



**REVIEWING THE PLAN FOR SOLIHULLS
FUTURE – DRAFT LOCAL PLAN
SUPPLEMENTARY CONSULTATION**

REPRESENTATIONS

On behalf of Kler Group Limited

Date: March 2019

Ref: 19.114

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1. SMBC Emerging Concept Masterplan – September 2017

1. Introduction

1.1 Cerda Planning has been instructed by Kler Group Limited to prepare Representations to the Draft Local Plan Supplementary Consultation, Reviewing the Plan for Solihull's Future dated January 2019.

1.2 The submissions have been duly made and submitted to the Council within the required consultation timescales.

1.3 In preparing these submissions, Cerda Planning have had regard to the draft Local Plan Supplementary Consultation as well as the following documentation;

- Solihull Local Plan Review – draft Concept Masterplans
- Draft Local Plan Supplementary Consultation – amber sites
- Draft Local Plan Supplementary Consultation - site assessments
- Draft Local Plan Supplementary Consultation – site assessments key plan

1.4 In addition, given that the evidence base underpinning the draft Local Plan has been updated, regard has also been had to this in preparing the submissions.

1.5 Kler Group Limited have significant landhold interests across Solihull Metropolitan Borough and have the potential to deliver well in excess of 1000 houses across sites at Knowle, Dorridge, Bentley Heath and Balsall Common. The extent of the landhold interests held by Kler Group Limited will be explained throughout these submissions, but in summary all of the land is free of legal inhibitors, with all land available, suitable and economically viable. Importantly in light of the increased emphasis within the updated National Planning Policy Framework, all of the land within Kler Group Limited's control is deliverable and, if allocated, could be brought forward in the first 5 years of the plan period from Local Plan adoption.

1.6 Cerda Planning has taken a responsible and constructive approach to these submissions, seeking to assist in the preparation of an up to date plan for Solihull. The intention throughout is to support the Council in ensuring that when the draft Local Plan is put forward for Examination it is evidentially;

- Positively prepared;
- Justified;
- Effective; and
- Consistent with National Policy.

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- 1.7 These are particularly important matters since they go to the heart of soundness. In the context of the current Development Plan for Solihull, which was previously the subject of Judicial Review via a High Court Challenge, the need for the Draft Local Plan to be robust, fit for purpose and capable of being free of challenge, is brought into sharper focus.

2. Background

- 2.1 Kler Group Limited have taken a proactive and ongoing approach to the issue of Development Plan preparation for Solihull Metropolitan Borough.
- 2.2 Representations were lodged in January 2017 to the Draft Local Plan when it was issued for consultation.
- 2.3 Our Representations were one of the over 1750 responses received by the Council at that time.
- 2.4 Cerda Planning subsequently lodged Representations to the Call for Sites which was issued by the Council in July 2017.
- 2.5 During the period of current plan preparation for Solihull, there have been two revisions to the National Planning Policy Framework (NPPF) and the implications of these against the Draft Local Plan have also been assessed.
- 2.6 A particularly important issue for Solihull is the wider Housing Market Area and the duty to cooperate. Solihull is one of 14 local planning authorities that is within (whole, or in part) the Housing Market Area that includes Birmingham and surrounding authorities.
- 2.7 Birmingham is a significant exporter of housing need across the WBHMA. Birmingham's Development Plan was adopted in 2017. It includes a housing requirement of 51,100, of which only 13,200 can be accommodated within the city's administrative boundary. Thus, there is a need to export 37,900 houses across the WBHMA. Solihull forms part of the WBHMA and indeed is an adjoining neighbour to Birmingham. But for the imposition of administrative boundaries there are large parts of Solihull which merge and coalesce with Birmingham forming a seamless substantial urban area.
- 2.8 In terms of Kler Group Limited landhold interests in Solihull Metropolitan Borough, these can be summarised as follows.
- 2.9 Firstly, land at Knowle, known as Arden Triangle. This is land extending to approximately 19.45 hectares, greenfield and washed over as Green Belt, with frontages to Warwick Road (A4141) and Grove Road. It should be noted that this land forms part of the wider allocation referenced as Site 9 identified both in the Draft Local Plan and this current Draft Local Plan Supplementary Consultation.

- 2.10 Secondly, land at Gentleshaw Lane. The site is greenfield, extending to approximately 7 hectares in size. It is bounded by the A41 to the north with a woodland edge along the north-western boundary, Gentleshaw Lane to the south and Warwick Road to the west. Both of these roads are residential in character. It should be noted that this land forms part of Site 107 identified both in the Draft Local Plan and this current Draft Local Plan Supplementary Consultation.
- 2.11 Thirdly, land at Darley Green Road. The site consists of two separate parcels of land to the south-east of Dorridge totalling 6.77 hectares. The western parcel is located on the south of Dorridge Road, and the eastern parcel is formed around an existing dwelling accessed from Darley Green Road. It should be noted that this land is referenced as Site 135 identified both in the Draft Local Plan and this current Draft Local Plan Supplementary Consultation.
- 2.12 With particular reference to the Arden Triangle site, Kler Group Limited, supported by Cerda Planning, has engaged with the Council and the local community in a series of meetings including two design development workshops. This work has been informed by a range of technical and environmental assessments to establish key constraints and opportunities, developable parcels and infrastructure mitigation requirements. This process has enabled the preparation of a Masterplan for Kler Group Limited's land.
- 2.13 This is an iterative approach which is anticipated will continue through to submission and examination stage of the Draft Local Plan.
- 2.14 It is also an approach that Kler Group Limited have committed to in relation to the Gentleshaw Lane and Darley Green Road sites which are not presently shown as proposed allocations notwithstanding the Representations made by Cerda Planning to date.

3. Representations

3.1 This section of our submissions details our Representations and specifically our response to the various questions raised by the Council requiring responses set out within the Draft Local Plan Supplementary Consultation.

3.2 Our responses have been informed by information gathered by Kler Group Limited's technical and environmental consultancy team.

3.3 The responses have been prepared in a constructive manner so as to inform and assist in the revising of the Draft Local Plan in readiness for the submission version, which it is understood is to be published in summer 2019 ahead of examination in public anticipated for winter 2019/2020.

3.4 Not all of the questions raised by the Council are the subject of responses. The sub headings below, correspond with the questions raised by the Council in the Draft Local Plan Supplementary Consultation.

1. Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so, what are the exceptional circumstances and what should the alternative approach be?

3.5 This is a question which revolves around the new standard methodology, brought in as part of the revisions to the National Planning Policy Framework, published subsequent to the earlier Draft Local Plan Consultation.

3.6 The standard methodology for OAN is a long-standing commitment of the Government.

3.7 It can be traced back to the Government's White Paper, Fixing the Broken Housing Market, published in February 2017. The provisions of the White Paper are now embedded within policy through the publication of the revised National Planning Policy Framework as well as the Planning Practice Guidance.

3.8 The expectation of the Government is clear; the standard methodology is intended to supersede the old approach of identifying objectively assessed needs.

