



**Consultation response on behalf of Mr T Khan,
Mr S Kelly and Mr J Green to the Solihull Draft
Local Plan Review Supplementary Consultation
2019**

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Consultation response on behalf of the landowners at 15, 59 and 61 Jacobean Lane to the Solihull Local Plan Review Draft Local Plan Supplementary Consultation January 2019

This is the response of Mr Taj Khan, Sid Kelly and John Green to the supplementary consultation by Solihull Council on the Solihull Draft Local Plan January 2019. The purpose of the response is to comment on the draft Plan and promote the site at 15, 59, & 61 Jacobean Lane Knowle for inclusion as a housing allocation within the Plan and land north of Jacobean Lane being removed from the Green Belt and to support the removal of land from the Green Belt to rectify anomalies and for consistency. The response is in question order.

The original responses to the Solihull Draft Local Plan 2016 consultation relating to the above are attached. (Site Ref 68 & 324) It should be noted that a larger site was submitted which included no.15 Jacobean Lane however this has not been accessed in the plan.

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.

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 for 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

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 makes 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 master planning 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 are 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?

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 in fact true.



Site 26 is no further away from Dickens Heath than site 13. 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.

This site (site 26) lies within the highly performing Green Belt parcel

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?

As indicated in the response to DLP consultation the 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?

Firstly, it is noted and it is agreed that Catherine de Barnes should be a settlement where limited and proportionate development is accepted. New development will assist with the future viability and vitality of such settlements as Hampton in Arden and Catherine de Barnes provided they are proportionate to the settlement, in the right location and contribute to the health and well-being of the community.

The site at Oak Farm should be included as an allocation as promoted in the submission to the SDLP 2016 consultation (Site Ref 136).

However, the allocation should include the land to the east of this proposed allocation and the west of Friday Lane.

Hockley Heath

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 doctor's 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?

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 Hockley Heath provided development is proportionate to the settlement, in the right location.

However, it is considered that a site in a more central location within the settlement would be preferable exhibiting equal if not better credentials in respect of Green Belt, accessibility, landscape and deliverability than Site 25 Land off School Road Hockley Heath.

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?

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).



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 plan 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.

Response to the removal of Tidbury Green and Widney Manor Road from the Green Belt should be read in conjunction with the response to the consultation on the Solihull Draft Local Plan (SDLP) 2016 land at Norton lane and Land at Widney Manor Road (Site Ref 205, 206)

The previous consultation responses on the SDLP 2016 Draft Local Plan (Site Refs 205, 206) were in respect of amendments to the Green Belt boundary at Norton Lane Tidbury Green and Widney Manor Road Solihull promoting the removal of land from the Green Belt. The reasons given in the submission for the removal of land from the Green Belt, including reference to Solihull draft Local Plan paragraph 361 which promoted changes being made to address

anomalies in Green Belt boundaries across the Borough, are still relevant and should be read in conjunction with this current response.

As such the proposed removal from the Green Belt of the settlement of Tidbury Green and the properties along Widney Manor Road would be fully supported providing:

- a) The properties along Norton Lane up to Rumbush Lane were to be included within the new inset area, Norton Lane providing the southernmost Green Belt Boundary
- b) All the properties along Widney Manor Road being taken out of the Green Belt with the eastern boundary of the Green Belt being relocated from the railway line to Widney Manor road.

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.

Land at 15, 59, 61 Jacobean Lane Knowle

Response to the removal of land North side of Jacobean Lane Knowle from the Green Belt should be read in conjunction with the response to the consultation on the Solihull Draft Local Plan (SDLP) 2016 (Site Ref 68 & 324)

The previous consultation response on the SDLP 2016 (Site Ref No 68 & 324) promoted a site to be included as a housing allocation at 15, 59, 61 Jacobean Lane Knowle and the removal of an area of residential properties, to the immediate north of Jacobean Lane, from the Green Belt. The reasons given should be read in conjunction with this current response. The plans delivered with the response identified the promoted allocation site and the area to be removed from the Green Belt

Within the current supplementary consultation, the proposed site at Jacobean Lane does not appear as a proposed allocation. Also, the area comprising residential development to the north of Jacobean Lane, which includes the submitted site, and promoted for removal from the Green Belt does not appear in the section “Washed Over Green Belt” Paragraphs 375-379 as an area to be removed from the Green Belt.

