



**Consultation response on behalf of Mr Taj Khan
to the Solihull Draft Local Plan Review 2016
Consultation**

Sept 2017

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This is the response of Mr Taj Khan to the consultation by Solihull Council on the Solihull Draft Local Plan 2016. The purpose of the response is to:

- (a) Comment on the draft Local Plan;
- (b) Promote the site at 15, 59, 61 Jacobean Lane, Knowle for inclusion as a housing allocation within the Local Plan; and
- (c) Promote amendments to the Green Belt boundary to be relocated north of residential properties on Jacobean Lane, for the next stage of the Local Plan preparation, the submission draft.

It is acknowledged that this submission is after the closing date of the consultation on the draft Local Plan (17/02/17). The site, or more accurately part of the site, has already been submitted for consideration during the consultation period by Harris Lamb property consultancy. However, the landowner of 15 Jacobean Lane now wishes a separate response be submitted covering the whole of his property as well as the adjoining properties at 59 and 61 Jacobean Lane and considered as a housing allocation within the Local Plan submission draft (see attached plan A).

Notwithstanding the proposal for a housing allocation a separate proposal is also being made, as part of this response, to consider an amendment to the Green Belt boundary, which currently runs along Jacobean Lane, to be relocated northward to a line along the rear boundary of properties to the north of Jacobean Lane (see attached plan B).

The response to the draft Local Plan is by chapter order with the site being submitted as a recommended housing allocation and amendments to the Green Belt boundary being promoted under the section on “Any Other Comments”.

Challenges

Q1. Do you agree that we’ve identified the right challenges facing the Borough? If not why not? Are there any additional challenges that should be addressed?

- Yes, agree with the challenges identified particularly:

- Challenge B, the requirement, in line with the NPPF, to meeting the Boroughs full objectively assessed housing needs and also accommodating some of the HMA wide housing shortfall and,
- The fourth bullet of the objective in Challenge B to address constraints in supply through windfall development and,
- Challenge E, to maintain the integrity of the Green Belt.

Vision

Q2. Do you agree with Borough Vision we have set out? If not why not and what alternative would you suggest?

- Agree in principle and in particular:
 - Higher density development will have been delivered along key public transport corridors, and sustainable urban extensions accommodated to help meet the housing needs of the Borough and its housing market area.
 - The rural area vision of sustaining the network of strong and vibrant communities across the rural area and the increased range of affordable housing provided in each community commensurate with the size of the settlement and its needs.
 - The reference to “a mix of market and affordable housing being provided in Knowle, Dorridge.....with significant new development on the edge of Knowle and Dorridge.

Spatial Strategy

Q3. Do you agree with the Spatial Strategy we have set out? If not why not and what alternative would you suggest?

- Agree in principle with particular reference to:
 - Strategic objectives and sequential approach to directing growth of Non Green Belt previously developed land first, with Green Belt previously developed land before Green Belt Greenfield, which reflects the guidance in the NPPF.

- The positive approach to development at paragraph 100 which refers to the balanced approach between concentration and dispersal and cites a number of advantages including the provision for some smaller sites which will assist the early delivery of housing during the plan period and support existing services. However, there are concerns that there is an overreliance on larger urban extensions, with very few draft allocations of less than 100 dwellings, that will not assist in addressing immediate housing need within the Borough.

Sustainable Economic Growth (Policies)

Q4. Do you agree with Policy P1? If not why not and what alternative would you suggest? Q5. Do you agree with the key objectives that development is expected to meet as identified in P1 are appropriate? If not why not? Are there any others you think should be included? Q6. Do you agree with Policy P1A? If not why not and what alternative would you suggest?

- Policy P1 UK Central Hub Area – there is a lack of confidence that the level of residential development anticipated will come forward and within the Plan period. There cannot be any certainty in the timeframe for development of HS2 and the UK Central Hub Area in general and the precise uses and percentages of different land use within the UK Central Hub Area. There is also the concern over the effect this may have on the Airports future plans its land requirements and ability to expand. Until such issues are resolved the level of and timing of housing development cannot be predicted or guaranteed.
- Policy P1A Blythe Valley Business Park – No Comment

Q7. Do you agree with Policy P2? If not why not and what alternative would you suggest? Q8. Do you believe the right scale and location of development has been identified? If not why not?

