

Challenges

1. Do you agree that we've identified the right challenges facing the Borough? If not why not? Are there any additional challenges that should be addressed?

The proposed challenge lists are quite comprehensive and in the main appropriate. With regard to the spatial plan the cascade model is a reasonable approach and the outcome places the proposed developments connected to existing urban areas with access to services. It is mindful of maintaining the rural area but needs to say more on transport network design and upgrades and avoidance of overloading rural networks connecting to primary routes.

The current proposed growth opportunities are in my view appropriate and will only have a potential indirect impact on Hockley Heath arising from the attendant local traffic growth adding to the impact of the Blythe Valle development. If the proposed additional local mass transit services in the region are of a significant scale and penetration across the borough then the local traffic growth may well be mitigated.

Agreed with specific additional comments on paragraph 66 as follows:

- Reducing inequalities in the Borough (Agreed - ensure that the transport network is properly designed and upgraded to cope with anticipated volumes arising from growth and that high volume rat runs on rural networks is avoided)
- Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall. (Agreed but Birmingham needs to do more)

Challenge A

- Other Areas of the Borough – sentence “Problems of access to housing and local services, particularly in some rural areas” should read “Problems of access to housing and local bus and health services, particularly in some rural areas”
- Additional consideration “Increasing investment in rural areas to upgrade and maintain village infrastructure”.

Challenge B

- “Accommodating some of the HMA wide housing shortfall without adversely affecting the quality of its environment and its attractiveness for businesses and residents (Agreed but Birmingham should be doing a lot more)”
- “A need for a range of affordable housing for older people and for people with learning, physical and sensory disabilities and mental health needs. (Agreed subject to detailed assessment)”

Challenge C

- “Ensuring there is sufficient amenity space and opportunities for secure children’s play in Rural villages as well”
- “Ensuring that residential and other amenities are protected in particular Superfast Broadband”

Challenge D

- Additional suggested “Identify the new growth industries that Solihull wishes to attract to the Borough e.g. Digital technology, Bio-Technology, Data Hubs Amazon, Google, Apple et al), Energy Hubs (Tesla), Life Sciences (Urgent)”
- amend “Meeting aspirations of key businesses to enable them to maintain competitiveness (Birmingham Airport, National Exhibition Centre, Birmingham Business

Park, Blythe Valley Park, Jaguar Land Rover) whilst contributing to sustainable development and providing a well-designed SMART road transportation network that can provide safe and secure access sensitive to the rural communities road infrastructure"

- "Managing by design the impact of congestion on motorways, the strategic highway network and rail from additional growth/housing"
- "Managing by design the impact of pressure for development on the quality of the environment"
- "Need for high speed digital connectivity to enhance competitiveness" is critical!

Challenge E

- "Maintain the Green Belt and improve the network of green infrastructure in Solihull, to prevent unrestricted expansion of the major urban area, to safeguard the key gaps between settlements such as the Meriden Gap and the countryside. Ensure that the countryside is managed so as to deliver a range of benefits including the growing of food and energy products, create an attractive rural setting and improved public access and recreational opportunities." This is absolutely critical to maintain the Borough's differentiation from any other urban sprawl

Challenge F

- "Impact on biodiversity conservation and landscape character establish growth of natural meadows to encourage natural flora and fauna"

Challenge G

- Robust enforcement of the use of traveller site with zero tolerance of unauthorised pitches

Challenge N

- To minimise the impacts of HS2 and the associated growth during both the construction and operational phases and to monitor and ensure that any unacceptable impacts are satisfactorily mitigated

Vision

2. Do you agree with the Borough Vision we have set out? If not why not, and what alternative would you suggest?

[No comment]

Spatial Strategy

3. Do you agree with the spatial strategy we have set out? If not why not, and what alternative would you suggest?

Paragraph 91 states "The two factors outlined above represent a significant shift from the starting point of the 2013 plan and requires the spatial strategy to be looked at afresh. This is in the context that to deliver the level of growth envisaged, will require significant releases of land from the Green Belt". HHPC do not agree with this conclusion

Paragraph 104 states "Releasing land from the Green Belt to maximise the growth potential from HS2". HHPC view is that this is yet to be agreed

Paragraph 105 – HHPC do not agree with "Growth Option G – New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements"

Sustainable Economic Growth

4. Do you agree with Policy P1? If not why not, and what alternative would you suggest?

One of the primary objectives of Policy P1 is to “Ensure that connectivity within and beyond the site creates an integrated approach to movement throughout the Hub area”. Neither the Local Plan nor the associated HS2 Growth Strategy adequately explain how existing stations such as Solihull and Dorridge will integrate with the new rail infrastructure. Hockley Heath Parish Council note that there is no rail connectivity indicated from these stations to the HS2 link, driving traffic to these stations - hardly “...an integrated approach to movement through the Hub area...”. As plans for Birmingham International are not clear from the evidence base it is uncertain how the development will allow commuters to reach HS2 from within the Solihull borough. There is insufficient detail here to ensure the Policy is compatible with P8.

