

Policy & Spatial Planning  
Solihull MBC  
Council House  
Manor Square  
Solihull  
B91 3QB

**VIA EMAIL**

30292/A3/JB/sw

15<sup>th</sup> March 2019

Dear Sir/Madam,

**REPRESENTATIONS TO THE SOLIHULL DRAFT LOCAL PLAN SUPPLEMENTARY REGULATION  
18 CONSULTATION – LAND SOUTH OF PARK LANE, BALSALL COMMON**

Barton Willmore LLP is instructed by Rainier Developments Ltd (the 'Client') to submit representations to Solihull Metropolitan Borough Council's Draft Local Plan Regulation 18 Supplementary consultation (the 'draft Plan') in relation to their land interests at land south of Park Lane, Balsall Common (hereafter referred to as the 'site'). Prior to our Client's involvement promoting this site, it was previously promoted for residential development and assessed by the Council in their Site Assessment Document as Site 305. We enclose a new Call for Sites submission alongside these representations which proposes employment development on the site.

We comment below on the Council's previous assessment of the site with the hope that in their new assessment for commercial uses, the issues we have highlighted will be addressed.

Whilst we appreciate that this is a non-statutory consultation and it does not seek to deal with Birmingham's unmet housing needs, this is clearly a significant factor in the overall housing requirement for Solihull which should be considered properly now. If, as numerous parties have identified, for instance North Warwickshire Borough Council, the overall numbers increase through the Regulation 19 consultation, additional sites will need to be identified in the coming months before consultation in summer 2019, and certainly before submission of the draft Plan in autumn 2019. As we will set out in this response, the Council's approach to employment is inadequate as currently proposed, and further housing growth over and above this will require a further increase in employment land to ensure growth is balanced. This imbalance is especially pertinent for Balsall Common and our Client's site is well placed to meet this employment land need. The site presents an opportunity to capitalise on HS2-related development and provide a sustainably located, well enclosed employment site which can serve the needs of the Balsall Common as it grows through the Plan period. The site will be used as a compound during the construction of HS2 and therefore cannot come forward until completion of this part of the route and/or it is released earlier as it is no longer needed by HS2. Employment land would therefore be delivered post-2025/6.

We set out below our comments and responses to the questions we consider are relevant to our Client's land interests.



FS 29637

Registered in England  
Number: 0C342692

Barton Willmore LLP  
Registered Office:  
The Blade  
Abbey Square  
Reading  
RG1 3BE  
F/ +44 (0)118 943 0001

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

Given the findings of the Employment Land Review (2017), we consider that the Council have not produced the necessary evidence regarding employment needs to answer this question. There is scope for an uplift in the housing requirement as a result of the HS2-related growth, as well as the potential to capitalise on the clear need for wider than local employment growth identified through evidence such as the 2015 West Midlands Strategic Employment Site Study (WMSESS), which identifies the M42 corridor as the area of highest demand for strategic industrial and commercial uses (Area A). The forthcoming new WMSESS is likely to be published before the draft Plan is adopted. In addition to Birmingham's unmet housing needs, the potential for higher housing numbers as a result of these points is something we consider could be an exceptional circumstance to justify an uplift beyond the standard method minimum (which we currently calculate to be 777 dwellings per annum).

Based on what we know regarding the issues with the Council's Employment Land Review, more employment land is required. A further increase in housing need (for instance in helping to meet Birmingham's unmet housing need) would require a further increase in employment land to ensure growth is balanced.

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

We broadly agree with the methodology but raise issues with the manner in which it has been applied to the site assessment process. Below we set out our concerns with the Council's previous assessment of the site for housing (reference 305).

The site was assessed as 'red' and we do not agree with the conclusion that it will have 'severe or widespread impacts that are not outweighed by the benefits of the proposal'. The site is relatively free from constraint. Issues such as heritage, given the Grade II and II\* listed buildings on Lavender Hall Lane, can be satisfactorily addressed through good design. This is bearing in mind the Council's conclusions on how their setting will already be affected by HS2 (see the Council's site analysis for Site 21, Lavender Hall Farm).

