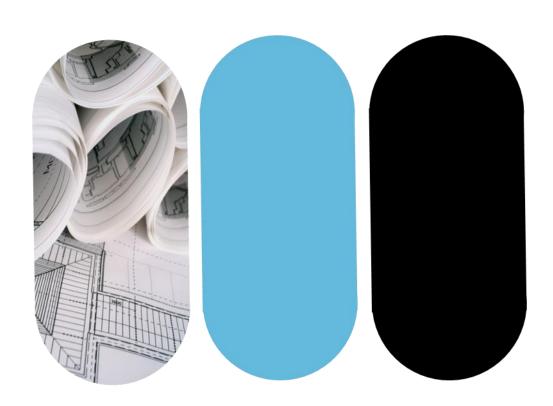


Solihull Local Plan Review

Draft Local Plan Supplementary Consultation, January 2019

Consultation Response on behalf of IM Properties & Shirley Golf Club

Land adjacent to Shirley Golf Course, Stratford Road (Site Ref: 62)





Summary

- 1. IM Properties & Shirley Golf Club request the Council re-assess Site Ref: 62: Land adjacent to Shirley Golf Course, Stratford Road. With reference to the Refinement Criteria, this Priority 5 site in the Council's Site Hierarchy should be identified as a 'green site' for the following reasons:
 - The site fully accords with the Spatial Strategy in the Draft Local Plan being located on the A34 Corridor;
 - There are no hard constraints which affect the site, or cannot be mitigated;
 - The site is visually allied to existing built development immediately to the north of Creynolds Lane and to the east & south is bounded by an existing tall, mature, dense, tree belt which separates it physically and visually from the Golf Course whichs would form a new strong, defensible southern boundary for the Green Belt;
 - Further, the Golf Course itself is a readily recognisable feature which will remain a permanent fixture within the Green Belt separating the site from Blythe Valley for many years to come;
 - The site is highly accessible to the urban area, and can connect into the footways, cycleways, and bus stops along Stratford Road and Creynolds Lane;
 - The site does not encroach any nearer to the settlement of Cheswick Green than
 existing development along Creynolds Lane, and would not erode the green gaps
 between the settlements within this part of the Borough as illustrated on the plan
 overleaf:
 - The release of the site would offer compensation in accordance with the Framework through investment in improving the environment and accessibility of the Golf Course within the Green Belt; and,
 - The site is available now, and could deliver much needed housing development (approx 75 dwellings) within the first five years of the Plan period after adoption, as well as circa 500 jobs based on standard BCO guidelines of one workspace per 10m² NIA.





Plan showing Site 62 would retain the green gap between the settlements

2. There are therefore no 'significant harmful impacts' associated with development of this site that warrants the site being regarded as a 'red site'. The release of this land from the Green Belt would not affect the integrity of the Green Belt in the Borough, and the Council are respectfully requested to propose it as an allocation in its Submission Version of the Local Plan.



Introduction

- 3. This response to the Draft Local Plan Supplementary Consultation is submitted on behalf of IM Properties & Shirley Golf Club (IM&SGC), and should be read alongside their previous representations to the Draft Local Plan Consultation (November 2016), and the Vision Document (September 2017) submitted in respect of Land adjacent to Shirley Golf Club, Stratford Road (Site Ref: 62) which are both appended.
- 4. It is noted this consultation is solely in relation to housing matters. The Council will be aware from the previous representations made by IM&SGC that Site Ref: 62 is being promoted for a mix of uses, namely residential uses on land adjacent to Creynolds Lane and commercial uses on land adjacent to Stratford Road. These representations relate to Site Ref: 62 as a whole, albeit it should be noted only part of the site is being promoted for residential uses.

Housing Requirement & Current Land Supply

- 5. IM&SGC have no comments to make in respect of Question 1. However, they make the following comments on this Section of the Consultation Paper.
- 6. It is noted that this consultation is not seeking views on the extent to which the Council contributes towards unmet housing needs within the Housing Market Area (paragraph 51). However, the decisions taken in respect of the Site Selection Process in Section 4 of the Consultation Paper have clearly been influenced by the need for the Plan only to satisfy the draft housing requirement set out in this Section, including the contribution proposed by the Council towards unmet housing needs. The concern is therefore that certain sites may have been disregarded as potential allocations at this stage on the basis that they are considered not needed.
- 7. The housing requirement and the consequent need to release land for development is not yet known either in total or in its phasing, and the Council will need to carefully consider whether in light of representations to this stage of consultation, some 'amber' or 'red' sites should be proposed for allocation both for immediate



development and/or in the longer term if they do not unreasonably affect the integrity of the Green Belt.

- 8. By way of example, land adjacent to Shirley Golf Club (Site Ref: 62) is suitable¹, in an accessible location², and does not make a meaningful contribution to the five purposes of the Green Belt³ and is available for immediate development. This is a site that should therefore be making a contribution to the housing requirement as its release from the Green Belt would not threaten its integrity within the Borough as explained below in response to Question 39.
- 9. The Table on Page 13 provides details of how the draft housing requirement could be met. In preparing the 'submission' version of the Plan, the Council will need to clearly demonstrate a sufficient supply and mix of sites to ensure the requirement is met, including specific, deliverable sites for the first five years of the Plan period.
- 10. Given the likely reliance on UK Central Hub Area and other allocations to deliver over half of the housing requirement, the Council will need to provide evidence that their trajectories for delivery are realistic and robust. Compelling evidence on windfalls will also be required in accordance with Paragraph 70 of the Framework.
- 11. Further, in light of the reliance on larger allocations, the Council will need to ensure it has a sufficient supply of smaller allocations which can boost the five year land supply. The Council should note that the residential uses proposed within Site Ref: 62 (circa 75 dwellings) could be delivered in their entirety within the first five years of the Plan period.
- 12. Finally, the Council will need to demonstrate there is sufficient flexibility within the housing supply to ensure the housing requirement is met. The Table on Page 13 indicates a surplus of only 726 dwellings, but this is less than one year's supply and is only around 5% of the total requirement. Given the reliance on larger allocations which have greater propensity to be delayed, and the extent of Green Belt in the

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¹ The site performs well against suitability, availability and achievability criteria (SHLAA, Nov 2016)

² Medium/High Access (Solihull Accessibility Mapping, Dec 2016)

³ Lower performing parcel with a combined score of 5 (Strategic Green Belt Assessment, July 2016)



Borough which limits addressing under supply through windfalls, there is a strong argument for more flexibility within this Plan.