It is contended that for the reasons already given in the original response and which included reference to Solihull draft Local Plan 2016 paragraph 361, which promoted changes being made to address anomalies in Green belt boundaries across the Borough, that:

- (a) The site should be an allocation, and/or
- (b) The area of land should be removed from the Green Belt.

Paragraph 376 of the supplementary DLP states that “Giventhe scale of Green Belt release being promoted through this plan, it is appropriate that this status (*Green Belt*) is reviewed now to:

- (a) “ensure that logical and consistent Green Belt boundaries are provided” and
- (b) “allow the potential of any appropriate development opportunities within such settlements to come forward. In the main this will be through windfall developments, which may

otherwise have been restricted to infill developments. However, it is noted that some call-for-sites submissions have been made in some areas contained washed over Green Belt and if the washed over status is removed then these sites could form part of the land supply”.

This paragraph is particularly relevant in the case of the promoted housing site and the land to the north of Jacobean Lane being removed from the Green Belt.

Whilst the relevant points have already been made in the submitted response it is considered important in this instance to reiterate some of these points together with further comments as a response to the supplementary consultation to DLP.

With both national policy and local draft policy in mind the following points would support the amendments to the Green Belt boundary at Jacobean Lane:-

The well-established and mature residential properties to the immediate north of Jacobean Lane, which mainly front onto Jacobean Lane are in the Green Belt. The properties to the south of Jacobean Lane and which also front onto the Lane are not in the Green Belt but within the Knowle/Dorridge/Bentley Heath Inset Area.

Properties on both sides of the Lane are distinctly similar and urban in character, layout and design. The properties to the north of Jacobean Lane, which contain the submitted proposed housing allocation (15, 59, 61 Jacobean Lane), clearly form part of the main fabric of Knowle village as do the properties to the south. They are not isolated from the village or sporadic in nature but clearly concentrated development with frontages onto the Lane

or the Warwick Road and more related to the village than the open countryside.

In fact, it would be difficult to make any sort of distinction between the two sides of the road or understand why the north side of Jacobean Lane was originally omitted from the inset area (See attached plan). However, to the north and north east of these properties there is a distinctive change of character with a substantial area of open space and open countryside which comprise sports pitches to the north and agricultural land to the east. To the north of the sports pitches is the M42 motorway a major and permanent barrier between Solihull and Knowle.

This distinct change of character between built development and open space/countryside would be the more logical break between Green Belt and non-Green Belt and the edge of the village inset area.

National Green Belt Policy refers to the fundamental aim of the Green Belt being to prevent urban sprawl by keeping land permanently open with the essential characteristics being their openness and permanence. The land north of Jacobean lane comprises two storey residential development and could not be regarded as exhibiting openness. Similarly, in respect of national policy the site could not be regarded as fulfilling the purposes of the Green Belt to any significant or modest degree.

The Council's Green Belt Assessment at refined parcel 35 (RP35) within which this land is located confirms this having a combined score of only 5 out of 12. For example and in particular, it does not assist in safeguarding the countryside from encroachment (score 1 out of a maximum 3): Even purpose 2 "to prevent neighbouring towns from merging" where RP35 scores poorly (and which is disputed in its scoring as part of the housing allocation

submission) does not strictly apply as the land is existing residential property (brownfield) and as such does not bring the two neighbouring settlements any closer together. An extremely pertinent point.

The other two criteria, checking the unrestricted sprawl of large built up areas and preserving the setting and special character of historic towns score 1 and 0 respectively.

Again, in national policy boundaries should only be altered in exceptional circumstances and at a Local Plan review stage. This Local Plan review is therefore the correct time to request such an amendment to the Green Belt boundary. The exceptional circumstances are related to the need to meet the local housing needs of Solihull and part of the wider HMA need. Inevitably removing the site from the Green Belt relaxes the stringent policy controls and would allow a more positive attitude to housing development and would provide the opportunity for smaller site development and redevelopment, in keeping with the village character, and therefore boost the windfall contribution to the housing shortage, both market and affordable, within Solihull.

In terms of Green Belt boundaries and their permanence, in accordance with national policy, Jacobean Lane, and the rear and side boundaries of the residential properties which comprise fencing and substantial hedgerows and trees, provide the firm, defensible and permanent boundary beyond which would be the open sports pitches to the north and open countryside to the east.

Looking around the whole of the Knowle/Dorridge/Bentley Heath Inset Area, the Green Belt boundary is defined mainly by rear garden boundary fencing

hedgerow and trees with open land beyond. This consistency would be maintained with this proposal and it is only where linear residential development spreads well out into the countryside does this not apply. In those cases, a logical line has to be drawn where openness plays a considerable role in the landscape.

