

SOLIHULL DRAFT LOCAL PLAN – SUPPLEMENTARY CONSULTATION 03/2019

Representations from:-

MARTIN TRENTHAM, [REDACTED]
[REDACTED]

Q1 NO

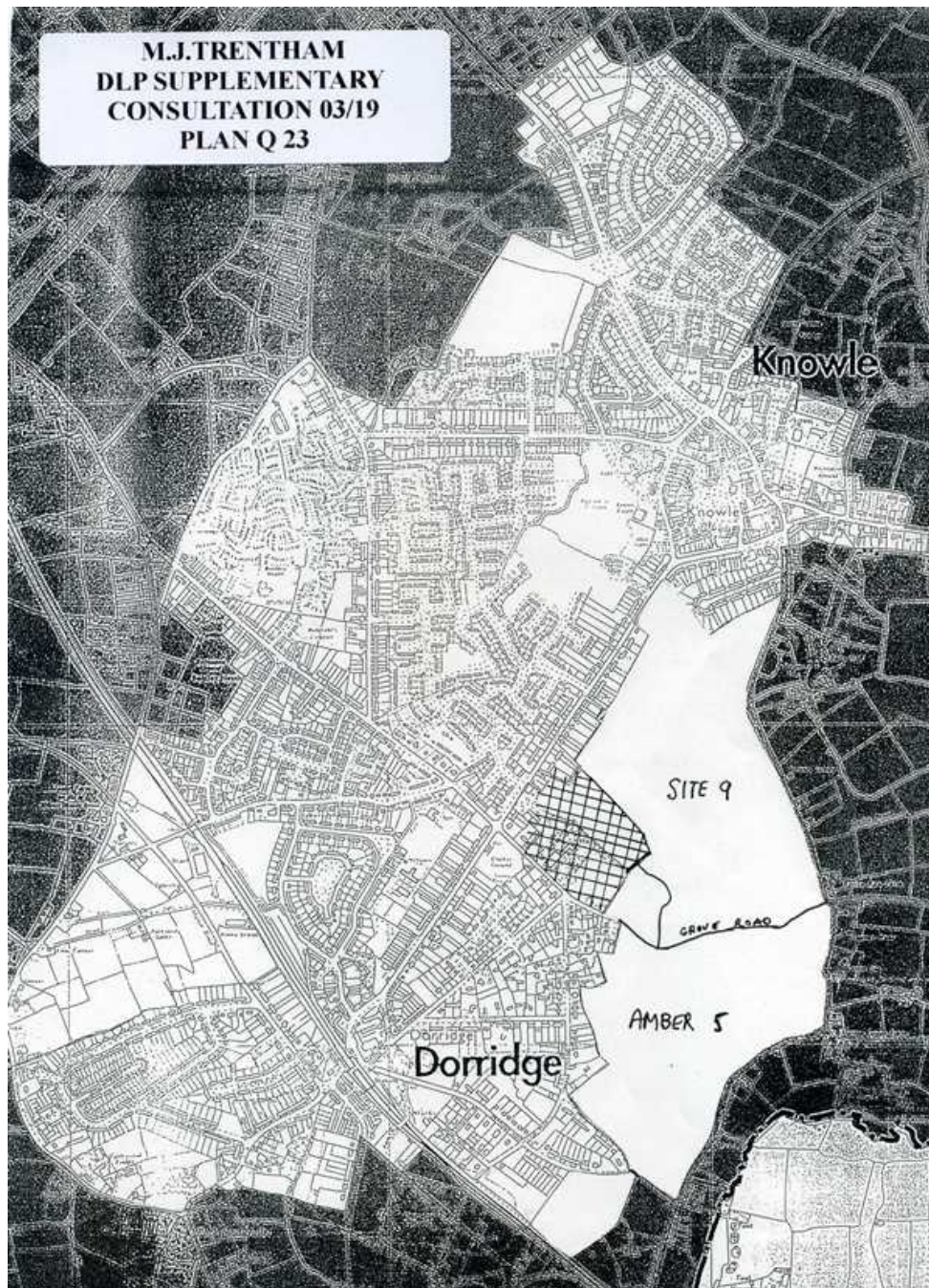
Q2 – Q21 No Comment

Q22 Ref. para 225:- There is nothing at all specific here, but there are local concerns about traffic congestion through Knowle High Street. In order to alleviate this, a sensible move would be to create a new two-lane one-way system going clockwise via High Street, Station Road, and Lodge Road. Wilsons Road could be stopped up at its junction with High Street, with no parking in Kenilworth Road by the church, in order to allow free movement both ways. (Replacement parking could be provided in Wilsons Road). Traffic entering Knowle from Kenilworth Road would then go past the church, before turning left opposite the Red Lion. Southbound traffic would continue along High Street, in two lanes, whereas northbound traffic would go left into Station Road at the green, to proceed northwards via Lodge Road & Warwick Road. Traffic entering from Hampton Road would have to turn left into High Street, so that junction would be far more free-flowing, although traffic from Lodge Road heading to Hampton would still have to cross Warwick Road, unless diverted via Arden Vale Road, which would be sensible. On-street parking in Lodge Road would have to be stopped. This is a much less expensive solution than the abandoned Knowle By-pass scheme.