Site Selection Process

- 13. In response to Question 2 on the Methodology, IM&SGC make the following comments.
- 14. In respect of the sequential approach, IM&SGC would refer to its comments made on this in its earlier representations appended. Further, criteria b. should now be amended to reflect Paragraph 138 of the Framework. When releasing Green Belt land, this requires 'first consideration' be given to previously developed land and/or land well served by public transport.
- 15. Criteria b i. and b ii. should therefore be merged in the sequential approach to directing growth as there is no distinction between these two attributes in national policy. Further, as per the previous representations made, the reference to 'being lost as a result of committed development' should be removed as this is not consistent with the Framework.

Red Sites

- 16. In response to Question 39, IM&SGC have no comments on Step 1 Site Hierarchy, and agree that Site Ref. 62 falls within Priority 5 'Greenfield in Accessible Lower Performing Green Belt Location' and 'Potential Allocation'.
- 17. However, in respect of Step 2 Site Refinement, the assessment undertaken does not support why Site Ref: 62 has gone from being a 'Potential Allocation' and a 'Lower Performing Green Belt Option' to a site with 'severe or widespread impacts'.
- 18. Paragraph 75 of the Consultation Paper states that 'Higher Performing Sites' (such as Site Ref: 62) need more significant harmful impacts if they are to be excluded'. IM&SGC have explored therefore whether there are any significant harmful impacts arising from Site Ref: 62.



Green Belt Purpose 2: Preventing Neighbouring Towns Merging into One Another

- 19. The Commentary in the Site Assessment for Site Ref: 62 refers to the site being highly performing in Green Belt terms in relation to preventing neighbouring towns merging into one another. This is based on the Strategic Green Belt Assessment criteria that stated the site formed part of a gap of less than 1km between Monkspath and Cheswick Green. However the gap between the settlements would not be reduced as a result of its development.
- 20. This is illustrated by the following plan (Green Belt Analysis of Purpose 2) which shows how releasing Site Ref: 62 from the Green Belt does not lead to any meaningful reduction in distances between the urban area and the surrounding settlements of Cheswick Green and Blythe Valley Park, indeed existing residential development on the northern side of Creynolds Lane is closer to Cheswick Green than the site.



21. Further, in the context of other proposed allocations in this area as shown on the plan, the gap that would be retained between Site Ref: 62 and nearby settlements is



much greater. This site is therefore less harmful in respect of Purpose 2, and there are no severe impacts to the Green Belt and Purpose 2 from the release of this site.

Landscape Character

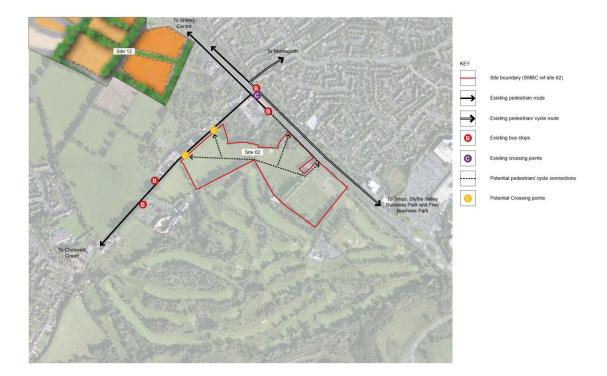
- 22. The Commentary refers to the site being within a landscape character area (LCA) of high sensitivity, medium landscape value, and very low capacity to accommodate change. This is taken from the Landscape Character Assessment (December 2016). Site Ref: 62 forms part of LCA 2 Southern Countryside which covers the entirety of open land south of Stratford Road to the Borough boundary. It therefore includes other proposed allocations Sites 12, 26, and 176. It is inconsistent & unreasonable therefore for Site Ref: 62 to be assessed as 'red' with severe impacts on the grounds of this Assessment, if other sites within the same Assessment area are 'green' and have been proposed to be allocated.
- 23. Further, there does not appear to be any finer grain analysis of LCA 2 which distinguishes between the sites. To address this issue, IM&SGC have undertaken this exercise and in respect of Site Ref: 62, the site has very limited intervisibility with the rest of LCA 2. The mature, dense tree belt along the southern boundary with the Golf Course prevents any views beyond. Further, views across the northern and eastern boundaries with Creynolds Lane are influenced by the built development on the opposite side of the Lane. Whilst the site has some landscape features of interest within it, notably the trees and woodland around its boundary, these can be retained to form components of any development.
- 24. In landscape terms, Site Ref: 62 has high capacity to accommodate change, and there would be no 'severe' landscape impacts arising from its development.

Accessibility

25. The Commentary refers to Site Ref: 62 having lower accessibility to a GP surgery and public transport based on the Accessibility Mapping (December 2016). However, this Assessment did give the site an overall Medium/High Accessibility score.



26. One of the points raised in the Assessment was the lack of an existing footway on Stratford Road. To address this issue IM&SGC have prepared the following Connectivity Analysis Plan to show how the site would be connected to the existing pedestrian and cycle routes, and bus stops.



- 27. This shows that a new footway would be installed from the Stratford Road site frontage to the Premier Inn footway to provide connections to the existing Toucan crossing point at the Creynolds Lane junction and enable access to the facilities to the north of Stratford Road.
- 28. In terms of proximity to a GP surgery, the nearest facility is the 'Village Surgery' at Cheswick Green within 1.3km. Several surgeries are accessible within the equivalent journey times by bus.
- 29. In terms of public transport, currently bus service no. 20 provides a half-hourly service past the site and in total there are six buses passing the site every hour. These services connect the site to key employment areas including Blythe Valley Park, Shirley, Solihull as well as amenities and local rail stations including Solihull rail



- station. As Blythe Valley Park is built out, the new bus services A7/ A8 will increase from hourly to half-hourly.
- 30. There are bus stops provided both on Creynolds Lane and on Stratford Road within 400m which is the highest band used in the Accessibility Mapping to score the accessibility of the site. The bus stops on Stratford Road would be within 260m from the Stratford Road access using the new footway. In addition, safe crossing points would be provided at the Creynolds Lane site frontage and the bus stops on the Creynolds Lane would be within 225m from the Creynolds Lane site access.
- 31. The bus services at these stops provide frequent services during the weekdays, evenings and Saturdays, which combined with new bus services for Blythe Valley Park which began in February 2019, substantively meet the criteria set out in the Accessibility Mapping.
- 32. In public transport terms, the site is highly accessible and the 'Access to Bus Services' scoring of 40 within the Accessibility Mapping is incorrect and should be updated to the full 100 points to provide an overall score of 320 for this site (see table below).