5. Do you agree with the key objectives that development is expected to meet as identified in Policy P1 are appropriate? If not why not? Are there any others you think should be included?

The key objectives identified are appropriate, but other policies (such as P8) must be assessed against these to ensure that development within the UK Central Hub Area support other policies, notably P9.

6. Do you agree with Policy P1A? If not why not, and what alternative would you suggest?

Policy P1A Blythe Valley Business Park, has failed to translate into planning policy and will require review given the result of recent planning approvals. HHPC would have expected the views expressed within P1A to have translated into planning policy in spite of the draft status of the Local Plan (given this is clearly SMBC’s direction in the area of BVP). The sentence indicating that development should proceed “...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...” has been ignored by the developers of the site. In addition the recent zero CIL rating (as opposed to a lower figure, albeit > 0) will significantly reduce the potential for the development to be “...provided in a way that benefits the wider area including nearby communities...”. The final paragraph of P1A remains a potential for benefit to the surrounding communities, and HHPC would urge SMBC to ensure that facilities within the BVP development contribute to the needs of surrounding communities in addition to the needs of the BVP development itself.

7. Do you agree with Policy P2? If not why not, and what alternative would you suggest?

P2 displays a bold vision for the future of Solihull, Shirley and Chelmsley Wood town centres. However, it is not clear to what extent SMBC will be able to realise this vision. The section “...The benefits that could be realised if the train station were to be relocated to an alternative site...” suggest dependencies on other parties, and we would expect SMBC to be clearer on its plan to realise the objectives of the masterplan with input from the relevant bodies (i.e. National Rail). The Local Plan goes further in the section “Solihull Town Centre Masterplan Opportunity Sites” but again it is unclear what SMBC intend to do to deliver this masterplan. There are numerous aspirations sections here - note “...this site provides the opportunity for large scale redevelopment, if the police station were to be relocated and developed along with the Magistrates Court which is currently being marketed...”. We would expect to see more detail within the Local Plan on how SMBC intend to act to ensure the masterplan proceeds intact.

8. Do you believe the right scale and location of development has been identified? If not why not?

HHPC do believe the scale and location of development is correctly identified in the Local Plan. Developments such as Touchwood have been effective in raising the quality of the environment in these areas.

9. Do you agree with Policy P3? If not why not, and what alternative would you suggest?

Yes.

10. Do you believe the right scale and location of development has been identified? If not why not?

Yes. The sites indicated utilise existing and planned infrastructure improvement and represent the best effective use of existing general business sites. More could be said in relation to paragraph 174 (for example powers relating to business rate reduction to encourage utilisation of existing premises over newly built SME-level development of smaller office sites). Vacant small and medium sites (e.g. along Stratford Road, Shirley) are a barrier to creating vibrant communities in these areas as current policy encourages tenancies in the charity sector over other retail use. With respect to Hockley Heath, we wholeheartedly support the decision not to include site 165 in the Local Plan as this would significantly impact the useful Green Belt (as per SMBC's Green Belt assessment) to the north of Hockley Heath.

Providing Homes for All

11. Do you agree with Policy P4? If not why not, and what alternative would you suggest?

We do not agree with a number of statements within Policy P4 as follows:

Policy 4A Affordable housing - we agree with a requirement of affordable housing in the Borough but disagree with the percentage proposed of 50% and comment further in Q12. We also consider that the statement "...where on-site provision is not feasible or viable there will be a financial contribution..." allows too much leeway to developers to opt for making a contribution meaning that affordable housing is being provided in concentrated sites rather than being spread equitably throughout new developments. We strongly believe that affordable housing should be integrated into communities by being part of a mix of housing provision not built 100% on one development which this policy may indirectly encourage.

We also highlight that in the vision paragraph for Hockley Heath (paragraph 84) that the statement reads "...and in Hockley Heath, affordable housing will have been provided to contribute towards the Borough's local housing needs." At our recent consultation event, residents identified a need for some new housing in HH but support a mix that would suit 'all pockets', especially the provision of bungalows or similar properties that would be accessible for elderly residents or those looking to downsize, not just affordable housing. Residents strongly feel that Hockley Heath should not be earmarked as available for development for affordable housing for the Borough, as this statement suggests. We are a small community with limited facilities and infrastructure which is already under strain from current occupancy levels and the development already approved. We would like this statement reworded to include Hockley Heath in the earlier part of the sentence with Knowle, Dorridge and Bentley Heath.