3.9 Adopting the standard methodology should make plan preparation, including examining plans and interpreting them post adoption a much more streamlined, certain and reliable process.

- 3.10 So important is the standard methodology to the Government that specific transitional arrangements were embedded within the first revision to the National Planning Policy Framework subsequent to the earlier Draft Local Plan. This was intended to set out the circumstances when the standard methodology could be set aside for the purposes of plan making in terms of a date for submission of emerging Local Plans.
- 3.11 The Government's expectation is that deviation from the standard methodology should be made only in exceptional circumstances. It is our submissions that there are no exceptional circumstances which warrant deviating from the standard methodology in respect of Solihull and it is right and proper that the Draft Local Plan Supplementary Consultation takes the opportunity, as it has, to step change away from the earlier Draft Local Plan in respect of housing need and adopts the standard methodology.
- 3.12 In so doing, the Draft Local Plan Supplementary Consultation firmly aligns itself with the National Planning Policy Framework and in respect of this issue, demonstrates soundness.
- 3.13 This figure is only the minimum starting point. Any ambitions to support economic growth and to deliver affordable housing are additional to the local housing need figure. The Government's objective of significantly boosting housing supply of homes remains. It is important that housing need is not under-estimated. The Council is encouraged to be as ambitious as possible when planning for housing.
- 3.14 It is important to recognise that the standard methodology is intended to deal with housing requirements arising only within Solihull Metropolitan Borough. The issue of a wider Housing Market Area and the duty to cooperate is an entirely distinct and additional matter to be planned for over and above the standard methodology.
- 3.15 Thus, for Solihull as it is for the other local authorities within the wider Housing Market Area, the housing requirement is made up of two discreet components; the standard methodology dealing with need as it arises in Solihull Metropolitan Borough, and the unmet need arising from the wider Housing Market Area.
- 3.16 Whilst it is recognised that the Draft Local Plan Supplementary Consultation is dealing only with the standard methodology and makes clear that issues around the wider Housing Market Area are deferred for the submission stage Draft Local Plan, the apportionment and distribution of housing across the wider Housing Market Area is the single biggest planning issue affecting the West Midlands at this time. Its importance cannot be overplayed.
- 3.17 In this context it is regrettable that the Council have elected not to as yet tackle the issue of contribution it should rightly make to dealing with the wider Housing Market

Area issues, particularly given that the figure identified in the earlier Draft Local Plan was a notional 2,000 houses. It should firstly be noted that this was not the subject of any evidence base justification. Secondly, it should be recognised that this is a figure of almost universal objection not only from the development industry charged with delivering housing across the West Midlands, but also the local authorities themselves charged with planning for housing across the West Midlands.

3.18 Whilst the Council are seeking to defer this highly important issue, which goes to the heart of plan making for Solihull, it is our respectful submissions that very careful attention should be paid to this matter now.

3.19 There is clear justification for Solihull Metropolitan Borough Council to make a higher contribution to the Wider Birmingham Housing Market Area (WBHMA) shortfall in comparison to other local authorities.

3.20 Solihull and Birmingham are near neighbours with the urban area seamless between the two; numerous people that work in Birmingham live in Solihull and vice versa and so it would be illogical to not consider Birmingham and Solihull as functioning inter-dependently given their close proximity to one another. Hence, it is apparent that Solihull bears more weight and responsibility in contributing more housing to support the WBHMA and ensure that required housing delivery numbers are met during the plan period (2011-2031).

3.21 The WBHMA comprises 14 local authorities (Birmingham City Council; Walsall Council; Lichfield District Council; Cannock Chase District Council, Stratford-upon-Avon District Council; North Warwickshire District Council, Redditch Borough Council, Bromsgrove District Council; South Staffordshire District Council; Tamworth Borough Council; Solihull Metropolitan Borough Council; Wolverhampton City Council; Dudley Borough Council and Sandwell Metropolitan Borough Council), all of which have a responsibility to contribute to the housing shortfall of 37,900 homes as quantified within the Birmingham Development Plan. None of the authorities involved have yet published a fixed figure of their contribution. Thus, all of Birmingham's overspill remains unaccounted for at this time.

3.22 However, it can easily be calculated that for each authority involved to take their numerically equal account this figure would result in an increase of 2915 homes by each of the 13 authorities (excluding Birmingham City Council) in the relevant plan periods.

3.23 It is Cerda's view that if each of the 13 authorities were to take an equal amount, this would not be a reasonable or justified approach. This approach is something of a blunt instrument and would make no allowance for the geographical proximity to

Birmingham, the size of the local authority (in terms of percentage increase against that local authority's own housing requirement) as well as their capability to accommodate and deliver 2,915 additional homes over the plan period. For instance, North Warwickshire Borough Council, of which its area of jurisdiction is not immediately adjacent to that of Birmingham City Council's, has an overall housing requirement of 5,280 homes as set out within the emerging Local Plan and so assuming a contribution to the WBHMA of 2,915 would be expected to deliver an additional 55% of its overall housing requirement within the Borough, a considerable and unachievable amount.

3.24 The table below sets out each of the 13 local authorities (excluding Birmingham City Council) involved in the WBHMA, detailing their own housing requirement and proximity in relation to Birmingham City Council's area of jurisdiction. As demonstrated, of the 13 authorities listed, 8 of these adjoin Birmingham City Council and 5 are in proximity to it with another local authority serving as a spatial 'buffer' between the two, as is the case with Cannock Chase District Council and Walsall Council.

3.25

Local Planning Authority within WBHMA	Overall Housing Requirement	Relationship to Birmingham City Council's area of jurisdiction
Cannock Chase DC	5,300	Not adjoining, in proximity
Walsall Council	8,881	Adjoining
Lichfield DC	10,030	Not adjoining, in proximity
Stratford-upon-Avon DC	14,600	Not adjoining, not in proximity
North Warwickshire DC	5,280	Not adjoining, in proximity
Redditch BC	6,400	Adjoining
Bromsgrove DC	7,000	Adjoining
South Staffordshire DC	3,850	Not adjoining, in proximity
Tamworth BC	4,425	Adjoining
Solihull Met. BC	13,039	Adjoining
Wolverhampton CC	7,300	Adjoining
Dudley BC	6,001	Adjoining
Sandwell Met. BC	10,385	Adjoining

3.26 As set out in the table, Solihull Metropolitan Borough Council has an overall housing requirement of 13,039 and adjoins and functions with Birmingham. As previously stated, if all 13 authorities (excluding Birmingham City Council) were to accommodate an equal share of the WBHMA shortfall, this would amount to 2,915 homes each. In Solihull's case, this would mean the Council delivering an additional 22% of its overall housing requirement, a relatively low figure compared with all of the other adjoining local authorities.

3.27 This figure is not proportionate when compared to the 55% additional homes that North Warwickshire would need to accommodate in such a scenario. Given that Solihull is adjoining to Birmingham as well as being in closer proximity to it than the entirety of North Warwickshire Borough Council's area of jurisdiction, it is considered appropriate that Solihull, as an adjoining authority, accommodate a higher housing figure than those local authority areas that are further away from Birmingham.

