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SOLIHULL LOCAL PLAN REVIEW

RESPONSE TO SUPPLEMENTARY CONSULTATION

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These Comments are made on behalf of myself and for individual sites on behalf of site owners who I represent.

Q1 Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so, what are the exceptional circumstances and what should the alternative approach be?

The methodology is imposed at national level and using the 2014 based figures probably produces a higher figure than the latest projections (2016) indicate are necessary. This is a matter that the Council should continue to press the government on bearing in mind that it has potentially significant consequences for the loss of highly performing green belt, the protection of which is also a government priority.

The methodology seemingly produces an annual rate of house building for the Borough of 885 dwellings per year, allowing for only a 2000 house contribution to the HMA shortfall.

It is understood that the Council have yet to reach agreement with any of the adjoining Councils in terms of its contribution to the HMA shortfall, and unless the Council make additional provision in their Local Plan it is likely that the Council will not be able to fulfil its duty to cooperate. Consequently the Local Plan may well fall at the first hurdle at the EIA. As a result considerably more housing land will need to be allocated from the Green Belt, possibly up to a further 2000 housing units to total 4000 dwellings as a contribution to the HMA.

The rate of delivery suggested in the Draft is far above the highest rate that has been achieved in the Borough in any one year apart from in 2005 which was a year leading up to the height of the boom.

It is double the average rate of delivery over the last 10 years and it is above the cap that would apply if the calculation related solely to Solihull's housing need.

It is inconceivable that such a high rate of delivery can be sustained as an average over the life of the Local Plan, not least because the house building industry does not have the resources to deliver such a rate even if planning permissions were quickly forthcoming. Further it does not take account of any likely downturn in the economic cycle which is likely in the next 12 months with or without the addition of the Brexit factor.

Therefore, if the 2016 based projection is used this would reduce the dpa for Solihull's need to 550 (taken from the GL Hearn Report) which would be a more realistic and deliverable figure, but again that has an implication of the amount of land being allocated in the Plan.

It is also very likely that some of the sites will not be capable of delivery because of ownership and infrastructure issues. Nor has the Council made any attempt to allocate smaller sites, and is still relying on a handful of larger sites which are unlikely to deliver the housing numbers required or even the infrastructure necessary if that has to wait to the end of the development period for such large sites.

The Council has continually failed properly to consider the wider components of growth, they have concentrated on housing to the almost entire omission of areas for employment such as in Balsall Common and Knowle as well as Dickens Heath. In all such communities new housing is proposed but all the additional residents as well as the existing will have to commute out of those settlements on an unimproved transport network to Birmingham or Coventry. No provision is made to try to encourage employment sustainability in those communities.

Nor have the wider implications of growth been considered such as additional shopping and parking, as well as an improved primary road links to get vehicle through congested local centres.

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

No.

There are significant inconsistencies in the application of the methodology which undermine the integrity of the whole site selection process. The analysis of sustainability does not meet the standards as set out in the NPPF2 Para. 3.32.

The Council should consider reviewing their Sustainability Appraisal in line with the criteria as set out in the Government's sustainability scorecard, see:- www.thescorecard.org.uk For example, when this analysis was applied to Site 4 at Dickens Heath, this site only scored a 30% sustainability rating which would have put it in the red not green category. Just looking beyond that example there are other sites that are inconsistent with Option G of the Spatial Strategy.

It is not possible to understand how some of the sites fall into the green category, “they have no or relatively low impact on relevant considerations; or that severe impacts can be mitigated,” when they clearly do have high impact. Again, if an updated sustainability scoring was produced in line with recent Government Policy, the results on site selection would be different. Without this, the credibility and robustness of the process is undermined.

It is also noted that the assessment excludes a number of smaller sites from the Sustainability Appraisal. The Strategy continues to focus only on large scale Green Belt releases which is not consistent with government advice in the NPPF that a mix of sites should be encouraged. Some of the smaller sites should be reassessed to see if they could contribute to housing growth in a more sensitive way which has less overall impact on the Green Belt and on local character and are more readily deliverable.

