



**Consultation response on behalf of Roconn
Strategic Land to the Solihull Draft Local Plan
Review Supplementary Consultation 2019**

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Consultation response on behalf of Rosconn Strategic Land to the Solihull Local Plan Review Draft Local Plan Supplementary Consultation January 2019

This is the response of Rosconn Strategic Land to the supplementary consultation by Solihull Council on the Solihull Draft Local Plan January 2019. The purpose of the response is to comment the draft Plan and promote three sites for inclusion as housing allocations within the plan. The response is by question order.

The 3 sites are:

Land at Three Maypoles Farm Shirley

Land at r/o 2214 Stratford Road Hockley Heath

Land adj 161 Lugtrout Lane Solihull

The responses on the three sites to the Solihull Draft Local Plan 2016 consultation are attached and which highlight the reasons why the sites should be allocations within the Local Plan.

This document should also be read in conjunction with the Ecology Report and Heritage Assessment in relation to land adj to 161 Lugtrout Lane, Solihull.

Your attention is also drawn to the attached Masterplan for land r/o 2214 Stratford Road Hockley Heath.

Notwithstanding that this is an informal consultation we consider that the document should be accompanied by an up to date SA.

Local Housing Need

1. Do you believe 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?

Would accept, in principle, that there are no exceptional circumstances. This position may change depending on the results of the Government consultation. Whilst the document does not seek comments about unmet need, the close economic and geographical relationships between Solihull and Birmingham it is inevitable that a greater share of the unmet need from BCC should be accommodated within Solihull.

Site Selection Methodology

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

Basic elements of the Methodology acceptable and workable however elements of the process are flawed, over complicated and confused. Little if any improvement on methodology in Solihull Draft Local Plan 2016. More specifically:

- a) Non-compliant with Government policy NPPF on strong defensible Green Belt boundaries. The refinement criteria at bullet point 5 in each column refers to “sites that would use or create a strong and defensible boundary to define the extent of land to be removed from the Green Belt”. National Green Belt policy at Paragraph 139 states that “when defining Green Belt Boundaries plans should..... (f) Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. There is no reference to creating boundaries which as well as being contrary to national policy would act against the spirit of planning.
- b) Lack of consistency throughout the site assessments particularly when comparing sites in the same location.

- c) Site assessments incomplete in some instances. e.g. Site Ref 122 land at south of Dog Kennel lane (commentary), Site Ref 176 land at west of Dickens Heath (commentary).
- d) Site selection process, hierarchy and refinement criteria becoming overcomplicated.
- e) Flawed judgements or lack of sound reasons why some sites allocated, rejected and others de-allocated.
- f) No advantage in creating and labelling sites yellow, blue and subsequently amber. This merely creates an unnecessary stage in the methodology adding to confusion and unnecessary complexity. Delete this element of the methodology and either allocate the amber sites or reject them as proposed allocations

Balsall Common

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 which should be included?

Notwithstanding the fact that it is entirely appropriate for Balsall Common to accept housing development as part of this Plan, under the proposals identified within this SDLP 2019 Supplementary Consultation Balsall Common will become a major settlement within Solihull Borough. The proposed amendment to the Green Belt boundary on the eastern side of Balsall Common will have significant implications for development over and above the allocations proposed. Lifting Green Belt restrictions on land will put considerable pressures for development and the future growth of Balsall Common with insufficient consideration on how this will be dealt with within this supplementary consultation, including infrastructure provision.

The lack of employment proposals within Balsall Common will exacerbate the settlements commuter image and fly in the face of sustainability credential Solihull may wish to exhibit.

4-9 Do you believe that sites 1, 2, 3, 21, 22, 23. Should be included as allocated sites, if not why not; Do you have any comments on the draft concept masterplans for the sites?