*Green Belt*

Whilst the site is within a parcel (BA04) that is assessed as being high performing (scoring 12), this parcel is probably the largest within the entire Borough, stretching from the south east of Balsall Common to just south of the M6. This provides a meaningless assessment of the site's contribution to the Green Belt, particularly as it does not take into account the amendments to the Green Belt around Balsall Common that are proposed through the draft Plan. By comparison, the parcel to the south (RP52) which is enclosed by the train line has an overall score of 6.

HS2 is a substantial factor that should also be considered in the assessment. As indicated on the enclosed Context Plan, the proposed route runs through the site and crosses Park Lane. Although the site is already enclosed by roads at present, HS2 will provide the site with an even stronger defensible boundary to the east. In addition, Park Lane is being upgraded alongside the provision of a new roundabout with the A452 to provide construction access for HS2. Accordingly, a more site-specific Green Belt assessment which accounts for committed development would clearly result in a significantly poorer score for this parcel of land. We have indicated on the appended Key Development Principles Plan how we consider our Client's site could be removed from the Green Belt in a logical manner given the context.

*Landscape*

We do not agree that landscape presents a constraint to development as the character assessment is broad in nature and does not take into account HS2 and the upgraded Park Lane, which will clearly have significant implications for the surrounding landscape, increasing its capacity for further change. An up-to-date site-specific assessment will come to a significantly different view in this respect. In any case, the Council have identified a number of allocations with similar landscape character, including other Balsall Common allocations such as the nearby Land at Wootton Green Lane and Kenilworth Road (reference 240). Consistency in the approach to assessments is required.

#### *Accessibility*

Rather than medium to high accessibility, we consider the site has high accessibility. The south east corner of the site is less than 15 minutes' walk from Berkswell Station and less than 10 minutes' walk from the Sainsburys Local on Kenilworth Road. There are a significant number of residents within walking and cycling distance of the employment opportunities presented by this site, including several 'green' assessed sites nearby. This labour pool increases significantly more so when considering the public transport connections. Given these reasons, and for the Green Belt and landscape reasons above, we do not agree that the site is 'poorly related' to the settlement.

**Suggested change:** the site is reassessed as a 'green' site in light of the above and identified as a draft allocation for employment purposes towards the end of the Plan period.

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

Balsall Common is identified as suitable for significant expansion and there are several allocations for large-scale housing growth here, alongside other sites which are not allocated but will be released from the Green Belt, meaning additional housing is likely to come forward beyond the numbers allocated.

We support the growth of Balsall Common given it is a sustainable location. However, there is clearly a serious disconnect between the level of housing and employment growth proposed. This is an existing issue for Balsall Common, as identified in paragraph 84 of the draft Plan:

**"Although it is of a size that caters for many residents day-to-day needs, it does not have significant areas of employment uses (other than service uses) and many of the village's economically active residents travel beyond the settlement for employment."**

Despite this acknowledgement, the draft Plan goes on to list a number of requirements for the settlement in the future, which does not include employment. Furthermore, the emerging concept masterplans for Barratts Farm and the other Balsall Common draft allocations do not include any land for employment. It is not clear how the Council propose to address this significant issue, which will only serve to exacerbate out-commuting and the associated environmental issues. This should be considered in the Sustainability Assessment.

HS2 presents an excellent opportunity to deliver employment land in this location. The upgraded Park Lane and the new roundabout with the A452 would provide a suitable access to our Client's site, and the proposed bypass to the east of the village will avoid through traffic. The site will become available for development after 2025/6 when HS2 is constructed, which should align well with the phasing of some of the larger scale housing proposed in the village.

**Suggested change:** include reference to Class B employment as a requirement for Balsall Common and identify our Client's site as a suitable location for employment.

#### **Questions 4 to 9: Balsall Common sites**

We agree with the identification of the Balsall Common sites given the sustainable nature of the settlement. However as above, it is clear that employment land will be required.

**Question 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 the 'washed over' Green Belt from those areas not covered by a formal allocation?**

We agree that the Green Belt boundary should be amended to reflect HS2 and other growth, however we disagree with the proposed amendment around Park Lane. We have identified a suggested Green Belt boundary shown in the Context Plan, which we consider presents a more logical boundary based on the committed infrastructure development around Park Lane, and the proposed allocation at Lavender Hall Farm to the east. HS2 will ultimately provide a new defensible boundary to Balsall Common and our Client's site falls within this boundary, therefore ensuring there will be no encroachment into the open countryside.