The Council's Vision for the Borough as set out is largely supportable but there are some missed opportunities for smaller scale developments and some of the amber and red sites to come forward in other lesser performing Green Belt locations, which would assist the Council in reducing its reliance on windfall permissions. It would also assist in its visionary aim of ensuring that centres such as Knowle remain strong, vibrant places to live. We also consider that provision should be made for employment for existing and proposed residents in Dickens Heath, Balsall Common and Knowle. The Council has reduced the available employment land at Blythe Valley Park as well as The Green, Shirley by reallocating business land for residential.

Q 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?

Before proceeding to allocate housing sites the LPA should look more widely at the individual settlement, how it functions and what problems currently exist. It is also important to appreciate the extent of major construction work taking place around Balsall Common with HS2 and the proposed northern/eastern Balsall Common by pass as well as proposals for the A46/A452 link road.

The current Local Plan housing proposals indicate most development on the eastern side of Balsall Common with many sites being built up to the proposed by pass and HS2. The Local Plan ignores potential sites on the western side of the village where major landholdings such as Grange Farm with additional smaller sites around it could be developed between the A452 Kenilworth Road and Balsall Street East. That could provide a southern/western link road for the village and help relieve additional traffic in the area.

In addition, the projected numbers of dwellings suggests that there would be pressure on two primary schools. A review of the impact of circa 1750 dwellings would suggest, by using the usual calculation (1000 dwellings = 800 pupils of school age.) This calculates to be 1400 pupils. If this number is stretched over 12 year groups it amounts to close on 120 per year group.

In addition to provision of primary schools other components of growth appear to have been ignored. There is no additional provision for employment land in or on the

periphery of Balsall Common, and a consequence of that is that most if not all residents of the new housing will need to commute out of Balsall Common to Coventry, Solihull or Birmingham. There will be no work opportunities in the community. Business development could be allocated along the side of HS2 and the by pass as well as sites outside the village such as at New Mercote Farm on the Kenilworth Road, north of the Village which has been promoted under the Call for Sites for employment use.

Additionally provision should be made in one of the larger sites for a large food-based store with other shops and facilities and parking to relieve pressure on the congested village centre.

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

No.

See above - This site is adjacent to both HS2 and the new by pass and both of those should be developed first before any new housing is allocated for the site.

Q 6. Do you believe that Site 3 Windmill Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No. The proposal to allocate Site 3, in Balsall Common, as part of the Local Plan perpetuates a poor strategic decision, it being too far from the centre. Although there are many reasons why the site is unsustainable, there is a significant ecological impact the development of this site. The Green Infrastructure map Habitat Distinctiveness 2016 shows that this is an area of High Habitat distinctiveness, where development should be avoided (see p4 of the Ecological Assessment).

However, these have not been fully respected when cross referenced to p23 of the master plans, particularly with regards to the 30m buffer around woodland. As such, although there is no doubt as to the high impact the site would have on biodiversity (p24), Solihull Council's proposed solution would appear to be focussed around offsetting rather than preserving these precious habitats. There are other smaller sites that have a higher sustainability scoring and a lesser ecological value than Site 3. Site 3 should therefore be deleted from the proposed housing allocation

Q 8 Do you believe that Site 22 Trevallion Stud should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

I have already submitted the property called Stoneycroft as additional housing land within the A452/Wootton Green Lane quadrant so the overall release of Trevallion Stud appears acceptable but even more so if land to the south at Grange Farm as well as north of Dengate Drive were also to be released as a large allocation west of Balsall Common. This would allow for proper provision for a large primary school and better centre for a large food store with parking and perhaps a western bypass or link road to pick up traffic.

Q 9 Do you believe that Site 23 Lavender Hall Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No – This site should be allocated for business use not residential. It is close to the centre but sandwiched between two train lines with HS2 to the north and In either case the narrow railway bridge which would need to be improved.

Q 12 Do you believe that Site 4 Land west of Dickens Heath should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No.

The Draft Local Plan Supplementary Consultation includes a proposed housing site allocation on land west of Dickens Heath, between Birchy Leasowes Lane to the south, Tilehouse Lane to the west, the Stratford-upon-Avon Canal to the north, and to the east Ancient Woodland and the privately-owned residential road Birchy Close. The revised proposal for the whole of Site 4 is for a development of 350 dwellings.

Further to our response submitted in December 2017, we are submitting further information and points on planning policy. They are on both the principle of the Site 4 allocation and the SMBC Illustrative Emerging Concept Masterplan.