General points on the housing allocations:

Paragraph 101 of the SDLP 2019 supplementary consultation highlights clearly the concerns that relate to some of the proposed allocations in Balsall Common. It states:

- a) “Some of the sites, in particular Barratt’s Farm, have multiple and potential complex land assembly issues. It is important that sites such as this are considered in a comprehensive manner to avoid piecemeal developments occurring”.
- b) “This needn’t necessarily preclude a phased approach where one parcel of land or part of a site may be available for development in advance of another, but this should be in accordance with an approach agreed by the Council and all relevant landowners/development promoters”.
- c) “Before being finally included in the plan, it will be necessary for the varied land interests to demonstrate to the Council that they are prepared to work on a collaborative and comprehensive basis to ensure a quality development is possible and can be satisfactorily delivered. This will include joint responsibility for the provision of infrastructure”. This latter point will also be relevant to other sites around the village which also need to ensure they contribute towards the provision of the required infrastructure.

The above points raise legitimate doubts about the likelihood of comprehensive development of some of the proposed allocations particularly when complex land assembly issues are highlighted and where approaches need to be agreed by the Council and all relevant landowners and the fact that before being finally included in the plan it will be necessary for the varied land interests to demonstrate they can work collaboratively and comprehensively together.

This inevitably raises doubts about sites coming forward within the Plan period, if at all. This is particularly relevant with the Barratt's farm proposed allocation and adjoining land within the proposed eastern Green Belt boundary particularly where land has not even been promoted for development.

4. Site 1 Barratt's Farm – The above comments regarding land assembly are particularly relevant to this proposed allocation. There is also no certainty over the provision of HS2 and the Balsall Common By-pass and as such there must be doubts over the provision of a firm eastern Green Belt boundary, without which and it is acknowledged within the site assessment that the site would result in an indefensible Green Belt boundary.

Some of the site is within the highest performing parcel in the Green Belt Assessment but not referenced in the site assessment.

5. Site 2 Frog Lane – no comments
6. Site 3 Windmill Lane – The above comments regarding land assembly are relevant to this proposed allocation. Although endeavouring to provide a firm and defensible Green Belt boundary the site becomes increasingly remote from the settlement in accessibility terms and produces a somewhat

contrived, insensitive and illogical addition to Balsall Common which could result in a visually unattractive entrance into the settlement from the South.

7. Site 21 Pheasant Oak Farm – The above comments regarding land assembly are particularly relevant to this proposed allocation. Acknowledged within the site assessment document as:
- a) “..... part high (*highest*) performing parcel in the Green Belt Assessment and would result in an indefensible Green Belt boundary to the east.
 - b) “Site has a low level of accessibility.....” and
 - c) “Could be considered subject to provision of clear firm green belt boundaries”.
 - d) “Development should preferably be on land that is more highly accessible, and/or performs least well in Green Belt terms and/or provides strong defensible boundaries”.

Again this allocation is heavily reliant on the building of a bypass and the assembly of land outside the site allocation. Hardly glowing commentary for an allocation.

8. Site 22 Trevallion Stud – The above comments regarding land assembly are particularly relevant to this proposed allocation. Firm and defensible green belt boundaries would only be created when considered in a comprehensive manner which cannot be assured.

The site is also identified as having high visual sensitivity in the Landscape Character assessment and from an assessment on site it is clearly evident that the land extends into open countryside impacting considerably on the openness of the Green Belt at this point.

9. Site 23 Lavender Hall Farm – The site assessment would not immediately suggest this site was suitable for allocation. It lies within the highest performing Green Belt Parcel, the landscape character assessment identifies that the site has high visual sensitivity. If HS2 is built the site would lie in a narrow belt between two highly used railway lines, hardly an ideal situation for residential development. The site would also lie outside the suggested firm and defensible Green Belt boundary east of Balsall Common and at odds with the implied development intentions to the east of Balsall Common. Also being contaminated land its viability would come into question.

It is difficult to understand why this site is proposed to be allocated within the Plan

10. Do you have any comments 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

The proposed amendment to the Green Belt boundary on the eastern side of Balsall Common will have significant implications for development over and above the allocations proposed. Lifting Green Belt restrictions on land will put considerable pressures for development and the future growth of Balsall Common and its elevation in settlement hierarchy within the Borough with insufficient consideration on how this will be dealt with within this supplementary consultation.

Also, part of the proposed allocation sites and those areas not allocated for development lie within the highest performing area within the Green Belt Assessment.