Band	Policy P7 Accessibility Score out of 400	Site 62 Corrected Rating		
Primary School	100	100		
Food Store	80	80		
GP Surgery	40	40		
Bus Services*	40	100		
Rail services*	(20)	(20)		
Total Score	260	320		

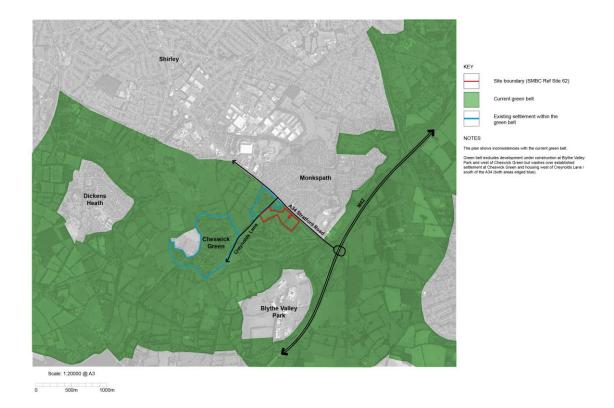
^{*}highest score for either bus OR rail

33. The implications of this are that the site should be regarded as having a 'High' Accessibility Score within the Council's evidence.



Green Belt: Strong Defensible Boundary

- 34. The Commentary refers to the site not having a strong defensible Green Belt boundary, and resulting in an unacceptable incursion into the countryside.
- 35. Historically, the Green Belt boundary has been Stratford Road as shown on the following plan.



- 36. However, given the Draft Plan's Spatial Strategy to focus growth on the A34 Corridor, Stratford Road is clearly no longer an appropriate boundary for the Green Belt as evident by the selection of Proposed Allocations at Sites 11 and 12 south of Stratford Road. Its character is inevitably going to change as more development takes place, and it no longer forms a role as a divide between urban area and countryside.
- 37. Paragraph 139 of the Framework requires Green Belt boundaries to use physical features that are readily recognisable, and likely to be permanent. The following plan proposes a new Green Belt boundary which releases Site Ref: 62 from the Green Belt.





- 38. The southern boundary of Site Ref: 62 is a tall, mature, dense tree belt which is long established and separates the Golf Course from the site. This tall screen forms a backdrop to the site, and is readily recognisable and likely to be permanent given its role in protecting the setting of the Golf Course. The Golf Course itself has been in existence for over 60 years, and is a long established recreational use within the Borough which is protected in land use planning terms. There is therefore a clearly defined southern boundary that accords with the Framework and will be permanent.
- 39. Development of Site Ref: 62 would be contained by strong, physical features that limit any intervisibility with the Golf Course beyond. It is not accepted therefore that development would result in an unacceptable incursion into the countryside on landscape or visual impact grounds, or any other grounds.
- 40. The northern boundary of Site Ref: 62 comprises Stratford Road, a small pocket of woodland, and built development along Creynolds Lane. The properties on the northern side of Creynolds Lane, and those around its junction with Stratford Road (e.g. Premier Inn), are currently within the Green Belt, however there is no need for this land to be designated as such given it is developed, it immediately adjoins the



urban area, and openness does not form part of its character. Criteria b of Paragraph 139 is clear in that Green Belt boundaries should not include land which is unnecessary to keep permanently open.

- 41. Furthermore, in the context of the proposed allocation Site Ref: 12 to the north of the properties on Creynolds Lane, the retention of the existing properties along Creynolds Lane within the Green Belt would be an anomaly when properties to the north would be outside the Green Belt. It would also present an illogical boundary and should therefore be removed, along with Site Ref: 62.
- 42. Retaining the Green Belt between the urban area and Cheswick Green is however important in preventing the two settlements merging, and therefore the boundary should be re-drawn at the western end of the existing properties on Creynolds Lane and Site Ref: 62 as shown on the plan.
- 43. In conclusion on Question 39, the Assessment undertaken has unfairly categorised Site Ref: 62 as 'red' for the following four reasons:
 - The site does not perform a role in maintaining separation between the urban area and Cheswick Green due to the existing development along Creynolds Lane;
 - It is not of high landscape value due to the limited intervisibility with the Golf Course beyond;
 - It is highly accessible being capable of being connected to the existing footway, cycleways and bus stops along Stratford Road and Creynolds Lane; and,
 - It has a strong, defensible boundary with the Golf Course to the south, which itself is a use which is likely to be permanent.
- 44. For these reasons, IM&SGC strongly urge the Council to re-assess Site Ref: 62 and propose the release of this land from the Green Belt.

"Compensation" for development

45. The Council have invited comments on how land to be released from the Green Belt can be offset through improvements to the environmental quality and accessibility of remaining Green Belt land in accordance with Paragraph 138 of the Framework.



46. In respect of Site Ref: 62, this land is owned by Shirley Golf Club and they would benefit from any release of the land from the Green Belt. As explained in representations made to the Draft Local Plan, the development of this land would give the Golf Club an injection of resources that would enable it to invest in improving its facilities for the residents of the Borough. This will inevitably improve the environment quality and accessibility of the Golf Course, land which of course falls within the Green Belt. The release of this land from the Green Belt would therefore provide compensation in accordance with the Framework.



This matter is being dealt with by Gary Stephens Bridgeway House, Bridgeway, Stratford upon Avon, CV37 6YX DX 16202 Stratford upon Avon T +44 (0)178 941 6400

Your ref: 00 Your ref: 968507/1

17th February 2017

Gary Palmer
Policy and Spatial Planning
Solihull MBC
Council House
Manor Square
Solihull
B91 3QB

Dear Gary

SOLIHULL LOCAL PLAN REVIEW

Response to Draft Local Plan Consultation on behalf of Shirley Golf Club Limited and IM Properties Limited

These representations are submitted on behalf of Shirley Golf Club Limited and IM Properties Limited. The representations relate to land adjacent to Shirley Golf Course, Stratford Road, Solihull (SHLAA reference 62).