Dickens Heath has experienced considerable development until recently and cannot take much more development. More development is happening at Tidbury Green following recent Appeals. Just because there is a nearby railway station is not enough to justify further major development of Dickens Heath. Every other planning factor points to the unsuitability of Site 4 for development. The cumulative adverse effect of the range of evidence set out above make Site 4 contrary to a range of local and national planning policies. This Site should be demoted to a “red” site.

Q 18 Do you believe that Site 24 Oak Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No problem with redevelopment of the brownfield part of the Farm being allocated for residential subject to careful treatment of the frontage to the canal. But it would be disastrous for the remainder of the site being developed so urbanising the entrance to Catherine de Barnes from the East. The protection of that green edge to the village is critical for the protection of the rest of the Green Belt.

Q 22 Do you agree with the infrastructure requirements identified for Knowle, Dorridge & Bentley Heath, if not why not; or do you believe there are any other matters that should be included?

The principal concerns with development in the KDBH area is firstly that the Arden Triangle development is likely to generate considerable additional traffic that will give rise to additional movements through Knowle High Street and Warwick Road. The deletion of the Knowle Bypass in an earlier iteration of the Local Plan/UDP was short-sighted and it should be restored on its previous line and built to cater for the new traffic generated in the plan. Site 125 which was the old by pass route for Knowle

should not be released for housing but should be retained as an option route for a revived by pass.

The centre of both Knowle and Dorridge are already congested at times with little spare parking capacity both for shopping and in general. Additionally Dorridge Station also has very little spare parking capacity.

No provision is made for any employment development in the area and like Balsall Common occupiers of new houses will have to commute out of the community to go to work, adding further to the traffic and parking issues.

The proposal for KDBH lack a robust sustainability assessment which if done properly would identify these issues and probably influence the release of land for housing both in terms of location and scale.

Q 24 Do you believe that Site 9 land south of Knowle should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

Proposed development of land should have been subject property sustainability studies especially in respect of traffic and employment. Most traffic from site will need to travel to the north and west and road system at present will not be able to cope. Additionally employment opportunities should be provided by allocation of land for business purposes.

Q 26. Do you believe that Site 16 east of Solihull should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site

Site should be extended east to Catherine de Barnes to allow for more growth in the Solihull central area. The development of further and would have no significant impact on the wider Meriden Gap beyond Catherine de Barnes to the east. Most of the land is poorly performing Green Belt with sports pitches etc and additional residential development should be allowed on such land including the Red Star Sport Ground - Site 412 which is not adequate in size for a proper sports facility.

Q 27 Do you believe that Site 17 Moat Lane/Vulcan Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

The relocation of the old Council Depot to a site more central in the M42 Gateway area would be sensible, but the remaining Boulton Road/Vulcan Road business uses are an employment asset which is irreplaceable. No provision is made in the Plan for relocating those uses and there must be a question mark therefore whether that site can be delivered.

Q 35 Should the washed over status of these settlements/areas remain? If not why not?

The settlements of Barston, Bickenhill and Berkswell should remain as washed over Green Belt if there is no proposal to release land for housing.

The settlement of Chadwick End which has a distinct north and south parts should be taken out of the Green Belt and a settlement boundary should be drawn around it

recognise the extent of opportunities for potential infilling development and safeguard the intervening land between the two parts.

Q37 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.

Page | 7

Country Parks should be created in the Green Belt.

Country Park A should be formed on the site of the former allocation 13 South Shirley as mitigation for loss of Green Belt in the Blythe area.

Country Park B should be created on the land between the Solihull Bypass and Ravenshaw Lane formed of the old Berry Hall Estate as mitigation for the loss of Green Belt around Solihull

Country Park C should be created formed adjoining Balsall Common as mitigation for the loss of Green Belt around that settlement.

Q 38. Do you have any comments on these amber sites, i.e. is it right they should be omitted, or do you believe they should be included, if so why?

Golden End Farm, Kenilworth Road, Knowle (ref A4 or site 59 in the call for sites/SHELAA) should be omitted.

While the site is located a short distance to the east of the centre of Knowle and may be in an accessible location, it falls within a Green Belt parcel that scores very highly (overall score 11) and would result in the village encroaching via a projection into the open countryside to the east without any form of 'rounding off' that would be achieved by development elsewhere in the same parcel that forms part of DLP site 8. Apart from an access from Kenilworth Road, Kixley Lane is a narrow road diminishing in width at its far end.

