime and enhancing public safety. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.18.16 Design requirements could have been included in other policies such as Policy 1 – Support Economic Success or Policy 4 – Meeting Housing Needs. However, an overarching policy was considered to be more appropriate as the design of development is cross cutting and relates to several topic areas e.g. climate change and sustainability, historic and natural environment, water and public realm. An overarching design policy with references to other policies for further guidance was considered to be more user friendly for applicants when submitting planning applications.
- 3.18.17 During the task of addressing the responses to the Consultation draft Local Plan the following alternatives were considered:
- Making reference to specific design guides, however as guidance would evolve this approach could risk causing the policy becoming inappropriate.
 - Removing reference to Life Time Homes, although this could compromise the challenge of addressing housing needs of an increasingly ageing population.
- 3.18.18 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.19 Appraisal of Policy 16: Conservation of Heritage Assets and Local Distinctiveness

Introduction

- 3.19.1 The proposed policy on heritage assets and local distinctiveness is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Minor changes have been made to the policy as highlighted in red.
- 3.19.2 The justification for the policy is provided in the draft Local Plan. Specific policy commitments are highlighted below. A review of the alternatives to the policy is presented at the end of this section.

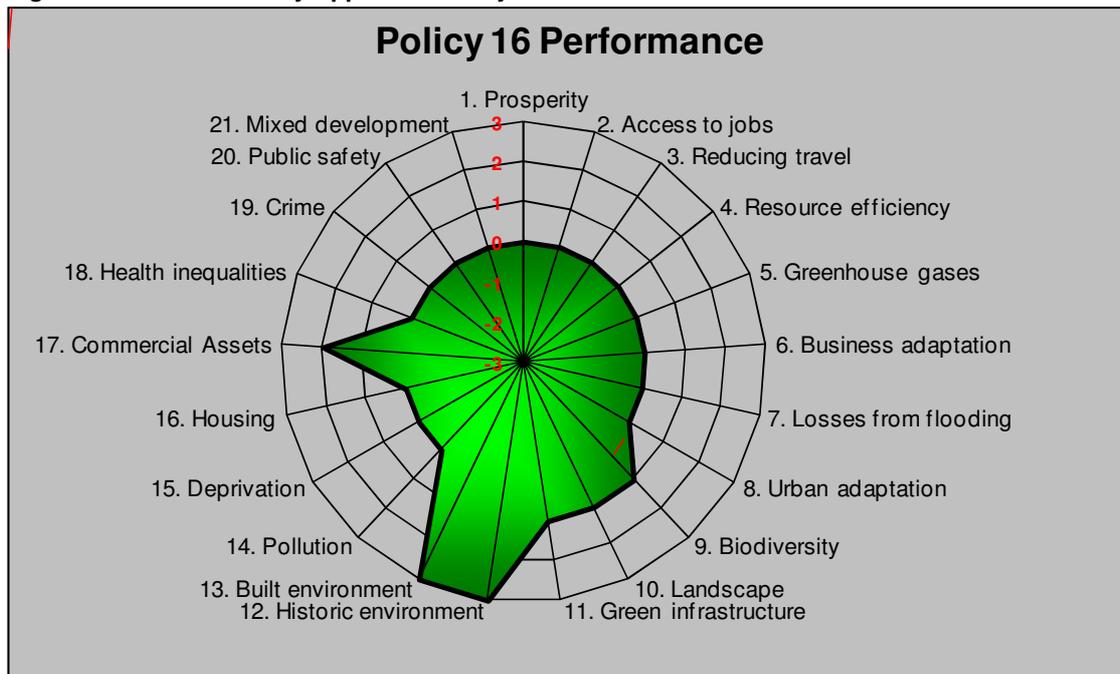
Policy P16 – Conservation of Heritage Assets and Local Distinctiveness
<p>The Council recognises the importance of the historic environment to the Borough’s local character and distinctiveness and its cultural, social, environmental and economic benefits and the effects this has on civic pride.</p> <p>The Council considers the following characteristics make a significant contribution to the local character and distinctiveness of the Borough and where applicable, development proposals will be expected to demonstrate how these characteristics have been conserved:</p> <ul style="list-style-type: none"> • The historic core of Solihull Town Centre and its adjacent parks. • The historical development and variety of architectural styles within the Mature Suburbs and the larger established rural settlements of Meriden, Hampton-in-Arden, Balsall Common, Knowle, Dorridge, Bentley Heath, Hockley Heath, Cheswick Green and Tidbury Green. • The Arden landscape, historic villages, hamlets, farmsteads, country and lesser houses and the distinct medieval core of historic rural settlements including Berkswell, Barston, Temple Balsall, Meriden Hill, Walsal End, Hampton-in-Arden, Bickenhill and Knowle. • Parks, gardens and landscape including common, woodland, heathland and distinctive fieldscapes as defined in the Warwickshire Historic Landscape Characterisation. • The canal and railway network, including disused railway lines and the working stations at Solihull, Olton, Dorridge and Shirley, together with associated structures. <p>Development will be expected to preserve or enhance conserve heritage assets as appropriate to their significance, preserve or enhance conserve local character and distinctiveness and create or sustain a sense of place. In Solihull, heritage assets include; Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas and also non-designated assets; buildings, monuments, archaeological sites, places, areas or landscapes positively identified in Solihull’s Historic Environment Record as having a degree of significance meriting consideration in planning decisions, such as those identified on the Local List.</p> <p>All applications and consents that affect the historic environment will be expected to have considered and used the evidence in the Solihull Historic Environment Record to inform the design of the proposal. This should be explained in the accompanying Design and Access Statement or, for significant proposals, in a Heritage Statement.</p> <p>Proposals seeking to modify heritage assets for the mitigation of and adaptation to the effects of climate change will be expected to be sympathetic and conserve the special interest and significance of the heritage asset and or its setting.</p>

Forecast Effects

- 3.19.3 The amendments introduced for the Submission draft Local Plan policy do not cause any changes to the appraisal provided for the Consultation draft Local Plan.

- 3.19.4 This policy largely results in neutral effects upon the sustainability framework (15 neutral objectives), however it does give rise to two major beneficial (historic environment and built environment), one moderate beneficial impact and three minor beneficial outcomes with no adverse effects.
- 3.19.5 Not surprisingly the impacts of the policy occur within the natural resource protection and environmental enhancement theme although there is a potential moderate beneficial effect upon commercial assets (see Figure 3.16).

Figure 3.16: Sustainability Appraisal: Policy 16



SA Objective		Likely Significant Effects		Rationale					
12.Historic environment		Maj+ve		Recognises different historic environment resources and their role in delivery of local distinctiveness.					
13.Built environment		Maj+ve		Likely to enhance local distinctiveness and identity.					
17.Commercial assets		Mod+ve		Through enhancing local distinctiveness the policy has potential to support attractiveness of RIS.					
Local	3	Unlikely	0	Direct	2	Positive	6	Maj +ve	2
District	3	Potential	3	Indirect	0	Negative	0	Mod+ve	1
Regional	0	Likely	0	Cumul	4			Min+ve	3
National	0	Definite	3					Neutral	15
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

- 3.19.6 The policy delivers positive outcomes across the natural resource protection and sustainable communities themes with only neutral outcomes anticipated for the sustainable consumption and climate change themes.
- 3.19.7 Five of the six sustainability objectives under the natural resource protection theme give rise to two definite major positive outcomes with three minor positive outcomes two of which have the potential cumulative outcomes.
- 3.19.8 The effects of the policy are mainly anticipated to occur over the longer term and a generally a result of the cumulative effects of individual change resulting from the policy.

Managing Uncertainty

- 3.19.9 Three of the forecast effects are considered to have the potential to arise with the beneficial effects upon biodiversity and the commercial assets objectives being viewed to be potentially beneficial outcomes.

Mitigation and Enhancement

- 3.19.10 No mitigation and enhancement measures have been identified for this policy.

Alternatives

- 3.19.11 The list of characteristics identified as making a significant contribution to the local character and distinctiveness of the Borough could have been moved from Policy 16 to the Spatial Portrait of the Plan. However, given that sustaining the attractiveness of the Borough is a key challenge for the Plan, it was considered important to retain the list in the policy to ensure that future development conserves the identified special characteristics and appropriate weight is given to this through the Development Management process.
- 3.19.12 An alternative of not to bring the Submission draft Local Plan policy in line with the legislation and the National Planning Policy Framework risked causing a lack of clarity.
- 3.19.13 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.20 Appraisal of Policy 17: Countryside/ Green Belt

Introduction

- 3.20.1 Countryside and greenbelt issues are examined in this section against the sustainability objectives to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. Justification for the policy is presented in the Draft Local Plan, while below the specific policy commitments are highlighted in bold with changes introduced for the Submission draft Local Plan highlighted in red. At the end of this section, a brief review of the consideration given to alternatives is provided.

Policy P17 – Countryside / Green Belt

The Council will safeguard the “best and most versatile” agricultural land in the Borough and encourage the use of the remaining land for farming. **Development affecting the “best and most versatile” land will be permitted only if there is an overriding need for the development or new use, and there is insufficient lower grade land available, or available lower grade land has an environmental significance that outweighs the agricultural considerations, or the use of lower grade land would be inconsistent with other sustainability considerations.** Development involving farm-based diversification will normally be permitted, providing it is in an appropriate location, of a scale appropriate to its location, and does not harm the Green Belt, conservation or enhancement policies.

The Council will not permit inappropriate development in the Green Belt, except in very special circumstances. In addition to the national policy, the following provisions shall apply to development in the Borough’s Green Belt:

Development involving the replacement, extension or alteration of buildings in the Green Belt will not be permitted unless it is demonstrated that it will not harm the need to retain smaller more affordable housing. ~~or the character and quality of the Green Belt.~~

Limited infilling will not be considered to be inappropriate development within the Green Belt settlements, providing this would not have an adverse effect on the character of the settlements. Limited infilling shall be interpreted as the filling of a small gap within an otherwise built-up frontage with not more than two dwellings

The reasonable expansion of established businesses in the Green Belt, will be allowed where the proposal would make a significant contribution to the local economy or employment

Where the re-use of buildings is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.

Where waste management operations involving inappropriate development are proposed in the Green Belt, the contribution of new capacity towards the treatment gap identified in the Borough may amount to very special circumstances, providing the development accords with the waste management policy of this plan.

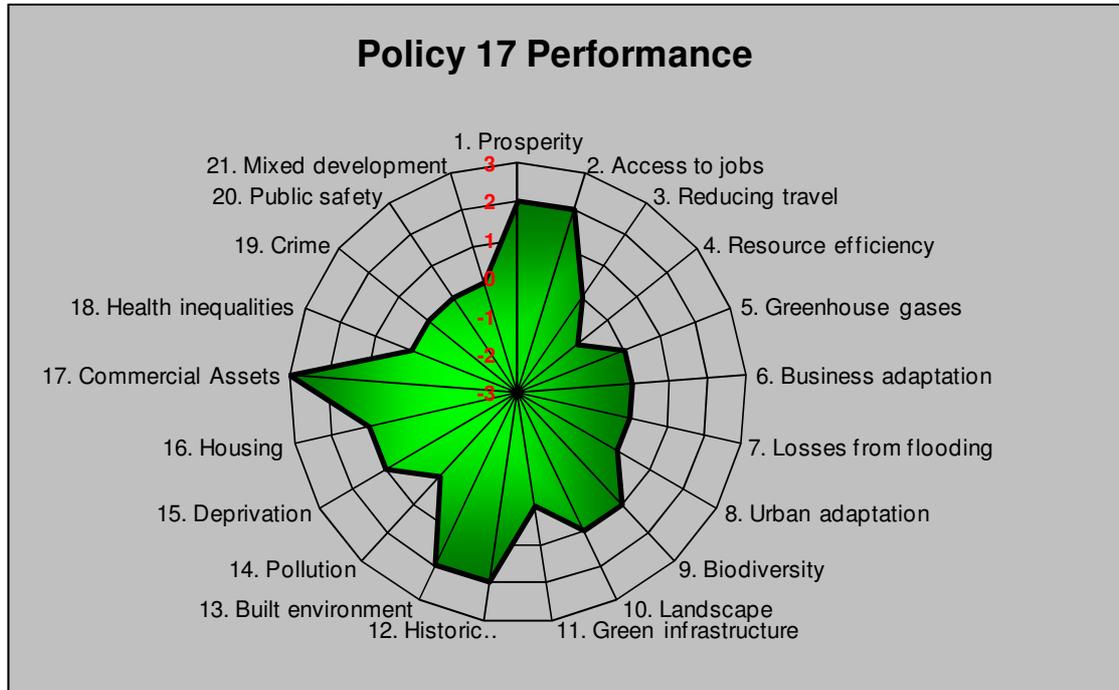
The small settlements of Hampton-in-Arden, Hockley Heath, Meriden and Catherine de Barnes are inset in the Green Belt and are not therefore subject to Green Belt policy. Nevertheless, the Council, **in considering applications for development in these settlements, will take into account the importance of their rural setting and of their attributes, such as historic buildings, open space, density of development, landscape and townscape that contribute towards their special character.** Immediately beyond the inset boundary, strict Green Belt policies will apply.

Forecast Effects

- 3.20.2 The amendment to the policy does not alter the sustainability performance since the deleted text is covered by the later requirement that there should be no conflict with nor any materially greater impact on the openness of the Green Belt and etc.