3.28 It is Cerda's view therefore that there should be a heavier weighting for the 8 adjoining authorities in that they should contribute more towards the WBHMA shortfall given their geographical relationship. In light of this, and having regard to the overall housing requirement figure for Solihull (being the highest of all the adjoining local authorities), we suggest that Solihull should deliver a minimum figure of between 5,000 and 6,000 dwellings in addition to their overall housing as a reasonable and proportionate contribution to the WBHMA.

2. Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?

3.29 Solihull Metropolitan Borough Council have a complex site selection process, comprising a 'two-stage' approach to assessing sites submitted during Call for Sites exercises;

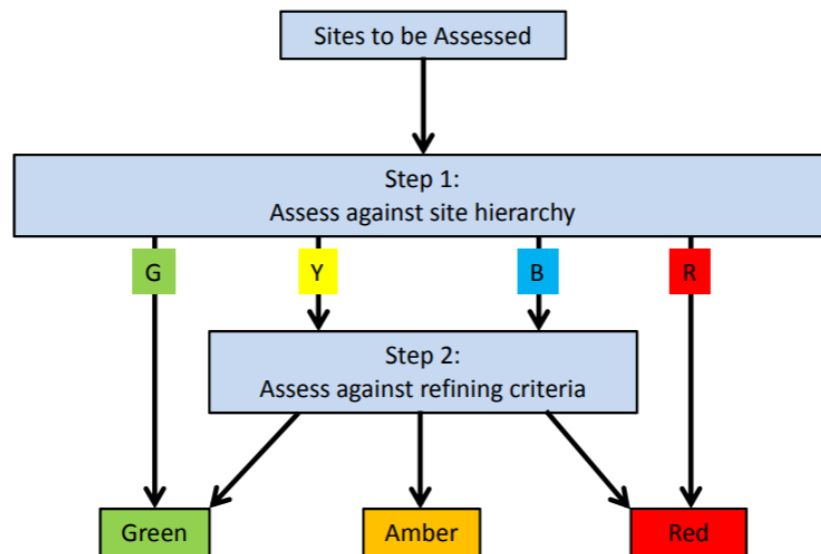
- Using a set hierarchy based on the one set out in the Draft Local Plan; and
- Using planning judgement to refine site selections.

3.30 We do not consider there to be any issues with the first stage of the site selection/assessment process, and believe that it is appropriate to establish a site within the hierarchy as set out in the Draft Local Plan in order to assist with the assessment of elements such as sustainability and the appropriate number of housing numbers to be allocated to the site.

3.31 The second step of 'site refinement' follows a RAG (red-amber-green) 'traffic light assessment', and the analysis used in step 2 is used to confirm whether 'potential' allocations (yellow) should be included as green or amber sites in the consultation, and whether 'unlikely' allocations (blue) should be included as amber or red sites in the consultation. A flow cart of the second step produced by the Council can be seen below.

3.32

Summary Illustration of Site Selection Process:



3.33 The process is highly complex and we do not agree with the methodology of the site selection process. Furthermore, the numerous elements of the Council's assessment process allow for a higher incidence of error or for assessments to be overly subjective.

3.34 Guidance on this issue can be found in the PPG, paragraph 001, which sets out that the assessment of land availability is an important step in the preparation of Local Plans. It states that an assessment should achieve the following:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.35 The site selection process relies heavily on the accompanying Sustainability Appraisal, produced in conjunction with the Local Plan Review. This is arguably the sole methodological aspect of the site selection process. However, a key issue is apparent in cases of sites that are an amalgamation of more than 2 parcels of land in that they are assessed collectively. In simple terms, there are instances of the Sustainability Assessment assessing an amalgamation of sites, and then this amalgamation is divided out in the site assessment exercise. Crucially, the Sustainability Appraisal assessment is simply followed through into the site assessment exercise even though a different amalgamation of sites is being assessed. This creates a clear disconnect and conflict in the assessment process, since the same assessment is being applied to a different combination of sites.

3.36 This is apparent in the case of Site 135 (land at Dorridge Road, Dorridge). Site 135 within the Draft Local Plan Supplementary Consultation; Site Assessments document

comprises only 2 land parcels, and the site's suitability to be upgraded from a 'red' site to an 'amber' site will be discussed in later sections of these Representations. However, within the Sustainability Appraisal to the Draft Local Plan, 4 sites are collectively assessed under reference AECOM 60. It is apparent that the 2 additional sites being assessed within the Sustainability Appraisal are weighing heavy upon Site 135 as the sites collectively are considered to have a 'low landscape capacity' which is not the case for the two Site 135 parcels carried forward to the Site Assessments document. Therefore, the use of the Sustainability Appraisal in assessing sites for allocation has not provided a firm framework for the individual evaluation of potential sites.

- 3.37 In terms of alternative methodologies, Stratford-upon-Avon (a local authority included in the WBHMA) utilises a much more refined approach in their site assessment methodology, in which the Council has a clearer framework to assess against that is evidence based and easier to compare alternative sites. Stratford's assessment approach is in accordance with the Planning Practice Guidance (PPG).
- 3.38 Paragraph 4.5 of Stratford's draft Strategic Housing Land Availability Assessment (SHLAA) Explanatory Note, published in August 2018, sets out the correct use of the RAG assessment, in which it is to highlight where issues that constrain sustainable development exist. The conclusions provide the opportunity for a professional judgement to be made, taking the assessment in the round, as to whether the existence of any particular constraint is of such significance that it renders the site undeliverable or inappropriate for development.
- 3.39 Notwithstanding, Solihull's land parcel assessment methodology is illogical, overly subjective and inconsistent and ultimately serves to undermine the Council's approach to assessment. A major issue identified is that the Council's assessment framework does not allow for constraints to be weighted differently. For instance, hard and soft constraints such as access issues and landscape issues, respectively, are considered to have similar weighting in terms of their impact upon development coming forward at a site. This raises another issue with the Council's site assessment process, in which it does not allow for mitigation of soft constraints. For instance, landscape issues could be mitigated through compensation planting and the provision of green space on site.
- 3.40 This cannot be correct; a site scoring poorly for a hard constraint such as access must regrettably fall away and sites with lesser constraints must subsequently be put forward for assessment for potential allocation.

22. Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not; or do you believe there are any other matters that should be included?

