

TOWN AND COUNTRY PLANNING ACT 1990

**SOLIHULL METROPOLITAN BOROUGH
COUNCIL**

**DRAFT LOCAL PLAN SUPPLEMENTARY
CONSULTATION JANUARY 2019**

**REPRESENTATIONS MADE ON BEHALF OF
COLCHURCH PROPERTIES LIMITED**

**IN RELATION TO LAND AT
BARRATT'S FARM, BALSALL
COMMON**

**BY
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1.0 REPRESENTATIONS TO THE DRAFT LOCAL PLAN SUPPLEMENTARY CONSULATION

Introduction

- 1.1 These representations are submitted by Richard Brown Planning Limited on behalf of Colchurch Properties Limited (hereby known as the site promoters) who are promoting the land at Barratt's Farm, Balsall Common. Colchurch Properties Limited have participated in previous consultations with Solihull Metropolitan Borough Council. The land has consistently been promoted as a suitable location for a residential-led mixed use allocation for circa 900 dwellings.
- 1.2 The land is provisionally allocated in the Solihull Metropolitan Borough Council Draft Local Plan as allocation Ref 1: Barratt's Farm, which is identified at Page 83 of the Plan to be capable of delivering approximately 900 dwellings. Through these representations we will seek to reinforce the exceptional circumstances justifying the release of the land from the Green Belt and demonstrate the site is deliverable.

Balsall Common

- 1.3 Balsall Common is considered to be an excellent strategic location for growth and is capable of delivering developments on a scale of that for Barratt's Farm. It has several distinguishing attributes. These have been confirmed by the figures contained within the WSP Transport Review of February 2017 which have been previously submitted to Solihull.
- 1.4 In term of its strategic location, Balsall Common is, strategically, very well located on both a regional and national basis. It lies approximately 20 km to the east of the centre of Birmingham; 9 km to the west of the centre of Coventry; and 145 km from the centre of London.

- 1.5 Its railway station, Berkswell, is located on the West Coast mainline providing local and national services. The station itself is located immediately to the north of the site on Station Road.
- 1.6 In terms of its range of facilities, the settlement includes all necessary facilities infrastructure: pharmacies; pubs; restaurants; a supermarket; post office; dental practice; opticians; a library; sports clubs and facilities; a health centre; a nurse; a primary school; and a secondary school.
- 1.7 Access to the settlement is via road, principally the A452 which runs through the settlement, with Station Road running perpendicularly to it, and Balsall Street, Kelsey Lane and Waste Lane to the south.
- 1.8 As a result it is very well placed to accommodate levels of growth in excess of its own needs.

Proposed Allocation: Site 1 Barratt's Farm

Context

- 1.9 The Barratt's Farm Site extends to ca. 93 hectares in total and is currently proposed as a Draft Allocation for residential development (Site 1) in the Draft Local Plan, for 900 units.
- 1.10 The Site lies on the eastern edge of Balsall Common. The existing settlement to the west is residential in character and includes a number of open spaces and public buildings. It lies approximately 350 metres from the centre of the settlement at its western boundary. Directly to the north lies Station Road and Berkswell Railway Station within the northern part of the settlement, with the railway line and open countryside in agricultural use further to the north. To the south lies the extended part of the settlement along Catchems Corner, with open countryside further to the south, also in agricultural use. To the east lies open countryside again in agricultural use, including the railway line and Kenilworth Greenway on a former railway line; and to the west the existing settlement extends. The area is well served by local roads, lanes and the public right of way system.

The Site

- 1.11 The Site is generally irregular in plan form, and occupies an area of agricultural land that generally extends from Station lane in the north to Waste Lane in the south; and from the existing settlement edge in the west, down to a notional line to the east, that cross the agricultural land.
- 1.12 The Site currently lies within the Green Belt, and was assessed in the 2016 Green belt Strategic Assessment. That assessment concluded that the majority of land within the allocation scored only 'moderately' in terms of Green belt function; with the eastern sections scoring higher. The Site is not subject to any landscape or amenity designation.
- 1.13 Virtually the entire site is in agricultural use, comprising a series of pastoral field enclosures, contained by mature hedgerows and a number of large mature hedgerow trees. Barratt's Lane Farm lies towards the southern central part of the Site. A number of hedgerows have been removed over time due to increased farming activity. There are also a number of field corner ponds.
- 1.14 A number of Public Rights of Way (PROW's) cross the site, linking Balsall Common with areas further to the east, and also into the wider PROW network including the Long-Distance Footpath, The Millennium Way to the south-east.
- 1.15 Topographically, the landform generally site slopes from the west down towards the east. The 120 metre contour extends across the western part of the site, where the land is flatter, and then falls towards the stream corridor, more noticeably in the north, to levels of 110 metres and lower. In this area, the slope of the land is slightly more prominent, less so to the south.
- 1.16 With regard to heritage matters, Barratt's Lane Farm House and the adjacent barn are both Grade II listed, as is Pool Orchard, a residential dwelling towards the western edge of the site just to the north of Barratt's Lane Farm. Off-site to the north, the Brickmakers Public House is

