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**CPRE WARWICKSHIRE OBJECTIONS TO SOLIHULL LOCAL PLAN REVIEW
SUBMISSION DRAFT
(Second set)**

Submitted December 2020

(This set of five objections are to Strategy and Housing Policies and to the lack of a Transport Assessment of the Plan. See first set for objections to individual proposed sites with Policy numbers)

Note that each response which was submitted by on-line method gets a different ID number and they are not a continuous series. The submitted text is sent back for one's records in an automatic e-mail. It has all been lifted into this document , with the ID number given by the planning authority shown..

ID: 10988

Type: Object

Document: Solihull Local Plan (Draft Submission) 2020

Section: Introduction

Summary:

The Plan is not sound because NPPF 2018 provisions set out in para 11 (b) (i) and (ii) have not been applied in its preparation.

Full Text:

Para 15 is titled 'What will happen if we don't identify enough land for new development'. This fails to make clear that Solihull does not have to meet all calculated or claimed needs. 1.1 The Solihull Local Plan Review proposes high levels of housing and removal of land from the Green Belt.

1.2 The Council states that it is meeting calculated housing needs and taking some housing from adjacent local authorities (Birmingham) as national planning policy requires it to.

1.3 The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's

case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. See NPPF 2018, paragraph 11.

1.4 The Council has not in its Submission Draft Plan explained why it has disregarded this key national planning policy and is proposing the release of large areas of Green Belt to meet the assessed housing need, when the NPPF policy on sustainable development states that it is not required to do this.

1.5 Exceptional circumstances for changing Green Belt boundaries (and thus removing land from the Green Belt) cannot be demonstrated where the policy in the NPPF para 11(b) has not been applied.

1.6 The Plan is not sound because the NPPF's policy has not been applied.

ID: 10992

Type: Object

Document: Solihull Local Plan (Draft Submission) 2020

Section: Challenges

Summary:

Challenge B is falsely stated. The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. The Plan is not sound.

Full Text:

Challenge B is stated to be meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall.

This fails to make clear that Solihull does not have to meet all calculated or claimed needs.

1.1 The Solihull Local Plan Review proposes high levels of housing and removal of land from the Green Belt.

1.2 The Council states that it is meeting calculated housing needs and taking some housing from adjacent local authorities (Birmingham) as national planning policy requires it to.

1.3 The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. See NPPF 2018, paragraph 11.

1.4 The Council has not in its Submission Draft Plan explained why it has disregarded this key national planning policy and is proposing the release of large areas of Green Belt to meet the assessed housing need, when the NPPF policy on sustainable development states that it is not required to do this.

1.5 Exceptional circumstances for changing Green Belt boundaries (and thus removing land from the Green Belt) cannot be demonstrated where the policy in the NPPF para 11(b) has not been applied.

1.6 The Plan is not sound because the NPPF's policy has not been applied.

D: 10994

Type: Object

Document: Solihull Local Plan (Draft Submission) 2020

Section: Spatial Strategy

Summary:

The Spatial Strategy is not sound. The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This means that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. See NPPF 2018, paragraph 11.

Full Text:

The spatial strategy stated at paras 56-59 is to develop and expand the Borough for the reasons given in paras 56, 57 and 58. Para 59 states that "to deliver the level of growth envisaged will require significant releases of land from the Green Belt".

This is contrary to national planning policy. Under the NPPF 2018, para 11 'The presumption in favour of sustainable development', Solihull does not have to meet all calculated or claimed needs.

The Solihull Local Plan Review proposes high levels of housing and removal of land from the Green Belt. The Council states that it is meeting calculated housing needs and taking some housing from adjacent local authorities (Birmingham).

The Council has not applied, and has chosen not to make use of, the National Planning Policy Framework policy on sustainable development. This is that policies should provide for assessed needs for housing and other uses unless policies that protect areas of particular importance provide strong reasons for restricting the scale of development. The areas of particular importance in Solihull's case are the areas of Green Belt. Green Belt designation covers all of Solihull's countryside and is justification for not meeting the assessed need for housing. See NPPF 2018, paragraph 11.