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

Any proposals for our Client's land will comprise a landscape-led masterplan and will enhance Green Infrastructure and linkages to the wider countryside.

**Question 39: Are there any red sites omitted which you believe should be included; if so which one(s) and why?**


As above, if re-assessed on the basis of the matters above, our Client's site should be included as a 'green' site when considered for employment use.

**Conclusion**

We have significant concerns with the amount of employment land in the draft Plan, particularly in terms of Balsall Common. Given the level of housing growth that is proposed around the settlement, this will only serve to exacerbate unsustainable out-commuting and the associated environmental issues that go alongside this. A more balanced approach to housing and employment is needed, and our Client's site south of Park Lane is a suitable location to meet this employment need in a later phase of the draft Plan (i.e. after 2025/6). The site is located within close proximity to an existing large labour pool, which will be further increased as part of the planned future growth in the area, and the site is within walking distance of Berkswell Station. HS2 presents an excellent opportunity in terms of creating a new defensible boundary to the north of Balsall Common. In addition, HS2 will deliver new road infrastructure providing excellent access to the site, including an upgraded Park Lane and a new roundabout with the A452. This new infrastructure will remain after HS2 is constructed. Given the need for employment land and the lack of non-Green Belt land to address this, we consider that this opportunity should be taken now to ensure there is a joined-up approach to infrastructure and growth between HS2 and the draft Plan.

We would welcome the opportunity to discuss these matters further and would be grateful if you could consider our comments in reassessing our Client's site for employment. If you have any queries regarding the above, please do not hesitate to contact James Bonner or me.