Shirley Golf Club

Shirley Golf Club Limited are the landowners of SHLAA reference 62, although the land does not form part of the operational golf course and is not in recreational use. The Golf Club has been in existence for over 60 years and is a long established recreational use within the Borough. It has a membership of over 400, the majority of whom are residents of the Borough. The golf course is open to visitors to play golf, and the Club also works with local schools in enabling children with disabilities to participate in sport.

The Club is therefore an important recreational asset of the Borough, and it clearly has a role to play in supporting the Council achieve its aim to improve the health and wellbeing of its communities (a guiding principle of the Draft Plan).

The Club is well run; however, like many golf courses it faces a number of challenges. Declining membership is the biggest challenge the Club faces, as golf tries to compete with other leisure activities for people's leisure time. Membership has dropped 27% between 2006 and 2016. In a tighter economic climate, the cost of membership is another factor that can contribute to people being less inclined to renew their membership or join the Club. These factors coupled with the increased costs associated with managing and maintaining a quality golf course, and without any other significant sources of income, means that it is increasingly difficult to maintain a profitable and viable club. In fact, the Club has returned a loss in 13 of the last 16 years.

The Club are therefore constantly considering ways in which they can raise revenue or secure income to sustain operations and the activities they provide for the community. The Club are

realistic in recognising that they cannot continue as they are, and that unless things change there may no longer be a golf club.

It is in this context that the Club have put forward the land adjacent to Stratford Road for development through the Local Plan process. The land is surplus to requirements and provides no income or use to the Club. The disposal of the land for development would not impact on the operation of the golf course, but would provide an injection of income that could provide a sustainable future for the Club, such as improving facilities to attract more golfers as well as providing more activities for local communities to come and try golf.

Over 90% of the membership of the Club voted in early 2017 to continue with putting this land forward for development, and this was a clear indication of the level of support there is within the Club in doing all that is possible to maintain its activities for the next generation of golfers.

There is clearly therefore a great deal of synergy between the ambitions of the Club to improve its facilities and sustain its operations, and the goals of the Council in its Draft Local Plan to tackle obesity and improve the health and well-being of its communities.

IM Properties

IM Properties are one of the UK's largest private sector property companies active in both the commercial and residential sectors. IM Properties and Shirley Golf Club Limited have partnered together to bring this site forward for development.

IM Properties have prepared an illustrative masterplan to support these representations, and this is appended. This shows how the land could be developed, in particular the relationship between proposed residential and commercial/car showroom uses. It also shows potential points of access onto Stratford Road and Creynolds Lane. The potential capacity of the residential areas is estimated at around 150 dwellings, with c. 3ha of land for commercial uses. The masterplan also shows how the boundary could be defined between the proposed development and the Golf Course/Green Belt to the south. Existing tree planting would be supplemented as necessary to provide a strong visual barrier, along with the positioning of the internal access road to the Golf Club which would reinforce the sense of separation between the proposed development and the Golf Course.

The following representations are made on the basis of the illustrative masterplan.

Spatial Strategy for Growth and Choice of Housing Allocations (response to Q.3 and Q.15)

The inclusion of a Spatial Strategy is welcomed and much of its content is supported. However, the Club are concerned that the selection of allocated sites does not appear to have been clearly guided by the Strategy as explained below.

The Strategic Objectives and its sequential approach to directing growth is logical in respect of considering suitable non Green Belt land before Green Belt land. However, in considering Green Belt land (criteria b.), it is not clear what 'being lost as a result of committed development' means. If land has a valid planning permission and is therefore 'committed', it is not necessary for this to inform the Strategy for directing future growth.

Furthermore, it is questioned why only 'committed sites' that are in highly or moderately accessible locations (criteria b. ii.) are preferred over all other greenfield sites (criteria b. iii.), i.e. why are 'uncommitted sites' in highly or moderately accessible locations not preferred to other less accessible sites.

It is suggested reference to 'and is being lost as a result of committed development' is removed from criteria b. ii. Green belt sites in highly or moderately accessible locations should be preferred to other less accessible Green Belt sites.

Recognition within the Strategy to the role of smaller sites in assisting with early delivery during the Plan period is welcomed, and indeed is consistent with references in the recent Housing White Paper to releasing more small and medium-sized sites. The land adjacent to Stratford Road (SHLAA reference 62) would constitute a smaller site that could assist with early delivery given the absence of the need for significant infrastructure prior to housing completions.

Support is also given to the recognition within the 'Guiding Principles Generally in Support' to 'optimising opportunities to bring forward developments that address identified issues within communities and contribute to wider community benefits'. As noted above, the development of land adjacent to Stratford Road owned by the Golf Club would directly contribute to wider community benefits in providing resources.

Paragraph 106 of the Draft Local Plan, and the Broad Options for Growth and Development, clearly indicate a preference for opportunities/proposals that may fall under Options A to D, consistent with responses received to the Scope, Issues and Options consultation. These include Shirley Town Centre and the A34 Corridor (Option D). It is no surprise that preference is given to this option, as the Sustainability Appraisal (November 2015) noted that this was 'a good location for access to jobs, opportunities to provide needed affordable and low cost housing, as well as attract workers with easy access to UK Central'.

The presence nearby of Blythe Valley Park as one of the major employment destinations within the Borough is further evidence to support the suitability of this Corridor for growth, and the delivery of the Council's shared vision for Blythe Valley Park will enhance the A34 corridor as a key public transport link. Growth along this corridor will benefit from its proposals, and appended to these representations is a technical note provided by Peter Brett Associates demonstrating the choices that will be available in terms of sustainable modes of transport to key services, facilities and employment areas in the Borough. The land adjacent to Stratford Road is highly accessible.

In considering the Council's evidence on this point, namely the Solihull Accessibility Mapping, the site (Parcel 62) is stated to perform poorly in relation to accessibility to public transport (bus). This assessment is incorrect and fails to recognise the existing bus stops on Creynolds Lane and the A34 which are within 300m of the site access, and which will be served by a 15 minute frequency service to Solihull town centre, Blythe Valley Park, Dorridge and Knowle. This site therefore performs highly in relation to public transport accessibility.

The report also notes that 'no footway is provided along all of site frontage'. The provision of a footway where necessary to connect with the existing off site foot/cycleways, and the location of bus stops, could be addressed and secured as part of the development. The evidence

therefore presented suggests the land adjacent to Stratford Road is more accessible than presented by the Accessibility Mapping.