3.20.3 The policy is forecast to result in 9 positive outcomes with one minor adverse effect. Key amongst the positive outcomes is the potential that through enhancing local distinctiveness and the rural identity that the regional investment assets retain and enhance their status. Furthermore, the policy does not compromise the expansion of these assets. Along with this major beneficial outcome, four moderate beneficial and four minor beneficial outcomes are anticipated (see Figure 3.17).

Figure 3.17: Sustainability Appraisal: Policy 17



SA Objective	Likely Significant Effects		Rationale						
17. Commercial Assets	Maj+ve		Through enhancing local distinctiveness the policy has potential to support attractiveness of RIS.						
1. Prosperity	Mod+ve		Provides exemption to the Green Belt policy for the expansion of large businesses where there is a contribution to the local economy or employment especially when accessible from North Solihull.						
2. Access to Jobs	Mod+ve		Provides an exemption to Green Belt policy for major expansion offering employment accessible from North Solihull.						
12.Historic environment	Mod+ve		Provides for the consideration of the effects of development on the special character of rural settlements that ought to lead to protection and conservation of historic assets.						
13.Built environment	Mod+ve		Provides for limited infill and requires that development in the small settlements consider their special characteristics.						
Local	5	Unlikely	0	Direct	8	Positive	10	Maj +ve	1
District	4	Potential	9	Indirect	2	Negative	0	Mod+ve	4
Regional	1	Likely	0	Cumul	0			Min+ve	4
National	0	Definite	1					Neutral	11
								Min-ve	1
								Mod-ve	0
								Maj -ve	0

3.20.4 Of the ten outcomes two are indirect (biodiversity and deprivation). Biodiversity may be protected as being a consideration in the decision to accept development involving the best and most versatile

agricultural land. Deprivation may be reduced due to the potential for employment accessible from North Solihull to contribute to reducing deprivation in the regeneration area not being constrained by the Green Belt. The other outcomes are all direct with five having the potential to be of district or regional scale.

- 3.20.5 The policy has the potential to deliver two moderate beneficial outcomes (prosperity and access to jobs) and one minor beneficial outcome (resource efficiency) result.
- 3.20.6 While neutral outcomes are forecast for the climate change and energy theme, four potential outcomes are anticipated for the Natural Resource Protection & Environmental Enhancement theme (two minor positive outcomes - biodiversity and landscape and two moderate outcomes - historic environment and built environment).
- 3.20.7 In terms of the sustainable communities theme, two minor positive (deprivation and housing) and one major beneficial outcome (commercial assets) are anticipated. The effects upon deprivation are considered to be a potential beneficial outcome as green belt release for existing businesses applies across the Borough rather than focused releases in support of sites readily accessible from North Solihull.

Managing Uncertainty

- 3.20.8 Only one outcome from the policy is considered to be definite to occur, the remaining **nine** all have a potential to occur primarily been dependent upon the manner in which individual development proposals in the Countryside/ Green Belt respond to the policy.
- 3.20.9 A key factor causing uncertainty in the anticipated outcomes is the extent to which “reasonable” expansion of existing businesses in the Green Belt would be permitted. The uncertainty focuses upon the phrase “reasonable expansion” since this implies that the business must currently be located into the Green Belt. While the policy would preclude large scale inward investment that would be new to the area unless within the remit of policy 1, the policy could be interpreted as allowing existing businesses located anywhere within the Borough to expand by new premises within the Green Belt.

Mitigation and Enhancement

- 3.20.10 As this is a new policy not previously presented in the Emerging Core Strategy, no mitigation and enhancement measures were previously identified. The only mitigation measure considered necessary at this stage is to clarify the situation concerning the “expansion of large businesses that would contribute to the local economy or employment.
- 3.20.11 It is suggested that the following terms be clarified:
- “reasonable expansion of established businesses into the Green Belt”;
 - “a significant contribution to the local economy or employment”.

Alternatives

- 3.20.12 Policy addresses concerns about the lack of policy guidance for the countryside and the impact of changes in national policy for green belts. A range of options for the expansion of established businesses were considered and the policy allows greater flexibility for expansion of businesses.
- 3.20.13 The Consultation draft Local Plan policy considered character and quality that are matters not relevant to Green Belt policy. The alternative of retention may give rise to a lack of clarity.
- 3.20.14 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.21 Appraisal of Policy 18: Health and Well-Being

Introduction

- 3.21.1 This section presents a review of the appraisal of the Draft Local Plan policy on support health and well-being against the sustainability objectives. The aim of the appraisal is to establish the policy's sustainability performance and identify any potential improvements to strengthen its sustainability credentials.
- 3.21.2 No changes have been made to the Consultation draft Local Plan. Justification for the policy is presented in the Draft Local Plan.
- 3.21.3 The policy commitments are highlighted below. Details of the alternative approaches that were considered are presented at the end of this section.

Policy P18 – Health and Well Being
<p>The potential for achieving positive health outcomes will be taken into account when considering all development proposals. Where any adverse health impacts are identified, the development will be expected to demonstrate how these will be addressed or mitigated.</p> <p>The Council will expect new development proposals to promote, support and enhance physical and mental health and well being. Support will be given to proposals which:</p> <ul style="list-style-type: none"> • Provide opportunities for formal and informal physical activity, exercise opportunities, recreation and play; • Contribute to a high quality, attractive and safe public realm in accordance with Policy P15 on Design, to encourage social interaction and facilitate movement on foot and by cycle; • Contribute to the development of a high quality, safe and convenient walking and cycling network; • Improve the quality and quantity of the green infrastructure network in the Borough, particularly in the North Solihull Regeneration Zone and in areas where green infrastructure is identified as lacking. The protection and enhancement of physical access, including public rights of way to open space and green infrastructure will also be supported; • Deliver new and improved health services and facilities in areas where they can be accessed by sustainable transport modes. Facilities for primary medical care should be identified and planned for. • Increase access to healthy food by sustainable transport modes and provide opportunities for growing local produce. The Council will resist the loss of areas which currently enable local produce to be grown. • Provide additional homes which are designed to meet the needs of older people and those with disabilities, and housing which enables older people to downsize from larger homes. • Improve the energy efficiency of housing. <p>New residential development will be expected to be built to the Lifetime Homes standard in accordance with Policy P15 Design, to ensure that homes are adaptable and enable people to live independently for longer. Such developments should maximise internal insulation and opportunities for solar gain and wherever possible, developments should also seek to incorporate private amenity space.</p> <p>Development proposals should incorporate planting, trees, open spaces and soft surfaces wherever possible in order to secure a variety of spaces for residents, visitors or employees to use and observe.</p> <p>The loss of community and social infrastructure will be resisted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> • It can no longer continue for commercial or operational reasons;

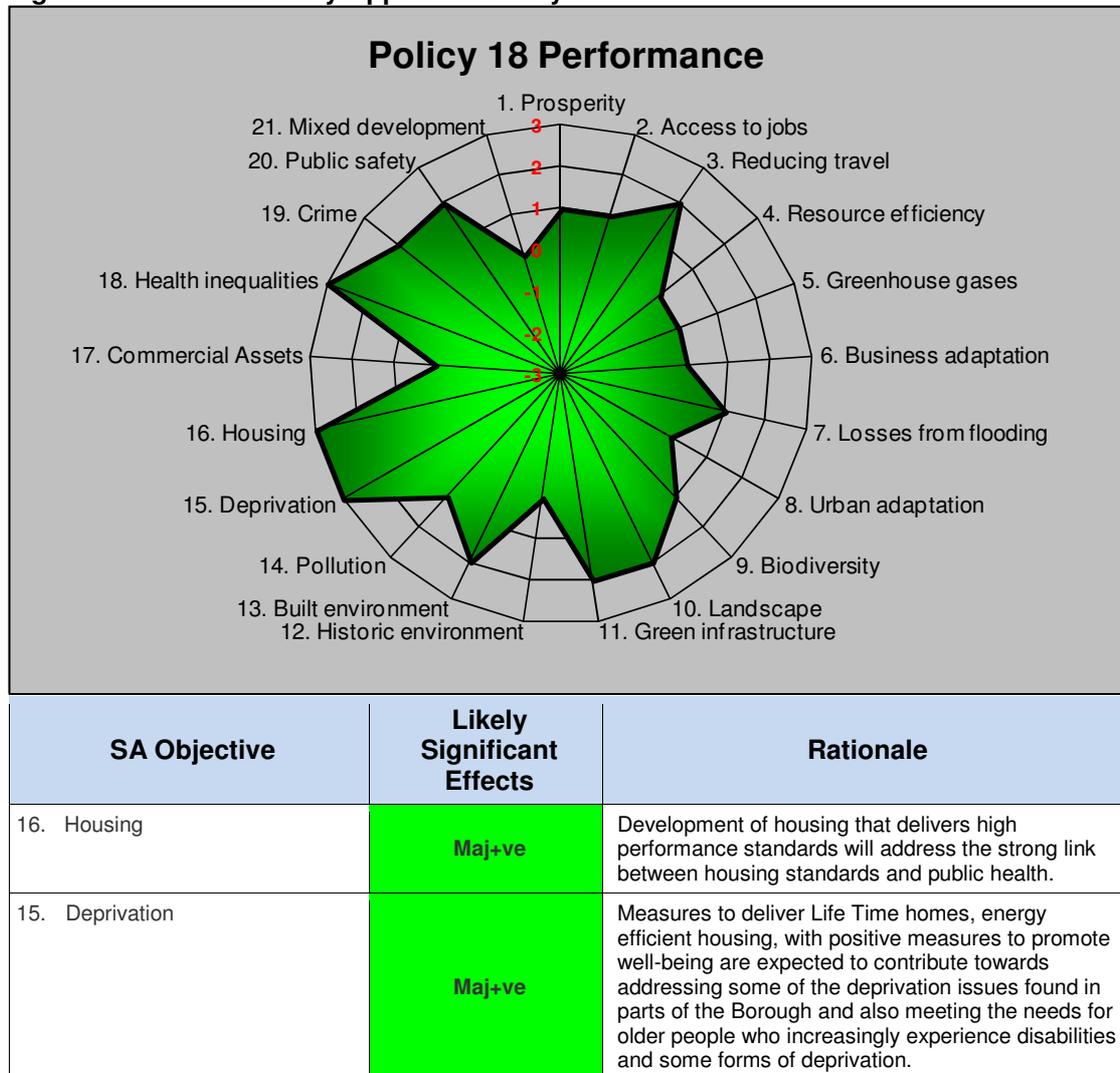
- There are identified benefits of the use being discontinued;
- Adequate alternative provision can be made in a manner which meets the needs of the community affected.

The Council will resist development proposals for hot food takeaways in areas where there is already a high concentration of such uses.

Forecast Effects

3.21.4 This policy emerged from observations on the Emerging Core Strategy policies and also recognition of the public health agenda in the draft National Planning Policy Framework. Unsurprisingly, the policy generates a highly positive outcome upon the sustainability framework delivering one major beneficial, eight moderate beneficial impacts and five minor beneficial outcomes with no adverse effects. A further seven sustainability objectives were scored as neutral, although opportunities exist to convert a further two to beneficial effects.

Figure 3.18: Sustainability Appraisal: Policy 18



SA Objective		Likely Significant Effects		Rationale					
18. Health inequalities		Maj+ve		Incrementally new development is likely to contribute towards reducing health inequalities by improved recognition of the health agenda during the formulation and consideration of development proposals. The policy provides for additional homes designed to meet the needs of older people and those with disabilities, and housing which enables older people to downsize from larger homes					
3. Reducing travel and promote sustainable modes		Mod+ve		Policy has a strong focus upon improving physical fitness that coincides with the objective of promoting sustainable modes of transport.					
10. Landscape		Mod+ve		Landscape improvements are likely to be associated with improvements to the green infrastructure and the creation of an attractive public realm.					
11. Green infrastructure		Mod+ve		Direct improvements to green infrastructure are anticipated across the Borough.					
13. Built environment		Mod+ve		The built environment is likely to be enhanced as a result of measures associated with delivering a high quality, attractive and safe public realm, as well as from resisting domination of hot food takeaways.					
19. Crime		Mod+ve		The policy is likely to help to reduce crime and the stress caused through improved consideration and delivery of design solutions.					
20. Public safety		Mod+ve		The policy is likely to help to reduce public safety and the stress caused through improved consideration and delivery of design solutions.					
Local	5	Unlikely	0	Direct	10	Positive	14	Maj +ve	3
District	9	Potential	4	Indirect	4	Negative	0	Mod+ve	6
Regional	0	Likely	5	Cumul	0			Min+ve	5
National	0	Definite	5					Neutral	7
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

- 3.21.5 Of the fourteen positive effects nine are considered to be of a district wide scale, the other five being local. A total of ten of the effects were considered to be direct consequences of the policy with four being indirect (all minor positive effects). Further details can be found in Appendix G.
- 3.21.6 In terms of the sustainable consumption and production theme, the policy is envisaged to deliver a moderate beneficial outcome and two potential indirect benefits particularly for those living in regeneration areas in terms of prosperity and access to employment.
- 3.21.7 The policy also has a potential link to by contributing towards reducing some local risks associated with flooding through the promotion of green infrastructure.
- 3.21.8 Across the six natural resource protection objectives, there are three likely or definite moderate beneficial outcomes at a district scale (landscape, green infrastructure and the built environment). Two minor beneficial local outcomes are also likely or possible for biodiversity and pollution.
- 3.21.9 Not surprisingly it is under the theme of sustainable communities that the three major beneficial outcomes result. These are supported by two moderate positive outcomes for crime and public safety.

