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Policy and Delivery
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Solihull Council
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Solihull
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14th March 2019

Dear Sirs,

**Draft Local Plan Supplementary Consultation, January 2019
Omission Site 57, land adjoining 2102 Stratford Road, Hockley Heath**

Introduction

Hancock Town Planning acts for the Tanworth Educational Foundation which owns Site 57 *'land adjoining 2102 Stratford Road, Hockley Heath'*. This site is one of the parcels of land which is not currently proposed for inclusion within the Local Plan Review.

The Consultation Document states that the planning authority is seeking to ensure that the identified preferred sites are the most appropriate when considered against the proposed spatial strategy which provides for an increase in the annual housing requirement from 791 dwellings per annum (dpa) to 885 dpa. However, Tanworth Educational Foundation does not consider that the proposed sites are the most appropriate for the reason that land adjoining 2102 Stratford Road, Hockley Heath should be identified for modest development within the Plan Review.

Tanworth Educational Foundation therefore wishes to **OBJECT** to the omission of the site from the list of proposed allocations detailed in the Supplementary Consultation.

Appraisal

The detailed Site Assessment identifies that Site 57 has been assessed as having a 'medium/high' accessibility. This takes into account the proximity of the site to a food store, the village primary school and proximity to bus stops. The 'medium/high' accessibility assessment is the same classification as Site 25, land south of School Road which the Local Plan Review proposes to allocate for 100 dwellings. However, the Foundation contends that Site 57 is at least as accessible as Site 25 as it is within 50 metres of two bus shelters providing frequent daily services and because the eastern side of the A3400 Stratford Road is a combined pedestrian and cycle route which extends to Hockley Heath village centre in a southerly direction and as far as Blythe Valley Business Park and Solihull Town Centre in a northerly direction.

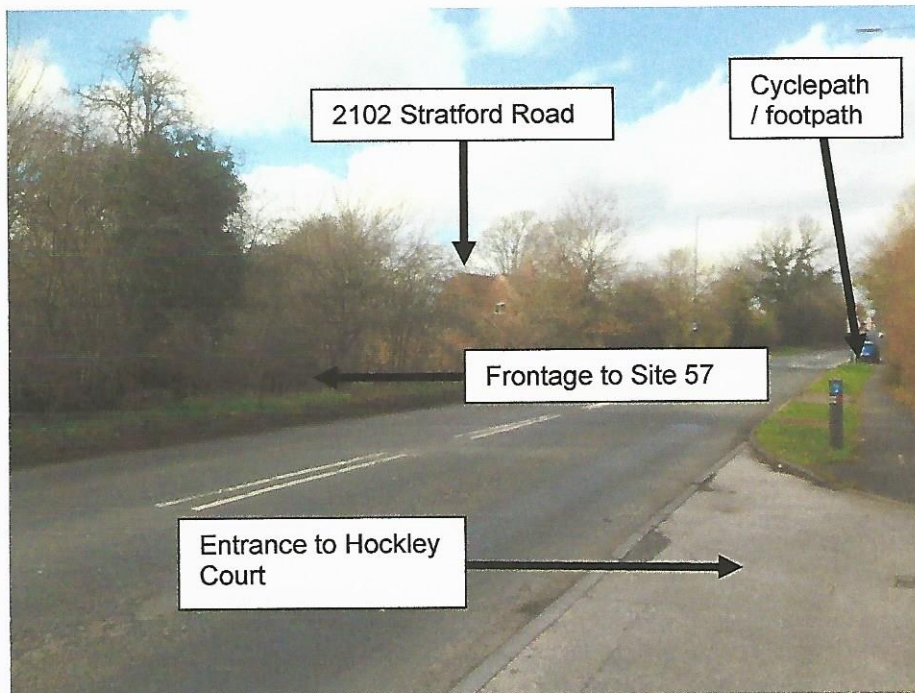
Other site assessment criteria, such as being within a 'lower performing' Green Belt parcel and landscape character assessment are also exactly the same for this site and Site 25. However, Site 25 is proposed to be allocated and Site 57 has received an indicative 'red' no allocation rating.

The only difference in the assessment of Sites 25 and 57 appears to be that the Borough Council has concluded that *"it would be difficult to establish a new logical and defensible Green Belt boundary in this location"*. However, Green Belt boundaries are very defensible. This because national planning policy requires 'exceptional circumstances' to exist in order to justify new residential development within Green Belts. Strong physical boundaries are therefore not required to successfully resist or prevent development beyond the boundaries of a specific allocation. Notwithstanding this, Site 57 is a separate visually self-contained parcel of scrub / vacant land which is clearly differentiated from the open farmland immediately to the south and west and is enclosed by a post and wire fence.