Grade II listed; and off-site to the west, a group of three buildings at nos. 85 and 83 Meeting House Lane are also all Grade II listed.

Infrastructure: Balsall Common By-pass and HS2

- 1.17 At paragraph 88 of the Draft Local Plan Supplementary Consultation (January 2019), reference is made to Balsall Common By-pass. Its provisional alignment is described, where Barratt's Farm Site is concerned as:

“ ... continuing the line of Hall Meadow Road around the eastern side of the village, crossing Waster Lane at Catchems Corner..... the design of the road would be a single carriageway with few direct access points thus being attractive to through traffic as an alternative to suing Kenilworth Road.... However the road would be expected to be the main vehicular access into the Barratt's Farm development.”

- 1.18 With regard to HS2, the proposed alignment adjacent to the Site runs just north and parallel with the Kenilworth Greenway, before reaching the West Coast mainline. At this point, HS2 crosses over the existing railway line (just to the south of Berkswell station) and continues north-westwards on a line roughly parallel with the West Coast mainline. To accommodate the crossing of the existing railway line, HS2 will sit on a viaduct rising to approximately 10 metres high, and approximately 250 metres in length – effectively along that part of it that runs just north and parallel with Kenilworth Greenway.

- 1.19 The land directly west of the HS2 alignment, across an area generally occupying the land between Kenilworth Greenway and the (notional line) eastern edge of the Barratt's farm Site Draft Allocation, is identified as “HS2 Safeguarded Land”.

- 1.20 The alignments of both the By-pass and HS2, in relation to the Site, are illustrated indicatively on Plate 1 below. In essence, the alignment of the By-pass demarcates the eastern boundary (notional line) of the Draft Allocation.



Plate 1: Balsall Common By-pass and HS2 alignments

Merits of the Barratt's Farm Site

1.21 On pages 22-23 of the Draft Local Plan Supplementary Consultation (January 2019), at paragraphs 87-96, the document sets out what elements are required for the settlement (of Balsall Common) in the future. These are set out below in tabular format, with an explanation of how well place the Barratt's Farm site is to contribute to these requirements.

Requirement	Barratt's Farm Site Contribution
Balsall Common By-pass	The site allocation can provide. The site would facilitate the objectives of para 85 of the draft Local Plan Review consultation document, notably significant environmental improvements to Kenilworth Road through the centre of the village by rerouting traffic away.
An enhanced centre	The Site contributes indirectly on the basis that the By-pass can facilitate environmental improvements along the A452, which will provide a catalyst for improvements in the settlement centre.

Station Parking	The site can make a significant contribution in this respect by allocating an area of land at the northern end for additional station car parking, in safe and easy walking distance to Berkswell Station, and assist in alleviating an ongoing commuter parking issue. Colchurch, the site promoters, have had initial dialogue with Network Rail and West Midlands Trains who have both expressed interest to a parcel of the Barratt's Farm site to be provided as additional car parking for the railway station and therefore alleviating overspill parking on the local roads. This is in line with paras 83 and 90 of the draft Local Plan Review consultation document.
Improved public transport	Contributions via development and an increase in population.
New Primary School	The Site, again through its scale, can make a significant contribution in this respect by allocating an area of land at the northern end for a new Primary School.
Secondary School	Contributions via S106.
Community Infrastructure Level	Direct contribution through development.
Concept Masterplan	The consultant team working on behalf of majority landowner across the Site has been working collaboratively with both officers of SMBC, and other landowners within the Draft Allocation boundary in order to assist in the preparation of a concept masterplan for the Site. Significant progress has been made in this respect.
Green Belt Enhancements	The emerging concept masterplan for the Barratt's farm site includes provision of significant Green Infrastructure including access and public open space, that can link with Kenilworth Greenway and Green Belt areas further to the east.