Given the preference within the Strategy for opportunities in the A34 corridor, the selection of opportunities within the less preferred Options E to G instead of land adjacent Stratford Road (SHLAA reference 62) is not justified by the evidence.

In Green Belt terms, the suitability for growth of the broad area south of Shirley between the A34 and Tanworth Lane (Area E) is recognised in the evidence base to the Plan (paragraph 372 of Section 24 of the Topic Papers). This is based on its moderate impact on the Green Belt and the medium to high accessibility. The only caveat to this support is that development in this area should retain meaningful gaps between settlements and avoid the higher flood zones¹.

In respect of the first caveat, the land does not form part of a meaningful gap between settlements. The land is bounded to the south by a strong tree belt along the boundary of the Golf Course and this provides a strong screen to views from Stratford Road. With additional planting as necessary, and with development securing the continued existence of the Golf Club as a sustainable recreational asset into the future, this would form a clearly defined boundary that is both recognisable and likely to be permanent (i.e. it meets the requirements of paragraph 85 of the Framework). In this context, the Golf Course would provide a meaningful gap between development and the Blythe Valley Park to the south.

To the west, the land is opposite the existing residential properties on the opposite side of Creynolds Lane. These properties extend further westwards than the land, and therefore its development would not extend built development any closer to Cheswick Green than already exists. The gap therefore between the built-up area and Cheswick Green would not be eroded by development, and the openness between would be retained.

In assessing the Council's evidence on this matter, namely the Strategic Green Belt Assessment, the parcel containing the land adjacent to Stratford Road (RP62) is stated to form a gap of less than 1 kilometre between urban areas (and therefore is deemed to perform poorly). Setting aside the question of whether Cheswick Green forms an 'urban area', this assessment is incorrect as the land does not represent a gap between the two settlements as explained above. Moreover, the soundness of the approach adopted in this aspect of the Assessment is questioned given parcels that are more remote from urban areas are deemed to perform better than those nearer to the urban area, even though they would have the same effect on the Green Belt in terms of loss of openness.

Notwithstanding the above concerns, it is also not clear how the results of the Strategic Green Belt Assessment have informed the selection of allocations. The land adjacent to Stratford Road (which scored 5) performs better (i.e. scores less against the four purposes of the Green Belt) than some of the proposed allocations, notably West of Dickens Heath (RP71 which scored 7), South of Dog Kennel Lane (RP65 which scored 6), and South of Shirley (RP69 which scored 6). It is recognised that the Assessment only forms part of the evidence base that informs the selection of allocations. However, given its high levels of accessibility (as noted above), and evidence of suitability (within the SHLAA Site Assessment), the Plan's

¹ This second caveat is not relevant to the land adjacent to Stratford Road as it falls within Flood Zone 1.

evidence base overall clearly supports the allocation of land adjacent to Stratford Road (RP62) ahead of other proposed allocations.

In this context, the Strategy and the evidence would justify the allocation of the land adjacent to Stratford Road (SHLAA reference 62) instead of other allocations in less accessible or suitable locations in Options E to G.

In re-assessing its choice of allocations following this consultation, it is respectfully requested the Council attach significant weight to those opportunities that fall within Growth Option D and Area E, and allocate land adjacent to Stratford Road (SHLAA reference 62) in accordance with the Spatial Strategy and the Plan's evidence base.

Sustainable Economic Growth (response to Q.10)

It is noted that Policy P3 and the Provision of Land for General Business and Premises is primarily directed towards the allocation of land for B1, B2 and B8 uses. Whilst it is fully appreciated that the majority of economic growth will be achieved through the delivery of development within these broad use classes, other land uses can also contribute towards economic development and should be recognised within the Plan. Indeed, paragraph 161 (first bullet point) of the Framework requires Councils to assess the needs for all types of economic activity over the Plan period.

In this respect, it is considered the needs of the automotive retail sector should be addressed by this Plan. Identifying land for new car showrooms and their associated service and maintenance activities is difficult given the size, profile, and accessibility of site required, and as a land use they do not often sit comfortably or succeed within town centre or business park locations. A number of uses have developed historically along the Stratford Road corridor given its characteristics, and this has created a critical mass of activity which makes this an attractive location for the sector.

There will inevitably be a requirement for additional land to provide new car showroom facilities to meet the automotive needs of a growing population, and supporting the growth of this sector will also have wider economic benefits for the Borough. The Council should therefore give consideration to the needs of this sector within its Plan and its evidence base², and identify land suitable for its continued growth and expansion. In this respect, part of the land adjacent to Stratford Road as shown on the Illustrative Masterplan is considered suitable for this use, and would if allocated make an important contribution to meeting the land requirements of this sector.

Providing Homes for All (response to Q.14)

It is recognised that the Council are seeking to balance the competing objectives of providing sufficient homes to contribute towards the needs of the Housing Market Area whilst protecting the quality of its environment and its attractiveness for businesses and residents.

However, it is considered that the development of land adjacent to Stratford Road could make a meaningful contribution to housing supply without adversely affecting the environment. Indeed, the contribution development would make to securing a sustainable future for the Club

² The supporting evidence, namely the 'Employment Land Review', does not consider the requirement for car showrooms.

would have a positive effect on the environment in terms of the management and maintenance of a large area of open space adjacent to the urban area and Blythe Valley Park. Moreover, an attractive and successful Golf Club would be an important recreational asset for attracting businesses and residents.

In this respect, therefore, the Council could do more in terms of releasing this land for housing without harming the assets which make the Borough an attractive place to live, work and play.

Policy P5 makes provision of land for housing. It is considered that the Council have failed to allocate sufficient land in order to contribute towards the needs of the Housing Market Area³. In particular, the failure to allocate land adjacent to Stratford Road (SHLAA reference 62) is evidence that it could do more to meet its housing needs without harming the quality of the environment as explained above.

The Council will also be aware of the need for its Plan to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against the housing requirement with an additional buffer to ensure choice and competition in the market, and a supply of site for years 6-10, and where possible 11-15 (paragraph 47 of the Framework). It is noted from the Draft Plan that work is to be undertaken to establish a phasing and delivery programme for the proposed allocations, including identifying critical infrastructure to be in place before occupation of phases (paragraph 224, 6th bullet point). There is clearly a level of uncertainty at this stage as to whether the proposed allocations are capable of meeting the requirements of paragraph 47 of the Framework, and it is not possible to comment on the soundness of the Plan in this respect. However, given the reliance on a number of larger allocations (over 500 dwellings), the Council should build into is Plan a healthy contingency in the event any of its sites fail to deliver at the rate required. The absence of such flexibility may render the Plan unsound, and the inclusion of smaller, more deliverable allocations in the early phases will give the Council more comfort whilst it waits for the larger allocations to start to deliver.