In this way there would be no traffic from Station Road, or Warwick Road south, including from the new Arden Triangle development, going through the High Street, unless heading for Hampton or Kenilworth. With the new roundabout proposed at Rotten Row, together with improvements to Grove Road, northbound traffic from Chadwick End & Warwick would have a choice as to which route to follow into Solihull, i.e. Widney Manor Road, or Warwick Road. Traffic from Purnell's Way area, Dorridge, and Bentley Heath heading south would go via Grove Road on to Warwick Road via the Rotten Row roundabout.

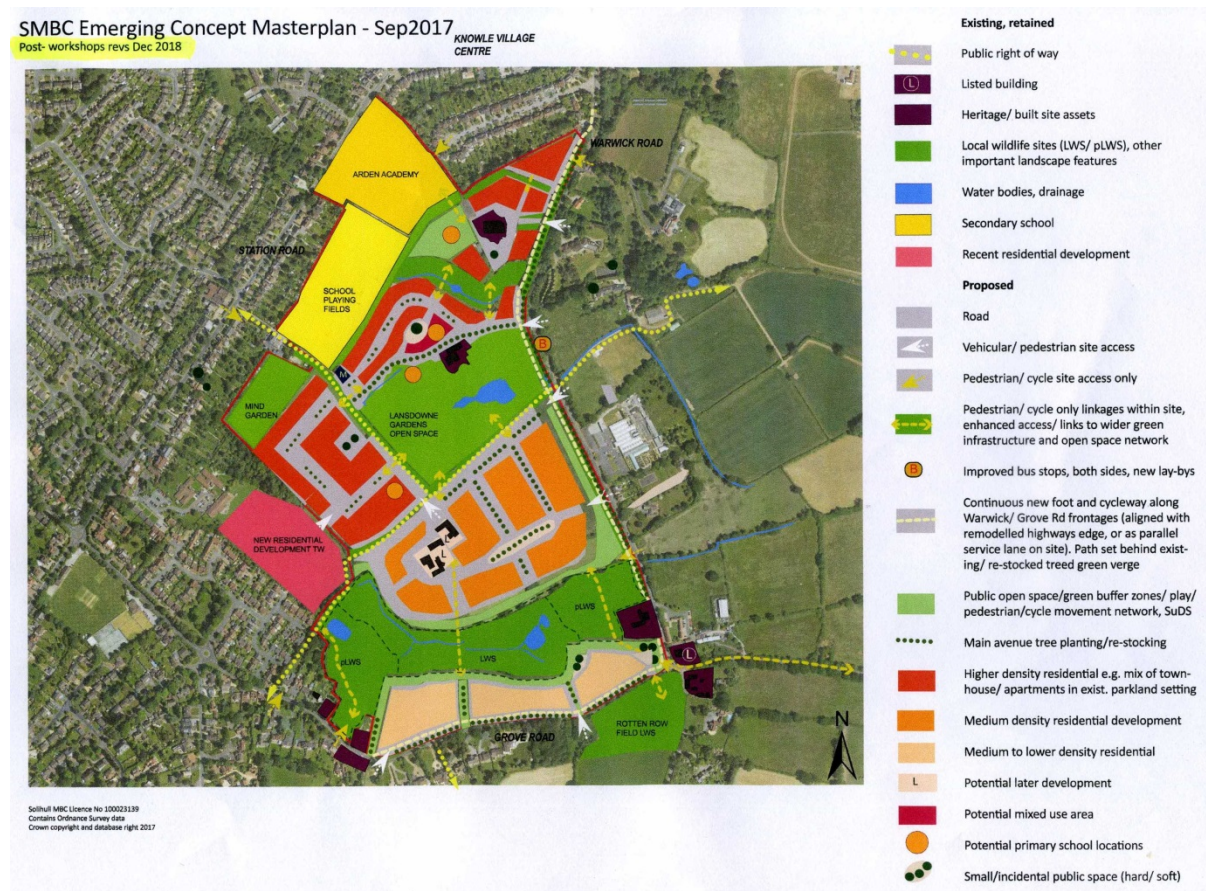
Ref. para 227:- It is acknowledged that a new primary school will be required, funded by s106 agreements with all developers of new sites in Knowle, in fair shares. I note however that the site of St. George & St. Theresa primary school is included in the housing land supply. Clearly, as stated in 225, there is already pressure on primary school places, so it is essential that the R.C. Church – the richest organisation in the world - demonstrates that it has bought a suitable site, and built a replacement school, before the existing site could be considered to be deliverable. This new site should be shown in the new Submission Draft Local Plan, or the existing site deleted from the list of sites, as it is not yet available for development.