Blythe

Response to sites in Blythe should be read in conjunction with the response to the consultation on the Solihull Draft Local Plan (SDLP) 2016 Three Maypoles Farm Dickens Heath Road Site Ref 340 .

In general, the proposed allocations fail to fulfil the intentions for the future of the area (Blythe), particularly in retaining the distinctive character of the settlements and avoiding coalescence.

The proposals fail to live up to the intentions of Paragraph 131 of the supplementary document in respect of settlement identity and ensuring coalescence is avoided through sensitive development.

11. Infrastructure Requirements

No objection in principle on infrastructure however, the current lack of traffic assessments make it difficult to adequately assess what highway improvements are necessary and impact on the choice of sites and site alternatives.

12. Do you believe that site 4 land west of Dickens Heath Road should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

The supplementary consultation confirms the distinct nature of the villages in Blythe set within and separated by attractive countryside and Green Belt giving the villages a sense of remoteness. In particular Dickens Heath is described as a modern multi award winning village guided by an architect led

masterplan. It goes on to say that significant new development at Dickens Heath will add vibrancy and vitality whilst retaining the intrinsic character of a distinctive village separated by open countryside.

The proposed allocation at Site 4 does not conform to any of the statements above or the more detailed statement in the supplementary consultation itself. Development here would result in the coalescence of Dickens Heath with Whitlocks End and Majors Green and identified as such in the Green Belt Assessment scoring and the site assessment document. The landscape character assessment also highlights the site as highly visually sensitive.

The intrinsic character of the multi award winning Dickens Heath was developed over time through concept planning, Public Local Inquiries and extensive masterplanning and maintained through, Architect, Developer, Resident and LA Working Parties. This would be lost through an ill-thought out addition to the west of the village having no relationship with the original concept or masterplan. Hardly sensitive treatment to an award winning settlement

This is particularly emphasised by the illustrative masterplan which makes no reference to how it would complement or enhance the village of Dickens Heath and even goes on to say that “Further work is needed to identify links from the new development to Dickens Heath Village Centre”. In other words no thought has been given to this process and appears somewhat of an afterthought.

Site 4 in point of fact has been dismissed as an allocation at a number of Public Local Inquiries over many years since the Solihull Local Plan has been

reviewed and the concept of Dickens Heath new village emerged in the early 1990s

It is somewhat ironic to suggest the impact that development of site 13 would have had on Dickens Heath and how important it is to keep a gap between any urban extension and Dickens Heath when the impact of site 4 would be considerably more devastating and coalescence with Dickens Heath, Whitlocks End and Majors Green would be the result.

Irrespective of what the Site Assessment commentary suggests (which is incomplete) there is coalescence and the perception anyway would be coalescence.

There is no identified sites local or otherwise for the necessary relocation of Sports pitches.

There is concern and no evidence has been provided for the impact of development on the highway system, particularly the route to Shirley on narrow and winding roads and junctions.

There has been no contextual thought in the process of proposing site 4 as an allocation.

13. Do you believe that site 11 The Green should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

Identified as an employment site in the Solihull local Plan 2013 and a mixed use site in the SDLP 2016. Would support a mixed use allocation but recent planning decisions would appear to negate this suggestion.

There is conflict with the employment policy within the SDLP 2016 and the future balance between employment and housing in the Borough. No indication as to where the B1 uses on site would relocate to.

14. Do you believe that site 12 south of Dog Kennel Lane should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

Although accepting the Council's Strategy of urban expansion this site raises concerns over compliance with government policy and the Council's own methodology and site selection process which includes using planning judgement to refine selection.

On Green Belt grounds and Landscape Character assessment concerns are expressed over the proposed development.

Government policy states that ".....the essential characteristics of Green Belts are their openness and their permanence." The land to the south of Shirley opposite Dog Kennel Lane (site 12) clearly exhibits such openness which is further enhanced by the land gently sloping towards Cheswick Green and clearly demonstrated when viewed from Dog Kennel Lane looking south towards Cheswick Green. Open vistas southwards are clearly evident from Dog Kennel Lane. This is further compounded by the Council's site selection assessment which also identifies the site as lying within a landscape character

area of high sensitivity. Development here would extend built development out into open countryside

Government policy also states at Paragraph 139:

“When defining Green belt boundaries plans should:

(f) define boundaries clearly using physical features that are readily recognisable and likely to be permanent”.