- Policy P2 Maintain Strong Competitive Town centres – Yes, agree in principle with the policy of maintaining strong and competitive town centres particularly in respect of Solihull Town Centre and the ambition to ensure its continued economic growth and success. However, there has been a

longstanding ambition to both improve the attraction of the centre by increasing its residential capacity and by the relocation of the train station closer to the town centre. Whilst these ambitions are supported they have not moved forward towards realisation and remain ambitions. Whilst a level of housing development will probably take place it is doubtful that the level of housing proposed (1400 within the Town Centre of which 861 within the plan period) is achievable or will be achieved.

Q9. Do you agree with Policy P3? If not why not and what alternative would you suggest? Q10. Do you believe the right scale and location of development has been identified? If not why not?

- Policy P3 Provision of Land for General Business and Premises – Agree with the policy in principle and note that alternative uses may be allowed where specific criteria are met. However concern is expressed that whilst there is an acknowledged acute shortage of housing and a shortage of proposals within the urban area to overcome this, employment sites within the urban area have been identified for housing within the Draft plan, which may conflict with Policy P3.
- General comment – the Plan should ensure that there is an appropriate balance between employment and housing and that employment sites are not sacrificed inappropriately as a consequence of an acute housing shortage.

Providing Homes for All (Policies)

Q11. Do you agree with Policy P4. If not why not and what alternative would you suggest? Q12. Do you agree with the level of affordable housing being sought in Policy P4? If not why not and what alternative would you suggest? Q13. Which option for delivering self and custom housebuilding do you favour and why? If neither do you have any other suggestions?

- Policy P4 Meeting Housing Need:
 - The Affordable Housing figure of 50% is too high and a potential impediment to housing delivery. The full implications of the housing white paper need to be assessed and would reserve judgement on a final policy.

Q14. Do you agree we are planning to build the right number of new homes? If not why not and what alternative? Q15. Do you believe we are planning to build homes in the right locations? If not why not and what locations shouldn't be included? Are there any other locations should be included? Q16 Do you believe we have identified the infrastructure required to support these developments? If not why not ? Are there any additional facilities you believe are required, if so what are they?

- Policy P5 Provision of Land for Housing
 - West Midlands LAs will be carrying out further work on housing numbers and locations within the broad Housing Market Area which may influence subsequent responses to this policy but comments now will directly relate to the current Draft Local Plan,
 - Submissions to the Draft Local plan have raised concerns that the full OAHN presented in the SHMAA provides an underestimate of housing need in the Borough in accordance with current guidance. The SDLP is therefore not planning for the correct number of homes to meet housing need and the housing target should be increased.
 - Windfalls – support for the comments in paragraph 219 of the draft Local plan and its inclusion as a source of supply, that there is compelling evidence that windfall sites become available within Solihull and the Policy objective of Solihull regarding development in residential gardens.
 - Concerns are raised about sites/locations allocated in the Draft Plan and site capacities as follows:
 - Solihull Town Centre – the overall housing capacity and capacity within the Plan period are considered to be unachievable. See response to Q8.
 - Moat Lane/Vulcan Lane – ability to bring forward current employment sites at this location within the Plan period and the potential conflict with the 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

- South of Dog Kennel Lane – the land to the south of Dog Kennel Lane is extremely open countryside with no clear definitive robust Green Belt boundaries being identifiable, as required by NPPF. With no clear and firm definitive green belt boundary evident on the allocation plan between Dog Kennel Lane and Cheswick Green it is difficult to assess the level of housing achievable on this site, a site which could lead to coalescence with Cheswick Green.
- The Green Shirley – Identified as an employment site allocation in the Solihull Local Plan 2013 and again in the Draft Plan 2016 but caveated in respect of a potential mixed use site in the next iteration of the Plan following the preparation of a masterplan. Considerable doubt therefore exists over the housing numbers identified for this site as well as the potential conflict with employment policy P3.
- Hampton Road Knowle – the same issue arises on this site as at Dog Kennel Lane with no definitive firm and logical green belt boundary being identified to the north of the site, west of Hampton Road therefore no conclusions can be drawn on housing numbers. Also, there is the issue of loss of a sports pitch with no relocation identified on the land to the east of Hampton Road and consequently therefore an overall target housing figure is difficult to assess.
- land off Meriden Road Hampton in Arden (Former Ammunition Depot) – 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 additional open space was forthcoming. This situation still exist

and so calls into question the allocation. Also the viability of the site is may be affected dependent on any potential contamination issues as a consequence of the former use of the site.