Q23 NO Without going into too much detail, my opinion is that Site 8 is too much of an intrusion into the pleasant area of Green Belt between Knowle and Hampton. On their own, the Football Club site is ok, and the old Thacker's nursery site, but the further extension of housing and the proposed new football complex all along Hampton Road right down to the canal would create a whole new urbanised area out into the countryside. I feel that Amber Site A5 would be a far better place to put the 300 houses, being close to Dorridge and the station and, blending in with Site 9, provides a real rounding-off of the combined settlements, with a defensible boundary along Warwick Road & Norton Green Lane. See Plan Q23 below.



Q24 YES I wholly support the allocation of Site 9. I have been involved in the Master-planning process as one of the landowners and we have been assiduous in assisting the Council through a series of workshops over the last two years, together with a large financial investment in demonstrating, through numerous surveys – bats, newts, trees, landscape, etc., etc., that our land is both suitable and deliverable. In addition we shall be providing, via s106 agreements, a new roundabout at Rotten Row, with improvements to Grove Road, a 7 acre public park and LWS, together with other open space around the site, amounting to substantial community benefits. Of course we shall be contributing to the construction cost of the proposed new primary school, elsewhere within the Arden Triangle, plus substantial CIL.

The two draft Masterplans provided are out of date and therefore misleading. Also the Developer Proposal plan for Arden Academy is from about 2 years ago, and was rejected by Council officers as non-policy-compliant. The Landscape Assessment shows the almost-completed Taylor Wimpey development, and the field to the east of it hatched as ‘Notable habitats’ which they are not (except perhaps for the owners of the new TW homes!) I respectfully suggest that comments from respondents to this consultation upon the details of these two plans, based on out of date information, should be considered with care and weighted accordingly, or even struck out altogether. Furthermore I take issue with calling them Option 1 and Option 2, because 2 is at this stage not a proceedable option. Really it should be labelled an unproven and therefore as-yet undeliverable aspiration. Option 1 should therefore be the only Masterplan for Site 9, and labelled as such, with “Option 1” deleted. However it should be the up to date version which was circulated to us in January, and subtitled “Post-workshops revs Dec 2018”. See below:-



Clearly Masterplans evolve over time, and we look forward to future workshops with continued evolution towards achieving the final version for insertion in the Submission Draft.