In the SDLP 2019 Supplementary consultation the proposed approach to Blythe states at Paragraph 144:

“Given that the opportunities to develop on previously developed land in Blythe are extremely limited, Green Belt release will be required and a redefined Green Belt boundary will need to be established. In accordance with national planning policy, such boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent”. The document then goes on to say at paragraph 154:

“Site 12 is within a parcel of moderately performing Green Belt, and given the existing field structure, does not have a clear contiguous defensible Green Belt boundary to the south. This will need to be provided by a strong edge to the proposed development e.g. a new road, which will demarcate the built-up area from the surrounding countryside and provide a meaningful gap with Cheswick Green”.

Conflicting statements and constructing a new road to form the Green Belt boundary does not conform to Government policy.

This then raises the issue that given the existing field structure, does not have a clear contiguous defensible Green Belt boundary to the south how in complying with national policy would coalesce with Cheswick Green be

prevented and what impact would there be on openness, developing out into open countryside and impact on landscape character.

15. Do you believe that site 26 Whitlocks End 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?

It is somewhat disappointing that cooperative work with the Council on preparing a workable masterplan for site 13 or a variation of the site has not been pursued with a preference for bringing forward site 26, a site which raises concerns.

Until the masterplan for site 26 is finalised and the areas designated as housing or public open space the issue of coalescence with Majors Green will remain irrespective of the railway line which lies in between and the comment that it will provide visual separation.

Until traffic surveys and analysis of the A34 and surrounding roads are completed and made public it is impossible to suggest, in terms of vehicular traffic movement, that Bills Lane/Haslucks Green Road would be/are any more or less congested than Dickens Heath Road. Dickens Heath Road, more recently upgraded, certainly provides a less onerous, less convoluted and safer route to the A34, the town centres of Shirley and Solihull, the M42 and beyond. Also, Bills Lane and Haslucks Green Road will have to deal with traffic from site 4 as well as its own. This would suggest the contrary is infact true.

Site 26 is no further away from Dickens Heath than site 13 (300m). Just as Public Open Space can be used to enhance the perception of the separation between Shirley and Dickens Heath. POS can also be used adjacent Dickens

Heath Road to ensure the perception of the gap between the urban area and the village is maintained and enhanced.

Of the complete land holding of Whitlocks End Farm (site Ref 41) this site (proposed allocation site 26) lies within the highly performing Green Belt parcel the remainder (former allocation site 13) lies within the moderately performing Green Belt.

Hampton in Arden Catherine de Barnes

16. Do you agree with the infrastructure requirements identified for Hampton in Arden, if not why not, or do you believe there are any other matters which should be included?

No objection in principle

17. Do you believe that site 6 Meriden Road should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

Land to the west of this site was allocated for housing in the 2013 Local plan on condition that the former ammunition depot was reclaimed for open space or if not available an alternative development solution delivering open space was forthcoming. This situation still exists and so calls into question the allocation. Also the viability of the site may be affected dependent on any potential contamination issues as a consequence of the former use of the site.

18. Do you believe that site 24 Oak 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?

No objection in principle

Hockley Heath

Response to sites in Hockley Heath should be read in conjunction with the response to the consultation on the Solihull Draft Local Plan (SDLP) 2016 Land off Stratford Road Hockley Heath Site Ref 121

19. Do you agree with the infrastructure requirements identified for Hockley Heath, if not why not: do you believe there are any other matters that should be included?

No objection in principle although consideration should be given to enable the provision of a doctors surgery.

20. Do you believe that site 25 land south of School Road should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

Firstly, it is noted and it is agreed that Hockley Heath should be a settlement where limited and proportionate development is accepted. New development will assist with the future viability and vitality of Hockley Heath

provided development is proportionate to the settlement and in the right location.