Health and Supporting Local Communities (response to Q.21)

The support within Policy P20 for proposals that will contribute towards the enhancement of existing recreational facilities is welcomed, and is further endorsement for the allocation of land adjacent to Stratford Road as explained above.

However, Policy P20 also seeks to protect existing facilities unless it can be evidenced clearly that the open space or facilities are surplus to requirements and are no longer required to meet local need (first bullet point of P20). The policy as drafted fails to recognise circumstances in which the facility is no longer economically viable and unable to operate. As evidenced above, maintaining the viability of privately owned recreational facilities is very challenging in the current economic climate. In these circumstances, support should also be given to change of use or redevelopment for alternative uses and the policy should be amended accordingly.

³ Separate representations have been submitted by Turley Associates for IM Properties and others on this point.

Summary/Conclusion

Shirley Golf Club is an important recreational asset of the Borough, but its future viability is uncertain and it needs an additional source of income to sustain its operations. It has therefore partnered with IM Properties to promote the delivery of a mixed use commercial and residential development on land it owns that is surplus to its requirements and which does not form part of, or impact on, the operational golf course.

The land falls within one of the most highly accessible locations outside of the urban area within the A34 corridor. It is of limited environmental value, and is contained by a combination of built development (along Creynolds Lane and Stratford Road) and the Golf Course and its extensive areas of tree planting and landscaping which screen views. It therefore has little relationship with the wider countryside beyond, or the Golf Course, and its contribution to the Green Belt is limited as evidenced by the Strategic Green Belt Assessment.

In the context of the need for the Council to release Green Belt land for development, this land represents the opportunity to locate new development within a sustainable location without causing significant harm to the environment of the Borough.

Its development would be consistent with the Council's Spatial Strategy for Growth, the Plan's evidence base, and help to address many of the key challenges the Council identifies in its Draft Plan.

The Council are respectfully requested to allocate the land within the Submission Version of the Plan.

Thank you for taking the time to read this letter, and we would welcome the opportunity to meet with you to discuss these representations further.

Yours sincerely

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Job Name: Shirley Golf Club, Solihull

Job No: 36850

Note No: 36850/5502/TN01 (Revision B)

Date: February 2017

Prepared By: Amrit Mudhar/ Robert Pawson

Subject: Transport and Accessibility

1 Introduction

- 1.1 Peter Brett Associates LLP (PBA) has been appointed by IM Properties PLC and Shirley Golf Club to prepare this Transport and Accessibility Technical Note demonstrating the accessibility of Land at Shirley Golf Club in Solihull in support of site representations to the Local Plan.
- 1.2 This Technical Note provides a high level review of the accessibility of the site by sustainable modes of travel and potential traffic impacts on the A34 Stratford Road/ Creynolds Lane signalised junction. The review is based on data available to PBA and information publically available from web sources. The structure of this Technical Note is as follows:
 - existing pedestrian and cycle facilities available on Creynolds Lane and the A34 Stratford Road in the vicinity of the site proving connectivity to key destinations, as well as a review of committed local pedestrian and cycle infrastructure and enhancement schemes and identification of potential key gaps and opportunities to enhance pedestrian and cycle facilities along Creynolds Lane and the A34 Stratford Road in the vicinity of the site

 - public transport along the A34 Stratford Road corridor and the new bus services to be introduced as part of the consented Blythe Valley Park development.

DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
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2 Pedestrian and Cycle Facilities/ Infrastructure

Existing Provision

- 2.1 A continuous, tarmacked footway along the northern side of Creynolds Lane provides a connection between Cheswick Green and the A34 Stratford Road via the proposed site access. There is good footpath provision to local destinations with paved footways along the A34 Stratford Road leading north-west towards Shirley and Monkspath, along the north and eastern side of M42 Junction 4 and along the A3400 Stratford Road from M42 Junction 4 to Hockley Heath.
- 2.2 A signalised crossing at the A34 Stratford Road/ Creynolds Lane junction provides safe access across the A34 Stratford Road to the site for pedestrians and cyclists from Monkspath. An on-road signposted cycle route runs along Hay Lane, connecting the site with local amenities in Monkspath. Creynolds Lane is an advisory cycle route, providing good access to local cycle routes in and around Cheswick Green to the south and the A34 Stratford Road to the north.
- 2.3 A signed, shared foot/ cycleway runs along the A34 Stratford Road with Toucan crossings located at the junction with Huskisson Way (site access to Fore Business Park) and across the A34 Stratford Road to the south of Huskisson Way providing access to Blythe Valley Park. This route forms part of a local cycle route providing connectivity between Hockley Health, Monkspath, Shirley and Solihull town centre. A copy of Solihull Metropolitan Borough Council's Cycling and Walking Map is provided in **Appendix A**, detailing pedestrian and cycle routes in proximity to the proposed development and throughout Solihull.
- 2.4 Policy P7 of the Solihull Local Plan states that 'All new development should be focused in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access'. The policy provides accessibility criteria for proposed developments and for residential developments this is stated as a walking distance to a range of local amenities including bus stops (400m) and primary schools, doctor's surgeries and food shops (all 800m). Accessibility by walking and cycling to a number of destinations in proximity to the site has been considered and presented in Table 2.1 (approximate walking and cycling times from the proposed site access on Creynolds Lane). The location of these destinations is shown in Figure 2.1.