- West of Dickens Heath – the loss of sports pitches is an issue which would need to be resolved with no reference to relocation or compensation. Development would result in coalescence of Dickens Heath with Majors Green which would be contrary to National Green Belt policy.
- Sharmans Cross Road Solihull – Although unused this is still a loss of Sports pitches and unsure how this impacts on sports provision within Solihull and there is no reference directly to relocation or compensation.
- Chester Road/Moorend Avenue Fordbridge without any detailed information on the remodelling of the road junction, any firm boundary details, the impact of the flood plain or even if a successful development would be achieved, it is difficult to assess the potential or success of this site.
- Locations/Sites which should be included as a housing allocation within the Local Plan :-

- Land at 15, 59, 61 Jacobean Lane Knowle.

(See “Any Other Comments” below for the justification for including this site as a housing allocation within the Local Plan).

Q17. Do you agree with policy P6? If not why not and what alternative?

- Policy P6 Provision of Sites for Gypsies and Travellers – no comment.

Improving Accessibility and Encouraging Sustainable Travel (Policies)

Q18. Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not why not and what alternatives would you suggest?

- Policy P7. Accessibility and Ease of Access – Agree in principle

- Policy P8. Managing Travel Demand and Reducing Congestion – Agree in principle
- Policy P8A Rapid Transit – No Comment.

Protecting and Enhancing our Environment (Policies)

Q19. Do you agree with the policies for protecting the environment? If not why not and what alternatives would you suggest?

- Policy P9 Mitigating and Adapting to Climate Change – Agree in principle.
- Policy P10. Natural Environment – Agree in principle.
- Policy P11. Water Management – Agree in principle
- Policy P12. Resource Management – No comment
- Policy P13. Minerals – No comment
- Policy P14. Amenity – Agree in principle.

Promoting Quality of Place (Policies)

Q20. Do you agree with the policies for Quality of Place? If not why not and what alternative would you suggest?

- Policy P15. Securing Design Quality – Agree in principle
- Policy P16. Conservation of Heritage Assets and Local Distinctiveness – Agree in principle.
- Policy P17. Countryside and Green Belt. – Agree in principle particularly at particularly at paragraph 361 which refers to minor changes to address anomalies in Green Belt boundaries across the Borough, taking into account an assessment of submissions made during the preparation of the Plan.

Submissions on promoting amendments to the Green Belt boundary and remove sites at Jacobean Lane from the Green Belt are made under “Any other Comment” below

Health and Supporting Local Communities (Policies)

Q21. Do you agree with the policies for Health and Well Being? If not why not and what alternatives would you suggest?

- Policy P18. Health and Well Being – Agree in principle
- Policy P19. Range and Quality of Local Services – Agree in principle.

- Policy P20. Provision for Open Space, Children’s Play, Sport, Recreation and Leisure. – Agree in principle.

Delivery and Monitoring (Policies)

Q22. Do you Agree with Policy P21? If not Why not and what alternative would you suggest?

- Policy P21 Developer Contributions and Infrastructure Provision – Agree in principle.

Any Other Comments

In responding to Q15 “Are there any other locations which should be included” additional comments are provided below to support the inclusion of land at **15, 59, 61 Jacobean Lane Knowle** to be allocated for housing within the Local Plan.

Similarly in response to Q20 additional comments are provided below to support the promotion of amendments to the Green Belt boundary and removal of the land at **Jacobean lane Knowle** from the Green Belt.

In promoting the site for allocation within the Plan, the route adopted by the LPA has generally been followed. That is, the strategy of managed growth, the development of strategic objectives and the sequential approach and guiding principles which has helped determine the locations where growth should be located.

It should be pointed out that the Draft Local Plan at paragraphs 224 -229 makes reference to the new allocated housing site boundaries not being fixed and that further work would be undertaken on the options to be taken forward and included in the submitted version of the Plan and that final capacities are likely to vary from the indicative numbers which may mean some sites accommodating more and some less numbers.

Also the Draft Plan states that the inclusion of a particular parcel of land within the allocated area does not necessarily mean that it is to be developed. In some instances

the plans represent the area to be removed from the Green Belt to create a logical defensible boundary. As has already been indicated in answer to Q15 it would appear that no clear, logical and defensible boundary can be achieved on some sites.

As a consequence of the uncertainty over sites, site boundaries and site targets, and further, the concerns that the LPA has identified an insufficient housing target, it is doubtful that the allocations are sufficient to meet the housing requirement identified in the draft Local Plan or the increased requirement identified in submissions to the consultation.