Yours faithfully

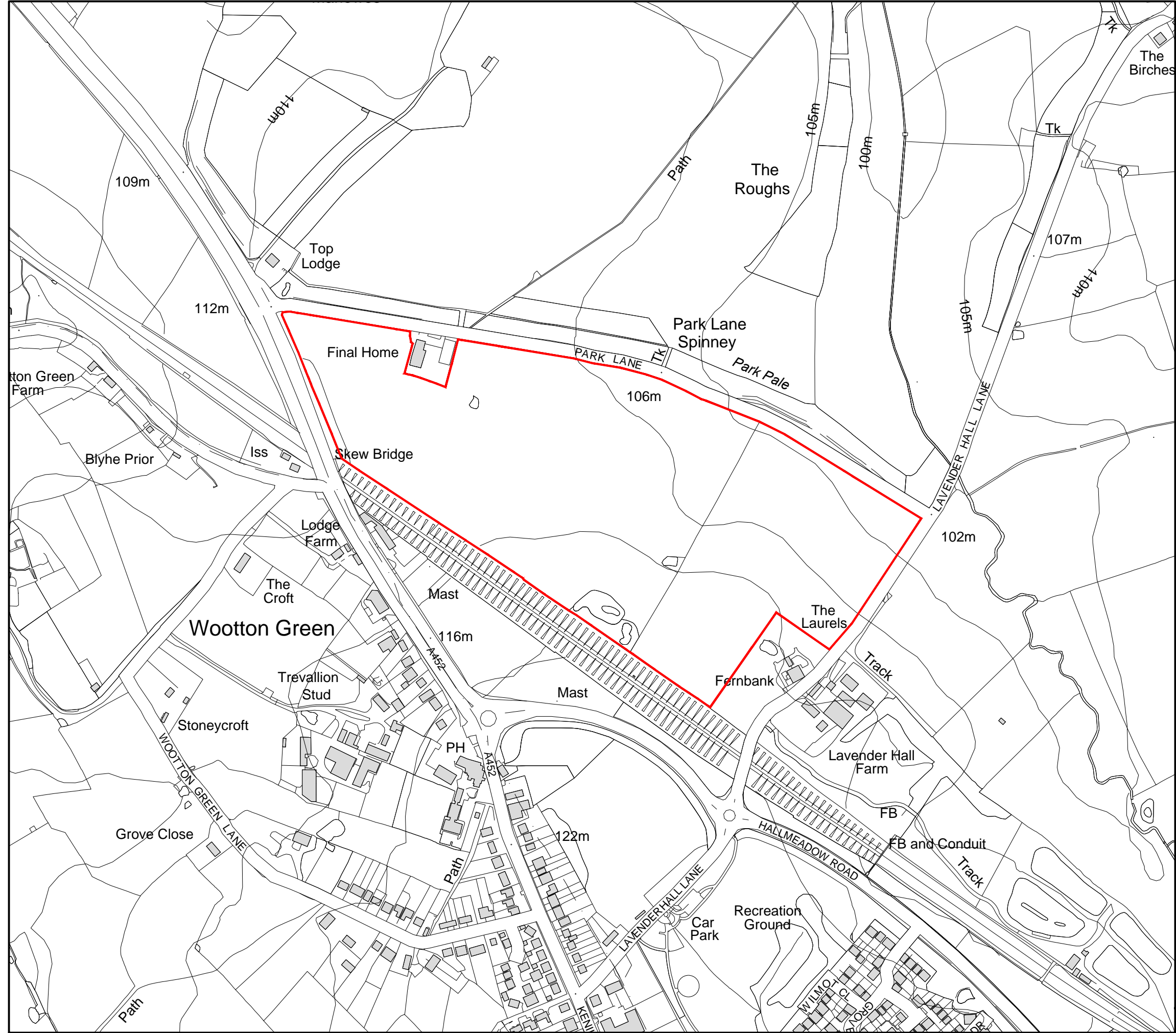


**MARK SITCH**  
Senior Partner

The scaling of this drawing cannot be assured

Revision \_\_\_\_\_ Date \_\_\_\_\_ Drn \_\_\_\_\_ Ckd \_\_\_\_\_

Site Boundary



Project  
**Land at Park Lane,  
Balsall Common**  
Drawing Title  
**Site Location Plan**



Date	Scale	Drawn by	Check by
