

Solihull Local Plan Review, Response to Supplementary Consultation

March 2019

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As an architect who has worked principally for residential developers since 1973, and having had offices in Balsall Common for over 12 years, I feel very strongly that insufficient thought has been put into forming the proposals for this Village.

I do appreciate that without an agreed number of dwellings to be incorporated into the new Local Plan it is very difficult to plan with any degree of certainty. It would certainly have helped if the figure for Solihull's contribution to the City of Birmingham's shortfall could have been agreed first. I have discussed my thoughts with both Richard Cobb and David Deanshaw, both of whom have provided me with copies of their responses, and I respect their professional views and knowledge of both the potential problems and potential. There is much to be gained from development in the right places, and I agree with their views.

I am restricting my comments to the Balsall Parish, Meriden Ward, as I have been involved with advising on sites 82, 421, 422, and some parcels of 233, and my involvement has been in the belief that the west side of Balsall Common appears to me to be the area to expand into.

With the onset of infrastructure work on HS2 on the east side, the present proposals for the distribution of sites for new housing will make much of Balsall Common's road network difficult to negotiate in future. With the inevitable interruptions that will be caused by construction traffic, limiting housing development to the west and restricting construction access to approaching from the north, would result in most of the Village being spared.

Having looked at most of the site appraisals, I find it difficult to see how some of the Site Selection Steps have resulted in land being listed as suitable to be included as Green in Step 2, when their score in Step 1 was 5 or more, and their Sustainability Appraisal more negative than positive. The final difficulty I have is understanding references to 'no defensible boundary' when parcels of land with which I am familiar do have clearly marked boundaries.

Commenting in turn on the sites in which I have an interest;

Site Reference 233

If the west side of the Village is to be considered favourably for expansion, then this site of 65.67 hectares, SHELAA Capacity estimated at 1,537 dwellings, or a large portion of it, would be well suited. As David Deanshaw points out, large scale development within this area could also locate a new Primary School and other much needed facilities. Its sustainability Appraisal has only one more negative point than positive, and defensible green belt boundaries could be incorporated into the design in the form of drainage swales or bunds. Its Green Belt Assessment is 'only moderately performing' so no better than parcels of land on the east side of the Village, most of which are equally distant from the economic assets.

In forming these views, I am mindful of the ratings given to other Sites within the appraisals, and would draw your attention to the following.

Site Reference 1

0.72 hectares, 21 dwellings, Step 1 rating 5. Despite the Commentary including 'Given it's limited size and existing constraints, may more suitably come forward is wider alterations to the Green Belt boundary are pursued.' it has been rated as Green in the Site Selection Step 2.

Site Reference 9

3.83 hectares, 63 dwellings,. Despite it's proximity to the existing railway line to the south west, and to the future HS2 to the north east, and one of the most dangerous access locations possible with the railway bridge, road alignment and levels, together with a high performing Green Belt Assessment, it has achieved a Step 1 rating of 3. It is brown field, but also has more negative than positive effects noted in the Sustainability Appraisal.; and yet it rates Step 2 Green.

While Site 170 has overall low access, is high performing (12) Green Belt Assessment, and has 3 positive (1 significant)/ 8 neutral/ 6 negative (2 significant) effects it somehow rates Step 1 as a 3, and with a commentary including 'given it's detached location and the lack of clear, firm Green Belt boundaries could only be considered as part of a larger site, it is rated Step 2 as Green.

Site Reference 320 (which includes 170 above includes in it's Commentary 'settlement is identified for significant growth and could be considered subject to provision of clear, firm Green Belt boundaries'. Despite this, it is rated Step 1, a 3, and Step 2 Green.

Site reference 47, 0.39 hectares, 5 dwellings, has 4 positive, 7 neutral and 6 negative (1 significant) in it's Sustainability Appraisal, and is rated Step 1 as a 5. However, even with the Commentary including '6 negative of which only the distance to key economic assets is significant' and 'this site could be considered as part of a larger site, it has been rated as Step 2 as a Green.

Site Reference 60, 1.72 hectares, 40 dwellings, despite 'moderately performing with combined score of 7 in it's Green Belt Assessment, and 5 positive (1 significant)/ 6 neutral/ and 6 negative effects in it's Sustainability Appraisal, it was rated Step 1 as only a 6. In the Commentary it includes 'would result in an indefensible boundary', but concludes 'given it's limited size and the lack of clear, firm Green Belt boundaries could be considered as a part of a larger site' and this results in a Step 2 rating of Green.