Land at 15, 59, 61 Jacobean Lane Knowle

Proposed Housing Allocation.

A substantial part of this proposed housing allocation site at Jacobean Lane is already identified in the SHELAA and the Accessibility Mapping Report as site 68. However this latest submission increases the overall site curtilage to include all of the property No15 Jacobean Lane to include the two storey detached dwelling, out buildings and a second frontage and access onto Jacobean Lane as well as 59 and 61 Jacobean Lane.

The site lies within the residential development at the northern end of Knowle village on the north side of Jacobean Lane having direct access onto the lane at two separate frontages. To the north of the residential development are a number of sports pitches beyond which is the M42 Motorway. To the east of the residential development is agricultural land and the Grand union Canal. The site is approximately 200 metres to the east of the A4141 Warwick Road, the main road into Knowle Village Centre. The village centre, with its full range of services and facilities, is just over 1km from the site. Having two wide frontages onto Jacobean Lane provides for easy alternative access arrangements into the site.

The attached Plan shows the precise location and extent of the site.

The site lies within the Green Belt, immediately to the north of the village inset area, the boundary of which runs along Jacobean Lane. The residential development to the north of the lane, is clearly part of and relates well to the village in terms of its character, layout and context and is not in an area of sporadic housing more related to the surrounding countryside.

The “L” shaped 2.56 hectare brownfield site comprises 3 residential properties with large extensive gardens 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. Being already part of the residential development of Knowle village,, no issue of coalescence with neighbouring settlements or impact on the openness of the Green Belt arises.

The Draft Local plan at paragraph 105 in assessing the broad options for growth and development sets out 7 broad options for accommodating growth one of which (growth option G) identifies the significant expansion of rural villages/settlements, which are highly accessible and/or settlements with a wide range of facilities and at paragraph 108 specifically identifies 2 locations in Knowle, land south and north east of Knowle with potential capacities of 750 and 300 respectively, both large allocations.

In support of the allocation of this site reference is made to the response to question 3 above and paragraph 100 of the Draft Plan, which refers to the balanced approach between concentration and dispersal and cites a number of advantages including the provision for some smaller sites which will assist the early delivery of housing during the plan period and support existing services. Also, as already commented on above, there are concerns that there is an

overreliance on larger urban extensions in the draft Local Plan with very few draft allocations of less than 100 dwellings to assist in addressing immediate housing need within the Borough. This site at Jacobean Lane which would bring forward between 50 and 100 dwellings, would help address this imbalance within the Borough as a whole and more specifically within the settlement of Knowle.

The Housing Topic Paper on the Knowle/Dorridge /Bentley Heath settlement identifies that the area around the settlement presents an opportunity for significant growth and concludes that the low to moderate impact on much of the Green Belt and the medium to high accessibility indicates that this settlement is suitable for considerable growth. The topic paper does go to say that any development would need to ensure that the key Green Belt Gap to the urban area is protected, however the site at Jacobean Lane as described earlier is brownfield and within a cluster of residential development along the lane and is clearly part of the main fabric of the village and as such would not impact on the integrity of the Gap between Knowle and Solihull.

In favour of this specific site is its strong and defensible Green Belt boundary as previously described, the excellent access arrangement along Jacobean Lane at either or both frontages and the particularly compelling argument that the site is brownfield. The site is compact, clearly part of the Knowle settlement not the open countryside, even though in the Green Belt albeit immediately adjacent to the Inset boundary. The Green Belt boundary around the Knowle/Dorridge/Bentley Heath Inset area is generally consistent being denoted by rear garden boundaries comprising screen walls and fences, substantial hedgerows and trees. The boundary of the proposed housing site is similarly identified by fencing and substantial trees and hedgerows consistent with the existing village inset and Green Belt boundary.

In assessing the site against the various studies carried out to assist in identifying housing allocations, it fairs equally well and in some cases better than some of the housing allocations in the Draft Plan.