Policy 4B Rural exceptions - we do not consider these two criteria are sufficient to override building on green belt land particularly given the reductions to green belt land already proposed across the Borough. This policy encourages housebuilding decisions to be made on a stand alone basis rather than considering developments in a wider area. This policy statement is also inconsistent with our view stated above that affordable housing, where required, should be integrated into communities and provided alongside a mix of housing types.

Policy 4C Market housing - we agree with the proposed approach.

Policy 4D Self and Custom Housebuilding - addressed by Q13.

12. Do you agree with the level of affordable housing being sought in Policy P4? If not why not, and what alternative would you suggest?

We acknowledge the need for some affordable housing within Solihull however this is an expensive place to live due to the environment and amenities that the Borough has to offer and consider that

affordable housing (as defined in the SPD) in its current form is not a sustainable approach, i.e. market rates will prevail after the first occupant resulting in further need in future years. This view is supported by our recent consultation event (14th January 2017) where attendees acknowledged that we need some affordable housing but consider that providing a mix of housing that addresses the needs of a wider profile of household types, e.g. elderly, single persons etc., would encourage better rotation of starter homes and houses suitable for families. HHPC would urge SMBC to include, as planning policy, provisions to ensure Affordable Housing remains affordable (e.g. the “staircasing” out is prevented so that the unit is accessible beyond the first tenancy).

13. Which option for delivering self and custom housebuilding do you favour and why? If neither do you have any other suggestions?

We understand that the Council is required to keep a register of individuals interested in identifying sites that would allow for self or custom housebuilding. By its nature we would expect that individuals requirements may be quite unique and therefore may not fit within allocated sites especially those identified for a large number of houses. We would therefore favour the Council identifying a number of smaller sites that would allow for this type of build in pockets across the Borough. A big decision for pt2 of Q15, I'm sure this will be discussed.

14. Do you agree that we are planning to build the right number of new homes? If not why not, and how many do you think we should be planning to build?

The number of homes being planned is based on current projection need and therefore difficult to challenge. It is encouraging that development is to be phased to ensure no excessive supply. However, Policy needs to include reviews and to be written to ensure that if projected demand does not materialise the number can be reduced. The impact of Brexit, HS2 etc really cannot be accurately predicted between now and 2033. HHPC would urge SMBC to commit to a review of the SHMA in five years.

15. Do you believe we are planning to build new homes in the right locations? If not why not, and which locations do you believe shouldn't be included? Are there any other locations that you think should be included?

Any indications of development within the greenbelt or rural exception should be included in the proposed final phases of the plan. This would afford them the maximum protection and ensure they were only developed if absolutely necessary, where there is no change in demand and insufficient windfall sites.

HHPC intend to work with the community and landowners to review the potential for including development sites within our Neighbourhood Plan. We support SMBC's decision, as evidenced in the Topic Papers paragraphs 417-422, that Hockley Heath is not suitable for growth, and would reiterate our intent to review this as part of the broader Neighbourhood Plan development process. Bringing sites back into the LP as a result of the consultation process would be wholly inappropriate, given the evidence and conclusions within the evidence base.

16. Do you believe we have identified the infrastructure required to support these developments? If not why not? Are there any additional facilities you believe are required, if so what are they?

As Hockley Heath is not included within the plan there are no details of proposed improvements to infrastructure. At a recent community event there was significant concern over the current lack of transport infrastructure and facilities and the likely impact upon them from;

- Existing and proposed developments within Hockley Heath
- Neighbouring developments, in particular Blythe Valley
- Developments across the Warwickshire border
- Promoting Quality of Place

Also of concern is the lack of policy references relating to the impact of the Local Plan on education provision across Solihull, and specifically in the Rural Area surrounding Hockley Heath (e.g. mitigating the impact of BVP).

17. Do you agree with Policy P6? If not why not, and what alternative would you suggest?

Agree – existing sites should be expanded first, and we agree with the Green Belt exceptions wording.

Improving Accessibility and Encouraging Sustainable Travel

18. Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not why not, and what alternatives would you suggest?

At Hockley Heath’s consultative event there was great concern over the level of traffic in the village - particularly on School Road and Stratford Road. The roads were described as inadequate, unsafe, narrow, rural and unable to cope with traffic today, let alone future developments. SMBC should instigate formal traffic monitoring to validate the traffic management study with respect to BVP, and HHPC would welcome discussions in this regard.

We acknowledge and welcome the plan’s commitment to ensuring new developments are located in locations where reliance on the private car is low, and the statement that developments should be focussed in the most accessible locations, and do not result in the reduction of safety for users of the highway or other transport network.