With reference to para 244, it is regrettable that Arden Academy has not yet demonstrated a financially viable scheme, thus preventing SMBC from making a decision on the relocation. It is acceptable to highlight the aspirations of Arden Academy in this non-statutory consultation, however it can not be assumed that it will be viable. There must come a time, before the Submission Draft is finalised, for a choice to be made. If by then the Council is satisfied and has given consent, then the relocation can be carried through and the default Masterplan updated. However if this matter is still in limbo at that time, it seems to me that the up to date default Masterplan must be the one that appears in the Submission Draft. I doubt that the Draft Plan could be ‘sound’ if two options were included without any certainty that Option 2 could actually happen. If it happens that the relocation becomes viable after adoption of the new Local Plan, and Site 9 has been removed from the Green Belt, there is nothing to stop the relocation being incorporated into the actual Development Masterplan. At present Masterplans are only broad concepts, and the stated purpose is to provide housing.

It is useful that no part of Lansdowne Farm is included in the Arden Academy proposals, so there can be certainty as to that part of the Masterplan that covers Lansdowne Farm and no changes would be required whether or not the relocation eventually happens.

With reference to para 235, I am surprised at the comment regarding “complex land assembly issues”. There are no land assembly issues, i.e. we know where the land is, and all the major landowners involved in the development are engaged. It seems clear that all the default Masterplan landowners will co-operate in producing the final Concept Masterplan, including reaching agreement regarding s106 commitments. The only fly in the ointment is the current state of flux regarding the relocation of Arden Academy, and it is clear to me that they must be pressed hard to either come up with a financially viable and policy compliant scheme, or stand back and let us get on with the default Masterplan.

I am not against the relocation of the Academy, however the default option is ‘Option 1’ and we must get on with it. IT IS VITAL TO REMEMBER THAT THE PURPOSE OF THIS LOCAL PLAN REVIEW IS TO PROVIDE ADDITIONAL LAND FOR HOUSING and the relocation of Arden Academy is NOT a requirement arising from that, but a private project which will become possible if Site 9 is removed from the Green Belt. The priority therefore is to achieve that, and continued wrangling about what Concept Masterplan appears in the Submission Draft should not be allowed to hold up the main purpose of the LPR.

Q25 – Q33 No comment

Q34 YES I welcome the Council's approach in para 376 to revise some parts of the Green Belt boundary to make it more logical, and to open up windfall development opportunities. I support the removal from Green Belt of the areas listed in para 378 together with those referred to in Q10 and Q21, and any others referred to in later chapters. It is highly desirable that Green Belt boundaries are logical, up to date, likely to be permanent, and where at all possible follow firm physical features, such as roads, rail lines, motorways, etc.

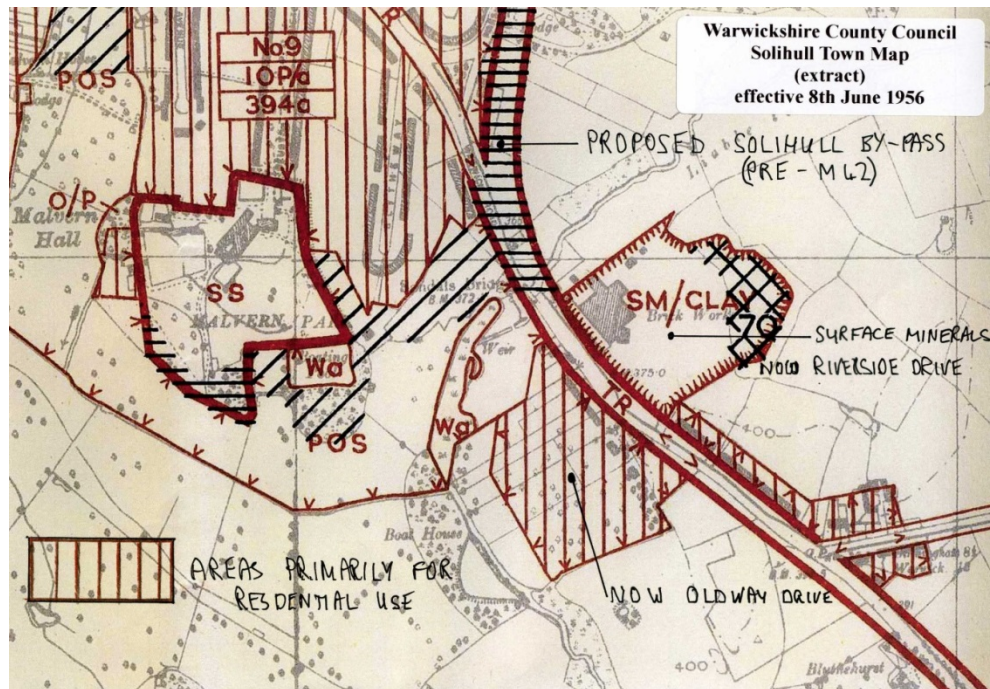
Q35 I disagree with para 380 that "settlements.... contribute to the openness of the Green Belt". It may be that the layout of a settlement precludes the establishment of a logical boundary around it, and that may be a reason for maintaining washed-over status. Otherwise settlements should not be washed over. Infilling could result over time in the sensible removal of the settlement from the washed-over area as proposed by the Council for those areas in para 378. This is also the case described in Q36 below.