We also disagree with the Council's assessment that the site has a 'high' landscape sensitivity and 'very low' capacity to accommodate change. We understand that this view is based on the fact that the site falls within Landscape Character Assessment 2 (LCA 2) of the Council's 2016 Landscape Character Assessment Study. The extent of LCA 2 is shown on the attached plan. One can see that LCA 2 encompasses a very extensive area, covering swathes of farmland up to and beyond Dickens Heath. Such an assessment is wholly inadequate for assessing the potential landscape impact of a 0.12 ha of land fronting the busy A3400 on the edge of Hockley Heath. For a LCA of this site to be relevant it must take into account the particular characteristics of this small parcel of land, as set out below.

As seen in Photograph 1 below, the site comprises only self-seeded scrub and a somewhat 'gappy' frontage hedge, with little in the way of mature trees. The site reads as part of the residential curtilage of the adjacent 2102 Stratford Road.

Photograph 1: Frontage of Site 57



Moreover, the land is sited opposite the four storey Hockley Court business space and is just north of the three storey Kingswood Court residential development.

The site also lies within the 30 mph speed restriction area on the Stratford Road, suggesting that the site relates more to the built-up part of Hockley Heath than to open countryside.

We also highlight that a scheme could be sensitively designed to reflect the rural vernacular, for example with two or three pairs of semi-detached cottages with the retention / reinforcement of a green frontage screen.

We therefore consider that appropriate development of Site 57 would not result in any particular 'harm' to landscape character of the area, and certainly not the 'high' level recorded in the detailed Site Assessment.

Turning now to Green Belt impact, we consider that the existing site contributes little towards the purposes of Green Belt designation as set out in paragraph 134 of the NPPF and repeated below.

- *To check the unrestricted sprawl of large built-up area.*

As previously noted, the site is visually separated from the wider landscape and reads as part of the residential curtilage of the adjacent 2102 Stratford Road. Given that it lies opposite substantial multi-storey buildings, the development would therefore not significantly extend the impression of built development into open countryside.

- *To prevent neighbouring towns merging into one another:*

The development of this very small site for modest residential development would not have any material effect in eroding the gap between Hockley Heath and the Solihull conurbation some distance further north.

To assist in safeguarding the countryside from encroachment.

The site does not read as open countryside, being bounded fenced off from the wider landscape and appearing as residential curtilage to No.2102.

- *To preserve the setting and special character of historic towns:*

Hockley Heath is not a historic town of special character and sensitive development of this unused scrub area could enhance the approach to the village.

- *To assist in urban regeneration, by encouraging the recycling of derelict and other land.*

The provision of a very limited number of houses on this site would have no impact on urban regeneration prospects for other parts of the Borough or Birmingham conurbation.

The site therefore makes little contribution towards the Government's stated purposes of Green Belt designation and that the designation should be removed from the land to enable its allocation for residential development in the Local Plan Review.

We also highlight that this land currently has no viable use as it is not part of an agricultural holding and is too small for any other countryside compatible use. Residential development would therefore be consistent with the aims and objectives of NPPF paragraph 117 and 118 which state that:

“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses”

and should:

“promote and support the development of under-utilised land and buildings”.

Residential development of Site 57 would also be consistent with the requirements of paragraph 68 of the NPPF which requires local planning authorities:

“to accommodate at least 10% of their housing requirement on sites no larger than one hectare”.

This is in order to provide a good mix of sites which can be built out quickly and will provide opportunities for smaller housebuilders. With a site area of approximately only 0.12 ha, the residential allocation of Site 57 would comply with this objective.

Summary

In summary:

- The Tanworth Educational Foundation objects to the non-allocation of 0.12 ha of land adjacent to 2102 Stratford Road, Hockley Heath for residential development.
- The site is at least equally accessible as Site 25 which is proposed for residential development at School Road within Hockley Heath, benefitting from immediately proximity to a cyclepath and footway and two bus stops serving major bus services.
- The site is physically discreet from adjoining open land and the mere fact of Green Belt designation provides a defensible boundary to prevent any future development which is not supported by the Planning Authority.
- The site has low landscape value and lies opposite existing three and four storey development. It is therefore not highly sensitive to change, as incorrectly recorded in the Council’s detailed Site Assessment, a conclusion which was based on an extremely broad brush appraisal of a very extensive area rather than a site specific assessment.
- Development of the site could comprise modest cottages with a rural vernacular and provide for retention of a green frontage, so minimising any landscape impact.
- The existing site contributes little to the purposes of Green Belt designation as it does not read as part of the wider landscape, appearing to be an overgrown and underused part of the residential curtilage of 1202 Stratford Road.
- Residential allocation will also make effective use of this under-used site and help diversify the housing supply in accordance with the objectives of the NPPF.

Please do not hesitate to contact me should you have any queries or require any additional information.

Yours faithfully,



Joel Hancock BSc (Hons) MSc MRTPI