The Draft Concept Masterplan

Overview and Collaborative Approach

1.22 The Consultant Team working on behalf of the majority landowner, led by The Pegasus Group, in collaboration with both other land owners and SMBC Officers, have retained a consistent dialogue since the identification of Barratt's farm as a Draft Allocation, in terms of working up

a Concept Masterplan. This has included a number of face-to-face meetings, together with the open sharing of survey and analysis work and draft conceptual masterplan thinking.

1.23 The latest concept masterplan prepared by The Pegasus Planning Group, which has been shared with Officers of SMBC, is referenced as Pegasus Drawing No. BIR.4651_36-01 and is appended to these representations. It indicates the emerging thinking and takes into account a number of matters that are expanded upon in the commentary below.

1.24 In the context this overview, the Draft Masterplan as illustrated in the Draft Concept Masterplans Document (January 2019) is generally supported, although a number of informative comments are relevant, as set out below.

General Extent of Proposed Development, Density and Overall Numbers

1.25 The general extent of proposed development within the Draft Allocation boundary is supported, however it is considered that:

1. The land indicated in red (keyed in as “Areas of significant ecological value”) directly adjacent to Meeting House Lane, be included as an area for development as part of the Draft Allocation;
2. The area indicated in buff (keyed in as “Potential area of development subject to heritage assessment”) are not likely to cause a significant or extensive heritage constraint and on that basis are likely to comprise development; and
3. On this basis, the Draft Allocation is capable of delivering, at an average of 35 dph (dwellings per hectare) up to 1300 units as opposed to the 900 units indicated. This is in accordance with paragraph 123 of the NPPF, notably criterion (a).

Heritage

- 1.26 It is understood that SMBC have engaged with an external Heritage Consultant in order to identify the level of constraint that given heritage assets may or may not comprise on all Draft Allocation Sites.
- 1.27 Following a brief desk-top heritage assessment exercise carried out by SMBC well in advance of their instruction to an external consultant, matters of heritage across the Site were considered a potential constraint. On this basis The Pegasus Group on behalf of the landowner, has carried out their own (Desk and Field) Heritage Assessment. This document has previously been shared with SMBC. It concludes that the existing heritage assets do not comprise a significant constraint to development, and in doing so has identified which part so the site may be suitably left free of development in respect of the setting of the different assets. These are minimal and can be usefully integrated into a meaningful open space strategy, as illustrated on The Pegasus Concept Masterplan appended to these representations.

Landscape and Visual

- 1.28 Significant landscape and visual analysis has been carried out across the Site. It is generally agreed that the character of the local landscape, specifically the Arden field enclosure pattern, can assist in shaping and influencing the form of development, and that other notable features including public rights of way and water courses/low land can be successfully integrated into a public open space strategy.

Mix of Uses

- 1.29 The indicated mix of uses includes residential with a potential for a (primary) school location at the northern end of the Site, as well as a site for a new Station Car Park, also at the northern

end, and significant open space. This mix of use is considered both appropriate and deliverable on this Site.

Balsall Common By-Pass

- 1.30 The alignment of the By-pass represents a sensible and logical boundary to development at this point in time. The contribution that the By-pass can make to the overall settlement going forward is significant and its presence is also mutually beneficial to development across the Site. It provides an opportunity in urban design and masterplanning terms to provide variable densities in different areas and create a variety of different character areas across a development proposal.

HS2

- 1.31 The alignment of HS2 will necessitate that area of land between the allocation and Kenilworth Greenway to be safeguarded for its purposes. HS2 provides no constraints as such in respect of the Draft Allocation.

Post HS2

- 1.32 Following construction of HS2, its safeguarded area has, on the Concept Masterplan, been identified for development. This comprises another sensible and logical strategy on the basis that the land will effectively be 'locked' to the north and west by existing development and the Draft Allocation boundary; to the east by Kenilworth Greenway; and to the south by Waste Lane.
- 1.33 One way of bringing it forward would be to 'reconstruct' its original field pattern, whilst integrating landscape elements retained from the HS2 safeguarding area e.g. balancing ponds. And working in development in a manner consistent with that across the Draft Allocation. It is considered that this area of land could deliver another 250 units at an average density of 35 dph, as indicated on The Pegasus Concept Masterplan.