- 3.41 A detailed assessment is made in the Draft Local Plan Supplementary Consultation at paragraphs 202 – 233 inclusive as to Knowle, Dorridge and Bentley Heath as a settlement now and the settlement in the future.
- 3.42 There is a detailed assessment as to what is required for the settlement for the future in relation to a range of transport, education, sport and recreation and housing need matters.
- 3.43 It is right that a detailed assessment has been undertaken given that paragraph 222 of the Draft Local Plan Supplementary Consultation makes clear;
- “Development in and around KDBH is not only an opportunity for the settlement to play a major part in accommodating the Borough and wider area needs, but also to accommodate a scale of development that is capable of supporting infrastructure and provision that can help play a part in dealing with existing issues and provide the necessary facilities for future residents.”***
- 3.44 It is clear therefore, that underpinning the Draft Local Plan Supplementary Consultation is an anticipation that KDBH will make a major contribution to accommodating not only the Borough’s housing needs, but also those of the wider Housing Market Area.
- 3.45 In terms of the specific infrastructure references, it is noted that paragraph 227 sets out a short justification for a new primary school in the area which is presently proposed on site 9 – Arden Triangle.
- 3.46 Insofar as Concept Masterplans, paragraph 230 references the inclusion of draft Concept Masterplans for the ‘green’ proposed allocations. As paragraph 230 makes clear, these seek to identify the key existing features of a site that may need to be retained, and show it a high level where development is envisaged within the wider site.
- 3.47 Detailed submissions are made later in these Representations in respect of the appropriateness of the draft Concept Masterplans, particularly in relation to Site 9 - Arden Triangle, all that needs to be stated at this point is that they only identify existing features of a site that may need to be retained, and the detail that is provided is inevitably at a high level which would need to be refined through an iterative planning application process informed by technical and environmental assessments, engagement with the Council and its statutory and non-statutory consultees, and the wider local community.

24. Do you believe that Site 9 land south of Knowle should be included as an allocated site, if not why not? Do you have any comments on the draft Concept Masterplan?

- 3.48 Land South of Knowle, reference Site 9, has been a consistent commitment by the Council throughout plan making in Solihull. It is a site which was identified within the earlier draft Local Plan and again finds itself as a proposal allocation within this draft Local Plan Supplementary Consultation.
- 3.49 The evidence base which justified the proposed allocation within the earlier draft Local Plan re-enforces and re-supports the allocation of the site within the current draft Local Plan Supplementary Consultation. The update to the evidence base does nothing to undermine the Council's approach to propose an allocation of the site and indeed supports the proposed allocation. Furthermore, subsequent to identification of the site in the earlier draft Local Plan Kler Group Limited have engaged technical and environmental consultants dealing with a range of issues in relation to the site. Surveys and area assessments have been undertaken in relation to access and Highway capacity, flood risk and drainage, trees, biodiversity, landscape impact, connectivity, levels, services, heritage (both above and below ground), phasing and deliverability.
- 3.50 This work has been forwarded to the Council and has underpinned the design development workshops which have been held with the Council and the local community. All the evidence that continues to build in relation to this site supports its inclusion within the draft Local Plan Supplementary Consultation.
- 3.51 It should also be noted that the Council's adoption of the standard methodology has increased the annual requirement for housing across Solihull and as yet the single biggest planning issue affecting the West Midlands region in terms of the housing numbers to be apportioned and distribution through the wider Housing Market Area have not been fixed. On this latter issue, it is unequivocal in light of the extent of the objections raised to the previous notional 2,000 houses identified by the Council as their proportion of meeting the wider Housing Market Area issues that the final figure to be settled upon will be substantially higher.
- 3.52 It cannot be said therefore that the housing requirement for Solihull though further iterations of the Draft Local Plan will reduce, the reverse is true and the actual requirement will in due course be substantially higher than the figure planned for within the Draft Local Plan Supplementary Consultation.
- 3.53 What flows from this is that there will not be pressures on the Council for reducing the number of sites to be allocated to meet both Solihull's housing needs and the wider

Housing Market Area housing needs; the pressures that will bring to bare will be a requirement for a substantially increased number of housing allocations, as well as a greater focus on increasing effectiveness and efficiencies in terms of net developable areas within those sites such as Site 9 – Arden Triangle, which have already been identified for proposed allocation.

3.54 Turning now to specific comments on the draft Concept Masterplans for the site, these are as follows.

(i) Access and Highway capacity

3.55 Neither the Site Analysis or Landscape Assessment Sections in the Masterplan document identify/acknowledge highway safety problems at the Warwick Road/Grove Road junction. Furthermore, neither the two Masterplan options, as shown, or text in the draft Local Plan mention any proposed improvement at this junction, which are critical to the allocated sites as this is identified as an accident hot spot and should be referenced therefore in the Local Plan and Masterplans.

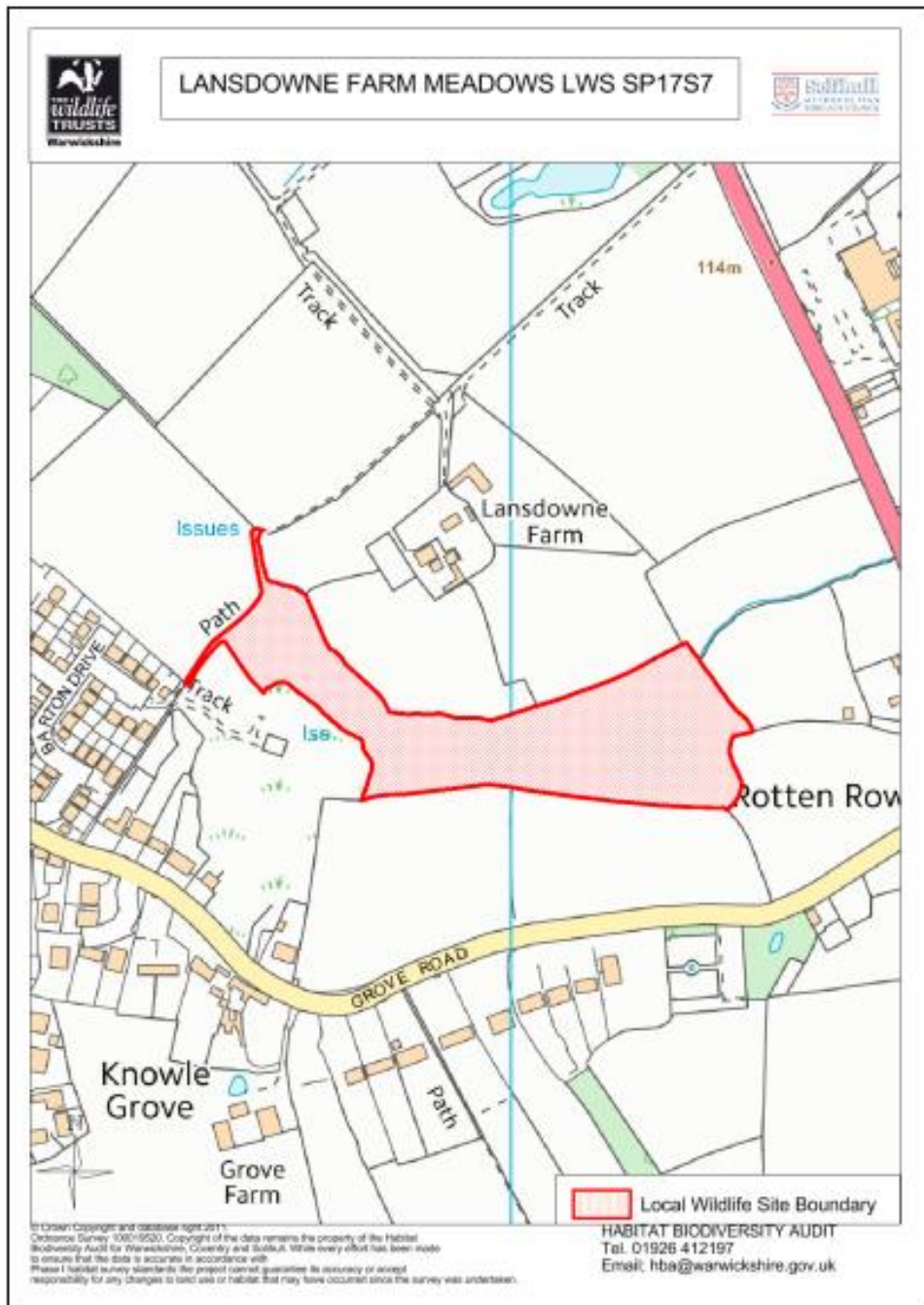
3.56 There are 3 points of access shown on the two Masterplan options, two into land north of the Kler Group Limited's option land and one to the south-east of the site, in the vicinity of the Warwick Road/Grove Road junction. No access has been shown to land west of Warwick Road to land under option by Kler Group Limited and it is not clear how this land would be served given that the Local Wildlife Site cannot be crossed. At least one point of access should be sought to serve the land associated with Lansdown Farm and under option by Kler Group Limited.