However, it is considered that the site on land off Stratford Road Hockley Heath submitted as part of the Solihull DLP 2016 consultation (site 121) is located in a more central location within the settlement and exhibits equal if not better credentials in respect of Green Belt, accessibility, landscape and deliverability than Site 25 Land off School Road Hockley Heath (see comments on omission sites).

21. Do you have any comments to make on potential changes to the Green Belt boundary north of School Road that would result in the removal of the washed over Green Belt from this ribbon development?

Should site 25 be allocated then there would be no objection to the run of development along School Road being removed from the Green Belt in the interest of consistency and in line with Paragraph 361 of the SDLP 2016.

Knowle, Dorridge & Bentley Heath

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

No objection in principle

23. Do you believe that site 8 Hampton Road should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

No objection in principle

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

No objection in principle

Solihull Town Centre & Mature Suburbs

25. Do you agree with the infrastructure requirements identified for Solihull and the Mature Suburbs if not why not: do you believe there are any other matters that should be included

No objection in principle

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

Response to the allocation at east of Solihull should be read in conjunction with the response to the consultation on the Solihull Draft Local Plan (SDLP) 2016 land adj 161 Lugtrout Lane (Site Ref 143)

No objection in principle. Site 16 has been modified following the SDLP 2016 consultation to include land north of Lugtrout Lane up to the Grand Union Canal. However, this revised site boundary north of Lugtrout Lane needs to

be clarified within the Masterplans document and the site assessment document such that both Site Ref 143 and 339 are confirmed within the allocation site and shown as green within the document (site Ref 143 appears as amber).

The SDLP 2019 supplementary document clearly confirms the new boundary and logically the additional land to be proposed for removal from the Green Belt should be from Damson Parkway up to the Grand Union Canal to the north to provide a firm defensible and logical Green Belt Boundary along with the inclusion of all of the land between Damson Parkway and the proposed eastern boundary of the site. This additional land has been promoted for development as part of the consultation process for the Solihull DLP 2016 Site Ref 143 and Site Ref 339

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

Potential conflict with employment Policy P3 on retention of employment land. Relocation of employment uses may be an option but to where within Solihull? No indication is given within the Plan of such an option. This calls into question the deliverability of the site.

28. Do you believe that site 18 Sharmans Cross Road should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

No objection in principle providing suitable relocation of sports facilities available. No commitment given to either deliverability or relocation. Playing pitches not in surplus in Solihull therefore development of the site uncertain.

Solihull Town Centre

Overall proposed housing capacity and the capacity within the Plan period considered to be unachievable within the pan period.

Meriden

29. Do you agree with the infrastructure requirements identified for Solihull and the Mature Suburbs if not why not: do you believe there are any other matters that should be included

No objection in principle

30. Do you believe that site 10 west of Meriden should be included as an allocated site, if not why not; Do you have any comments on the draft concept masterplan for the site?

Agree in principle

North Solihull, Marston Green & Castle Bromwich

31. No objection in principle

32. No objection in principle

33. No objection in principle

Green Belt

34. Should the washed over Green Belt status of these settlements/areas be removed and if so what should the new boundaries be? If not why do you think the washed over status of the settlement should remain.

Yes the washed over status of these settlements should be removed

35. Should the washed over status of these settlements/areas remain, if not why not

The washed over status of the settlements should remain.

36. Are there any other areas of the Borough where washed over status should be reviewed, if so which areas and why.

No comment at this time

37. Compensatory provision for land being removed from the Green Belt

No comment at this time

Omitted sites

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?

As already indicated in answer to the question on the methodology (Q2) there is no advantage in creating and labelling sites yellow, blue and

subsequently amber. This merely creates an unnecessary stage in the methodology adding to confusion and unnecessary complexity. Delete this element of the methodology and either allocate the amber sites or reject them. The sites would be commented on or not under omission sites in general.

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

Site 340 Three Maypoles Farm Dickens Heath Road

This response to the omission site must be read in conjunction with the original response to the Solihull Draft LP 2016 (Ref 340) and which is attached, which outlines in detail the quality the site exhibits in respect of its suitability as an allocation along with two adjoining land holdings (Site Refs 41 & 223) i.e. Site 13 within the Solihull Local Plan.