14.03.19	1:5,000@A3	M.S.	MXS
Project No	Drawing No	Revision	
30292	BM-M-01	-	



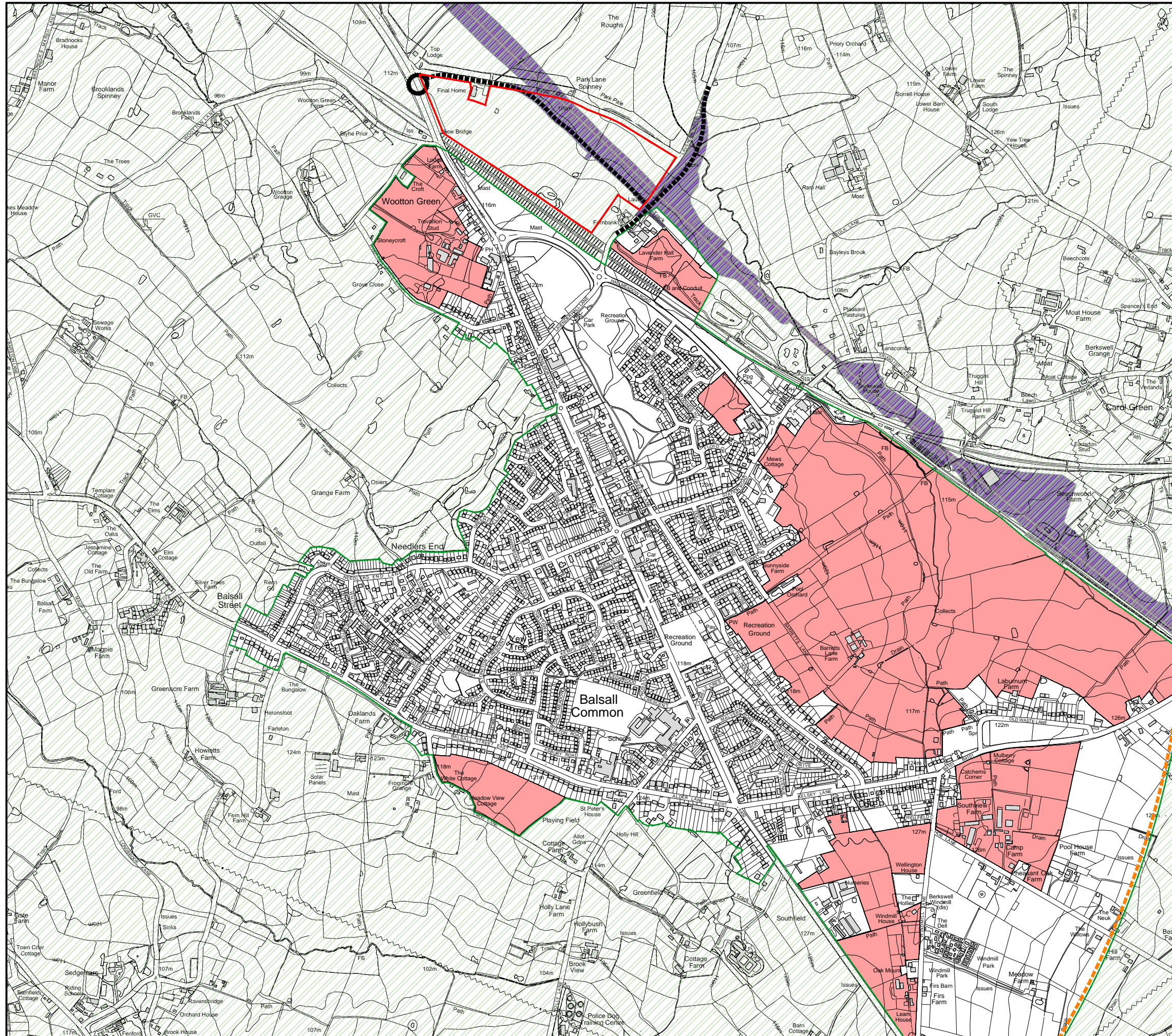
Planning • Master Planning & Urban Design • Architecture •  
Landscape Planning & Design • Environmental Planning • Graphic  
Communication • Public Engagement • Development Economics