3.57 Paragraph 242 references improvements to public transport provision. Taking into account the point made above, no vehicular access is shown from Warwick Road adjacent to the garden centre and this would limit the route a bus service could take.

(ii) Biodiversity

3.58 The area mapped as a Local Wildlife Site (LWS) on the Illustrative Emerging Concept Masterplans for Arden Triangle is incorrect (see below plan showing the correct boundary).

3.59



3.60 In addition, the existing hedgerows and semi-improved grassland are not accurately mapped on the Site Analysis Plan on page 69 of the Draft Concept Masterplans document or subsequent plans. Nevertheless, it is noted that the Framework Plan developed by Kler Group Limited following numerous stakeholder workshops, retains the LWS and the majority of existing hedgerows and associated trees.

3.61 There is the opportunity to enhance the Lansdowne Farm Meadows LWS through the implementation of a positive management regime, however, this does not preclude the opportunity to provide public access to the LWS and therefore provide benefits to the local community. Indeed, this is a potential opportunity to increase public appreciation and awareness of nature. As such, we would suggest that the LWS is identified as

providing POS within the Concept Masterplan options. With this in mind, the POS area proposed adjacent to the north-west of the LWS may not be necessary. In addition, the proposed link shown on the Landscape Assessment between the Lansdowne Farm Meadows LWS and the off-site Field at Rotten Row LWS is not realistic due to the fact that the two designations are separated by Grove Road. It is also noted that the two LWS are designated for different reasons and therefore the proposed link would not, in any event, necessarily provide any appreciable ecological benefit.

(iii) Landscape and trees

- 3.62 In terms of landscape and trees, the concept reflects our recommendation that the existing mature hedgerows be retained and inform the creation of development parcels. We also agree with the extent of proposed development within the large fields to the south-west of the Garden Centre.
- 3.63 However, it is questionable why the area to the south-west of Lansdowne Farm has been excluded from the developable areas as shown as POS. This area is visually well contained from Grove Road by the mature treescape associated with the LWS to the south and west, while the existing built form associated with Lansdowne Farm forms a backdrop to this parcel, being located in an elevated position. There is scope to access this parcel from the parcels immediately to the north and east without compromising the key treescape associated with the field boundaries. It is considered that the suggested POS provision can be accommodated across the allocation without the need to preclude development from this parcel.
- 3.64 The parcels immediately to the north of Grove Road could accommodate a mix of low and medium density development. It would seem appropriate to have lower densities to the southern boundary to reflect the existing townscape character to the south and south west. However, the fall nature of the landform toward Cuttle Brook means that densities could be increased within the northern parts of these parcels without compromising views or townscape character.
- 3.65 Development could extend east along Grove Road without comprising the landscape setting and appreciation of the listed property at the junction. Grove Road has a sunken character in this location, ensuring views over this parcel are limited and are focussed along the street scene. The eastern boundary of the parcel does not follow any definitive features on the ground.
- 3.66 With regard to the comments within the emerging Local Plan in relation to landscape value, sensitivity and capacity, we have not seen a detailed study by the Council. However, we would suggest that the comments that this is in an area of 'low landscape capacity to accommodate new development' is not particularly helpful and does not

suggest that the site and its setting can integrate development. We do, however, agree with the comments regarding low visual sensitivity.

(iv) Heritage

- 3.67 With regard to built heritage sensitivities, the initial heritage assessment identified two designated built Heritage Assets that had the potential to be affected by the development of the site through changes within their setting. These comprise Rotten Row Farmhouse (Grade II) and the barn to the north-east of Grove (Grade II).
- 3.68 The extent of the zone of significance identified by the Council in the Site Analysis to Rotten Row Farmhouse is questionable, particularly with regard to the fact the farmstead is located to the eastern side of Warwick Road (outside of the site). This provides the strongest contribution to its heritage significance and will not be affected by the development of the site. The views from the north-west across the site towards the farmhouse are also fairly limited given the topography and existing vegetation, and visually the farmhouse is only experienced within the southern part of the site. However, the area the Council identified as being sensitive to development within the concept plans is much smaller and this is likely to be the most important consideration in determining the developable areas of the site.
- 3.69 With regard to the Listed Building shown to the west of the site, confirmation is required as to which heritage asset this relates to. The National Heritage List for England records no heritage asset in the location identified by the Council, but does record a Grade II listed barn which was identified in our heritage assessment to the southern side of Grove Road. The Council's plans should be updated with regard to the correct location of the Listed Building as it is likely to require the revision of the identified zone of significance, which currently extends into the site along its western boundary.
- 3.70 The Concept Masterplans (Options 1 & 2) both identify an area to the west of Rotten Row Farmhouse that may be suitable for development subject to a heritage assessment; this is located to the south-eastern part of the site. The Masterplans both also identify the provision of a new access within this area of the site which is consistent with discussions held in the workshops regarding road/safety improvements. These works to the highway will result in the urbanisation within this part of the setting of the Grade II Listed Building and it is considered that extending housing into the area presently shown as being potentially suitable for development would not materially increase the level of harm to the Listed Building arising from the development of the site as a whole. Subject to the sensitive design of the proposed development in this location in conjunction with additional mitigation measures, housing could be accommodated within this area and the impact on Rotten Row

Farmhouse would remain within the less than substantial harm spectrum of paragraph 196 of the NPPF.