Revised Green Belt Boundary

- 1.34 On the basis of the commentary above, and in the context of paragraph 97 in the Draft Local Plan Supplementary Consultation, the re-alignment of the Green Belt boundary along the route of HS2 directly east of Kenilworth Greenway, is again both sensible and logical, and would constitute a robust and enduring Green belt boundary.

Land Ownership and Deliverability

- 1.35 Paragraph 101 of the Draft Local Plan Supplementary Consultation makes reference to the multiple and complex land assembly issues on the Barratt's Farm Site, presumably based on varied land ownerships. It also notes that, in terms of masterplanning, this needs to be approached in a comprehensive manner, with clear demonstration that the varied land interests are prepared to work on a collaborative basis.
- 1.36 These matters are not considered to be a constraint in terms of development at Barratt's farm. The majority landowner, Colchurch Properties Ltd. is, and always have been, prepared to work on a collaborative basis, and have encouraged their consultant team to masterplan the Site as a comprehensive whole.
- 1.37 With respect to other landowning interests across the Site to the south, Colchurch is engaged with the various landowners, together with the larger interest across land to the east of the allocation up to the alignment of the Kenilworth Greenway.

Green Belt Considerations

- 1.38 The main planning constraint applicable to the Barratt's Farm site is green belt designation. In previous representations Colchurch has submitted its position in terms of the function of the site in relation to the role of Green Belt and put forward a list of factors it considers form provide the exceptional circumstances to justify the release of the land from the Green Belt. The following sections summarises the position Colchurch has adopted and why.

- 1.39 Para 133 of the Framework states the essential characteristic of Green Belts are their openness and permanence, notably criterion (e) which states that Local Plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. Green Belt is not intended to exist unaltered in perpetuity. This is why Paragraphs 133-136 relate to and provide review mechanisms and the need to test the necessity of the designation against exceptional circumstances as specifically outlined in Para 137.
- 1.40 The NPPF seeks to align Green Belt boundary reviews with sustainable patterns of development (paragraph 138). Local planning authorities are encouraged to 'consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'.
- 1.41 The land being promoted is located entirely in the existing Green Belt which is tightly drawn around the settlement of Balsall Common. Para 133 of the Framework reaffirms the Government's continued support for Green Belts but the Green Belt in this instance, is of some considerable vintage, and there is a very obvious need for Green Belt release to meet the housing need. As paragraphs 364 to 374 of the Consultation explain, there is a clear paucity of land available for development within the urban area of the Borough, or within the built-up areas of the rural settlements, and there are significant unmet needs that cannot be accommodated without using land in the Green Belt. Colchurch agrees with that position. Moreover, the Council is committed to meeting unmet needs from the wider HMA which cannot be achieved without Green Belt release. In essence, the question of whether exceptional circumstances exist requires an exercise of planning judgement that is fact sensitive in each case.
- 1.42 In respect of allocation at Barratt's Farm, it is submitted by Colchurch and confirmed by the Council's provisional allocation, that the settlement is a sustainable location and the site

relates well to the settlement, in accordance with NPPF 138. The settlement needs an appropriate quantum of growth to meet its future needs and maintain the existing services by virtue of additional population. The Green Belt designation, it is submitted, is not intended to stifle the delivery of sustainable development where such development is justified. Indeed, recent case law, see **IM Properties v Lichfield District Council** (reaffirmed by the Court of Appeal in February 2016) identifies that Green Belt is meant to be the servant of sustainability and not its master.

1.43 There is no doubting that Balsall Common, and other similarly proportioned settlements in Solihull, are sustainable locations and are capable of supporting residential development as a complementary form of allocation to the larger Sustainable Urban Extensions that are also proposed as part of the Local Plan Strategy. This is a fact acknowledged by earlier iterations of the Local Plan and the current consultation where a dispersal strategy is advocated.

1.44 Given the Green Belt status two paragraphs of the Framework need to be addressed. Paragraph 136 of the Framework states: -

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

1.45 Paragraph 138 of the Framework states: -

“...Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

1.46 Although it is not arguable that the mere process of preparing a new Local Plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary, the

process of producing a new Plan and the evidence base that is required so to do may well identify the circumstances which do necessitate Green Belt boundary adjustment. That has happened in the case of Solihull. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 136 NPPF), and has always required "exceptional circumstances" to justify a revision.