The following points should be noted:-

- In the assessment against the **Green Belt Assessment refined parcels and broad areas combined scores (Appendix F)** the site, which is within refined parcel RP35 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 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 Shirley and Monkspath along the A34 Stratford Road, which has not hindered their inclusion within the draft Local Plan.
- In assessing the site against the **Accessibility Mapping (Figure 6A - Site Accessibility & Appendix E - Accessibility Summary Spread Sheet)** site 68 the original submission scores low 85 against a highest score of 400. However, the site as now 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,

- To put this submission site in to context in terms of services and facilities; Jacobean Lane is served by a regular bus service along the A4141 (S3, S3W both ½ hourly Mon – Sat, 87,88 hourly Mon – Sat); there is a doctors practice (Blythe Medical Practice) within 1.3km Knowle local centre; multiple foodstores are within 1.4km; and the primary school (Knowle C of E Primary) is within 1.6km. On this basis and using the assessment criteria identified in the Accessibility Mapping Report a score of 230 would be considered appropriate and more in line with draft allocations in the Local Plan and indeed in excess of some.
- In assessing the site through the **Strategic Housing and Employment Availability Assessment (SHELAA)** and in particular the **Appendix 5 Housing Site Assessment Record** it would be similar to site 68 results and would show that the site is brownfield, in three ownerships. It is marketable and readily available to come forward within the first five years of the Plan period. According to the assessment details of site 68 for the suitability criteria the revised larger site would not be dissimilar facing no suitability criteria issues and scoring highly. The only criteria that would be disputed for site 68 and most certainly for the revised site is the Suitability of Location Criteria Constraints which for the now submitted and revised site would score in excess of 35 and therefore would score three as opposed to zero. The assessment concludes that the site performs well against suitability, availability and achievability criteria. The assessment conclusion would be no different for this submission.

In conclusion, a response has been provided to all questions within the Draft Local Plan consultation. As a consequence of the uncertainty over sites, site boundaries and

site targets, and further, the concerns that the LPA has identified an insufficient housing target, it is doubtful that the allocations are sufficient to meet the housing requirement identified in the Draft Local Plan or the increased requirement identified in submissions to the consultation. This site could assist in achieving the housing requirement and could also come forward early in the Plan period and therefore address the immediate housing need within the Borough. As such, this site has been put forward for inclusion as a housing allocation within the forthcoming Submission Draft Local Plan.

Proposed revision to the Green Belt Boundary to the north of Knowle to include residential property land North of Jacobean Lane

Without prejudice to the promotion of the above submission for a housing allocation within the Local Plan, the nature of development immediately surrounding the proposed housing allocation submission and in view of the draft Plan reference to amending anomalies in Green Belt boundaries across the Borough (paragraph 361), an amendment to the Green Belt boundary to the north of properties on Jacobean Lane is proposed. This amendment to the boundary would be consistent with the Green Belt boundary around the Knowle/Dorridge/Bentley Heath inset area in terms of its permanence and particular recognisable physical features of rear and side boundary fencing, trees and hedgerows.

National policy on Green Belt

National Green Belt policy is set out in the NPPF. This states at paragraph 79 that the Government attaches great importance to Green Belts and that the fundamental aim is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green belts are their openness and their permanence.

At paragraph 80 the 5 purposes of the Green belt are highlighted:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns and

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

At paragraph 83 it states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

At paragraph 84 it states that when drawing or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable development.

At paragraph 85 it states that when defining boundaries local planning authorities should define boundaries clearly using physical features that are readily recognisable and likely to be permanent.

Finally at paragraph 86 in reference to villages it states that if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

Solihull Draft Local Plan - Green Belt Policy

In respect of Green Belt policy in the Solihull Draft Local Plan at paragraph 362 it states that the policy is consistent with national policy and at paragraphs 358 and 359 it provides the exceptional circumstances to justify the changes to the Green Belt boundary including the need to meet local housing need and some of the wider HMA housing need and the lack of opportunity with the urban area.

Also at paragraph 361 of the Draft Local Plan it states that a small number of minor changes will be made to address anomalies in Green Belt boundaries across the Borough, taking into account an assessment of submissions made during the preparation of the Plan.

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 the road are in the Green Belt. The properties to the south of Jacobean Lane and which also front onto the road are not in the Green Belt but within the Knowle/Dorridge/Bentley Heath Inset Area. Properties on both sides of the road 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 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 Jacobean Lane or 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 above) 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. 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 86 it should be excluded from the Green Belt.

In terms of sustainability the site has been and would continue to be served by Knowle village of which it is a fundamental part. It is in close proximity to the village centre with its extensive services and facilities with an excellent bus service along the Warwick Road and bus stop adjacent to Jacobean Lane. In terms of accessibility the site would score in the region of 230* where the maximum is 400. **Our scoring based on Solihull's accessibility criteria.*

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.