- 3.71 With regard to housing density within the southern part of the site along Grove Road, a mixture of low and medium density housing could be accommodated without any detrimental impact on the character of Grove Road or the setting of the built Heritage Assets.
- 3.72 In drawing together the above observations, informed as they are by the technical and environmental team engaged by Kler Group Limited, it is evident that the notional yield of 600 houses identified by the Council is low and does not fairly reflect the constraints and opportunities which the site presents. In the earlier Draft Local Plan, the Council identified a capacity of 750 houses, which was reported prior to the detailed technical and environmental testing of the site. That technical and environmental testing has not caused the site to be more sensitive in terms of features to be maintained, and indeed there is now a fix on key issues such as the Local Wildlife Site which provides for certainty in terms of net developable areas.
- 3.73 It is our respectful submission to the Council that a re-visit on the Concept Masterplans for Site 9 – Arden Triangle is essential in order identify the actual deliverable yield from the site and in turn inform the residual housing requirement required of the other 'green' proposed allocations, the requirement for amber sites and the inevitability of having to bring forward additional sites to meet the finally identified housing figure for Solihull, taking account of the standard methodology and the wider Housing Market Area issues.
- 3.74 As a result, at this time neither of the options can be supported. Subsequent to the publication of the Draft Local Plan the Council have issued a further Concept Masterplan (see **Appendix 1**) which is an improvement over the current two options but even this must take into account of the comments set out above.

34. *Should the washed over Green Belt status of the settlement/areas be removed, and if so, what should the new boundaries be? If not, why do you think the washed over status of the settlement should remain?*

- 3.75 Our response to Question 34 is that in the specific circumstances the washed over Green Belt status of settlement/areas should be removed since it will make for a more rational, logical and defensible boundary to the West Midlands Green Belt where it is situated within Solihull. In turn, this will assist in the wider general public's understanding of the function of the Green Belt and the rationality of the Draft Local Plan, all of which will engender a far higher degree of confidence in the plan making process, which in overall terms will reinforce the status of the Draft Local Plan ensuring

it is up to date and relevant for a longer period and fit for purpose where it comes under scrutiny in the context of development management and both application and appeal levels.

3.76 Our detailed responses in justifying our position are set out below in relation to Questions 35 and 36.

35. *Should the washed over status of these settlements/area remain? If not why not.*

3.77 It is important to recognise that Green Belt boundaries can only be re-defined through a Local Plan review. This therefore is the correct time to undertake a wholesale and detailed Green Belt boundary review not only in the context of seeking to allocate housing and other needs in the plan period but also as an opportunity to rationalise and re-define Green Belt boundaries where they are a legacy and a hangover from the current Development Plan prepared, as it was, in the context of a radically different planning policy context.

3.78 In many cases, Green Belt boundaries were defined many decades ago, in the context of the previous suite of Planning Policy Guidance notes themselves published before Planning Policy Statements. The current Green Belt boundaries can therefore be traced to a very different planning policy context, and over a period in excess of 20 years.

3.79 Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the Development Plan for the starting point for decision making. Where a planning application conflicts with an up-to-date Development Plan the Site Allocations Plan will form part of the Development Plan and will identify additional sites for housing development. The site was submitted to the Council for assessment during previous 'Call for Sites' exercises

3.80 It is clear therefore that the opportunity to re-visit (both the strategic and very localised level) Green Belt boundaries should be taken in the Draft Local Plan if it is to be consistent with national policy as it exists now not as it existed when the boundaries were first drawn up.

3.81 This is vital given that the concept of soundness was not in play when current Green Belt boundaries were first derived.

3.82 In terms of the specifics of our submissions, it would not be logical to say that villages of any sort have any character which contributes to the openness of the Green Belt. By definition open means free of buildings, structures, surfacing and boundary

treatment. This is demonstrably so having regard to the development management function of the Council; in Green Belt locations, the introduction of fencing, even if it were proposed associated with an agricultural use consistent with uses encouraged within the Green Belt, would be considered to have a harmful impact upon the openness of the Green Belt and there are many instances where such low key and relatively localised and insignificant proposals are refused.

3.83 In a strict application of policy, any building which would not be permitted as a result of Green Belt policy if applied for now should not be included in washed over areas since this would be to bring within the gambit of plan making an inconsistency between policy making and development management.

3.84 It is recognised that there will inevitably be some limited exceptions to this, for example isolated dwellings in generally open areas away from development boundaries and clearly areas characterised by urban features can reasonably be washed over by Green Belt. Any other concentration of buildings, structures, hard surfacing or boundary features however should not be washed over as Green Belt.

36. Are there any other areas of the Borough where washed over status should be reviewed, if so which areas and why?

3.85 It is our submissions that there are other areas of the Borough where washed over status should be reviewed. Specifically, this relates to the large area of existing development at Warwick Road, Pool Meadow Close and Riverside Drive.

3.86 Our submissions relate back to the Green Belt Assessment undertaken by Atkins in 2016 and specifically Refined Parcel 32.

3.87 Area 1 – Widney Manor Road a suggested new boundary to the east of all development fronting Widney Manor Road including the sixth form college up to the Malvern Park boundary but excluding Lovelace Avenue.

3.88 In terms of Area 2, Warwick Road the new boundary from the entrance to Brueton Park adjacent to all development in Oldway Drive/Pool Meadow Close up to the M42 and then along the M42 to the Solihull Bypass, and the Bypass where it joins the existing boundary to the Marie Curie hospital.

3.89 These two areas are both within Refined Parcel 32 and exclude the majority of built up development within that parcel, leaving only the ribbon development of Lovelace Avenue. The Atkins Green Belt Assessment of 2016 scoring is rigid and removal of these two areas does not decrease or increase the score but the practical reality would

improve the basis of the score without in any way compromising the performance of the parcel.

3.90 Staying with the Atkins Green Belt Assessment, it is the comment regarding the Refined Parcel 31 under purpose 1 is to be noted. This makes clear that the RP31 boundaries to the west and south are clearly defined by the A41 (bypass) and M42 respectively and are therefore durable. This is a key part of the evidence base, and demonstrates that the bypass and M42 are already recognised as clear and durable boundaries to the proposed removed area. The western boundary of the proposed removed area is at least as good as the majority of the boundaries in the Borough and has the River Blythe immediately adjacent as reinforcement. The large areas of trees around Riverside Drive do not require Green Belt protection as they are already protected by SSSI and Local Wildlife Site designations together with a Tree Preservation Order on some of the trees along the northern boundaries along the open land.

3.91 The consequence of this proposal is to bring the land at Gentleshaw Lane out of washed over Green Belt given the inconsistencies embedded within the evidence base underpinning the Draft Local Plan Supplementary Consultation. This ensures that the opportunity is taken now to address anomalies within Green Belt boundaries which were drawn up some considerable time ago and never fully revisited since.

37. *What compensatory provision should be made for land being removed from the Green Belt? Where relevant please give examples that are specific to individual sites that are proposed for allocation.*

3.92 In responding to this question, particular regard is to be had to the revised National Planning Policy Framework which states at paragraph 138 that Development Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

3.93 In terms of the weight to be applied to any compensatory provision, it is first necessary to have regard to the National Planning Policy Framework and what it regards as uses or other aspects which are beneficial to Green Belt.

3.94 In this regard, paragraph 141 makes clear that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; opportunities for outdoor sport and recreation; to retain and enhance landscapes; visual amenity and biodiversity; or to improve damaged and derelict land.