Managing Uncertainty

- 3.21.10 As can be seen from the table above, ten of the fourteen positive scores were considered to be likely or definite outcomes. Those where the effects were viewed as being a potential outcome were in relation to

their effects upon prosperity, access to jobs and abating the losses from flooding and pollution all of which affect the determinants of health.

Mitigation and Enhancement

- 3.21.11 As this is a new policy not previously presented within the Emerging Core Strategy, no mitigation and enhancement measures were previously identified. Several mitigation and enhancement measures have been identified for two of the four sustainability themes.
- 3.21.12 As there is a strong link between climate change and public health, the Council could seek to draw together these themes with measures promoting the provision of shade and cooling areas within the scheme designs.
- 3.21.13 While the justification for the policy recognises the links between pollution and community engagement/social isolation, the policy as proposed relies upon those proposing development to demonstrate that adverse effects would be addressed or mitigated.
- 3.21.14 It is suggested that preamble to the policy would benefit from making it clear to developers may need to address links between high noise levels and stress as well as the effects of odour and air quality upon public health.
- 3.21.15 As a wider observation, the Council may wish to consider whether the application of the policy should be restricted to major development proposals rather than all development proposals.
- 3.21.16 Links with the requirement for Sustainability Reporting could be considered with a requirement for the scope of such reports to be agreed with the Council in discussion with the Director of Public Health and the Health and Well-Being Board when the scale of the proposal merits such discussions.

Alternatives

- 3.21.17 Consideration was given by the Council to including health and well being as a cross-cutting issue to be addressed within each relevant policy area of the Local Plan. However, as many specific health and well being issues are multi-faceted and can be tackled by a range of policy areas, it was considered that the inclusion of health and well being in each policy area would be somewhat repetitive and result in policy overlaps.
- 3.21.18 In order to ensure that the important links between spatial planning and health were not lost within other policy areas, it was decided that health and well being should be included as a specific policy area of the Local Plan.
- 3.21.19 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.22 Appraisal of Policy 19: Range and Quality of Local Services

Introduction

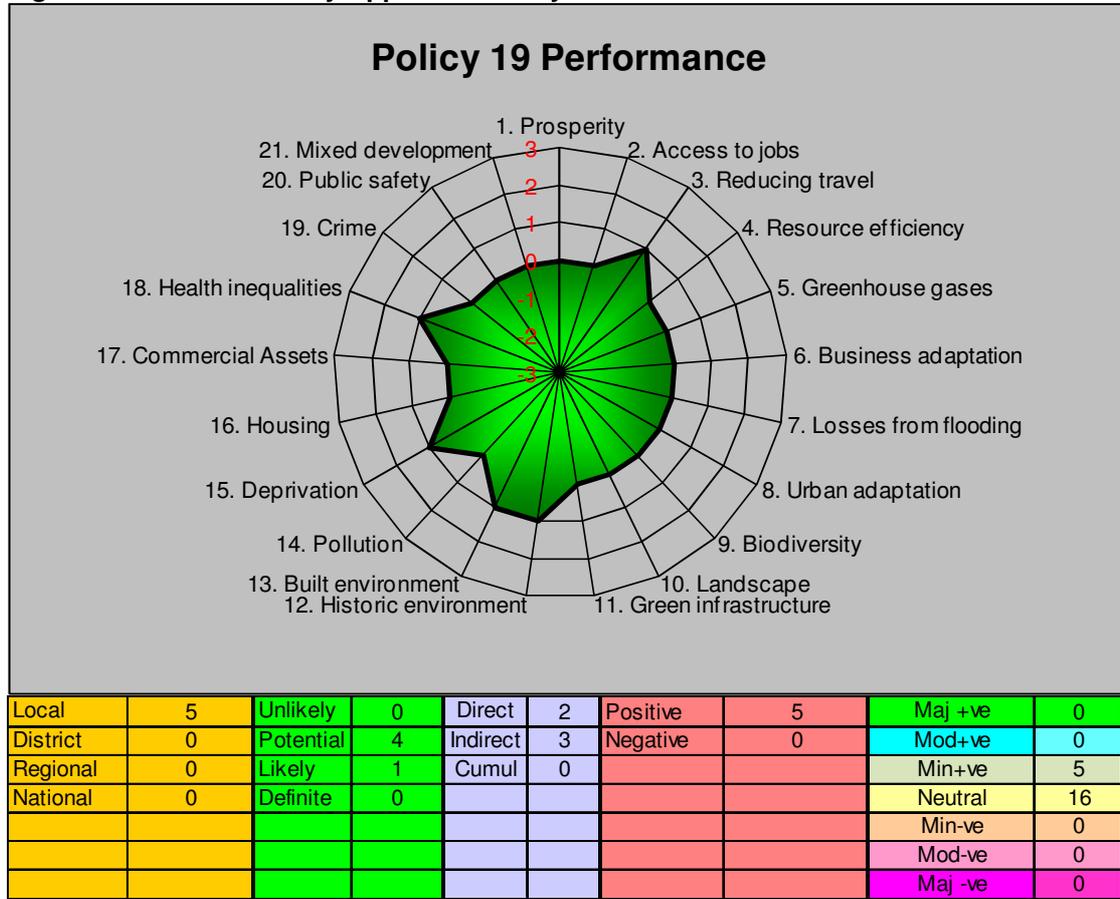
- 3.22.1 The proposed policy on local services is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. No changes have been made to the Consultation draft Local Plan. Justification for the policy is presented in the draft Local Plan. The specific policy commitments are highlighted below.

Policy P19 – Range and Quality of Local Services
<p><u>Local Centres, including:</u></p> <p>Knowle, Dorridge, Castle Bromwich, Marston Green, Balsall Common</p> <p>Hobs Moat, Kingshurst, Aran Way, Craig Croft, Dickens Heath, Hatchford brook, Shelly Farm, Meriden, Olton.</p> <p><u>Parades and Local Shops</u></p> <p><u>Local centres</u></p> <p>Solihull has a variety of local centres which need to be developed and sustained in a way which ensures their continued sustainability and economic success.</p> <p>The scale and nature of new development should reflect the centre’s role and function in serving local needs, the opportunity to reduce the need to travel or the need to sustain the economic viability and vitality of the centre.</p> <p>Appropriate development could include retail, leisure, community and other facilities.</p> <p>All new development will need to be sensitive to local character and enhance the public realm.</p> <p><u>Parades and local shops</u></p> <p>Local retail parades and local shops providing for day to day needs, including those serving villages, will be sustained. Proposals for change of use or new development will be granted planning permission where this role would not be prejudiced.</p> <p>All new development will need to be sensitive to local character and enhance the public realm.</p>

Forecast Effects

- 3.22.2 This policy has a limited impact upon the sustainability objectives with 5 minor positive effects. The remainder of the outcomes are considered to be neutral (see Figure 3.19).
- 3.22.3 Not surprisingly the policy has a distinct local focus to its minor beneficial outcomes. The policy has the potential to contribute towards reducing the need to travel through the retention of local shops and services, although it has no implications for climate change and energy.
- 3.22.4 In terms of the natural resource protection theme the policy is likely to have a direct minor positive effect upon the built environment given the requirement for development to be sensitive to local character and enhance the public realm. However the outcome for the historic environment is envisaged to deliver a potentially minor beneficial outcome as development is to be sensitive to local character.
- 3.22.5 Only two objectives within the sustainable communities theme deliver indirect minor beneficial outcomes for deprivation and health inequalities, both a function of the policy’s intention to sustain local shops and services which potentially provide health benefits to the elderly and those with disabilities.

Figure 3.19: Sustainability Appraisal: Policy 19



Managing Uncertainty

3.22.6 Of the five effects upon the sustainability framework from this policy only one is likely to result in a positive effect, while four have the potential to deliver a minor beneficial outcome.

Mitigation and Enhancement

3.22.7 The appraisal of the Emerging Core Strategy identified mitigation and enhancement measures under the sustainable communities theme. These are presented below in Table 3.59 along with the response to the proposal from the Borough Council.

Table 3.59: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consideration could be given to identifying locations where community severance (transverse, longitudinal and temporal) occurs to develop solutions to enhance accessibility to local services for all members of community regardless of the time of day or season. 	<ul style="list-style-type: none"> No longer relevant to this policy as revised. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Consider restrictions on the provision of fast food takeaways to provide public health benefits. 	<ul style="list-style-type: none"> Policy 18 provides for restrictions on hot food outlets. 	<ul style="list-style-type: none"> None.

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Promote local and independent retailing by the provision of a range of smaller units and by new development needing to provide for a range of unit sizes. 	<ul style="list-style-type: none"> No longer relevant to this revised policy. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.22.8 The Council considered whether Knowle should be included in the Local Plan as a district centre because of the broad range of services that it provides. Whilst it is an important centre for the rural part of Solihull, it was considered that its function was more focussed towards day to day needs. Furthermore, the evidence base to the Local Plan does not suggest that the centre has capacity for significant retail or employment development. Much of the centre is in a conservation area and there are some important listed buildings. The character of the centre is therefore quite sensitive. For these reasons it was considered that it should be included as a local centre where development will be expected to reflect local role and function and significant new retail development is not anticipated.
- 3.22.9 The Council considered whether a more restrictive policy could be used to resist loss of shops and services in local centres, particularly in rural areas. It was considered that this would be difficult to enforce in practice because the issue is often lack of commercial viability. Also, the use classes order enables considerable freedoms to change between one type of shop and another. The suggested policy aims to sustain valued services and facilities through granting consent to suitable alternatives and encourages modernisation in a sustainable way rather than by blunt resistance to change that will probably not succeed.
- 3.22.10 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.23 Appraisal of Policy 20: Provision of Open Space, Children’s Play, Sport, Recreation and Leisure

Introduction

- 3.23.1 The proposed policy on open space and recreation is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials.
- 3.23.2 Clarifications that enhance the links with other policies are provided by the Submission draft Local Plan and are presented in red. At the end of this section, a brief summary of the alternatives considered for this policy is presented.

Policy P20 – Provision for Open Space, Children’s play, Sport, Recreation and Leisure

Existing public open space, children’s play, sports and recreational facilities
The Council recognises the importance and multi-functional benefits of public open space, sports and recreational facilities within the Borough and will **support the enhancement of existing facilities and open space. Loss of existing facilities through development will not be permitted where they are of value by to the local community for recreation, visual amenity, nature conservation or make an important contribution to the quality of the environment or network of green infrastructure, unless:**

- **it can be demonstrated that the open space or buildings are clearly surplus to requirements, or**
- **the need or benefits of the development clearly outweigh the loss.**

In such circumstances, the Council will require appropriate compensatory measures for the loss. Enhancement of open space or buildings shall be in accordance with Policy P15 – Securing Design Quality and Policy P10 – Natural Environment.

The Council supports the principle of designating land as Local Green Space. Where designation would be appropriate, necessary and where the open space meets the criteria outlined in national guidance, the Council will support designation of Local Green Spaces in neighbourhood plans.

Provision of new public open space, children’s play, sports and recreational facilities
The Council will require provision for and maintenance of appropriate open space, sports and recreational facilities as an integral part of new development. This should address identified shortfalls in local provision, outlined in adopted Council strategies and provide for the resultant increase in population from the development. Provision should accord with the local standards and priorities for action outlined in the adopted Green Spaces Strategy (2006) and future revisions, the forthcoming Indoor Sports Facilities Strategy and Green Infrastructure Strategy. **Where the minimum standard for children’s play and youth facilities is already met, developments will be expected to give more generous provision.**

To ensure a high quality living environment for the occupiers of all new residential development, including supported housing schemes for the elderly and those with disabilities, provision should be made for informal amenity space, in accordance with Policy 15 - Design. Proposals for family housing will be expected to provide opportunities for safe children’s play in accordance with the Design for Play and the Free Play Network’s 10 Design Principles.

To promote healthy lifestyles in the workplace, major commercial development proposals, (over 1ha or 1,000 sq.m) will also be required to provide new open space and/or contribute to enhancement of the green infrastructure network, in accordance with Policy 15 – Design and Policy 10 – Natural Environment.

Provision of new indoor sports and leisure facilities
The Council will support proposals for new or improved sports and leisure facilities providing that the development:

- **Addresses any shortfall in provision outlined in the forthcoming Indoor Sports and Recreation Facilities Strategy or the adopted Green Spaces Strategy (2006).**
- **Reflects the ‘town centre first’ principle outlined in national guidance and is of a scale and size appropriate to the hierarchy of Town Centres as defined in Policies 2 - Town Centre, 1**

- Economic Success and 19 - Local Services.