This site does not have an open character and therefore does not contribute to the openness of the Green Belt and if needed, its character can be protected in other ways, in accordance with national policy paragraph 140 and it should be excluded from the Green Belt.

Paragraph 378 of the supplementary consultation supports the proposal in referring to those settlements and areas identified for potential removal from the Green Belt as not having an open character that makes a contribution to the openness of the Green belt. The issue of openness is of course a fundamental point of national policy.

For the above reasons it is submitted that the land to the North of Jacobean lane should be removed from the Green Belt and the Green Belt boundary amended accordingly and thereby addressing this long standing anomaly and in accordance with paragraph 361 of the draft Local Plan and Paragraph 376 of the supplementary consultation.

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

No comment

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 15, 59, 61 Jacobean Lane Knowle

This response to the omission site must be read in conjunction with the original response to the Solihull Draft LP 2016 (Ref 68 & 324) which outlines in detail the quality the site exhibits in respect of its suitability as an allocation within the Solihull Local Plan as well as the response to question 36 above on the issue of Green Belt.

However, as the site has not been identified as a proposed allocation within the supplementary SDLP 2019 it is necessary to look at the main reasons for its apparent failure.

Firstly, it is unfortunate that the specific site does not appear in full in the site assessments document so it is necessary under the

circumstances to look at the nearest comparisons which are site 68 & 324 (59, 61 and r/o 15 Jacobean Lane). The full site comprises the full curtilage of 15 Jacobean Lane as well as 59 and 61. The access to No15 is considerably closer to Warwick Road and consequently the bus stop at the junction of Jacobean Lane and Warwick Road.

Looking specifically at the commentary within site assessments document the reasons for the site not being a proposed allocation would appear to be on two issues, Green Belt and accessibility.

However before discussing those points it appears disappointing and somewhat mystifying that the commentary does not in the very first instance confirm that the land is currently residential development and equestrian paddock (brownfield) and is clearly part of and relates well to the village in terms of its character layout and context.

In terms of accessibility the commentary acknowledges that accessibility may be improved if a new access onto Jacobean Lane was established. A new access (pedestrian or vehicular) is available and always has been available from 15 Jacobean lane and the site as submitted has a frontage and access onto Jacobean Lane much closer to the A4141 Warwick Road, the main road into Knowle (150m as opposed to 450m) and within the 400m Policy P7 Accessibility criteria for bus services. Notwithstanding the fact that the original score is considered to be too low, particularly in view of the frequency of bus service and proximity of the bus stop on Warwick Road, this submission would elicit a higher score in each category and in total. The bus stop is in fact immediately outside Jacobean Lane with a bus frequency of less the 30 minutes into and out of Knowle.

In respect of the Green Belt the commentary suggests it is very difficult to establish a new defensible boundary. This is contested, the “L” shaped brownfield site comprises 3 residential properties with large extensive gardens and an equestrian paddock, the boundaries of which, particularly to the north, consist of boundary fencing with substantial tree and hedgerow planting thereby providing firm and defensible Green Belt boundaries. Jacobean Lane itself would form the firm and defensible eastern boundary.

Being already part of the long established residential development of Knowle village no issue of coalescence with neighbouring settlements or impact on the openness of the Green Belt arises.

It must also be pointed out again as in the original submission (Ref 68 & 324) the site, which is within refined parcel RP35 of the Green Belt assessment document (land to the north of Jacobean Lane) would perform moderately low against the purposes of the Green Belt having a combined score of 5 which is lower than or equal to most of the parcels where the draft local plan allocated housing sites are located. The only one of the five purposes of the Green Belt where the parcel is higher performing is “to prevent neighbouring towns from merging”. However, it appears particularly inconsistent and unexplained why for this particular purpose of the Green Belt all the remaining parcels of land between Solihull and Knowle, of which there are 9 and which are of similar character, are moderately performing with one immediately adjoining parcel 35 being lower performing. This particular assessment is therefore challenged for its accuracy and consistency. In any eventuality, the scoring for this purpose of the Green Belt for RP35 is no different to some draft allocations in the draft Local Plan particularly those adjoining south of Shirley and east of Balsall Common, which has not hindered their inclusion within the draft Local Plan. We note that a site has

been proposed at Kenilworth Road, Knowle as an amber site (site 59) which in fact scores 11 out of 12.

Land at 15,59,61 Jacobean Lane therefore should be included as an allocation.

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