3.95 It is our submissions that compensatory measures should be framed around the provisions of paragraph 141 of the National Planning Policy Framework. Thus, there is a clear set of requirements where sites being removed from the Green Belt where they are necessary for development such as Site 9 – Arden Triangle – should incorporate as part of the master planning approach compensatory provision.

3.96 As per paragraph 141 of the National Planning Policy Framework, public open space should be provided on site which meets the requirements not only for outdoor sport and recreation but also provides access to the area. Opportunities should be taken to enhance landscapes through for example retaining existing trees and hedgerows and bringing these under the gambit of a management company or similar to ensure long term stewardship and longevity. Biodiversity enhancements should be made wherever possible which can relate both to the undeveloped open areas of the site (one example being additional native planting) as well as opportunities being explored within the built-up areas of the site (for example bird and bat boxes). Where land is damaged and/or derelict bringing this back into beneficial use is, in and of itself, consistent with paragraph 141 of the National Planning Policy Framework. Damaged and derelict land need not apply solely to previously developed land but can also be applied to undeveloped, greenfield land.

38. Do you have any comments on these amber sites, i.e. is it right they should be omitted, or do you believe they should be included, if so why?

3.97 For the first time, during this consultation process, the Council have identified 7 amber sites to be assessed for potential allocation for housing development.

3.98 The sites have been assessed against the Council's site selection framework, as critiqued earlier within these Representations. In the first instance it should be noted that sites to be taken forward, these need to be assessed against a PPG compliant assessment methodology, which has not been the case.

3.99 The Council are deferring the issue of ensuring that there are enough housing allocations to meet the overall housing requirement during the plan period, including that of the WBHMA shortfall. For instance, the Council have not included enough amber sites within this consultation process to meet its own need and that within the WBHMA. The sites categorised as green, and therefore allocated for development, constitute what is required to meet the Council's own housing requirements of 13,039. The 7 amber sites assessed have a total yield of 707 dwellings, this being well below requirements in terms of accommodating the WBHMA figure for Solihull even based on the Council's notional 2,000 house allocation without considering the additional apportionment we have set out in these Representations.

3.100 The Council's site selection/assessment process explains;

'In carrying out this assessment it should be noted that of the sites that have not been included, some nevertheless performed better than others. As part of this supplementary consultation the Council believe it is useful to identify these 'less harmful' sites (that are shown as amber) so that residents and stakeholders are able to comment on their omission, and whether this is justified'.

3.101 Cerda's comments in relation to the 7 sites categorised as amber are tabulated below. An individual assessment has been undertaken of the sites, and each one was visited taking account of the Council's view of the sites and how our assessment compares to this. The main aim of the exercise was to consider how sites perform when applying a PPG compliant assessment procedure that considers:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.102 The site visits assessed the relationship of each land parcel, individually and comparatively, to the settlement and landscape around it. Aspects such as access, landscape character, sustainability and subjective observations were considered, these being reflected within the table below, and this approach is consistent with site assessment guidance set out in the PPG.

3.103 Aspects of each site were then appraised thoroughly through a desk-based assessment, included their ease of access, landscape character and restrictions, sustainability in terms of their proximity to local day-to-day services and transport amenities as well as a subjective observation in terms of whether they should be omitted or included. The results of this assessment are tabulated below.

	Land r/o 575A to 587 Tanworth Lane, Cheswick Green (capacity of 36 dwellings).	Land at Mount Dairy Farm, Cheswick Green (capacity of 10 dwellings).	Land r/o of 146 to 152 Tilehouse Lane, Whitlock's End, Tidbury Green (capacity of 18 dwellings)	Golden End Farm, Kenilworth Road, Knowle (capacity of 250 dwellings)	Land off Blue Lake Road, Dorridge (capacity of 340 dwellings)	Rowood Drive, Solihull (capacity of 30 dwellings)	Land r/o 114 to 118 Widney Manor Road, Solihull (capacity of 22 dwellings)
Access							
<i>Council's assessment</i>	Development would require the demolition of a minimum of 1-2 dwellings to facilitate access.	Existing access form Tanworth Lane.	An access onto Tilehouse Lane using the access used by the former storage use on the site	N/A	N/A	N/A	An access onto Widney Manor Road
<i>Cerda's assessment</i>	No access point is currently available to the site. Dwellings would need to be demolished to allow access.	Access can be achieved via existing access of Tanworth Lane, and potentially from Noble Way.	Access achievable from Tilehouse Lane.	Access can be achieved from Kenilworth Road.	Access achievable from Blue Lake Road.	Access achievable from Rowood Drive.	An access onto Widney Manor Road
<i>Overall assessment</i>	Access not available. Inappropriate approach to remove dwellings to facilitate an access point.	No comments to be made.	No comments to be made.	No comments to be made.	No comments to be made.	No comments to be made.	No comments to be made.
Landscape considerations							
<i>Council's assessment</i>	Site washed over by the Green Belt, but development at the site is not thought to negatively impact upon the openness of the Green Belt.	For this development to come forward the washed over Green Belt status of Cheswick Green would need to be amended.	For this development to come forward the washed over Green Belt status of Whitlock's End would need to be amended. Site included on Brownfield Register.	It has not been included as a preferred site as it falls within a Green Belt parcel that scores very highly (overall score 11) and would result in the village encroaching via a projection into the open countryside to the east without any form of 'rounding off' that would be achieved by development elsewhere in the same parcel.	The site sits in a Green Belt parcel that is lower performing (overall score of 4) which is partly as a result of ribbon development that is already in existence.	Whilst the site is located in the urban area and would be well suited to residential development, the need for potential mitigation as a result of it's former use as playing fields remains to be established	Development would take place to the rear of existing frontages and would not impact on the openness of the undeveloped Green Belt opposite the site.
<i>Cerda's assessment</i>	Site covered by numerous mature trees, of which their removal may be detrimental to the character of the local area. Otherwise, the site is relatively flat and does not comprise any built structures.	Site washed over by the Green Belt, although it comprises previously developed land.	Washed over by Green Belt – development not thought to have negative impact on openness. Mature trees line the site's border.	Washed over by high quality Green Belt land – encroachment into open countryside.	Open countryside to the east of the site.	Relatively flat, treeless land in a relatively urban area.	Contained parcel of land, opposite Green Belt land.
<i>Overall assessment</i>	No disagreement with Council's view.	No comments to be made.	No comments to be made	No comments to be made.	No comments to be made.	No comments to be made.	No comments to be made.
Sustainability							
<i>Council's assessment</i>	N/A	N/A	N/A	The site is located a short distance to the east of the centre of Knowle and is therefore in a very accessible location.	The site is located a short distance to the east of the centre of Dorridge.	N/A	N/A
<i>Cerda's assessment</i>	Site is located in a relatively sustainable location, with a small number of shops/services/amenities located in Cheswick Green. 2 bus stops located along Tanworth Lane.	Site is located in a relatively sustainable location, with a small number of shops/services/amenities located in Cheswick Green. 2 bus stops located along Tanworth Lane.	Sustainable location – nearby to Whitlock's End railway station, and in close proximity to Trueman's Heath and Dicken's Heath (larger settlements) – site not in walking distance.	Sustainable location – directly to the east of Knowle.	Sustainable location, in close proximity to Dorridge.	Sustainable location in proximity to Solihull centre.	Highly sustainable location.
<i>Overall assessment</i>	N/A	N/A	N/A	No comments to be made.	No comments to be made.	No comments to be made.	No comments to be made.
Concluding observations	Development would form back land development. Site is not accessible from Tanworth Road. New residential development directly to the north of the site (Cheswick Place development).	Development at the site would be a viable option.	Development at the site would be a viable option, an amalgamation of 3 sites.	Development at the site would constitute inappropriate development in the Green Belt and there are more appropriate sites on which to develop.	A logical and appropriate site for development.	A logical and appropriate site for development.	A logical and appropriate site for development.
Cerda final coding	Red	Amber	Amber	Red	Amber	Amber	Amber