A freight management strategy which removes the heaviest vehicles from residential roads is a positive move and would be welcomed in Hockley Heath as the Stratford Road (A34) is a relief road for the M40 / M42 network at times of accidents, roadworks and excessive traffic. HHPC would expect SMBC to support HHPC attempts to mitigate traffic impacts from developments, and policy wording to this effect would be welcomed.

The consultative event also demonstrated residents’ desire for more cycle lanes / paths and it is disappointing there is so little mention of plans to extend the existing network.

HHPC support the conclusion that a bypass in Hockley Heath is no longer deemed necessary.

Protecting and Enhancing our Environment

19. Do you agree with the policies for protecting the environment? If not why not, and what alternatives would you suggest?

Hockley Heath largely supports the plan’s policies for protecting the environment but is disappointed there is so little mention of the village within the need to protect the natural environment. HHPC would welcome more reference to the canal infrastructure with feedback from Canals & Rivers Trust and historic reference to historic place of “Oakley Heath”.

We would also welcome more alternative transport links such as cycle lanes to mitigate and adapt to climate change.

We would also point out that at our consultative event, there was discussion on the issue of poor drainage and flooding of Hockley Heath’s roads after rain. This is particularly evident on Stratford Road, and in the gardens of houses on School Road. Requiring developers to have proper sewerage infrastructure for any new developments is a must.

We would add that with the frequent dumping of household and other waste in the roads around our village, the plan’s requirement to address the waste capacity in Solihull is welcomed.

Promoting Quality of Place

20. Do you agree with the policies for quality of place? If not why not, and what alternatives would you suggest?

P15/ Securing Design Quality

The key objectives of contribute or create high quality places & spaces; regard local distinctiveness and achieve high quality, inclusive & sustainable design are appropriate. P15 also suggests that there should be engagement in pre planning decisions, there are concerns in relation to current levels of engagement with developers and SMBC in relation to recent planning decisions and consultation on local developments (i.e. BVP). The policy would need to outline in more detail the terms and levels of pre planning consultation.

P16/ Conservation of Heritage Assets & Local Distinctiveness

Yes, agree with the principles of P16. In a recent consultation with local residents key feedback was that residents felt it important to keep the “village feel” of HH and remain its rural character.

P17/ Countryside & Green Belt

Agree with policy that inappropriate development will not be permitted in the Solihull green belt. Concerns raised by HHPC/Residents Association and residents at local consultation that plan states that small settlements of, HH, which are inset in the green belt are not subject to green belt policy. Following recent planning decisions in and adjacent to HH there are concerns that SMBC will not take into account the importance of the rural setting and note any feedback or objections from HHPC and residents of HH. The importance of maintaining the distinctiveness of HH and its separation with Dorridge should be reinforced in the Local Plan.

Any further development in HH would put significant strain on the already inadequate infrastructure of the village. Poor quality roads, which are regularly affected by traffic congestion on local motorways (M42/M40) would be further affected with additional developments resulting in an increase in traffic.

Feedback from residents urge SMBC to consider brown field sites as a priority for re development before green belt areas.

Health and Supporting Local Communities

21. Do you agree with the policies health and supporting communities? If not why not, and what alternatives would you suggest?

P18/ Health & Wellbeing

Yes, agree with principles of P18.

However, concerns raised by residents at local consultation regarding provision of healthcare facilities locally and ability to access local services due to poor transport network.

HH currently has no GP surgery or pharmacy so residents have to travel to access these services. This can be particularly difficult for the local elderly population, particularly if they have to use public transport. Residents have expressed difficulties in accessing appointments at GP surgeries in adjacent communities, therefore SMBC needs to consider the location of any new Primary Care facilities to ensure that they are accessible to all.

Failure to provide adequate access to primary care health facilities will in turn put additional pressure on local secondary care.

Provision (i.e. Solihull Hospital/ Heartlands Hospital). Elderly residents may be at risk of unnecessary hospital admissions due to poor quality or lack of primary care intervention.

P19/ Range & Quality of Local Services

Yes, agree.

Local centres key to supporting residents in HH. Recent resident consultation supported need for local amenities such as local post office.

P20/ Provision for Open Space, Children's Play, Sport, Recreation and Leisure

Yes, agree

Residents would welcome input into enhancement of canal network to improve tow paths and surrounding areas and also provision of cycle ways to access local areas

Delivery and Monitoring

22. Do you agree with the Policy P21? If not why not, and what alternatives would you suggest?

No comment.

Any Other Comments

23. Are there any other comments you wish to make on the Draft Local Plan?

None