Part of Site Ref 340 lies within site 13 within the SDLP 2016. The original response to the consultation highlighted why land within site Ref 340 should be included within Site 13.

Following the original consultation and response the site (Ref 340) has been promoted along with the representatives of Site Ref 41 and in conjunction with the Council (Site Ref 223) as joint landowners of Site 13.

In response to the consultation on the Draft Local Plan many objections were received which is not unique in a process where sites are identified in a Local

Plan. The high level of objection received does not appear to have been repeated on other proposed allocations.

Site 13 is the only site from the list of proposed allocated sites from the SDLP 2016 which the Council have decided not to pursue. Rather than pursue site 13 the Council are pursuing an adjoining site 26.

In adding to the original response highlighted above (Ref 340), the following comments are now made based on considering the supplementary document SDLP 2019, any relevant new evidence e.g. Masterplans and site assessment document and addressing concerns raised and the decision not to pursue the site.

In pursuing site 26 instead of site 13 the Council in the supplementary SDLP 2019 at page 32 identified three advantages over the former site.

In response to the three suggested advantages the following comments are made:

- a) Similar to site 13, Site 26 also narrows the gap between the urban area and Dickens Heath an inevitability of the decision in the strategy to pursue urban extensions. Also, the perception of a gap along Dickens Heath Road which is of particular concern can be successfully master planned. Indeed the masterplan for Site 12 carries out a similar process to ensure the perception of a gap adjacent to Dickens Heath Road by the positioning of public open space.
- b) Again successful masterplanning can achieve maximising accessible public open space, habitat creation and offset the loss of Green Belt. In promoting Site Ref 340 there has never been any intention to build development up to the canal. The intention has always been to retain

a substantial proportion of Green Belt retaining an existing firm and defensible Green Belt boundary and avoid coalescence with Dickens Heath. We remain a 300m gap as requested.

- c) There has been no evidence provided in respect of traffic flows and congestion issues put forward to suggest Bills Lane/Haslucks Green Road is a preferable access and egress to Dickens Heath Road. In travelling along Bills Lane and Haslucks Green Road there would appear far more traffic related issues than on the recently much improved Dickens Heath Road e.g. difficult junctions, blind bends and substantial amounts of traffic accessing the two roads from existing built development both commercial and residential. This will be exacerbated by the traffic generated from site 4
- d) On a related point in terms of context when considering housing land allocation, site 26 appears rather isolated and an uncomfortable addition in its relationship to existing development and the other urban extensions south of Shirley (Site 11 and 12). Site 13 would provide a more rounded and well-conceived urban extension with Sites 11 and 12.

In making the decision to include urban extensions within the Local Plan Strategy and in particular urban extensions south of Shirley it was inevitable that development would be closer to the settlements in Blythe and in particular Dickens Heath.

The identification of sites 4, 11, 12 and 13 was part of that strategy. Masterplanning of sites 11, 12, 13 together in terms of infrastructure, form and content made complete sense and was the process that was progressing. The development of each of those sites would inevitably raise issues and

concerns which need to be addressed as part of the planning process, issues such as coalescence, identifying Green Belt boundaries and access and egress from the sites.

It is disappointing that in endeavouring to overcome the various concerns and issues at the sites (and not always successfully as highlighted in answer to questions 12 -15), site 13 has been deleted from the process.

Since the proposed allocation at site 13 was identified in the DLP landowners have been working collaboratively to assist in the production of a masterplan to provide an imaginative and workable scheme whilst also addressing issues as well as concerns raised through the consultation process namely:

- a) Ensuring a firm and defensible southern Green Belt boundary in the form of the existing clearly identifiable, substantial metalled track and mature trees and hedgerows significantly away from the Stratford on Avon Canal and Dickens Heath village with greenfields in between. This would ensure coalescence would not occur whilst maintaining the vision of the retention of the intrinsic character of distinctive villages separated by open countryside. The intention of the landowners was always to ensure a defensible Green Belt boundary and maintain substantial greenfield between development and the canal.
- b) The issue and concern for a potential vehicular access through the residential development (Woodloes Road) north of site 13 would be easily remedied by creating an access onto Dickens Heath Road on land through Site Ref 340 part of revised site 13. Access and Egress from site 13 onto both Bills Lane and Dickens Heath road would remove any need for access through the existing residential