- **Is situated within an accessible location as defined in Policy 7 – Accessibility, where the development is easily accessible to the local community and is well served, or is capable of being well served, by public transport, walking and cycling.**
- **Accords with other Green Belt and Amenity policies in the Plan.**

Subject the above the criteria, the Council will **support proposals for shared sports facilities at educational centres, where the facility also serves the local area.**

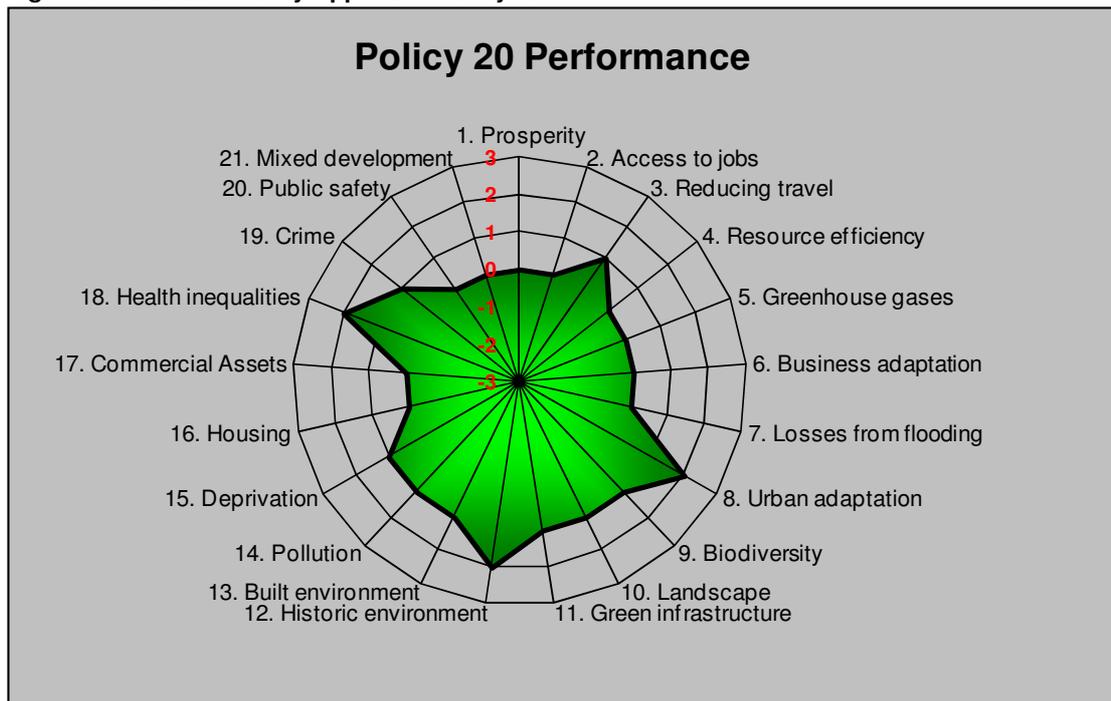
Waterways

The Council will support proposals that encourage greater recreational use and enhancement of the river and canal network providing that the development safeguards the historic and natural environment and purpose of the Green Belt, in accordance with Policies 10 – Natural Environment, 16 – Heritage Assets and Local Distinctiveness and 17 – Countryside and Green Belt.

Forecast Effects

3.23.3 The introduction of a link to policy 15 – securing design quality - is considered to increase the likelihood of contributing towards reducing crime and the fear of crime through design, albeit subject to not threatening the viability of the proposed development. Similarly the link to policy 10 is anticipated to increase the likelihood of biodiversity enhancements.

Figure 3.20: Sustainability Appraisal: Policy 20



SA Objective	Likely Significant Effects	Rationale
6. Urban adaptation	Mod+ve	Protection and enhancement of open space has a role in mitigating the urban heat island effect.
12. Historic environment	Mod+ve	Seeks to 'encourage greater recreational use of and enhancement of the canal network, whilst safeguarding its heritage'

Local	9	Unlikely	0	Direct	4	Positive	11	Maj +ve	0
District	2	Potential	3	Indirect	6	Negative	0	Mod+ve	2
Regional	0	Likely	7	Cumul	1			Min+ve	9
National	0	Definite	1					Neutral	10
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

3.23.4 This policy is based upon policy 11 from the Emerging Core Strategy and performs in a similar positive manner giving rise to two moderate beneficial effects with a further eight minor beneficial effects. A total of ten outcomes against the sustainability framework are neutral.

3.23.5 The nine of the eleven effects are considered to be of a local scale with six being an indirect consequence of the policy.

Managing Uncertainty

3.23.6 Of the eleven recorded beneficial effects all five were regarded as having the potential to occur with six being likely to occur or definite outcomes. This represents an improved level of certainty over the earlier draft of the policy.

Mitigation and Enhancement

3.23.7 Mitigation and enhancement measures were identified under all four sustainability themes in the appraisal of the Emerging Core Strategy. These are presented below together with the response from the Council. There are no additional measures proposed for the mitigation or enhancement of this policy.

Table 3.60: Sustainable Consumption and Production

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> The provision of adequate private garden land for family housing could be at the expense of community allotments or public open space or additional affordable housing. 	<ul style="list-style-type: none"> The policy no longer refers to private gardens but requires all residential development to include informal amenity space and, in particular, family housing to provide opportunities for safe children’s play, which gives flexibility in the type of amenity space provided. Provision of new open space should accord with the priorities for action outlined in the Green Spaces Strategy. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> In determining that existing public open space is surplus to requirements, the Council ought to take into account future rather than existing needs to reflect the changing nature of the local community and future development activity. 	<ul style="list-style-type: none"> Any loss must be clearly surplus to requirements. 	<ul style="list-style-type: none"> None.

Table 3.61: Climate Change and Energy

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider high energy conservation and renewable energy standards for indoor recreational facilities. 	<ul style="list-style-type: none"> Proposals for indoor sports facilities would need to accord with Policies 9 – Climate Change and 15 – Design which require development to have the highest possible environmental performance. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Reference the need to protect and enhance open spaces within the most built up parts of the Borough to provide mitigation against the urban heat island effect. 	<ul style="list-style-type: none"> Policy provides protection where the site makes an important contribution to the quality of the environment or network of green infrastructure. Heat island effects can be considered as part of the contribution to the quality of the environment. 	<ul style="list-style-type: none"> None.

Table 3.62: Natural Resource Protection and Environmental Enhancement

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider the consequences of increased recreational activity and local biodiversity interests through the provision of appropriate design and planting strategies. 	<ul style="list-style-type: none"> To be addressed at the project proposal scale. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> The policy could reference the role of open space in framing and defining local character and distinctiveness. 	<ul style="list-style-type: none"> Policy 16 – Heritage Assets identifies key characteristics of the natural environment which make a significant contribution to local character and distinctiveness. 	<ul style="list-style-type: none"> None.

Table 3.63: Sustainable Communities

Mitigation/Enhancement Proposal	Response	Additional Proposals
<ul style="list-style-type: none"> Consider the layout and the number of houses served by access roads for new housing areas so as to maximise the opportunity for safe play areas adjacent to housing for parental supervision. 	<ul style="list-style-type: none"> Site layout is a matter for individual planning consents, however safe play provision is included in the policy. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Make reference to the particular issues surrounding open space provision (and possibly also access to the countryside) associated with the North Solihull Regeneration Area. 	<ul style="list-style-type: none"> See Monitoring Framework. Policy 20 will continue to monitor the change in value of open space in North Solihull Regeneration Area to ensure the programme remains on track to deliver an improvement. 	<ul style="list-style-type: none"> None.
<ul style="list-style-type: none"> Promote the adoption of green gyms in communities experiencing high levels of health inequalities. 	<ul style="list-style-type: none"> Policy 20 supports the general enhancement of existing open space, which could include the use of green gyms. 	<ul style="list-style-type: none"> None.

Alternatives

- 3.23.8 Policy 20 – Open Space could have been combined with Policy 10 – Natural Environment, however, it was considered that as the policies have different and sometimes competing objectives, it was better to keep the policies separate. There was also concern that the policy could have become too long and unwieldy.
- 3.23.9 Consideration was given to whether the plan should include a separate policy on Green Infrastructure, however, given the strategic nature of Green Infrastructure, it was considered to be more appropriate in the Spatial Strategy of the Plan.
- 3.23.10 The alternative of not providing the amendments in the Submission draft Local Plan may risk a lack of attention to the needs for children’s play, while not also linking the provision of open space, sports & recreation to securing design quality and the natural environment could lead to a lack of clarity should conflicting objectives arise.
- 3.23.11 While potential alternatives were explored none were considered sufficiently reasonable to merit detailed appraisal.

3.24 Appraisal of Policy 21: Developer Contributions and Infrastructure Provision

Introduction

3.24.1 The proposed policy on developer contributions and infrastructure provision is a new introduction to that appraised for the Consultation draft Local Plan. The policy is examined in this section against the sustainability objectives. The aim of the appraisal is to establish the policy’s sustainability performance and identify any potential improvements to strengthen its sustainability credentials. At the end of this section, a brief summary of the alternatives considered for this policy is presented.

Policy P21 – Developer contributions and infrastructure provision
<p>Development will be expected to provide, or contribute towards provision of:</p> <ul style="list-style-type: none"> • Measures to directly mitigate its impact and make it acceptable in planning terms • Physical, social and green infrastructure to support the needs associated with the development <p>Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Local Plan.</p> <p>The Council will, where appropriate, seek to secure site-specific measures through planning obligations.</p> <p>The nature and scale of any planning obligations sought will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.</p> <p>Developer contributions in the form of the Community Infrastructure Levy will contribute towards strategic infrastructure required to support the overall development in the Local Plan</p> <p>The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan, preparing Development Briefs and other LDF documents if necessary.</p>

Forecast Effects

3.24.2 The introduction of Policy 21 has the potential to provide beneficial outcomes across those sustainability objectives that are capable of being supported. Hence contributions toward infrastructure provision may enhance efficiency in the operation of the district and thus contribute to prosperity. Given that cumulatively such contributions to improved efficiency could occur across the Borough, so a major beneficial effect is anticipated.

3.24.3 Assuming that the policy directs and builds upon the national incentives to reduce greenhouse gases such as through contributions towards low carbon decentralised heating systems, then a moderate beneficial effect may emerge from the cumulative effects of the policy. The policy is also anticipated to have the potential to give rise to local minor beneficial effects on flooding, biodiversity, landscape and green infrastructure as well as crime and public safety as illustrated in Figure 3.21.

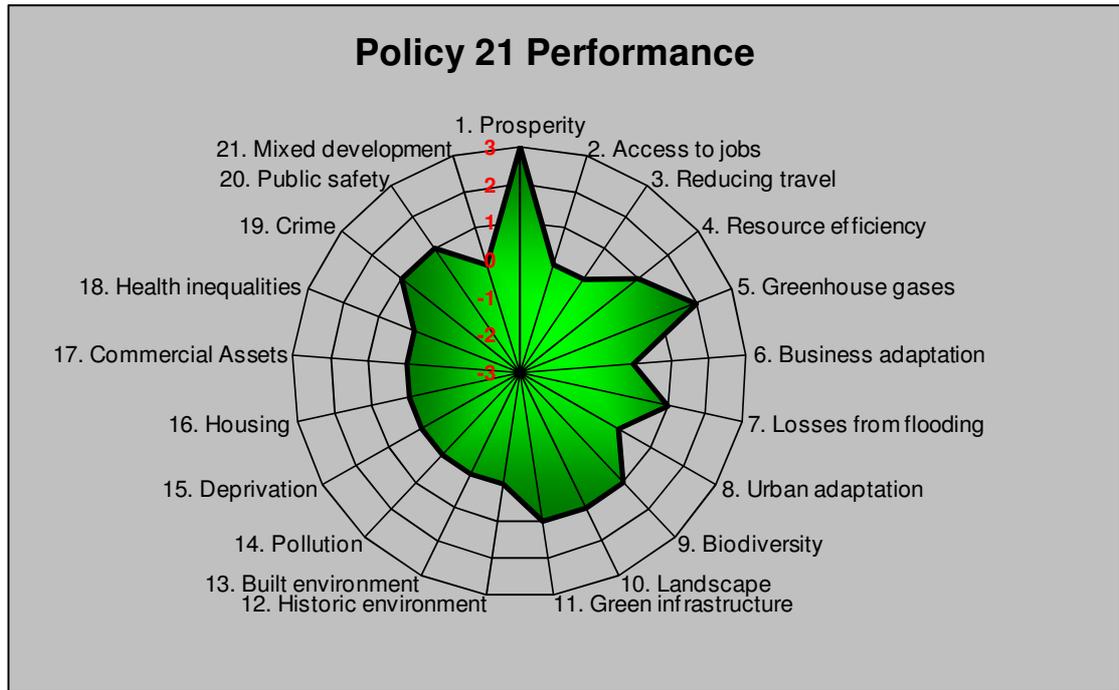
Managing Uncertainty

3.24.4 Of the eight identified outcomes that support the sustainability objectives, all but the major beneficial effect upon prosperity are considered to have only the potential to deliver the identified outcome, since they are dependent upon the conclusions of individual development proposals.

Mitigation and Enhancement

3.24.5 No mitigation and enhancement measures have been identified.

Figure 3.21: Sustainability Appraisal: Policy 21



SA Objective		Likely Significant Effects			Rationale				
1. Prosperity		Maj+ve			Contributions towards infrastructure provision as a result of the policy are expected to contribute towards the efficient operation of the district and thus contribute to prosperity.				
5.Greenhouse gases		Mod+ve			Potential for contributions to be directed towards decentralised energy systems and heating networks to reduce carbon emissions.				
Local	7	Unlikely	0	Direct	0	Positive	9	Maj +ve	1
District	2	Potential	8	Indirect	0	Negative	0	Mod+ve	1
Regional	0	Likely	1	Cumul	9			Min+ve	7
National	0	Definite	0					Neutral	12
								Min-ve	0
								Mod-ve	0
								Maj -ve	0

Alternatives

3.24.6 The alternative of not including policy 21 was to address the subjects through supporting text however this might reduce the weight of argument to address the cumulative impacts of development. As there was only one alternative, it was not possible for appraisal to examine any variants beyond the with or without options.

3.25 Policy Performance

Introduction

3.25.1 This section considers how the various policies interact across the entire range of sustainability objectives. Appendix G provides copies of the appraisal tables generated for each of the draft policies.