1.47 The demonstration of "exceptional circumstances" is a well debated topic in planning law terms with no all-encompassing definition as outlined by the list of relevant cases mentioned previously. Rather in simplistic terms it is a combination of factors which apply to a site and which, taken together, when weighed up cumulatively amount to something very special. It is this concatenation of factors which justifies a review or alteration of the Green Belt.

1.48 In Solihull, and specifically Balsall Common, a combination of factors exists, which when combined equate to "exceptional circumstances" being demonstrated sufficiently to justify a release of land from the Green Belt for appropriate development (or for immediate release dependent upon housing need). These can be summed up as follows:

- High housing need in Solihull
- Neighbouring Authorities with high housing needs (Particularly Birmingham)
- Lack of sustainable brownfield or previously developed sites (SHLAA conclusion) in the Solihull area.
- Local Plan Review acknowledges that Green Belt land will be likely to be needed in the Draft Local Plan
- Availability of the Balsall Common site which does not score highly in terms of Green Belt function but does score well in sustainability terms.

1.49 That there is high housing need in Solihull and also from neighbouring authorities such as Birmingham is acknowledged throughout the Local Plan that provides a strategy aimed at finding a sustainable solution to accommodate the growth. It is part of the overall planning

picture impacting on the Borough and therefore those preparing the Plan have to apply planning judgement to whether or not the situation is sufficiently exceptional to justify reviewing the Green Belt.

- 1.50 Beyond simply the scale of housing need the District has to accommodate over the plan period (to 2028) the limiting factors are a combination of available sites, the extent of Green Belt coverage and the need to deliver sustainable patterns of development (required by paragraph 138 of the Framework).
- 1.51 The Solihull Strategic Green Belt Assessment (2016) considers the sites in the Green Belt that had been put forward in the Call for Sites. The land at Barratt's Farm is assessed by the Green Belt Assessment. The assessment reviews how strong a contribution each parcel makes against four criteria derived from the Purposes of Green Belt defined in the Framework. These include 1. Check the unrestricted sprawl of large built up area. 2. Prevent neighbouring towns from merging. 3. Assist in safeguarding the countryside from encroachment. 4. Preserve the setting and special character of historic towns.
- 1.52 The release of land from the Green Belt at Barratt's Farm will not lead to the unrestricted sprawl of a large built up area. The site is a highly logical expansion to an existing residential area that will appear in time as a seamless extension to the settlement with a long term and enduring edge to the settlement and Green Belt through the new By-pass and HS2.
- 1.53 The development will not adversely impact upon the setting and special character of Balsall Common as a historic town or settlement as set out in the Green Belt Assessment.
- 1.54 It is acknowledged that the release of the land would necessarily result in some mitigated encroachment into the open countryside. Such a consequence is inevitable with development on greenfield land adjoining an existing settlement. However, the site is a logical one being contained by permanent long-term boundaries in the form of the proposed By-pass and HS2.

It is submitted that the revised Green Belt should follow these long-term boundaries which are identifiable and robust.

- 1.55 Development at Barratt's Farm would not cause neighbouring towns to merge into one another. It is submitted that in reality the release of land at Barratt's Farm would not result in actuality, or in perception that Balsall Common had merged with nearby settlements. There would remain a clear open tract of land beyond the extended urban edge of Balsall Common. In terms of visual impact, the proposed housing would be seen against the backdrop of existing housing so would be visually appropriate in this context.
- 1.56 It is submitted by Colchurch that the site proposed to be allocated in the Draft Local Plan is the most appropriate site for release from the Green Belt to meet housing needs in Balsall Common.
- 1.57 There is no functional reason for the land to remain in the Green Belt as its removal will not harm any of the five purposes for Green Belt designation at para 134; the requirements of para 138 which seek to ensure sustainable patterns of development come forward; or the requirements of para 139 which give guidance on how boundaries should be drawn. It is submitted the site is not necessary to remain in the Green Belt taking into account the five identified purposes of the Green Belt at Para 134. It will assist delivery of a sustainable site (para 138) which will complement the wider development strategy and the site satisfies the requirements of para 139. It is not necessary to be safeguarded; is not necessary to be kept open and is consistent with the spatial strategy in seeking to deliver a sustainable development.
- 1.58 It is submitted that in strategic terms exceptional circumstances have been demonstrated and at a local level the site is logical and should be considered favourably when assessed against the Green Belt criteria in the Framework.