The Council has not in its Submission Draft Plan explained why it has disregarded this key national planning policy and is proposing the release of large areas of Green Belt to meet the assessed housing need, when the NPPF policy on sustainable development states that it is not required to do this.

Exceptional circumstances for changing Green Belt boundaries (and thus removing land from the Green Belt) cannot be demonstrated where the policy in the NPPF para 11(b) has not been applied.

The Plan is not sound because the NPPF's policy has not been applied; in fact it has been ignored.

ID: 11005

Type: Object

Document: Solihull Local Plan (Draft Submission) 2020

Section: Policy P5 Provision of Land for Housing

Summary:

Provision of housing to meet the increase in households projected by ONS for Solihull up to 2036 can be achieved without any removal of Green Belt or allocation of housing on land now Green Belt, except at the UK Central Hub north of the A45.

The housing strategy is wrongly based on allocation of a small number of large housing sites, on land now Green Belt. Replacement of these by a strategy of small sites would enable the increase in households to 2036 to be catered for without the scale of loss of Green Belt that the Plan proposes.

Full Text:

Policy P5 and the accompanying tables propose a high level of housing provision over 15/16 years (2020-2036) - 15,000, or nearly 1,000 per year. This is much higher than any past rate for housing completions except in occasional years. The total is well in excess of the ONS projection for increase in number of households in the Borough. The annual increase is given (Table at para 220) as 632 households/ year 2020-230. The ONS projection beyond 2030 is not shown; if the rate of increase is the same the growth in households 2020-2036 would be about 9,500. That may be too high.

Without allocating any new sites which are on Green Belt and without including any housing at the UK Central Hub area to 2036, the Solihull Housing Land Supply table (Table at para 222) shows a total supply of 7,000 new dwellings. This is from summing all figures in lines 1 to 8 of that table. The entry for line 5, Town Centre Sites, of 961, seems likely to be underestimated because capacity of Solihull Town Centre and scope for additional dwellings there seems likely to be higher than the Plan quotes (861 dw, see footnote 29).

Provision of housing to meet the increase in households projected by ONS for Solihull up to 2036 can be achieved without any removal of Green Belt or allocation of housing on land now Green Belt, except at the UK Central Hub north of the A45. That land is proposed for removal from the Green Belt

for the HS2 station and development around it. If 2,740 dwellings are delivered there by 2036, the total supplied housing by 2036 would be 9,750.

The housing strategy is wrongly based on allocation of a small number of large housing sites, on land now Green Belt. Replacement of these by a strategy of small sites, which would require much less removal of land from the Green Belt, would enable the increase in households in the Borough to 2036 to be catered for without most of the removal of land from the Green Belt that the Plan proposes.

A good example is that residential allocation BC3, Windmill Lane Balsall Common of 120 houses - which would be very damaging to the setting of the Grade II* Berkswell Windmill - can be replaced by small sites in the Balsall Common area, notably Site 82 north of Derngate Drive, west side of Kenilworth Road (capacity 60-70 dw). Site 82 is Green Belt but partly surrounded by other houses and heavily screened on the west side. Similar examples where small changes to the Green Belt boundary would allow small housing development without harm to the general Green Belt have been identified by other objectors.

ID: 11007

Type: Object

Document: Solihull Local Plan (Draft Submission) 2020

Section: Improving Accessibility & Encouraging Sustainable Travel

Full Text:

The Chapter titled 'Improving Accessibility and Encouraging Sustainable Travel' was written before the Transport Study produced by Mott Macdonald was prepared and long before it was published. The Policies listed (P7, P8, P8A) are not a transport policy or strategy for the Borough. The requirement of the Planning Practice Guidance for Local Plans is that there should be a transport assessment carried out, at the main stages of Plan preparation. There is still no transport assessment as required by the PPG.

In the absence of a formal transport assessment the Plan is not sound.