Sustainability Objectives v Draft Local Plan Policies

3.25.2 In considering how the policies from the Submission draft Local Plan perform across the sustainability objectives (see Table 3.64) it is evident that there is a strong beneficial performance against the following sustainability objectives (in order of performance):

- **Prosperity:** A total of fourteen policies provided support to this objective with eight having the potential to deliver the forecast outcome and six being likely to deliver the forecast outcome. Only one of the forecast outcomes was a potentially adverse outcome as a result of policy 14 amenity policy.
- **Built environment:** This objective is supported by fourteen policies with eleven considered to be likely or definite in the delivery of the forecast beneficial outcome. The remaining three (policies 6, 9 and 17), were recognised as having the potential to deliver beneficial outcomes.
- **Deprivation:** The strong performance against the deprivation objective is interesting given that it is fourteen policies could contribute positive outcomes. However nine of the policies have the potential to deliver a positive outcome with five being considered to be likely or definite to deliver the forecast beneficial outcome. One policy (policy 5 – land for housing) has the potential to deliver an adverse outcome due to the potential for increased pressures being placed on housing in North Solihull through the loss of 130 units from Foxglove Crescent.
- **Resource efficiency:** For this objective a total of thirteen policies provided contributions towards beneficial outcomes. One policy was considered to give rise to a definite outcome (policy 13 – minerals), while five were likely to deliver the forecast outcome. A further seven had the potential to deliver against the objective with one being considered to be unlikely to deliver.
- **Commercial assets:** Seven policies provided contributions towards beneficial outcomes for this sustainability objective. Two were considered to be likely to achieve the forecast outcome (policies 1 and 15) with five having the potential to deliver a beneficial outcome.
- **Health inequalities:** This objective is supported by fourteen policies, with one (policy 18) that is envisaged to definitely contribute to a beneficial outcome. A further four policies are likely to contribute a beneficial outcome. In eight cases, a potential to deliver a beneficial outcome was identified with one policy (policy 5) having the potential to contribute to an adverse outcome.
- **Access to Jobs:** A total of eleven policies support access to jobs of which four are considered likely to contribute towards a beneficial outcome for the objective and a further eight having the potential to do so. One policy (policy 14 – amenity) has the potential to deliver an adverse outcome.
- **Reducing the need to travel:** Eleven policies provided contributions towards a beneficial outcome for this objective with seven having the potential to deliver a beneficial outcome and four being likely or expected to deliver a beneficial outcome. Policies 1 and 5 were considered to be likely to work against the objective of reducing the need to travel.
- **Landscape:** Fifteen policies were considered to contribute towards beneficial outcomes for this sustainability objective. Eleven of these policies were envisaged to be likely or expected to deliver a contribution towards a beneficial outcome with the remaining four having the potential to have a beneficial outcome. Policy 1 was considered to be likely to give rise to an adverse outcome with policies 4 and 5 also having the potential to give rise to adverse outcomes.

3.25.3 In contrast, the policies performing least well against the following sustainability objectives in reverse order of performance (i.e. business adaptation performs the least well):

- **Business adaptation to climate change:** No policies were considered to interact with the objective of encouraging the economic base of the borough to adapt to the market changes and economic consequences of climate change.

Table 3.64: Sustainability Objectives v Draft Local Plan Policies

	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21
1. Prosperity	Major +ve																				
2. Access to jobs	Major +ve																				
3. Reducing travel	Major +ve																				
4. Resource efficiency	Major +ve																				
5. Greenhouse gases	Major +ve																				
6. Business adaptation	Major +ve																				
7. Losses from flooding	Major +ve																				
8. Urban adaptation	Major +ve																				
9. Biodiversity	Major +ve																				
10. Landscape	Major +ve																				
11. Green infrastructure	Major +ve																				
12. Historic environment	Major +ve																				
13. Built environment	Major +ve																				
14. Pollution	Major +ve																				
15. Deprivation	Major +ve																				
16. Housing	Major +ve																				
17. Commercial Assets	Major +ve																				
18. Health inequalities	Major +ve																				
19. Crime	Major +ve																				
20. Public safety	Major +ve																				
21. Mixed development	Major +ve																				

Legend

-  Major +ve
-  Moderate +ve
-  Minor +ve
-  Neutral
-  Minor -ve
-  Moderate -ve

- **Mixed development:** Five policies are considered to contribute towards a beneficial outcome for this objective, one was considered to definitely deliver and one likely to deliver a beneficial outcome. The remaining three were considered to have the potential to deliver a beneficial outcome for the objective.
 - **Pollution:** There are nine policies considered to contribute beneficial outcomes against the sustainability objective for pollution, however four are considered to have the potential or be likely to contribute adverse outcomes (policies 1, 2, 5 and 9). Six of the nine policies considered to have the potential to contribute beneficial outcomes with the remaining three being likely or definitely to result in a beneficial outcome.
 - **Historic environment:** A total of eight policies were considered to deliver beneficial outcomes with five giving rise to adverse outcomes. Only in the case of policies 3, 15 and 16 are likely or definite beneficial outcomes anticipated.
 - **Crime:** Six policies are envisaged to deliver beneficial outcomes for this objective with four policies being considered likely to deliver a beneficial outcome and two having the potential to do so. Policy 6 was considered to have the potential of contributing an adverse outcome by not explicitly reflecting a fear of crime that residential communities may hold.
 - **Greenhouse gases:** A total of eight policies provided support for a beneficial outcome to the greenhouse gases objective with policy 9 being expected to contribute to a beneficial outcome. Three policies were considered to have adverse outcomes for the sustainability objective (policies 1, 2 and 3). Policies 1 and 2 were expected or were likely to work against the sustainability objective, while there was a potential for policy 3 to operate against the objective.
 - **Public safety:** Of the nine policies that interact with public safety, three are unlikely to deliver and three policies have the potential to deliver against the objective. Policy 1 has the potential to deliver an adverse outcome as a result of the increased traffic envisaged to be stimulated by the development activity. Of the eight other policies, policies 6, 8 and 21 were considered to have the potential to contribute to positive outcomes for the objective.
 - **Urban adaptation:** Five policies were considered to offer the contributions towards beneficial outcomes for this sustainability objective with policies 10 and 14 having the potential to make beneficial contributions.
- 3.25.4 In terms of the sustainability themes, interactions leading to beneficial or adverse outcomes with the sustainability objectives are the greatest for the natural resource (seventy) and sustainable communities themes (sixty-seven). In contrast there are fifty-two for sustainable production and twenty-three interactions for the climate change and energy theme.
- 3.25.5 In considering the possibility of the delivery of likely or definite outcomes, the climate change and energy theme performs least well with eight interactions of which six are beneficial and two are adverse. Whereas in the case of the natural resources and environment enhancement theme there are thirty eight interactions likely or are expected to deliver beneficial outcomes. One adverse outcome is likely the interaction of policy 1 with the landscape objective.
- 3.25.6 In terms of the sustainable communities theme, twenty nine interactions are considered to be likely or are expected to deliver beneficial outcomes, with no adverse outcomes that are considered to be likely or expected to arise.
- 3.25.7 In part this is an academic review since what is important is that each policy is effective in the delivery of the plan objectives and seeks to perform well against the sustainability objectives. Nevertheless, from the appraisal it is clear that opportunities exist to enhance the performance of the policies across most sustainability objectives. Typically this could be achieved by turning the potential for beneficial outcomes into reality during the examination of development proposals. In this regard, Table 3.65 may inform the consideration of development proposals, highlighting where the potential of a policy may be exploited.

Table 3.65: Uncertainty of the Sustainability Outcomes

	Policy 1	Policy 2	Policy 3	Policy 4	Policy 5	Policy 6	Policy 7	Policy 8	Policy 9	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15	Policy 16	Policy 17	Policy 18	Policy 19	Policy 20	Policy 21
1. Prosperity	Likely	Likely	Likely	Potential	Potential	Potential	Potential	-	Likely	-	-	Potential	Potential	Potential	Likely	-	Potential	Potential	-	-	Likely
2. Access to jobs	Potential	Likely	Likely	Likely	Likely	Potential	Potential	Potential	-	-	-	Potential	Potential	Potential	-	-	-	Potential	Potential	-	-
3. Reducing travel	Likely	Likely	Potential	Potential	Definite	-	Potential	Potential	Potential	-	-	Likely	Potential	-	Likely	-	-	Definite	Potential	Potential	-
4. Resource efficiency	Potential	Likely	Potential	Potential	Potential	-	Potential	Potential	Likely	-	Likely	Likely	Definite	-	Likely	-	-	Potential	-	-	Potential
5. Greenhouse gases	Definite	Likely	Potential	-	-	-	Potential	Potential	Definite	-	-	Potential	Potential	Potential	Potential	-	-	-	-	-	Potential
6. Business adaptation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7. Losses from flooding	-	-	-	-	-	Potential	-	-	Definite	Potential	-	-	-	-	Potential	Likely	-	Potential	-	-	Potential
8. Urban adaptation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9. Biodiversity	Potential	-	Potential	Potential	Potential	Likely	-	-	Potential	Likely	Likely	Potential	Potential	Potential	Likely	Potential	Potential	Likely	-	-	Potential
10. Landscape	Likely	Potential	Likely	Potential	Potential	Likely	-	-	Likely	Likely	Likely	Potential	Definite	Likely	Likely	Definite	Potential	Likely	-	-	Potential
11. Green infrastructure	-	-	-	Potential	-	-	-	-	Potential	Potential	Definite	-	Potential	Likely	Likely	Potential	-	Definite	-	-	Potential
12. Historic environment	Potential	Potential	Likely	Potential	-	Potential	-	-	-	-	-	Potential	Potential	Potential	Likely	Definite	Potential	-	-	-	Potential
13. Built environment	Likely	Likely	Likely	-	Likely	Potential	-	Likely	Potential	-	-	Likely	-	Likely	Definite	Definite	Potential	Likely	-	-	-
14. Pollution	Potential	Likely	Potential	-	Potential	Potential	-	Potential	Potential	-	Likely	Potential	Definite	Likely	-	-	-	Potential	-	-	Potential
15. Deprivation	Potential	Likely	Likely	Likely	Potential	Potential	Potential	Potential	Potential	-	-	-	-	Potential	Potential	-	-	Potential	Definite	-	-
16. Housing	-	Likely	Potential	Definite	Potential	Definite	-	-	Potential	-	Potential	-	-	-	Likely	Potential	Definite	Definite	-	-	-
17. Commercial Assets	Likely	Potential	-	-	-	-	-	-	-	-	-	-	-	-	Likely	Potential	-	-	-	-	-
18. Health inequalities	-	-	-	Likely	Potential	Potential	Potential	Potential	Potential	Likely	-	-	-	-	Potential	Likely	-	Definite	Potential	Likely	-
19. Crime	-	-	-	-	-	Potential	Likely	Potential	Potential	-	-	-	-	-	Likely	-	-	Likely	-	-	-
20. Public safety	Potential	-	-	-	-	Potential	Likely	Potential	Potential	-	Likely	Definite	-	-	-	-	-	Likely	-	-	Potential
21. Mixed development	Definite	Likely	Potential	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Legend	
	Beneficial
	Neutral
	Adverse

Draft Local Plan Policies v Sustainability Objectives

- 3.25.8 In taking an overview of how the policies perform across the array of the sustainability objectives, it is evidence that the following provide good coverage by delivering likely or expected beneficial outcomes for the sustainability themes:
- **Policy 15 – Securing design quality:** The delivery of design quality is assessed as providing beneficial outcomes across eighteen of the twenty-one sustainability objectives with fifteen of the beneficial outcomes considered to be likely to or expected to occur.
 - **Policy 18 – Health and well being:** This policy provides strong support across a wide range of sustainability objectives reflecting the many ways in which the effect of the plan upon employment, housing and the environment influences public health. This policy delivers moderate beneficial outcomes with no adverse effects with ten of the fourteen interactions being considered likely or definite to deliver the forecast outcome.
 - **Policy 2 – Maintain Strong, Competitive Town Centres:** Although this policy has the potential for adverse effects upon the historic environment and to cause likely adverse outcomes for the pollution objective, it is envisaged to give rise to nine likely or expected beneficial outcomes.
- 3.25.9 The policies 8, 17, 19 and 21 are judged to deliver the lowest level of performance across the sustainability objectives on the basis that they deliver the smallest number of likely or expected beneficial outcomes with all except one of the interactions for each policy having only the potential for a beneficial outcome.

Inter-relationships (Cumulative & Synergistic Impacts)

- 3.25.10 This above approach to the appraisal of the policies examines each policy individually to explore their strengths, weaknesses as well as their potential to deliver the against the sustainability objectives. In reality planning policies are frequently applied together acting upon the development proposal as necessary.
- 3.25.11 An enhanced test of the sustainability of the Draft Local Plan requires an overview of the possible collective performance of the policies. This collective performance can partly be judged by the overall likelihood of the policies delivering against the sustainability objectives.
- 3.25.12 An examination of the likelihood of delivering against the sustainability objectives reveals that approximately 10% of the interactions between the sustainability objectives and draft policies were anticipated to be expected to deliver a beneficial outcome for an objective. A further 31% were considered likely to deliver a beneficial outcome, with 46% having the potential to deliver a beneficial outcomes. Consequently 13% of the interactions were viewed as contributing adversely to the sustainability objectives.
- 3.25.13 Much of the uncertainty is a reflection of the flexibility afforded in the policies during the process of considering development proposals. On one hand, such flexibility can be seen to create uncertainty for developers, while on the other it enables the policies to be applied in a pragmatic manner to suit local circumstances. Nevertheless, as 41% of the policy interactions with the sustainability objectives are likely or are expected to deliver beneficial outcomes, the policy framework appears to be less robust than might otherwise be the case.
- 3.25.14 The following topics emerge from the analysis:
- M42 economic gateway sites;
 - Supporting Employment Opportunities for North Solihull;
 - Greenbelt;
 - Housing provision;
 - Transport and accessibility;
 - Climate change;
 - Health and well-being;

- Local distinctiveness;
- Public safety and crime;
- Natural environment.