Conclusions

- 1.59 It is submitted that the land at Barratt's Farm provisionally allocated as part of the Solihull Draft Local Plan Review (Site 1) is suitable and should be released from the Green Belt and allocated for residential development.
- 1.60 It is a sustainable site in a sustainable settlement as concluded by the Council's own evidence base documents. It will contribute to the delivery of sustainable development. The site is able to deliver circa 1,300 units taking into account standard net developable areas. There is also an opportunity for the site to deliver an additional 250 (approx.) units on land between the current allocation edge and HS2.
- 1.61 The site is viable as no abnormal development costs are anticipated and is a deliverable site if released from the Green Belt and allocated. The scale of the proposed allocation is considered proportionate to the ability of Balsall Common to sustain it and the additional housing will address local housing needs and help sustain the existing services and facilities.
- 1.62 There are many benefits to allocating the land including delivery of housing, affordable housing; facilitating the delivery of a new By-pass leading to town centre improvements, station parking and open space.
- 1.63 It is submitted that the release of the land at Barratt's Farm would not harm the underlying purposes of the Green Belt – other than resulting in a minor encroachment into the countryside. This impact is outweighed by the need to identify more land for housing to meet the needs of the Solihull and the Birmingham Housing Market Area in which Balsall Common is located. As such the release of this land from the Green Belt will contribute to the provision of sustainable patterns of development as outlined by Para 138 of the NPPF.
- 1.64 Balsall Common is a sustainable location that is capable of accommodating growth. The settlement has an artificial constraint in the form of the Green Belt and the existing settlement

boundary which has constrained growth in the past but such boundaries are not inviolable and the appropriate time to review them is now during the formation of the Local Plan.

1.65 In order to deliver sustainable development and address the high housing needs in the locality it is appropriate to review the Green Belt and settlement boundary as the evidence base has done and make a positive decision in the interests of delivering sustainable patterns of development (as required by Para 138 of the Framework) to look to allocate sites when additional land is needed. It is submitted land at Barratt's Farm, Balsall Common is an appropriate site in these circumstances.

1.66 Paragraphs 136 and 138 of the Framework provide a mechanism for reviewing the Plan and making alterations to Green Belt boundaries where "exceptional circumstances" can be demonstrated. It is a matter of planning judgement as to whether or not "exceptional circumstances" have been demonstrated. Colchurch Properties Limited submit (in agreement with the Council) that the concatenation of factors applicable to this Plan preparation process justify the conclusion that "exceptional circumstances" have been established.

Response to the Local Plan Supplementary Consultation January 2019

1.67 On the basis of the commentary above, responses to the relevant questions in the Schedule of Questions at 0.76 of the Consultation are as follows:

3. Do you agree with the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are other matters that should be included?

1.68 Response: On the basis of these representations, we agree with the infrastructure requirements, in particular the delivery of the By-pass and it is clear that the Barratt's Farm Site has a key role in delivering this element, to the significant benefit of the wider settlement.

4. Do you believe that Site 1 Barratt's Farm should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

1.69 Response: The Barratt's Farm site should be included as an allocated site for all the reasons set out in these representations. It is essential to the future sustainable growth and development of Balsall Common and can contribute significantly to the needs of the settlement going forward.

1.70 Moreover, it is considered that the Draft Allocation can deliver more housing numbers than those set out in the Draft Local Plan Supplementary Consultation (January 2019) – up to 1300 units as opposed to 900. In addition, the land between the current Draft Allocation eastern boundary and Kenilworth Greenway has the potential to deliver, post HS2, another 250 units (approx.) as part of a comprehensively masterplanned development. As such, it could be usefully included within the Draft Allocation at this point.

10. Do you have any comments to make on potential changes to the Green Belt boundary east of the settlement that would result in the removal of 'washed over' Green Belt from those areas not covered by a formal allocation?

- 1.71 As mentioned the land between the current Draft Allocation eastern boundary and Kenilworth Greenway has the potential to deliver, post HS2, another 250 units (approx.) as part of a comprehensively masterplanned development for Barratt's Farm. As such, it should be usefully included within the Draft Allocation at this point and removed from the Green Belt.
- 1.72 Mindful of meeting the needs of the wider HMA and an uplift to the housing requirement for Solihull it is considered that the inclusion of additional land between the current Draft Allocation eastern boundary and Kenilworth Greenway is an appropriate and logical location to meet additional housing needs in Solihull and Balsall Common through a comprehensive and sustainable development.