- 3.104 In light of the above, it is our view that a correct appraisal of the amber consulted sites reduces these from 7 to 5, and the total yield from 707 to 421.
- 3.105 **39. Are there any red sites omitted which you believe should be included; if so which one(s) and why?**
- 3.106 It is our view that 2 red sites should be upgraded to amber and arguably green; Site 135 (land at Dorridge Road, Dorridge) and Site 107 (Land at Gentleshaw Lane, Knowle).
- 3.107 In relation to Site 135, within the second step of the Council's assessment process the Council acknowledge that the site comprises 2 separate land parcels, although this is not clearly outlined within the accompanying map. This is a drafting error.
- 3.108 Within the Council's site assessment, it is set out that a main constraint is the site's lack of a strong Green Belt boundary in turn raising concerns over the site's impact on the openness of the Green Belt, the Council within their commentary stating that *'although there are physical features in the vicinity that would help define strong Green Belt boundaries, this would require the release of additional land'*.
- 3.109 We do not agree with this view, and maintain that any development coming forward at the site will not require the release of additional land to facilitate it due to it having strong boundary features that contain the site, preventing development protruding into nearby Green Belt land. The defensible boundaries are clear, especially so when considering the 2 parcels in the Site Assessment as distinct from the 4 parcels assessed in the Sustainability Appraisal. This is a highly material point to raise.
- 3.110 In all other respects Site 135 has been assessed relatively favourably, and the overall assessment produce more positive points than negative points; the Sustainability Appraisal identified 4 positive and 3 negative effects, with the majority of the effects being neutral. The Council considers the site to be in a sustainable location that relates well to nearby Dorridge.
- 3.111 The only conclusion to be reached therefore is that the site should be re-coded amber as a minimum and more logically green.
- 3.112 Turning to the Council's assessment of Site 107, within their second step analysis, the site is considered as 'amber' within the tabulated assessment and 'red' within the site assessment map, the Council offering no explanation for this drafting error. It is our view that as the tabulated assessment offers clear and written justification for the site's categorisation as 'amber' this should take precedence over the site's classification as 'red' on the accompanying map.

3.113 Notwithstanding that the site should by default be re-coded amber to address the drafting error we have identified, the site is assessed positively in the Council's assessment. This acknowledges that the site is in a highly sustainable location, beyond the existing Green Belt boundary in a lower performing parcel of Green Belt. Furthermore, the site is considered to be well contained and would represent a 'rounding off' of the settlement in this location.

3.114 The Council considers hard constraints to be the presence of TPOs and a high-pressure gas pipeline to the south-east boundary. As previously discussed within these Representations, specifically within the critique of the Council's site assessment methodology, it is considered that these constraints need to be afforded a moderated weighting of which they are not granted within the Council's assessment. It is considered that both of these constraints can be mitigated through certain measures such as positioning dwellings away from the gas pipeline as well as implementing a compensation planting scheme to address the loss of TPO or by simply retaining the protected tree. It should be noted that the negative comments relating to impact on trees are grossly over played, there is only one TPO tree on site which presents no constraint at all.

40. Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floorspace incentivise developers to build more smaller market housing?

3.115 The Council's proposed approach is not clear. The Council is attempting to deal with identified issues associated with market housing mix including more smaller market dwellings, increasing housing densities on all sites and minimising release of Green Belt land via an alternative approach to affordable housing contributions. These matters are separate and should not be co-joined. It is inappropriate to deal with these matters via the Council's affordable housing policy.

3.116 The Council has provided no justifying evidence that the proposed alternative approach of requiring affordable housing contributions based on total square meterage or habitable rooms/floorspace rather than number of units will incentivise developers to build smaller market housing.

41. If so, what is the most effective approach? It is to calculate affordable housing as; (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?

3.117 The calculation of affordable housing contributions on bedroom numbers, habitable rooms or habitable square meterage are not considered an effective approach. It is standard practice that affordable housing contributions are calculated on the basis of

numbers of units. The Council's proposed alternative approach will not provide the necessary certainty for developers or decision makers with regard to its implementation. The use of any of these methods of measurement will not provide a clear indication of the number of affordable units that may be required causing difficulties for an applicant to undertake the appropriate viability assessment requirement when bringing land forward for development. The divergence from a number of units approach will slow down the processing of planning applications and as a consequence housing delivery by requiring far more negotiation between the Council and applicants.

- 3.118 The Council's viability evidence as previously undertaken was not based on this proposed alternative approach. New viability evidence would have to be carried out by the Council to support any change in the Council's approach. The Council would have to explain the relationship between the site thresholds for the provision of affordable housing and its calculations.

42. *What is the best way of measuring developable space for this purpose; bedroom numbers, habitable rooms or habitable floorspace?*

- 3.119 It is an inappropriate approach irrespective of the way used to measure developable space, in our submissions.

Appendix 1

SMBC Emerging Concept Masterplan – September 2017

SMBC Emerging Concept Masterplan - Sep2017

KNOWLE VILLAGE CENTRE

Post- workshops revs Dec 2018



- Existing, retained**
- Public right of way
- Listed building
- Heritage/ built site assets
- Local wildlife sites (LWS/ pLWS), other important landscape features
- Water bodies, drainage
- Secondary school
- Recent residential development
- Proposed**
- Road
- Vehicular/ pedestrian site access
- Pedestrian/ cycle site access only
- Pedestrian/ cycle only linkages within site, enhanced access/ links to wider green infrastructure and open space network
- Improved bus stops, both sides, new lay-bys
- Continuous new foot and cycleway along Warwick/ Grove Rd frontages (aligned with remodelled highways edge, or as parallel service lane on site). Path set behind existing/ re-stocked treed green verge
- Public open space/green buffer zones/ play/ pedestrian/cycle movement network, SuDS
- Main avenue tree planting/re-stocking
- Higher density residential e.g. mix of town-house/ apartments in exist. parkland setting
- Medium density residential development
- Medium to lower density residential
- Potential later development
- Potential mixed use area
- Potential primary school locations
- Small/incidental public space (hard/ soft)

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