M42 Economic Gateway Sites

- 3.25.15 Planning decisions affecting the regional employment sites in the M42 Economic Gateway are guided by Policy 1 - Support economic success. There is however a need to “have regard to” the other Draft Local Plan policies. This weakens case for the application of other policies in these development decisions.
- 3.25.16 As a result of policy 1, development proposals by major businesses in such prominent and sought after locations are not being asked to deliver exemplar of sustainable development. It could be expected that such development delivered high standards of sustainable construction; a high quality public realm enhancing local distinctiveness while also contributing towards the Local Plan objective of reducing inequalities through their procurement, employment and training programmes that could be targeted at assisting in the regeneration of North Solihull.

Supporting Employment Opportunities for North Solihull

- 3.25.17 Development within the M42 economic gateway is envisaged to generate funds for the Borough Council which could be used in a progressive manner to encourage business activities, training, education, transport, housing and other public health measures to enhance the abilities of communities in the regeneration areas to access employment opportunities. Unfortunately the Draft Local Plan does not set out a clear vision on how inequalities are to be addressed beyond encouraging the retention of small and medium sized enterprises across the Borough. Indeed, it might be argued that development in the M42 economic gateway would attract the businesses offering employment opportunities that the regeneration community may not be best equipped to exploit.

Green Belt

- 3.25.18 The policies enable the release of Green Belt land where significant employment opportunities are being created. For example, policy 1 states that “*The reasonable expansion of the site into the Green Belt will be given positive consideration where economic need can be demonstrated and appropriate mitigation can be secured*”. While Policy 17 states that “*The reasonable expansion of established businesses in the Green Belt, will be allowed where the proposal would make a significant contribution to the local economy or employment.*”
- 3.25.19 Policy 17 would appear to permit expansion (it is not clear what reasonable expansion means or how it is defined) by any business into the Green Belt regardless of where they are currently located. While the test of making a “*significant contribution to the local economy or employment*” would benefit from some further definition.
- 3.25.20 It is not clear how the loss of Green Belt can be mitigated or that the returns for the residents of the Borough especially those experiencing inequalities are clearly evident. Given the high levels of accessibility afforded by the motorway and rail network, many of the benefits could accrue to non-Solihull residents.
- 3.25.21 Housing allocations are also permitted to take land from the Green Belt in accordance with policy 4. In this case, such proposals are first to have been considered through a Parish or Neighbourhood Plan and there is to be evidence that people with a local connection have a housing need. Also, this need must not be able to be met through affordable housing provision on an allocated housing site. Finally, the proposed development is to be supported by the Parish Council or Neighbourhood Group.

Housing Provision

- 3.25.22 The provision of affordable housing is a key issue as there are some **13,310** people on the housing waiting list as of April 2011²⁶. Also, forecasts suggest that between the years 2008 to 2033 some **3,000**

²⁶ Communities and Local Government, 2012: Live Tables – Table 600 Rents, lettings and tenancies
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/livetable/>

households between the ages 65-74 and 5,000 aged above 85+ will create new needs for adapted housing²⁷.

- 3.25.23 Should the delivery of affordable housing not be met then this could well have adverse consequences upon labour mobility as well as contributing toward health inequalities as people remain in unsuitable housing conditions.
- 3.25.24 In terms of meeting the housing needs of the elderly, a failure to deliver the requisite number and designs could result in elderly people remaining within unsuitable housing increasing the risk of accidents. Further, it may lead to constraints on housing availability for younger members of the community.
- 3.25.25 Failure to deliver the specialist housing for the older age groups could lead not only to use of unsuitable properties, but also to the use of expensive hospital beds where respite care and hospice care is not available.
- 3.25.26 While provision of new housing may create capacity to enable refurbishment/demolition of Radburn housing areas, this is not evident from the policy. Nor is it evident that new housing is to be designed to improve public safety via the development briefs.
- 3.25.27 While there remains a focus on allocating housing within urban areas that potentially reduces the need to travel, the allocation of houses at Blythe Valley Park and away from North Solihull is envisaged to increase reliance upon the private car. The third phase places an emphasis upon rural provision and is thus likely to increase travel needs further. This suggests that rural areas are likely to experience change with 1,235 dwellings being allocated.
- 3.25.28 With a quarter of the new housing being in the rural areas, there is a potential that both biodiversity and landscape objectives would be adversely affected. No provision is made in the policy to contribute towards green infrastructure or to consider the historic environment although these objectives may be delivered via the site development briefs.
- 3.25.29 The policy states that new housing is to contribute towards maintaining local character and distinctiveness, whereas housing on unidentified sites is to contribute wards "*enhancing local character and distinctiveness*".

Transport and Accessibility

- 3.25.30 While there are two policies focusing upon transport, Policy 2 provides for the provision of additional public parking where there is insufficient public parking already available.
- 3.25.31 Policy 8 requires that all development proposals should have "*regard to*" transport efficiency and improved highway safety for all users. However this sets up a potential conflict with the requirement upon all developments to promote and encourage sustainable transport modes. With a predict and provide approach to car parking provision and the requirement to have "*regard to*" transport efficiency and highway safety, there is a chance that increased traffic flows could be experienced in the town centres. As a consequence the policy may increase the concerns of pedestrians and cyclists and cause delays to public transport users thereby impeding the second part of the policy.

Climate Change

- 3.25.32 While Policy 9 is devoted to addressing climate change, the development activity generated as a result of Policy 1 is only to "*have regard*" to the climate change requirements. A further difficulty arises in relation to housing and the need to deliver affordable housing since reducing greenhouse gas emissions and enhancing resilience to climate change may well come at a higher cost to the developer if not the local community.
- 3.25.33 There is a delicate balance needed between addressing the immediate affordable housing needs and that of addressing climate change. However with an increasing number of people experiencing fuel poverty (a

²⁷ Communities and Local Government, 2012: Live Tables – Table 414 Household Projections by Age and District.
<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/locallevelstatistics/227222/>

state that is unlikely to decline), enhanced energy efficiency will deliver benefits by helping to reduce health inequalities particularly for an increasingly elderly population.

- 3.25.34 The policy framework weakly considers adaptation to climate change dealing with flood risk and sustainable urban drainage. There are no measures that help to promote business adaptation thereby helping to deliver sustainable economic development. Enhancing the public realm in terms of adaptation to high winds and temperatures and provision of green infrastructure provide opportunities for improvement. With an increasingly elderly population, their needs for urban adaptation can be delivered by cooling vegetation and the provision of rest areas.
- 3.25.35 The climate change policy promotes the development and provision for heat and energy networks. It also makes provision for development to pay for a wide variety of other measures to reduce emissions or address the impacts of climate change across the Borough (these are termed Allowable Solutions). With this provision coming into force by 2016, a strategy defining the possible measures will be needed soon if the implications on project viability are not to constrain development processes.
- 3.25.36 Much of the extent to which this policy is effective is dependent upon keeping the proposed Sustainable Design and Construction Supplementary Planning Guidance up to date reflecting the rapidly changing technologies in this area. Effectiveness is also dependent upon the manner in which site development briefs embrace the concept of designing in energy efficiency, reduced emissions and adaptation measures.

Health and Well-being

- 3.25.37 A specific policy has been introduced to promote health and well-being that gives important recognition to the manner in which housing makes a contribution towards public health.
- 3.25.38 The policy also addresses part of the link between food and health in those areas with a high concentration of hot food take-ways to be resisted. However, the policy does not go further and limit such uses in close proximity to schools and public parks.
- 3.25.39 While the policy recognises links between pollution and community engagement/social isolation, the policy as proposed relies upon those proposing development to demonstrate that adverse effects would be addressed or mitigated.
- 3.25.40 The main approach to improving health and well-being is through the provision of employment opportunities for the communities experiencing health inequalities. Hence this suggests a targeted approach that strongly links with the wider regeneration agenda, although this is not evident from the Draft Local Plan.
- 3.25.41 The next most important approach is that of ensuring good quality housing appropriate to the life-stages and needs of the individuals and in this regard the housing policy together with the health policy should deliver benefits.
- 3.25.42 Addressing the risks associated with road accidents, crime and safety can be seen as the next theme to address health inequalities and here, the policies on transport provide mixed outcomes for the health agenda.
- 3.25.43 Altering the behavioural aspects is another aspect where spatial planning can enhance health outcomes and the policy partly addresses this by a capacity approach to the number of fast food outlets. In contrast, other authorities have taken an approach of precluding the location of new fast food outlets in close proximity to schools.
- 3.25.44 A final health opportunity relates to the design of the public realm to cater for an increasingly elderly population and the effects of climate change.

Local Distinctiveness

- 3.25.45 The Draft Local Plan provides several policies where the objective is to protect and enhance local character and distinctiveness (policies 5, 10, 15, 16 and 20). This should help promote a local sense of

identity. Indeed, policy 16 emphasises the importance of creating a sense of place. This opportunity could have links to public health and the needs of the elderly where increasing dementia sufferers might be aided by the creation of distinct identities that assist with their orientation.

Public Safety and Crime

- 3.25.46 Six policies provide a link with crime and safety, although in the case of policies 8 and 21, a beneficial outcome is only a potential outcome. While policies 7, 15, 18 and 20 (accessibility, travel, design quality, health and open space) are likely to provide beneficial outcomes for public safety and crime. Policies 2, 3 and 4, which deal with development proposals, miss the opportunity to promote measures although the site development brief is a means by which this could be addressed.

Natural Environment

- 3.25.47 The policies focused on the natural environment provide some protection to natural resource and environment sustainability theme with policy 7 being the only one to have no links, while policies 1 and 4 have the potential to have adverse outcomes for the natural environment theme. Where beneficial outcomes are anticipated, then most of the links result in minor beneficial outcomes. Opportunities to provide a strategic landscape scale approach to biodiversity mitigation, allowable solutions, green infrastructure and public health could be explored, potentially via a supplementary planning document.

4. APPRAISAL OF SITE ALLOCATIONS

4.1 Introduction

4.1.1 This section considers the sustainability performance of the site allocations for housing/mixed-use and employment/commercial development.

4.1.2 The Submission draft Local Plan has brought about the following changes:

- Foxglove Crescent site (reducing the number from 200 to 70 dwellings);
- An increase in the density and provision at Blythe Valley Park;
- A slight increase from 100 to 130 housing units at the Shirley Powergen site;
- The deletion of Moat House Farm as the site has gained planning consent following appeal;
- An increase in the size of the site for employment land at Birmingham Business Park.

4.1.3 The appraisal undertaken for the Consultation draft Local Plan considered the housing sites within the following five groups:

- North Solihull Regeneration Area – including Foxglove Crescent;
- Solihull Town Centre;
- Shirley – including the Powergen site;
- South west rural housing – including Blythe Valley Park;
- Eastern rural housing.

4.1.4 Employment sites were arranged into three groups: the NEC/Birmingham Business Park, Shirley and Kenilworth.

4.2 Implications of Revisions to Policy 5 on Site Allocations

4.2.1 The objective of the site allocations appraisal was to gain a strategic understanding of the performance of the sites assembled into the housing and employment groups. As such the appraisal was not repeating or extending the examination of sites undertaken as part of the Strategic Housing Land Availability Assessment, but was considering the implications of multiple sites upon the delivery of sustainability objectives within parts of the Borough.

North Solihull Regeneration Area

4.2.2 As the changes introduced affect only the Foxglove Crescent site within the North Solihull Regeneration Area group it is necessary to consider whether the effects of reducing the number of dwellings from 200 to 70 would give rise to a change to the appraisal of the Consultation draft Local Plan.

4.2.3 As the changes to the North Solihull Regeneration Area due to the lowered provision at Foxglove Crescent bring about a 16% reduction in the housing provision during the first phase (up to 2018). The potential for the loss of housing to have an adverse effect upon the local housing market, potentially increasing the need to examine alternative sites has been noted in the appraisal of policy 5.

4.2.4 When considering whether the change to the Foxglove Crescent site would affect the performance of the group of sites in the North Solihull Regeneration Area the following sustainability objectives potentially could be affected as a result of the reduction in site area from 4.37 to 1.98 ha and density from 45 to 35 dwellings per hectare:

- **Biodiversity:** The reduced site area is envisaged to lower the risk of adverse effects upon the local nature reserve. The sites were assessed as having a neutral effect overall on biodiversity since it was assumed that there would be no land take from designated sites and that any impacts caused by human activities would be offset by enhancements to open space as a result of the green infrastructure strategy. Consequently no change in the appraisal score is considered necessary.

