



Strategic Advice

planning & urban design solutions

Policy & Delivery
Managed Growth & Communities Directorate
Solihull Metropolitan Borough Council,

14 March 2019

Dear Policy & Delivery Team,

Solihull Draft Local Plan Supplementary Consultation, January 2019

These representations are submitted on behalf of Mr & Mrs J King of 93 Silhill Hall Road, Solihull, who own the land & property at Norton Lane, Earlswood. to which the representations relate and which is referenced as site 69 in the Council's Call for Sites and Supplementary Consultation Site Assessments documents and BLR/34 in its Brownfield Land Register.

Representations were previously submitted in February 2016 in response to the Draft Plan and these are attached for convenience.

Consultation Question 2: site selection methodology

Not agreed.

Assessment scorings based on the performance of individual sites against criteria rather than packaging sites which are geographically clustered together precludes the effective exploration of the potential for strategic land releases which could, through comprehensive treatment of an area, deliver new homes, services & green infrastructure in a way which minimises impacts on landscape & the Green Belt and which so would establish Green Belt boundaries which are clear, defensible & would endure. Such an approach would improve the performance score of the cluster compared with that of its individual component sites. In essence, the site selection methodology prejudices effective planning for the whole by assessing only its parts.

In particular, the 'partial approach' results in poor scores for individual sites in terms of Green Belt boundary definition and also impacts on assessments of accessibility and service provision.

This flaw in the site selection methodology needs to be addressed and clusters of sites assessed as a whole rather than individually.

Consultation Question 39: Red Sites omitted which should be included

This point is well illustrated by the cluster of sites in Earlswood where a simple overlay of the railway line & stations and clearer representation of the built areas of Wythall and Earlswood on the base plan of the Draft Plan Supplementary Consultation Site Assessments Key Plan would illustrate land owner & developer interest in & the potential for a sustainably located new settlement well related to existing communities but such a prospect has not been assessed by the site selection methodology.

Such a proposition is recognised to require effective cross-boundary working between a number of different local planning authorities and so would engage the Duty to Cooperate but it is a reasonable alternative strategy to that being pursued by the Local Plan Review and so should be the subject of Sustainability Appraisal.

Therefore & thereby Site 69 should be included in the Council's consideration of possible Green Belt land releases for new housing development.

Further, the attributes of Site 69 on an individual basis remain largely unchanged since representations on the Draft Plan were submitted – it is relatively close to the Birmingham-Stratford rail line & stations and local services, is underused, includes a vacant house and commercial buildings, is shielded from wider views by trees and by existing development in Norton Lane and Rumbush Lane and is capable of an immediate start; therefore it is well placed to provide a much needed boost to housing land supply with no significant detriment to strategic Green Belt functions, support public transport provision in the area and contribute appropriately to necessary funding for the development of the proposed Earlswood Living Landscape – other than to say that a recently commissioned expert survey concluded that the site has a “relatively low ecological value” and that development would result in “a minimal loss of biodiversity”.

Therefore Site 69 remains available & suitable for housing development which is immediately deliverable and so should be considered further through the Local Plan process.

Finally, it should be noted that the landowners would be happy to work with the Council and others in taking forward consideration of the development of their land either in isolation or in conjunction with nearby sites.

If you have any queries or require any further detail in respect of these representations, please do not hesitate to contact me.

Yours sincerely

P.R. Watson



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