Q36 YES The area which I refer to as the 'Oldway Drive Area' of concentrated residential development comprising Riverside Drive, Oldway Drive, Poolmeadow Close, Gentleshaw Lane, and Warwick Road. In all this contains just short of 200 dwellings, none of which is Affordable, and they do not contribute in any way to the openness of the Green Belt. The photo below shows the existing boundary to be deleted marked with red and the new boundary marked with white dashes.

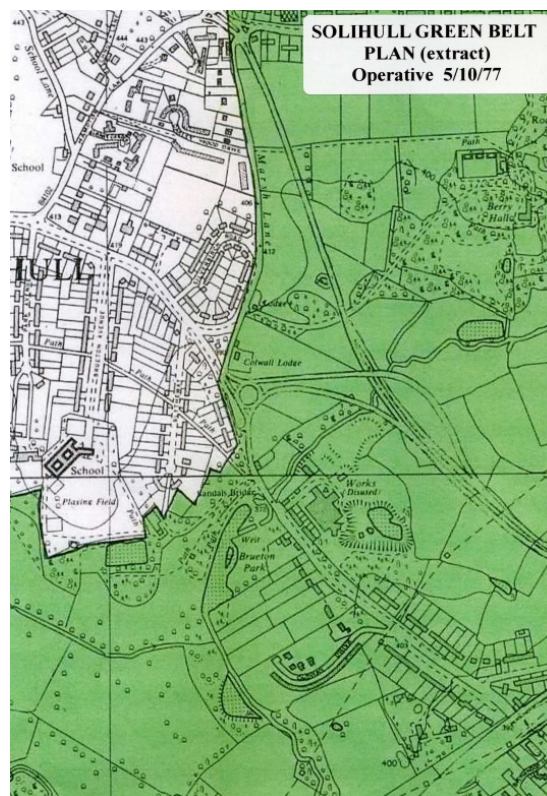
Sandwiched between the built up part and the By-pass is Site 107 Gentleshaw Lane and a substantial area of protected woodland (SSSI, LWS & TPO) around Riverside Drive flats. Due to the topography these are largely invisible to traffic on the By-pass, and are low-performing as Green Belt. **Peter Brett Associates** comment that 107 is "a well contained greenfield site in close proximity to the motorway junction, which could round off the settlement". They put it in Category 2, with a yield of 150 dwellings, of which 60 would be much-needed Affordables, on a bus route and within walking/cycling distance of Marie Curie Hospital, Solihull Hospital, and the town centre, providing ideal accessible housing for key workers.



In 1956 Warwickshire County Council administered Solihull, and they produced a County Development Plan. It can be seen from the extract below that what was to become Oldway Drive was already zoned for residential development.



The Solihull Brickworks area was still zoned for surface minerals, and the original route identified for the proposed Solihull By-pass – an obvious choice for the Green Belt boundary on the first Green Belt plan which appeared in 1960, but which for various reasons was not fully adopted until 5th October 1977, although retaining the 1960 boundaries. See below:-



The extract above from the 1977 plan shows the beginnings of Oldway Drive, plus new development along the south west side of Warwick Road, and Pool Meadow House, which was not envisaged in 1956-60. It also notes that the brickworks had become disused. From that time onwards, and despite Green Belt status, development continued apace, with a change of use for the brickworks brown field site to accommodate the 88 dwellings in Riverside Drive, and with the completion of Oldway Drive and further infilling there and around Pool Meadow House, which continued through the 1980s and '90s.