- **Landscape:** At the North Solihull Regeneration Area scale, although open spaces were to be taken by the housing proposals overall their landscape value was not considered to be high, with green infrastructure provision and detailed site design and landscaping having the potential to offset the losses. While the reduced density and land take ought to give rise to a lower landscape impact at the Foxglove site, overall a neutral score remains valid.
- **Green infrastructure:** A minor beneficial outcome was assigned for green infrastructure as it was envisaged that high quality green infrastructure would be provided delivering higher use levels than the existing open-space. The reduced area and density of the Foxgloves Crescent site does not alter this outcome and thus a minor beneficial score is retained.
- **Housing:** Although there has been a reduction in the number of dwellings to be provided the remaining sites ought to still contribute increased housing choice albeit perhaps somewhat more constrained in terms of choice towards the end of the first housing phase. A moderate beneficial score remains appropriate.

Shirley

- 4.2.5 The change proposed introduces a further 30 dwellings to the Powergen site with the Solihull Lodge also providing a further 300 dwellings. This is not expected to have consequence upon the provision of mixed use development and thus opportunities to enhance access to employment. Hence there is no change in the appraisal provided for the Shirley sites.

Blythe Valley Park

- 4.2.6 The proposed change at Blythe Valley Park involves bringing forward 1.25 ha from phase 2 to phase 1 in the housing programme with an increase in the first phase density from 40 to 46 dwellings per hectare and the second phase from 40 to 50 dwellings resulting in an additional 100 dwellings during the first phase and with 250 dwellings being provided in the second phase.
- 4.2.7 Alongside Blythe Valley Park also included within the south west rural housing sites were four other sites including Mount Dairy Farm, Cheswick Green. The appraisal was conducted on the basis of the five sites contributing 1100 homes. As Mount Dairy Farm has received planning consent the appraisal of the plan is to focus on the remaining provision.
- 4.2.8 The increased density at Blythe Valley Park was reported in section 3.8 as having a risk of contributing pollution due to additional traffic attracting the younger professionals able to exploit the opportunities of the M42 Economic Gateway with others more likely travelling by car to other sources of employment. As a result the neutral score assigned in the appraisal of the Consultation draft Local Plan has been re-assessed to be minor adverse.

Birmingham Business Park

- 4.2.9 Provision is made in policies 1 and 3 provide for the expansion of Birmingham Business Park to the south west of the current site and in a manner that aids access by public transport. This provision requires land to be taken from the Green Belt with the *“potential for creating new jobs and contributing significantly to regeneration”*. The amended draft Local Plan supporting text states that the scale of the extension is needed to *“provide a site that would have the advantages of access and setting that would attract and appropriate quality of development”*.
- 4.2.10 Birmingham Business Park was assessed as one of four sites within the NEC/Birmingham Business Park group which included the Birmingham Airport extension. The Submission draft Local Plan increases the area allocated at the Business Park from 5.0 ha to 8.5 ha. A further 5.8 ha was allocated at Bickenhill Lane and at the Clock Interchange on the A45 Coventry Road.
- 4.2.11 The increased size of the site is not considered to alter the appraisal provided on the Consultation draft Local Plan since the outcomes for the prosperity and access to jobs sustainability objectives were previously assessed as being moderate beneficial. The landscape consequences were also previously assessed as being moderate adverse and it is not considered to change since it is already viewed as being a district scale impact.

4.3 Summary of Performance

4.3.1 For both housing/mixed-use sites and employment sites, the changes introduced by the Submission draft Local Plan only necessitate a single change in the appraisal – a minor adverse score being registered for the Blythe Valley site due to increased road traffic emissions. As a result there is no change to the relative performance of the allocations or how the allocations may impact cumulatively on the sustainability objectives. Should reference be made to Appendix H of the previous Sustainability Report to gain a summary of the appraisal tables for the site allocations, then this alteration should be borne in mind.

4.3.2 To minimise the need to refer to the previous Sustainability Report, the summary from that report is represented below although the tables have been updated as necessary.

Housing and Mixed Use Sites

4.3.3 Table 4.1 suggests that the Solihull Town Centre mixed use allocation performs well against sustainability objectives. The Powergen/Solihull Lodge allocations and North Solihull allocations also perform well, whilst the rural allocations do not perform so well.

4.3.4 In terms of how the allocations might impact cumulatively on sustainability objectives, it is evidence that there is a strong beneficial performance against the following objectives:

- Prosperity;
- Commercial assets;
- Housing;
- Access to jobs;
- Built environment;
- Health inequalities;
- Mixed development.

4.3.5 In contrast the allocations for housing and mixed use sites perform least well against the following sustainability objectives:

- Landscape;
- Losses from flooding;
- Pollution;
- Reducing travel;
- Greenhouse gases;
- Public safety;
- Urban adaptation;
- Resource efficiency.

4.3.6 It is worth noting that in terms of the uncertainty of the outcomes, the outcomes forecast for sustainable consumption were considered rated as being likely to occur, while those associated with the other themes were generally viewed to have the potential to occur. For example, the biodiversity and health inequalities benefits were viewed to be a potential outcome across each of the housing sites.

4.3.7 This suggests that the sites when taken alone across all but the sustainable consumption theme there is a need to rely upon the policies examined in chapter 5 to deliver greater certainty in the outcomes being achieved. Consequently, changes to the policies could also have a marked change in the sustainability performance of the proposed housing sites.

4.3.8 It is evident that the Solihull Town Centre site scores particularly well given its mixed use and town centre location in contrast to the rural sites which record a neutral effect across nine of the twenty-one objectives.

Table 4.1: Summary Performance of Housing and Mixed Use Sites

	North Solihull	Powergen	South Western Rural sites	Eastern Rural Sites	Solihull TC
Prosperity					
Access to jobs					
Reducing travel					
Resource efficiency					
Greenhouse gases					
Business adaptation					
Losses from flooding					
Urban adaptation					
Biodiversity					
Landscape					
Green infrastructure					
Historic environment					
Built environment					
Pollution					
Deprivation					
Housing					
Commercial Assets					
Health inequalities					
Crime					
Public safety					
Mixed development					

Employment Sites

- 4.3.9 Table 4.2 suggests that the Shirley employment allocations perform well against sustainability objectives, whilst the Kenilworth Road minerals allocations do not perform well. The performance of the NEC/ Birmingham Business Park allocation is somewhere in the middle.
- 4.3.10 In terms of how the allocations might impact cumulatively on sustainability objectives, it is evident that there is a strong beneficial performance against the following objectives:
- Prosperity;
 - Access to jobs;
 - Commercial assets;
 - Business adaptation;
 - Health inequalities;
 - Public safety.
- 4.3.11 The ‘access to jobs’ benefit highlights that the location of employment development does have the potential aid those parts of the Borough where there are currently barriers to employment.
- 4.3.12 In contrast, the sites perform least well against the following sustainability objectives:
- Reducing travel;
 - Pollution;
 - Greenhouse gases;
 - Biodiversity;
 - Landscape.
- 4.3.13 The potential for negative effects to the reducing travel, resource efficiency, biodiversity, landscape and urban adaptation objectives reflects the greenfield location of some sites. However it is not clear how sensitive these sites are and the extent of potential mitigation. Furthermore, several of the sites are previously developed sites.

Table 4.2: Summary Performance of Employment Sites

	NEC Sites	Shirley	Kenilworth Sites
Prosperity	Green	Green	Green
Access to jobs	Green	Green	Green
Reducing travel	Red	Red	Green
Resource efficiency	Yellow	Green	Yellow
Greenhouse gases	Yellow	Yellow	Green
Business adaptation	Green	Green	Green
Losses from flooding	Green	Yellow	Green
Urban adaptation	Yellow	Green	Green
Biodiversity	Yellow	Green	Yellow
Landscape	Red	Green	Yellow
Green infrastructure	Green	Green	Green
Historic environment	Green	Green	Yellow
Built environment	Yellow	Green	Green
Pollution	Yellow	Yellow	Yellow
Deprivation	Green	Red	Green
Housing	Green	Green	Green
Commercial Assets	Green	Green	Green
Health inequalities	Green	Green	Green
Crime	Green	Green	Green
Public safety	Green	Green	Green
Mixed development	Green	Green	Green

4.4 Summary Mitigation Measures

Introduction

4.4.1 Having considered the summary performance of each of the allocations, and the way in which the allocations may impact cumulatively on sustainability objectives, this section summarises (for both housing/mixed use and employment allocations) key mitigation and enhancement measures. No changes have been introduced to this section.

Housing and Mixed Use Sites

4.4.2 The following mitigation/enhancement proposals result from the appraisal:

- Encourage new development in the North Solihull Regeneration Area to contribute towards improving accessibility to key local services, facilities and employment opportunities in accordance with the North Solihull Strategic Framework Supplementary Planning Guidance (SPG) and the North Solihull Regeneration Area Strategic Transport Framework.
- Increase accessibility by walking and public transport. Consider safe pedestrian and cycle routes between housing and village centres to minimise traffic growth and enhance safety.
- Use housing to help develop a coherent network of community hubs.
- Incorporate sustainable drainage systems to reduce surface water runoff and hence flood risk.
- Consider the role for green infrastructure enhancements and the potential for green roofs.
- Confirm that no significant air quality impacts would result.
- Consider the consequences of car-based travel, upon the services offered in village centres so that residents are able to meet at least some of their needs locally.
- Require boundary treatment and the design of rural development to avoid damage to the Arden landscape.

- Consider opportunities for residents to influence the design of development and community infrastructure brought forward alongside housing.
- Given the considerable scale of proposals for housing at Blythe Valley Park, opportunities should be explored for requiring developers to fund housing that meets high sustainable design and construction standards.
- Given that most housing at Balsall Common and Hampton-in-Arden will not be developed until Phase 3 of plan implementation (2023 - 2028), there may be a need to explore ways of alleviating existing issues of housing need in the short-term.

Employment sites

4.4.3 The following mitigation/enhancement proposals have been identified:

- Measures to encourage take up of new jobs by North Solihull Regeneration Area residents could be explored such as by ensuring that public transport connections (as well as walking / cycling routes) are in place. Local recruitment and local supply chains could also be promoted.
- Measures to mitigate an increase in commuting by car ought to be explored, such as through travel plans.
- A requirement for 'green roofs' could be explored.
- Development of a landscape scale ecological strategy to respond to the loss of green field land could be developed building upon the Natural Environment White Paper.
- Explore a site layout and design for Birmingham Business Park that mitigates loss of green space.
- Confirm that no significant air quality impacts would result.

4.5 Monitoring

4.5.1 The following are measures that might be taken to monitor the significant effects that have been highlighted through this appraisal. This list of monitoring recommendations is pragmatic. Recommendations are not made to monitor all potential sustainability effects in-light of the fact that time and resources available for monitoring are limited.

4.5.2 The suggested monitoring measures are as follows:

- Housing waiting lists for residents of North Solihull;
- The characteristics of employment generated within the Birmingham Business Park cluster;
- Retail and employment mix within Solihull Town Centre;
- Traffic congestion in Solihull Town Centre;
- Proportion of residents at Blythe Valley Park working in the Business Park;
- Use of planning brief/conditions and planning obligations to ensure Blythe Valley is a flagship development;
- Use of public transport from rural settlements;
- Proportion of jobs within the NEC / Birmingham Business Park that are taken by residents of the North Solihull Regeneration Area;
- Proportion of jobs within the Shirley Employment Sites that are taken by residents of the North Solihull Regeneration Area;
- Transport choices taken by employees at the NEC / Birmingham Business Park and Shirley Employment Sites.

5. MITIGATION & MONITORING

5.1 Introduction

5.1.1 This chapter draws together the various mitigation and enhancement measures as well as the indicators that have been identified for the four sustainability themes:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement;
- Sustainable communities.

5.1.2 The section on mitigation and enhancement draws together broad principles based upon the earlier chapters rather than reproducing the measures again. The final section deals with the initial views on potential indicators to be deployed to monitor the sustainability performance of the draft Local Plan as part of the Authority Monitoring Reporting.

5.2 Mitigation and Enhancement Measures

5.2.1 This section provides a summary of the opportunities identified to mitigate and enhance draft Local Plan as reported in the January 2012 Sustainability Report with updates to reflect the Submission draft Local Plan as necessary. It first focuses upon the emerging policies before considering the spatial strategy and then the site allocations, although there is inevitably overlap between all three.

Draft Policies

5.2.2 In response to uncertainties and the forecast effects, recommendations for mitigation and enhancement have been put forward in Chapter 3. A series of proposals have been put forward for most policies with the intention of enhancing the sustainability performance of the plan and subsequent planning documents and processes that direct the sustainability performance of development proposals.

5.2.3 The overall message associated with the Submission draft Local Plan policies is that they provide a reasonably effective approach to addressing the sustainability objectives that have been identified. However, there are opportunities where enhancement could be explored. Principally, the major enhancement would be to ensure that the policies and supporting text recognised the inter-connections across the sustainability agenda ensuring that the potentially beneficial outcomes are converted into likely outcomes.

5.2.4 The policies 8, 17, 19 and 21 are judged to deliver the lowest level of performance across the sustainability objectives on the basis that they deliver the smallest number of likely or expected beneficial outcomes with all except one of the interactions for each policy having only the potential for a beneficial outcome.

5.2.5 Enhancement measures that could be considered under the sustainable consumption and production theme include:

- Require the preparation of travel plans for each business park dealing with all movement patterns;
- Consider transport implications of additional rural housing;
- Examine the relationship between Policy 1 and Policy 9;
- Review the role of Sustainable Design and Construction Supplementary Planning Document for all major development and clarify the intended scope/contents;
- Consider opportunities to promote waste management technologies via Affordable Solutions.