Table 2.1 – Accessibility to Local Destinations

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Figure 4.1 Ref.	Destination	Distance (km)	Walk Time (minutes)	Cycle Time (Minutes)	Bus	
1	Creynolds Lane bus stops	0.3	4	1		
2	A34 Stratford Road bus stops	0.3	4	1		
3	Cheswick Green Primary School	1.0	11	3	✓	
4	Tesco Extra, A34 Stratford Road	1.3	16	5	✓	
5	Cheswick Green Post Office	1.4	18	5	✓	
6	The Village Surgery	1.4	18	5	✓	
7	Blythe Valley Park	2.3	26	9	✓	
8	Shirley local centre	3.5	46	13	✓	
9	Solihull town centre	4.0	50	15	✓	

Source: Google Maps journey times (accessed on 03/02/2017)





2.5 **Table 2.1** shows that the bus stops on Creynolds Lane and the A34 Stratford Road are within the accessibility criteria for journeys by foot, and primary schools, shops and GPs are all within 20 minutes' walk, destinations are also accessible by cycle; as noted in Section 3 these destinations are also accessible by public transport. Good quality footways are provided in the vicinity of the site to Cheswick Green and along the A34 Stratford Road which connect these destinations to the site.

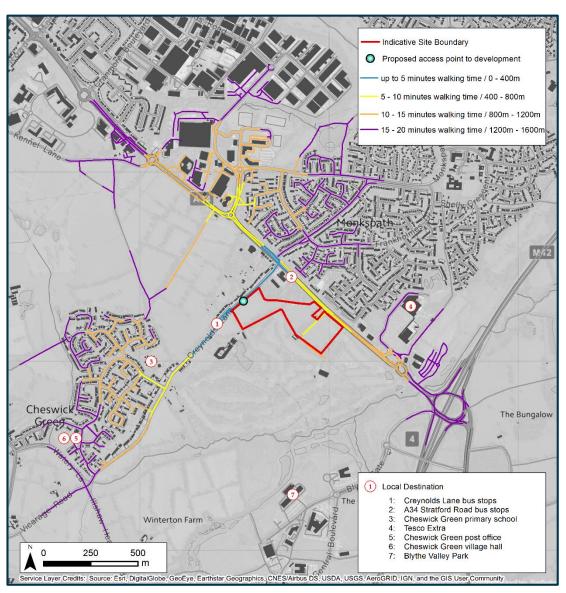


Figure 2.1 – Location of Local Destinations in Proximity to the Site

Future Schemes

2.6 The A34 has been identified by both Solihull Metropolitan Borough Council and the West Midland Combined Authority (WCMA) as a key route between the employment site at Blythe Valley Park, Shirley local centre and Solihull town centre. In both the WCMA's 'Movement for Growth: The West Midlands Strategic Transport Plan' and the 'Solihull Connected Transport Strategy', the A34 is identified as a strategic cycle route. 'Solihull Connected' outlines a number of 'primary routes' including the A34 which will provide 'fast and safe journeys to/from our main trip generating locations'. A multi-modal study of the A34 Stratford Road is currently being developed by Solihull Metropolitan Borough Council with the outline business case due to be published by October 2017. Additionally, a new Walking and Cycling Strategy, to be published in summer 2017, will set out the opportunities and priorities for the Borough.





Potential Gaps and Opportunities

- 2.7 Potential opportunities to provide a safe crossing point from the northern side of Creynolds Lane to the site access would improve pedestrian accessibility to the site. The form of crossing, if necessary, will be explored with Solihull Metropolitan Borough Council
- 2.8 There may also be the opportunity to provide a footway along the A34 Stratford Road (subject to utilities infrastructure and available width in the highway boundary) between the existing Golf Club site access and the bus stop westbound bus stop on the A34 Stratford Road to the west of the existing site access, or the westbound bus stop to the east of the site access. This would provide a more direct and safer route for people wishing to travel by public transport towards Solihull which would avoid walking on the verge or crossing the A34 Stratford Road at an informal crossing point. This will be investigated further at the appropriate stage in consultation with Solihull Metropolitan Borough Council in support of Policy P7.

3 Local Highway Network

Access Arrangements

- 3.1 A new vehicular site access could be provided off Creynolds Lane to serve the residential areas of the development. In addition, improvements to the existing access off the A34 Stratford Road which could serve the proposed commercial area could also be provided. Further opportunities to provide an additional point of access to the commercial area off the A34 will be explored, in the form of a left in/ left out junction.
- 3.2 The existing Shirley Golf Club site access could be retained and upgraded with opportunities for further enhancement of the A34 to be explored. This thereby provides two potential routes for staff and members to the Golf Club (via the existing A34 Stratford Road access and proposed Creynolds Lane access).
- 3.3 The proposed site access arrangements would allow residential and commercial traffic to be segregated. The provision of a site access off Creynolds Lane would also allow a more direct route for residential and Golf Club traffic travelling towards Cheswick Green without the need to use the A34 Stratford Road/ Creynolds Lane junction. Further, the proposed improvements to the A34 Stratford Road/ Creynolds Lane junction as part of the Blythe Valley Park development (see A34 Corridor Improvements sub-section) would allow a right turn from Creynolds Lane onto the A34 Stratford Road and therefore reduce the impact of development traffic at the A34 Stratford Road/ Monkspath Hall Road roundabout; currently traffic travelling eastbound from Creynolds Lane has to U-turn at this roundabout.

Development Trip Impact

- 3.4 A summary of total vehicle trip generation expected by the proposed development with up to 150 residential dwellings has been provided in **Table 3.1**. This has been informed by trip rates and trip generation presented in the Transport Assessment prepared by Savoy Consulting on behalf of Banner Homes as part of the resubmitted planning application in 2013 (application reference: PL/2013/01355/OLM). The trip rate/ generation assumptions from the Savoy Consulting Transport Assessment (2013) were:
 - golf course staff five two-way trips in each peak hour
 - golf course members 27 two-way trips in each peak hour, and
 - residential 0.8 person trips per household in each peak hour, noting that this is higher than recently approved residential schemes such as Blythe Valley Park.
- 3.5 2011 Census mode share data has been applied to the residential trip rate provided in the Savoy Consulting Transport Assessment (2013) to determine the number of vehicular trips



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generated by 150 residential dwellings (82 per cent of all trips are as a car driver); as per the Transport Assessment it is assumed the same number of trips are generated in both peak hours.