Thus today we have a concentrated area of development which has grown from c50 dwellings in 1960 to c200, comparable in size and density with Millisons Wood, which the Council has itself put forward for removal of washed-over status – Q.E.D.

Other significant factors which affect the Oldway Drive Area have been the release, to the immediate north, of the Marsh Lane housing site in the mid- 1990s and more recently still the release of the Marie Curie site. The choice of the By-pass as the new GB boundary is of course consistent with the 1956 proposal. These factors have caused a substantially changed locational context, against which to view the Oldway Drive Area.

This Consultation is the first published opportunity to consider the removal of washed-over areas from the Green Belt, other than as development sites. I submit therefore that because the Oldway Drive Area and environs are substantially different from what they were when the original Green Belt boundary was drawn up in 1960, that the developed area covered has grown to such an extent and density that, together with the need for a fresh batch of Green Belt sites required to be released for development in this Review, an objective review of its washed-over status, in the exact terms of para 376, is both timely and appropriate.

Site 107 has been promoted and assessed on previous occasions, but only as a stand-alone removal from the Green Belt. It has therefore suffered rejection because it would appear on the GB map as an island in a sea of green which of itself promotes the superficial **illusion** of a wide belt of openness between Solihull and Knowle. Now that the NPPF and SMBC recognise the principle of removal of washed over built up areas which ought not to be washed over, Site 107 can be reassessed as part of a wider and completely logical extension of the main built up area, and its history should not be held against it. The previous extensions at Marsh Lane, and the Marie Curie Hospital, have already recognised the soundness and permanence of Solihull By-pass as a Green Belt boundary. This, together with M42 is confirmed by **Atkins** in their July 2016 Solihull Strategic Green Belt Assessment, reference RP31 – Purpose 1 “Refined Parcel RP31 boundaries to the west and south are **clearly defined by the A41 and M42 respectively and are therefore durable.**”

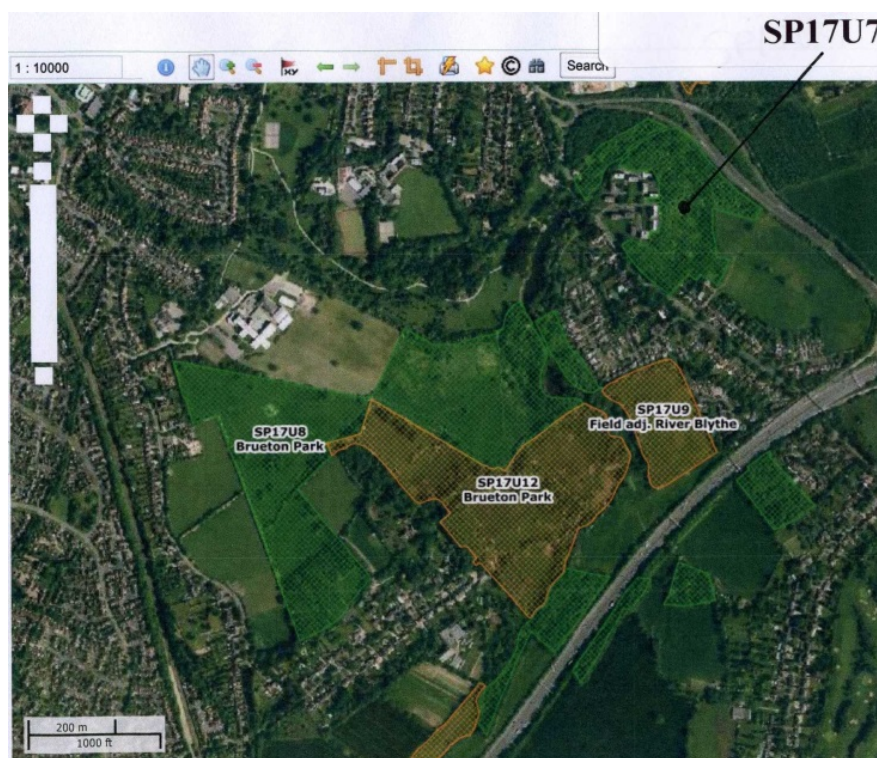
With further reference to **Atkins** both the Oldway Drive Area and Widney Manor Road Area are within RP32. Their comment at p12 Purpose 2 (preventing neighbouring towns from merging into one another) “Parcels which are more moderately performing against purpose 2 include ...RP32”. The removal from RP32 of the two washed over built up areas will not decrease its scores against the four purposes, nor decrease the **actual** gap between Solihull and Knowle, as new housing on Site 107 will be generally to the north of, and further from Knowle than the existing properties in Gentleshaw Lane and Pool Meadow. So while the deletions will not increase the scores either, they will reinforce the basis of the scores.