- development and spread traffic flows between the two roads thereby easing any potential congestion issues.
- c) As referenced above concerns over the perception of narrowing the gap between Shirley and Dickens Heath along Dickens Heath Road can be resolved by careful masterplanning. The land adjacent Dickens Heath Road is owned by the three landowners involved in Site13 and how to resolve the issue formed part of the ongoing discussions.
 - d) With the three landholdings there is considerable opportunity to provide substantial public open space creating attractive footpath routes for walkers, potential sports facilities and landscaped areas.

The original submission (Ref 340) clearly makes the case for including the site within the allocations set against the evidence base at that time. The current site assessment document highlights each site and summarises evidence and site selection and appears to be the basis of summarising and determining why certain sites have been selected and others not.

In looking at the site assessment for Three Maypoles Farm Site Ref 340 the main concern would appear to be that development would unacceptably narrow the gap between Dickens Heath and Shirley and that the site would not provide a strong defensible Green belt boundary. This latter point has already been addressed above and in the initial response (Site Ref 340) prior to the preparation of the site assessment document. The firm and defensible green belt boundary of metalled track and substantial tree and hedgerow boundary can be easily identified on site. This has clearly been missed in the preparation of the site assessment.

On the former point built development and the line of the Green Belt boundary on site 13 would be no closer than built development and the Green Belt boundary on site 26 (300m) and in any eventuality, masterplanning can again resolve any perceived issues related to the gap between Shirley and Dickens Heath.

In respect of consistency with adjoining or nearby sites in the site assessment document, no reference or criticism has been made on the issue of perceived gap to Dickens Heath along the roads leading to the village on Site Ref 122 which contains proposed allocation Site 12. Here the masterplan shows POS adjoining the roads leading to Dickens Heath an outcome which is entirely feasible and available at Site 13. Nor has coalescence with site 12 and Cheswick Green to the south been raised as a concern. This relationship is no different to the relationship between Site 13 and Dickens Heath.

Also no critical reference appears to have been made to firm and defensible Green Belt boundaries for site 12 south of Dog Kennel Lane, indeed the answer appears to be the creation of a new firm and defensible boundary by building a road on the southern perimeter which is clearly contrary to National Green Belt policy.

Similarly on comparison with Site Ref 176 (allocation site 4) land west of Dickens Heath, no reference is made on the issue of coalescence between Dickens Heath and Whitlocks End and Majors Green which is clearly evident.

Issues related to the adjacent sites have been addressed in more detail at questions 12-15 and need not be repeated here but taken into account when considering the site at Three Maypole Farm.

It is worth repeating though that of the complete land holding of Whitlocks End Farm (site Ref 41) the site (proposed allocation site 26) lies within the highly performing Green Belt parcel whilst the remainder (former allocation site 13) lies within the moderately performing Green Belt.

Of major concern is the manner in which the sites close to Dickens Heath have been dealt with. It cannot be denied that in pursuing a policy of urban extension south of Shirley inevitably issues and concerns would be present on all sites. In the case of Site 4, 11 and 12 these issues and concerns apparently can be successfully dealt with through masterplanning and the planning process. In the case of site 13 after seemingly successful discussions on how to resolve any issues or concerns the response has been to not pursue the site and delete it from the process, introducing an alternative instead.

The initial masterplanning process looked at the development of 11, 12, 13

Also, as far as can be ascertained concern over the proposed allocation of site 13 and the emerging masterplan were never discussed with residents and the Parish Council.

It is interesting to note that in the supplementary document reference is made to site 26 being pursued in preference for site 13 identifying the advantages of site 26 but not dismissing site 13 for specific technical reasons. What strong evidence has arisen since the first consultation? The question must be raised therefore, after identifying site 13 in the SDLP 2016, why have other new sites been elevated to proposed allocations at this stage when not preferred to site 13 at the earlier SDLP 2016 consultation phase.

Site 340 land at Three Maypoles Farm Dickens Heath and as a consequence Site 13 should still be a proposed allocation within the SDLP 2019.