Overall the release of the site for housing would destroy the important approach to Knowle from the east when entering from open countryside.

A combination of other smaller sites around the KDBH community could achieve 250 dwellings in a less destructive way and be better integrated into the community.

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

Site 82 - Land north of Dengate Drive, Balsall Common.

Site is within moderately performing parcel in the Green Belt Assessment, but would not result in an indefensible boundaries. Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change and is deliverable, subject to some constraints. The SA identifies 5 positive and 5 negative effects, although only the distance to jobs is a significant negative. Settlement identified as suitable for significant expansion, and site would have defensible green belt boundary to the south at Dengate Drive, a woodland to the west and track to the north. This site should be elevated to amber if not green, and considered for release in conjunction with Grange Farm or at a later date.

Site 244 - Land at Tilehouse Green – Copt Heath Golf Course

The site is located immediately adjacent to the built up area of Knowle and straddles the Green Belt boundary around the settlement. The southern half of the site is located within the settlement outside the Green Belt and the northern half is situated in the Green Belt, in a lower performing parcel. Whilst there are no permanent physical features that would easily define a new boundary, the site is well-contained and there appears to be strong field boundaries. The site has few constraints and represents a logical 'rounding off' to this part of the settlement. The golf course to the north and west would prevent further expansion into the countryside. The site has a medium level of accessibility and is in an area with medium landscape character sensitivity. This site should be elevated to amber if not green

Site 238 - Redwoods Wootton Green Lane

Disagree with Site Assessment - Site is within moderately performing parcel in the Green Belt Assessment, is small and would round off development on south side of Wootton Green Lane. Site has a medium level of accessibility, is in an area of high visual sensitivity with capacity for change having regard to Trevallion Stud etc on the north side. The SA identifies 5 positive and 6 negative effects. Settlement is identified for significant growth, and site would have defensible green belt boundary.

Site 142 and 233 - Grange Farm, Balsall Common

Site is within moderately performing parcel in the Green Belt Assessment, and would result in a defensible boundary to north and west particularly if a link road were proposed to take traffic across to the A452 from Balsall Street. Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change and is deliverable. The SA identifies 6 positive and 7 negative effects. Settlement identified as suitable for significant expansion, and site could have a defensible green belt boundary. Better to develop on the west side of Balsall Common than the east side with adequate space to develop new centre – see earlier comments..

Site 86 - Land at Old Station Road Hampton in Arden

Site is recognised as brownfield land on the Register and within a lower performing parcel in the Green Belt Assessment, but site is not isolated with existing development to the south and west which would result in a defensible boundary. The site has a medium level of accessibility, is within an area of medium landscape sensitivity with low capacity for change, and is suitable for development. The site should be elevated to amber if not green.

Site 83 - Land at Catherine de Barnes

Site assessment is incorrect. Land is clearly shown outside of Green Belt on previous proposal maps, but site assessment puts it into the Green Belt without justification. Site is bounded by Canal and common land to the north, both defensible boundaries.

Site should be elevated to green or amber.

Site 422 - Land at Rose Bank, Balsall Street

Site is within moderately performing parcel in the Green Belt Assessment, although it is small but would result boundaries to the south and west which are as defensible as many other sites identified for release. Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change and is deliverable. Balsall Common is identified as suitable for significant expansion, the site is noted as being suitable for consideration as a windfall site, and should be elevated to green or amber.

Site 92 - New Mercote Farm Kenilworth Road

Having regards to the previous comments on the need for more employment land in Balsall Common, this site was promoted for that purpose. Site is well contained by the road and rail corridor, and is no more or less isolated from the settlement than other sites being released to the south of the village centre. Site has a good level of accessibility, is in an area of high visual sensitivity with capacity for change. Balsall Common is identified as suitable for significant expansion, and this site would provide a high profile business site for employment in the expanding settlement. Site should be elevated to green or amber.

Site 91 - Home Farm Berkswell

Site is within highly performing parcel in the Green Belt Assessment, would result in defensible boundaries, and is a natural extension to the existing business park providing local employment ion the local rural community. Site has good level of accessibility, and Balsall Common is identified as suitable for significant expansion. In the absence of the Council providing no new employment sites this site expands on an existing provision. Site should be elevated to green or amber.