These two deletions will introduce a consistent GB boundary treatment along the northern side of M42 from A45 in the north all the way to A34 in the south. See plan below for the natural boundaries of the proposed removal of washed-over status. The solid white line is the existing Green Belt Boundary, and the dotted lines show the proposed new replacement

boundaries of the proposed Oldway Drive Area, and the Widney Manor Road Area put forward by the Council in para 378. Boundary deletions marked in red.



The proposed Widney Manor Road boundary excludes all of the built development fronting the road, plus the Sixth Form College. For the Oldway Drive Area the eastern and southern boundaries are obviously the By-pass and M42. The western boundary commences on Warwick Road at the entrance to Brueton Park then skirting all of the built development down to M42. This boundary is reinforced not only by Brueton Park, but by the River Blythe, and Local Wildlife Sites which cover most of the remaining area of revised RP32. SP17U7 will increase the overall area of green space within the main built up area.



Q37 No comment

Q38 YES – comments as follow:-

A1-A3 No comment

A4 I believe this is an unwarranted projection into a highly scoring area of the Green Belt, which does not round-off the settlement in any way. There are many far less damaging sites available and this one should be changed to Red. If anything this area should be considered for the replacement football ground, rather than the prominent and visually intrusive area north of Site 8.

A5 I refer to my previous comments in relation to Q23 and Plan Q23 above. This site is better in most respects than Site 8 and should be considered as a substitute, and included as Amber. My opinion is entirely objective as I have no financial or other interest in this site.

A6 No comment

A7 Please see my comments in response to Q34 and Q36 above. The Widney Manor Road area, with boundaries as shown on Plan Q36 above, should be removed from the Green Belt thus making A7 redundant, as development Site 134 should then become Green.

Q39 YES Please see my comments above in response to Q36. I recommend that the proposed Oldway Drive Area, with boundaries as shown on Plan Q36 above, be removed from the Green Belt as part of the review of washed over areas, and therefore that Site 107 - Land at Gentleshaw Lane - be changed from Red to Green. Site 107 has never before been assessed as part of a wider area, already containing c200 dwellings, to be removed from the Green Belt.

Q40 – Q43 NO I understand that there are already viability problems on some developments related to the affordable housing requirement. It seems that the Council is deliberately seeking to increase such problems by being too greedy. It is in my view entirely unreasonable to expect that affordable (i.e. subsidised) housing should be of the same size or standard as market housing. The current method of measuring the requirement as a straight percentage of unit numbers is simple and effective. The idea of going by area measurement is surely going to make the whole process much more complicated and difficult to manage. It would likely involve surveyors armed with tape measures going round all the dwellings on a development to ensure that developers are sticking to the rule. KEEP IT SIMPLE.

The Council would also do well to consider that such rules might produce exactly the opposite result from that intended, i.e. that, rather than building more small market homes, developers will build fewer but larger affordable dwellings, in order to preserve the profitability of the development. In such a case you may well end up with fewer than 40% by number. Another effect of being over-generous with affordables is that the occupiers will have no incentive to move out and acquire market housing of their own, even when they become financially able to buy, so more and more affordables will be required.

Q44 With reference to para 51, I understand that other LPAs in the HMA have already rejected the offer of 2000. It would be prudent to allocate sufficient extra sites in this Plan Review to provide additional capacity, to ensure that the Plan is sound, and there is no repeat of what happened last time.