5.2.6 Strengthening business adaptation to climate change represents a key aspect that also accords with the Government's renewable energy strategy and the transition to a green economy strategy. Hence the following suggestions are highlighted from chapter 3:

- Consider means to avoid potential sterilisation of sites within the M42 economic corridor with a role in distributed heat and energy networks;
 - Develop strategy for Allowable Solutions in time for its 2016 introduction to reduce uncertainty for developers;
 - Consider requiring major development proposals to demonstrate how they have provided for adaptation to climate change;
 - Consider use of development briefs to provide for urban cooling measures;
 - Consider requiring major development proposals with large parking capacity to set aside dedicated car pool and electric vehicle charging points;
 - Consider requiring developers providing on-site car parking to demonstrate why installation of renewable energy generation on the site would not be viable;
 - Include green/brown roofs and SUDs within the Sustainable Construction and Design Supplementary Planning Document.
- 5.2.7 In considering potential enhancements under the natural resources and environmental enhancement theme, the following emerge for consideration:
- Whether green infrastructure ought to be accommodated alongside promotion of high quality public space within the policies.
 - Whether the sustainability of each housing phase could be enhanced by specific further guidance;
 - Site development proposals for North Solihull Regeneration Area could be required to demonstrate net improvement in the quality of open space;
 - Consider requiring car parking provision to be designed to minimise surface water runoff as well as the promotion of beneficial use of runoff as helps to reduce carbon emissions;
 - Consider the preparation of a landscape scale plan for the natural environment to define and reduce the impacts of climate change;
 - Consider requiring all major development proposals to have a positive net impact on biodiversity.
- 5.2.8 Across the sustainable communities theme there were several opportunities where enhancements to the draft Local Plan could be considered. These include:
- Linking the benefits of development particularly in the M42 economic gateway with measures to reduce inequalities, such as promoting links between successful business communities and regeneration initiatives;
 - Require development proposals to deliver designs for key social groups and deliver retail areas attractive for an elderly population;
 - Encourage development that enhances the local balance between jobs, housing, services and accessibility;
 - Consider the effects of development proposals upon the viability of all public transport services;
 - Expand consideration of resilience to climate change to include community resilience as well as issues such as flood risks.
- 5.2.9 It is noted that while some policy and sustainability areas have not emerged to need enhancement, there is a strong underlining need to ensure that the policies associated with economic development deliver benefits and opportunities to those in need.
- 5.2.10 Efforts to address some of these suggestions for enhancement might also help deliver improved certainty to developers in applying the Local Plan.

Spatial Strategy

- 5.2.11 While the spatial strategy delivers several beneficial outcomes, it potentially underperforms in relation to subjects such as resource efficiency, greenhouse gases, climate change urban adaptation and several

environmental aspects. However the area of greatest opportunity lies in addressing some of the uncertainties associated with:

- Increasing efforts to close the inequalities gap;
- Maximising provision of affordable housing and a suitable housing mix;
- Reducing greenhouse gas emission and promoting local energy/ heating systems;
- Maximising opportunities for sustainable transport.

5.2.12 There is a challenge regarding the M42 corridor development pressures with the attraction of inward car based commuters conflicting with the objectives of reducing greenhouse gas emissions and reducing inequalities. In part, there is not just a spatial and transport issue to be addressed, but also how the benefits from the spatial strategy are captured so that communities not able to take advantage are in some manner helped to become better equipped to exploit employment opportunities over time. Essentially, a strategy of delivering the trickle-down benefits from the regional assets to its residents could be explored.

5.2.13 Finally, the housing strategy and the relationship with green infrastructure and community facilities could feature further.

Site Allocations

5.2.14 As with the policies there was frequent uncertainty in most of the appraisals on the delivery of sustainability outcomes. Hence consideration could be given to develop a policy framework through development briefs and Supplementary Planning Documents that would enhance the prospect of positive contributions being made towards the sustainability objectives.

5.2.15 In terms of the employment sites, the M42 economic corridor sites were considered to cause a series of negative outcomes: reducing the need to travel, landscape, resource efficiency, greenhouse gas emissions etc. This suggests that the efforts ought to be directed towards not only delivering sustainable design solutions for the sites, but also to reducing the extent of car based commuting. There is also an apparent need to link the opportunities potentially afforded by the proposed employment sites with the needs and capabilities of the deprived communities elsewhere in the Borough. It is not clear that the support of business parks along the M42 corridor does more to support inward commuters with little benefit in the way of reducing inequalities. A key issue to consider is the decoupling of development in the M42 corridor through Policy 1 from the other 19 policies

5.3 Monitoring Indicators

5.3.1 The Authority Monitoring Report (AMR) forms part of the LDF and provides the means to assess, the implementation of the Local Development Scheme (LDS) and the extent to which LDD policies are successfully implemented. The AMR is therefore a mechanism through which adjustments to policies in the Local Plan can be made, based on monitoring results.

5.3.2 While the sustainability performance of the Local Plan has evolved from that of the Emerging Core Strategy, for the remaining significant effects monitoring can be undertaken through a flexible manner. It is worth noting that monitoring in the context of the SEA Directive does not necessitate the assembly of a time series of data observations

5.3.3 The SEA Directive requires monitoring be undertaken to identify unforeseen adverse effects arising from the plan in order to enable remedial action to be taken. For this reason, local planning authorities should consider how to react if significant effects indicators reveal any unforeseen adverse effects, or effects which exceed acceptable limits.

5.3.4 Monitoring is the responsibility of the Council in association with other bodies, such as the Environment Agency. Given the reduced financial resources, the funding of monitoring is likely to be restricted.

5.3.5 Proposals for monitoring the significant effects of the plan are presented in Tables 5.1 to 5.4 for each of the sustainability themes.

5.3.6 While there are considerable number of proposals for monitoring set out in the tables, it is suggested that given resource constraints that the following could be considered as priority indicators:

Sustainable consumption & production

- Percentage of young unemployed;
- Travel to work patterns;
- Change in number of jobs within 400m of a high frequency bus service;
- Area of greenbelt land taken for development.

Climate Change and Energy

- The actual energy saved and generated by renewable and conservation measures by major development proposals each year;
- Growth in the population employed in sectors considered to be resilient to the effects of climate change.

Natural Resource Protection & Environmental Enhancement

- Number of consented development proposals with net beneficial ecological effects;
- Number of consented development proposals negatively affecting the integrity of wildlife corridors;
- Net number of trees planted due to major development proposals;
- Number of development projects that detract from either the historic landscape or elements of the historic environment;
- Length of culverts opened up into open watercourse and the length of watercourse restored.

Sustainable Communities

- Percentage of jobs in Solihull filled by local residents;
- Annual affordable housing completions;
- Annual number of housing for the elderly;
- Proportion of people employed at the regional assets who are resident in the Borough.

Table 5.1: Monitoring Proposals for Sustainable Consumption & Production Theme

Monitoring	Frequency	Responsibility
Sustainable consumption & production		
<p>Employment: Policies may not reduce inequalities across the Borough through regeneration, education/training and job opportunities.</p> <ul style="list-style-type: none"> • Number of small business units established per year within 400m of a high frequency bus service. • Workforce engaged in new technology, low carbon and care services. • Number of jobs located in North Solihull. • Number of jobs created due to the transport and knowledge hubs. • Level of qualifications amongst the younger members of the workforce. • Percentage of young unemployed. 	<ul style="list-style-type: none"> • Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.
<p>Population: Retaining a balanced workforce able to locally resource the needs of businesses operating within the Borough.</p> <ul style="list-style-type: none"> • Percentage of people who express satisfaction with their quality of the environment. • Travel to work patterns. 	<ul style="list-style-type: none"> • Bi-annual monitoring with action to rectify adverse trends. • Ten yearly census data and local surveys. 	<ul style="list-style-type: none"> • Borough Council. • Office of National Statistics.
<p>Accessibility: Mixed messages within the policies on access to work by sustainable transport.</p> <ul style="list-style-type: none"> • Change in the number of jobs within 400m of a high frequency bus service based on the 2010 Solihull Strategic Accessibility Study. 	<ul style="list-style-type: none"> • Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.
<p>Material Assets: Improve resource efficiency and reduce demands on landfill.</p> <ul style="list-style-type: none"> • Area of greenbelt land taken for development. • Reduce quantity of household waste generated per household. • Management of waste higher up the waste hierarchy. 	<ul style="list-style-type: none"> • Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.

Table 5.2: Monitoring Proposals for Climate Change and Energy Theme

Monitoring	Frequency	Responsibility
Climate Change and Energy		
<p>Greenhouse Gas Emissions: Policies may not deliver the rate of reduction in GHG required.</p> <ul style="list-style-type: none"> Annual emissions of greenhouse gases across the Borough. 	<ul style="list-style-type: none"> Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> DECC.
<p>Energy Use and Renewable Energy: Action needed to ensure policies deliver expansion of local heat and energy networks as well as delivery of energy efficient and production of renewable energy in new development.</p> <ul style="list-style-type: none"> The actual energy saved and generated by renewable and conservation measures by major development proposals each year. Amount of energy consumed by street lighting. 	<ul style="list-style-type: none"> Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.
<p>Employment Resilience: Build employment based upon businesses resilient to direct and indirect effects of climate change and economic dislocation.</p> <ul style="list-style-type: none"> Growth in the population employed in sectors considered to be resilient to the effects of climate change. 	<ul style="list-style-type: none"> Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.
<p>Resilience to Adverse Weather Conditions: Deliver a public realm that protects those vulnerable to the effects of climate change.</p> <ul style="list-style-type: none"> Area of “cooling” features within main public thoroughfares. 	<ul style="list-style-type: none"> Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.

Table 5.3: Monitoring Proposals for Natural Resource Protection & Environmental Enhancement Theme

Monitoring	Frequency	Responsibility
Natural Resource Protection & Environmental Enhancement		
<p>Biodiversity, Geodiversity and Soil Resources: Policies seek to minimise losses rather than meet national objectives of reversing decline.</p> <ul style="list-style-type: none"> • Number of consented development proposals with net beneficial ecological effects. • Number of consented development proposals negatively affecting the integrity of wildlife corridors. • Length of culverts converted to open channels with wildlife habitats. 	<ul style="list-style-type: none"> • Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.
<p>Landscape, Open Space, Green Infrastructure: While policies support enhancing the public realm the focus ought to be on maximising the multiple benefits for the resources expended.</p> <ul style="list-style-type: none"> • Net number of trees planted due to major development proposals. • Number of healthy trees removed that were subject to tree preservation orders. • Number of development projects providing a positive contribution to Arden Landscape Guidelines. 	<ul style="list-style-type: none"> • Bi-annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.
<p>Historic Environment & Townscape: Policies are focused upon promoting local distinctiveness and protecting the historic assets across the Borough.</p> <ul style="list-style-type: none"> • Number of development projects that enhance either the historic landscape or elements of the historic environment. • Number of development projects that detract from either the historic landscape or elements of the historic environment. 	<ul style="list-style-type: none"> • Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council.
<p>Water Quality: Climate change and increased abstraction could lead to increased water quality problems not addressed by the Local Plan.</p> <ul style="list-style-type: none"> • Length of culverts opened up into open watercourse and the length of watercourse restored. 	<ul style="list-style-type: none"> • Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> • Borough Council. • Environment Agency.

Table 5.4: Monitoring Proposals for Natural Resource Protection & Environmental Enhancement Theme

Monitoring	Frequency	Responsibility
Sustainable Communities		
<p>Deprivation and Social Exclusion: Policies do not link economic development activities with addressing deprivation and exclusion to the extent possible.</p> <ul style="list-style-type: none"> Percentage of jobs in Solihull filled by local residents. Percentage of Super Output Areas that fall within the 20% most deprived areas using the index of multiple deprivation. Percentage of people who say they are satisfied with their local area as a place to live. 	<ul style="list-style-type: none"> Bi-annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.
<p>Housing: While the Local Plan has a strong housing policy the extent to which local needs, particularly for the elderly and special needs groups are met along with housing affordability are key.</p> <ul style="list-style-type: none"> Annual affordable housing completions. Annual number of housing for the elderly. Number of gypsy and traveller pitches available. 	<ul style="list-style-type: none"> Annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.
<p>Public Health: The Local Plan provides a policy on public health, although other policies delivering further car based mobility and development may constrain delivery of positive outcomes.</p> <ul style="list-style-type: none"> Proportion of planning applications catering for an ageing population. Percentage of people who consider themselves to be in good health. Percentage of people undertaking physical activity. 	<ul style="list-style-type: none"> Bi-annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council. Health & Well-Being Board.
<p>Crime and Safety: The design of the public realm can have an influence on perceptions of crime and actual crime levels hence the extent that the Local Plan policies deliver enhancements to the public realm that reduce crime is of interest.</p> <ul style="list-style-type: none"> Total crime per 1000 people. Proportion of residents feeling safe after dark. 	<ul style="list-style-type: none"> Bi-annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council. Police.
<p>Culture & Recreation: Focus is upon the extent to which interventions deliver improvements in health inequalities and promote healthy lifestyles.</p> <ul style="list-style-type: none"> Percentage of residents expressing satisfaction with recreation and open space provision 	<ul style="list-style-type: none"> Bi-annual monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.
<p>Regional Assets</p> <ul style="list-style-type: none"> Proportion of people employed at the regional assets who are resident in the Borough. Floorspace consented per year. Longest duration to determine a planning application affecting such regional assets. 	<ul style="list-style-type: none"> Minimum of five yearly monitoring with action to rectify adverse trends. 	<ul style="list-style-type: none"> Borough Council.