My final example is Site Reference 101, 1.64 hectares, 40 dwellings, is described variously as low access, low (4) Green Belt, 3 positive (1 significant)/ 8 neutral/ 6 negative (2 significant) effects in it's sustainability appraisal, and given a Step 1 rating of 7. the Commentary then includes 'site is within moderately performing parcel in the Green Belt although it is too small and poorly related in isolation. Site has low level of accessibility, Incorrectly quotes '5 positive and 6 negative effects, and concludes that 'Given the settlement is identified for significant growth, site may more suitably come forward if wider alterations to the Green Belt are pursued'.

Some sites appear to be turned down because they have no defensible boundaries, when others are accepted if suitable boundaries are provided, others are excluded because they are isolated, while more are included because they could become attached to larger parcels of land

Site Reference 82

This 1.85 hectare site, SHELAA Capacity 47 dwellings, like Site 233, is also rated Selection Step 1 as a 6, and Step 2 as R for Red. There is an error in the stated commentary compared with the positive and negative effects from the Sustainability Appraisal, which ought to improve it's Step 1 figure, while the only significant negative is the distance to jobs. As the site is within 500 metres of the Village Centre, new jobs there, or as both David Deanshaw and Richard Cobb point out, if the more northerly land parcels were considered for employment development, job opportunities would be much closer to hand.

Again we have the description 'site would have no defensible green belt boundary', but this does not appear to be accurate. The north east boundary abuts the rear of Kenilworth Road properties, the south east abuts an area of adopted Public Open Space, while the south west, and half the north west boundaries abut woodland in other ownership. The remaining short length of boundary abuts a broad hedge with established trees, the other side of which is a public footpath along an established farm drive.

Even if Site 233 does not go forward, Site 82 would stand alone, and provide variety in the size of sites being included in the Plan, in accordance with the requirements of the NPPF. For these reasons I feel strongly that this site should be upgraded to Green.

Site Reference 421

This 0.44 hectare site, SHELAA Capacity 16 dwellings, like sites 233 and 82 is also rated Step 1 a 6, and Step 2 Red. If site 233 is to be brought forward (or Site 198, the southern and western element of 233) it abuts the south eastern and north eastern boundaries of Site 421. So, just as other small, isolated parcels have been rated as Green because they abut larger parcels that in future may be considered favourably, then so too should Site 421. The remaining portion of 'no defensible green belt boundary', the short boundary facing north west, is a well established agricultural field hedge, which is no less defensible than many other green belt boundaries.

Site Reference 422

This 0.77 hectare, SHELAA Capacity 25 dwellings, has not had the benefit of a Sustainability Appraisal. However, with a Step 1 rating of 5, it is one better than the aforementioned parcels. Once again the site is described as 'too small and would have no defensible green belt boundary', but the Commentary goes on to say 'although it may be suitable for consideration as a Windfall site'. If this is likely, then surely the site should be Step 2 Green, or at least Amber, and the Green Belt Boundary moved to surround the land.

As the Green Belt currently runs half way across the lawns of several properties, the current boundary can hardly be described as 'defensible'. While the Green Belt Assessment includes 'lower performing parcel (RP61) overall with a combined score of 5', although surrounded by agricultural land, the Green belt parcels within Site 422 are private areas extending from domestic gardens. Some may have been in agriculture many years ago, but not for 70 years or more. Together with parcels at the rear of 3 houses off Fernhill Lane which are entirely in the Green Belt, it would certainly make sense to include this within the Plan if sites 233 is brought forward, but with houses to the north and east, and Greenacre farm complex a short distance south, this site is not isolated. It would stand including in the Plan as another smaller site to provide the mix of site sizes expressed in the NPPF

I refer to these example sites not because I wish to see them downgraded, but to draw to your attention to what appear to be large differences in the weight attached to some of the criteria, and believing that if the sites in which I have an interest were weighted in the same way, they would succeed in being included.

Thank you for giving me the opportunity to comment upon the Draft Proposals, and I hope that you will look closely at the way in which the sites have been rated and review the Plan accordingly.

C P Fellows