Site 121 land r/o 2214 Stratford Road Hockley Heath

This response to the omission site must be read in conjunction with the original response to the Solihull Draft LP 2016 (Ref 121) which outlines in detail the reason why firstly Hockley Heath should be a settlement suitable for development and secondly, the quality the site exhibits in respect of its suitability as an allocation within the Solihull Local plan.

In response to the supplementary consultation, the confirmation that Hockley Heath is now accepted as a settlement for limited and proportionate expansion is warmly welcomed. There is however disappointment with the only choice of site as a proposed allocation on the southern edge of the settlement off School Road in preference to other sites promoted within the settlement and in particular the site off Stratford Road (Ref 121).

On comparing the School Road site with the Stratford Road site (Ref 121) through the site assessment document there is little if any difference between the two sites other than the statement that on the Stratford Road site:

“Although the site is relatively well contained by landscape features there would be an incursion of built form into the open countryside where no permanent physical features are present to establish a strong defensible Green Belt boundary”.

Apart from stating that the site is well contained, which it is, the comment is strongly disputed.

There is the welcomed acknowledgement that the site is well contained by landscape features. These landscape features are substantial being mature trees and hedgerows, a nationally recognised, acknowledged and well established example of a firm and defensible Green Belt boundary (NPPF).

However, the site is bounded on three sides by development and does not extend as far out into the countryside as the existing substantial development to the north and south of the site and as such could not be described as an incursion into open countryside. Indeed it could be argued that the School Road site extends outward into open countryside more prominently than the Stratford Road site. A careful observation on visiting the sites would confirm this.

Of particular note in comparing the two sites, the site off Stratford Road is also more centrally located and has in appearance a stronger relationship to the village and offers the opportunity of setting aside land within the site for the provision of a doctors surgery (as demonstrated on the submitted master plan). Without reiterating the points raised in the original submission the site performs well against the Green Belt Assessment, the accessibility mapping and the Strategic Housing and Employment Land Availability Study.

Consideration therefore should be given to replacing the School Road site with the Stratford Road site or alternatively allocating the Stratford Road site along with the School Road site. The additional development would still be regarded as limited and proportionate to the size of the settlement and therefore would not impact on Policy, would boost the housing supply and

provide financial assistance to the infrastructure requirements of the settlement.

Site 143 & 339 land adj 161 Lugtrout Lane (part of allocation Site 16 east of Solihull)

The land east of Solihull allocated within the Solihull DLP 2016 has been supplemented by adding land above Lugtrout Lane and identifying the Grand Union Canal as the proposed new Green Belt boundary. The masterplans appear to suggest different boundaries and in some instances exclude the above submission. The site assessment document indicates the sites as green or amber. The SDLP supplementary document suggests the sites are part of the housing allocation site 16. This appears to be an anomaly and a printing error and as such would request confirmation that this land Site Refs 143 & 339 are included within the proposed allocation.

Since the Supplementary Consultation an Ecology Report has been carried out concluding that the site was of limited ecological importance.

An Archaeological and Heritage Assessment have been carried out which identified no significant constraints or impacts.

Both reports should be read alongside this response.

Affordable housing Policy and open Market Housing Mix

40. No evidence has been provided to justify the alternative approach now being taken. It appears that the Council is using affordable housing policy to deal

with identified issues associated with market housing mix such as delivering smaller housing, increasing densities and minimising Green Belt release.

The current approach of requiring affordable contributions on total sq meterage or habitable rooms/floorspace would not comply with affordable housing site thresholds set out by Government in the Written Ministerial Statement dated 28th November 2014 or para 64 of the NPPF 2019.

41. This is not considered an effective approach. Standard Practise is to calculate on number of units. This provides more certainty at the outset of development. A change from this could see an adverse impact on the delivery of affordable housing.

New viability evidence should be carried out to support this new approach.

42. Considered to be an inappropriate approach as discussed in 40 & 41.

43. Should be about providing an appropriate mix of housing for all and responding to need across the board i.e. families, elderly, self-build as well as smaller units.

Any other comments

None at this time