bartonwillmore.co.uk



The scaling of this drawing cannot be assured

Revision \_\_\_\_\_ Date \_\_\_\_\_ Drn \_\_\_\_\_ Ckd \_\_\_\_\_

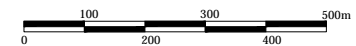


- Site Boundary
- Draft Housing Allocations (Regulation 18)
- Green Belt Boundary Proposed by Council (Regulation 18)
- HS2
- Proposed Haul Road
- Proposed Roundabout
- Alignment of Balsall Common bypass to be established. Land inside of bypass proposed to be removed from the Green Belt as part of the Local Plan Review

Project  
**Land at Park Lane,  
 Balsall Common**  
 Drawing Title  
**Context Plan**



Date	Scale	Drawn by	Check by
15.03.19	1:12,500@A3	M.S.	MXS
Project No	Drawing No		Revision
30292	BM-M-02		-



**BARTON  
 WILLMORE**

Planning • Master Planning & Urban Design • Architecture •  
 Landscape Planning & Design • Environmental Planning • Graphic  
 Communication • Public Engagement • Development Economics

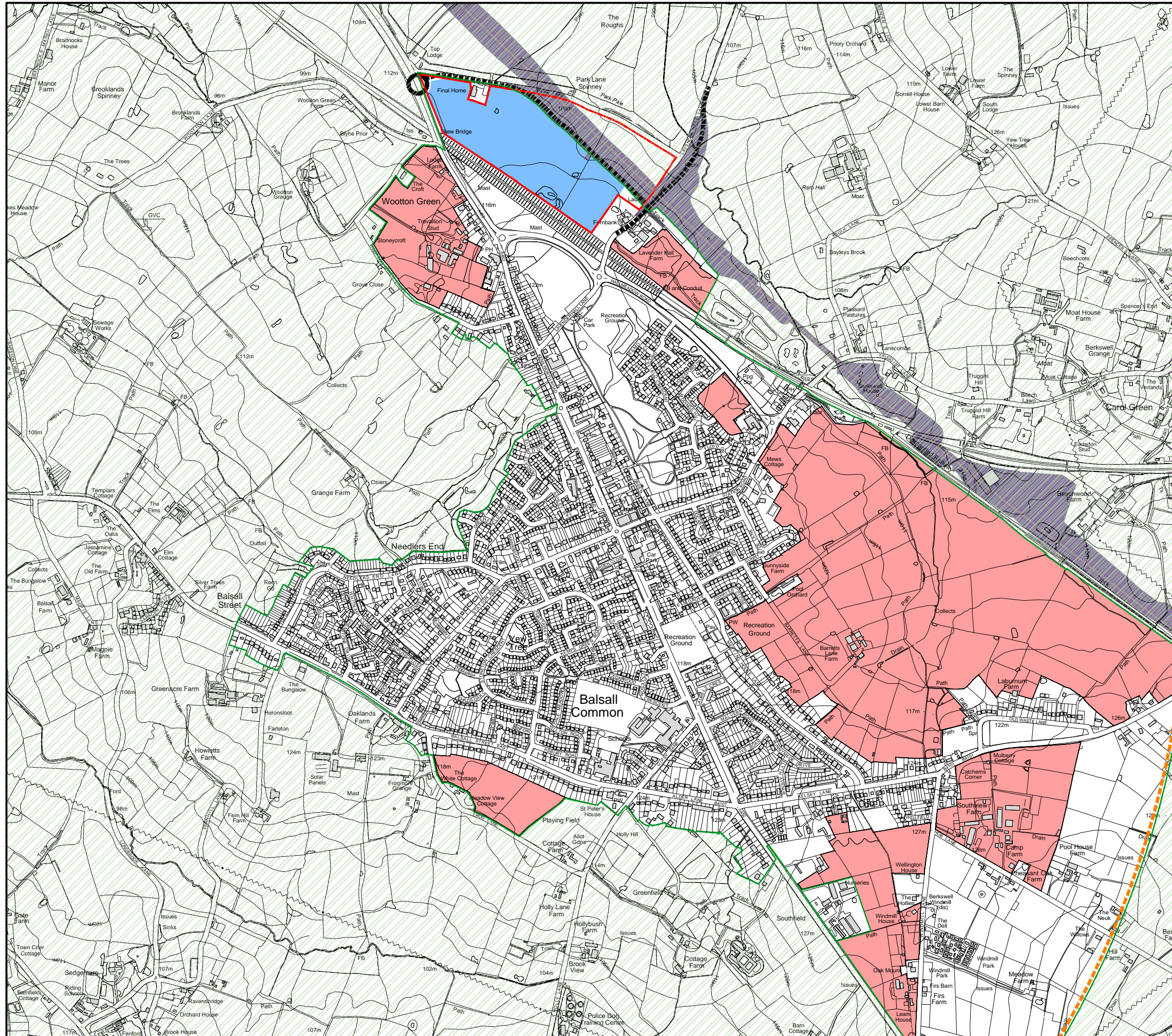
bartonwillmore.co.uk



Offices at Birmingham Bristol Cambridge Cardiff Ebbw Vale Edinburgh  
 Glasgow Leeds London Manchester Newcastle Reading Southampton

The scaling of this drawing cannot be assured

Revision \_\_\_\_\_ Date \_\_\_\_\_ Drn \_\_\_\_\_ Ckd \_\_\_\_\_



- Site Boundary
- Proposed Commercial Area
- Draft Housing Allocations (Regulation 18)
- Green Belt Boundary Amendment Proposed by Rainier
- HS2
- Proposed Haul Road
- Proposed Roundabout
- Alignment of Balsall Common bypass to be established. Land inside of bypass proposed to be removed from the Green Belt as part of the Local Plan Review

Project  
**Land at Park Lane, Balsall Common**  
 Drawing Title  
**Key Development Principles Plan**



Date	Scale	Drawn by	Check by
18.03.19	1:12,500@A3	M.S.	MXS
Project No	Drawing No	Revision	
30292	BM-M-03	A	



**BARTON WILLMORE**

Planning • Master Planning & Urban Design • Architecture •  
 Landscape Planning & Design • Environmental Planning • Graphic  
 Communication • Public Engagement • Development Economics

bartonwillmore.co.uk



Offices at Birmingham Bristol Cambridge Cardiff Ebbw Vale Edinburgh  
 Glasgow Leeds London Manchester Newcastle Reading Southampton