3.6 Commercial trip rates have been taken from recently consented developments near to the site as an initial proxy.

Table 3.1 - Preliminary	/ Vehicle Trin	Generation from th	e Proposed Development	(including existing trips)
Table 5.1 – Freinfilliary	/ VEHILLE HILL			(IIIIGIUUIIII GAISIIIIG IIIDS)

Land Use	Morning Peak Hour (8am to 9am)			Evening Peak Hour (5pm to 6pm)		
	In	Out	Two-way	ln	Out	Two-way
Up to 150 residential dwellings, commercial development and Golf Club	99	49	148	43	102	145

Source: informed by Savoy Consulting Transport Assessment (2013) and TRICS

A34 Stratford Road/ Creynolds Lane Junction Modelling Outputs

- 3.7 Preliminary junction capacity modelling using LinSig software has been undertaken at the A34 Stratford Road/ Creynolds Lane signalised junction for a 2016 base year and future years of 2021 and 2026. The model results showed that the junction operates within capacity in the 2016 base year, 2021 Do Minimum and 2021 Do Something scenarios. In the 2026 scenarios (without and with development) there are expected to be some capacity issues in the morning peak hour with the junction operating within capacity in the evening peak hour.
- 3.8 Initial modelling has shown that the proposed development with up to 150 dwellings and commercial use does not result in any significant change in capacity at the A34 Stratford Road/ Creynolds Lane junction.
- 3.9 It should be noted that further junction capacity assessments would be required in due course to validate the traffic impact from the proposed development at this junction which does not take into account any Travel Plan measures that could be implemented at the site or wider sustainable travel measures proposed by Solihull Metropolitan Borough Council.

A34 Corridor Improvements

- 3.10 As part of the Blythe Valley Park development, mitigation measures are proposed at the A34 Stratford Road/ Creynolds Lane junction and the A34 Stratford Road/ Monkspath Hall Road roundabout. The impact of these two mitigation schemes were modelled using 2026 traffic flows which include development trips from Blythe Valley Park based on the realistic and maximum developable scenarios. The benefits of these two schemes combined has also been considered. Further details of the mitigation schemes have been provided below.
- 3.11 The A34 Stratford Road/ Creynolds Lane scheme provides a right turn out of Creynolds Lane and reduces the number of drivers that would U-turn at the A34 Stratford Road/ Monkspath Hall Road roundabout. This also provides a more direct public transport route from Cheswick Green to Blythe Valley Park which would also serve the proposed development. Modelling of this highway scheme shows that whilst there is increased delay at the junction, the scheme provides benefits for public transport (allowing faster journeys from Cheswick Green to eastbound locations) as well as improving journey times for drivers and providing a potential alternative route for local residents (e.g. those travelling from Dickens Heath to the M42 Junction 4).
- 3.12 There are also proposals to part signalise the A34 Stratford Road/ Monkspath Hall Road roundabout. When these mitigation schemes are combined and operationally linked, the results show an improvement in capacity at both the A34 Stratford Road/ Creynolds Lane



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junction and the A34 Stratford Road/ Monkspath Hall Road roundabout compared against the existing layout.

3.13 The highway improvements proposed at both the A34 Stratford Road/ Creynolds Lane junction and A34 Stratford Road/ Monkspath Hall Road roundabout as part of the Blythe Valley Park development would also positively impact existing users of Shirley Golf Club as drivers wishing to travel south-east along the A34 Stratford Road from Creynolds Lane would have a shorter journey time through the provision of a right turn from Creynolds Lane.

4 A34 Stratford Road Public Transport

Existing Provision

- 4.1 The closest bus stops to the site are located on Creynolds Lane (approximately 300m to the south of the proposed site access) and on the A34 Stratford Road (approximately 250m south and 300m to the north of the proposed site access). The Creynolds Lane north and southbound bus stops can be accessed via the footway on the northern side of Creynolds Lane and comprise a flag on a pole with timetable information. The most frequent service serving these bus stops is the S2 service which provides a half-hourly weekday service between Cheswick Green and Dorridge via Solihull.
- 4.2 The A34 Stratford Road east and westbound bus stops comprise bus laybys with shelters, a flag and timetable information and can be accessed via the footway on the northern side of Creynolds Lane (and Toucan crossing over the A34 Stratford Road for the eastbound bus stop). These bus stops are served by the X20 service which operates hourly between Birmingham and Stratford Monday to Sunday.

Future Schemes

- 4.3 As part of the Blythe Valley Park development, the S2 service, which is accessible from Creynolds Lane, would be enhanced to create a circular bus route operating along the A34 Stratford Road. It is proposed that the new bus route and associated infrastructure would be provided upon occupation of the first dwelling at Blythe Valley Park with contributions to be paid under a Section 106 agreement.
- 4.4 The improved bus service would provide a 15-minute frequency providing connections to Solihull town centre, Blythe Valley Park, Dorridge and Knowle every 30 minutes in a clockwise direction and every 30 minutes in an anti-clockwise direction Monday to Saturday. On Sunday the service would operate every hour in each direction providing a half hourly connection to Solihull and other destinations along the route. This would double the frequency of buses serving the closest bus stops to the site and enhance weekend services as currently the X20 provides the only weekend service operating in the vicinity of the site.
- 4.5 Access to the existing and improved bus services will enable future residents of the development to access shops, schools and jobs by public transport.
- 4.6 It may be possible to install Real Time Passenger Information (RTPI) at the bus stops closest to the site to encourage travel by bus to and from the site.

5 Conclusion

- 5.1 Following the review of site accessibility and benefits which can be delivered as part of the proposed development at Land at Shirley Golf Club, the transport related benefits and opportunities for the site to support its allocation include:
 - the site is situated in an accessible location, by foot, cycle and public transport







- there are a number key local amenities and facilities which are accessible by foot and cycle via good walking and cycling routes; Toucan crossings along these routes aid safe crossing of the A34 Stratford Road
- there are opportunities to improve the public transport offer through providing RTPI at bus stops and better connections between the existing site access and bus stop on the A34 Stratford Road to the west of the site access
- the off-site infrastructure and public transport improvements to be delivered as part of the Blythe Valley Park development will have a beneficial effect on the proposed development further improving the sustainability of the site location
- the proposed highway improvements and access arrangements would allow more direct routeing and reduce trip impact on the A34 Stratford Road/ Monkspath Hall Road roundabout (by right-turners from Creynolds Lane) and A34 Stratford Road/ Creynolds Lane junction by allowing a left turn from the proposed Creynolds Lane site access
- the level of vehicle trips generated by the proposed development would not have a significant impact on the A34 Stratford Road/ Creynolds Lane and therefore it is unlikely that the mitigation requirements and/ or triggers associated with Blythe Valley Park would be affected by the proposed development, and
- Travel Plan measures could be implemented at this site which could reduce the number of vehicle trips generated by the site.





Appendix A Solihull Cycling and Walking Map

