

Solihull Draft Local Plan Supplementary Consultation, March 2019

Response of Richard Lloyd, Parish Councillor

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

Yes.

The population is of above average age, therefore the standard method artificially inflates the rate of household formation. In addition, the high proportion of retired people with substantial resources creates distortion in the affordability ratio.

A more accurate assessment of local need could be based on actual demographics based on records of births, marriages, and deaths.

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

No.

2.1 Green Belt analysis

The Green Belt analysis fails to investigate the harm caused by the cumulative impact of the loss of the Refined Parcels. Near Balsall Common, it takes no account of the encroachment of Coventry developments into the narrowest part of the Meriden Gap from the other side, or of the narrowing of the Gap by the HS2 structures. This is already the narrowest gap between the major conurbations, and as such, is the most highly valued piece of Green Belt in the Borough.

The Green Belt analysis also fails to take account of the high quality of the productive farmland adjacent to Balsall Common, and its accessibility for the public.

Finally, the Green Belt analysis envisages the release of land without first having exhausted the possibility of increased housing density in town centres and other areas provided with good public transport, as required by section 137 of the NPPF. The single example quoted in the Draft Plan is not an indicator of an effective policy.

2.2 Public transport

The Accessibility assessment of Balsall Common is inaccurate. The area has very poor public transport, both rail and bus. The rail service is limited to 2 trains per hour in each direction, with an unequal interval, by the service pattern on the main line between Coventry and Birmingham. This is confirmed by the latest Network Rail report¹ which shows the trains at Berkswell and Tile Hill Stations are full up to 140%, and that any service upgrade would have an "indicative" cost up to £10.4 billion.

In comparison, the Chiltern line serving Dorridge provides 5 services per hour at peak, and has seat occupancy of 70% or less.

There is a once per hour (daytime) bus service to Berkswell Station, poorly coordinated with the train times. The station is beyond walking distance from most of the existing community as well as from most of the planned developments. Parking is massively

¹ West Midlands & Chilterns Route Study, Network Rail, Aug 2017

over-subscribed due to people avoiding parking difficulties in the cities, the NEC, and the Airport. The demand is, in effect, insatiable, due to price and availability at those destinations.

2.3 Roads

The selection process has been distorted by the proposed provision of an eastern by-pass for Balsall Common. However, the need for this by-pass has not been substantiated, as nothing in the latest Draft Plan refutes the factors that led to removal of the dormant by-pass line from the Solihull Local Plan in 2013². These were: protecting the vitality and viability of the shopping centre; national commitment to sustainable economic growth; encouraging a shift away from car use; and managing the needs of the centre in a cohesive way to encourage a sense of place.

Recent surveys show that traffic through Balsall Common on the A452 has failed to grow, and the HS2 project is not expected to generate any significant traffic growth³, no mitigation measures being considered necessary.

A by-pass around Balsall Common has been contentious for nearly 50 years, when the scheme was switched, from the west side of the village, to the narrow part of the Meriden Gap to the east. Today, a western by-pass would provide direct access between UK Central and the expanding JLR works at Fen End. There is no evidence that alternatives have been evaluated or that property developers have been consulted about funding a link from the A452 to the Fen End Road. This would be shorter than the proposed eastern by-pass from Station Road to the A452/ A4177 junction.

There is no evidence that the proposed eastern by-pass can be funded by the possible housing developments. The large Berkswell Gate development was only able to fund a little over a kilometre, and that was on land owned by Solihull MBC and with a lower construction standard than required to replace the A452, as it was intended solely as an access road to the development.

Much of the A452 traffic originates in Balsall Common, and the proposed by-pass may be ineffective due to the high number of roundabouts and the lack of service areas.

2.4 Affordability ratio

Given the impact the affordability ratio has on the calculated Local Housing Need, it's surprising that the opportunity has been missed to direct housing to where it might have the effect of reducing house prices. The average price in Dorridge, across a range of dwelling types, is 40% greater than in Balsall Common. Logically, this would direct future housing to that area, yet the housing allocations are heavily skewed toward Balsall Common.

2.5 Infrastructure

The site selection process hasn't taken account of the scale and deliverability of necessary enhancements to the village centre of Balsall Common. The current centre is totally incapable of serving a community 50% larger than now. Whilst a study is

² Solihull Local Plan, December 2013, Sections 9.3.15 - 9.3.19 "Bypass Improvement Lines"

³ HS2 Environmental Statement for CFA23, 2013, section 12

proposed, there is no recognition of the cost and timescale required to rebuild the centre. Additional land would be required to provide the necessary circulation space, retail space, and car parking.

2.6 School availability

School availability should have been included in the site selection criteria. Any significant growth in the population will require new schools. In the case of Balsall Common, a primary school with at least 4-form entry would be needed to service the increased housing allocation envisaged in the Draft Plan, but only 2-form entry is proposed.

3. Do you agree with the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are any other matters that should be included?

No.

The proposed by-pass is on the wrong side of the community, and longer than need be. Its design is inadequate to attract traffic from the current A452, or to be designated as an 'A' road (see §2.3 above).

For a 50% growth of the community, a major expansion and redevelopment of the village centre is required, and it's needed before any significant numbers of new houses are built. It's impractical to expand a village by adding massive extensions, while keeping the centre the same size. If Balsall Common were to be transformed into a town, the centre would have to be totally redesigned to provide the size and range of retail and community facilities that would be required.

There is no evidence to support the idea that local train services can be improved without very substantial expenditure (see §2.2 above). Studies by Midlands Connect and TfWM show no increase in services are envisaged.

The proposed primary school is inadequate for the numbers of new houses (see §2.6 above). Difficulties with the secondary school are ignored. It is desirable for the Heart of England School to continue to have a wide catchment area, because this encourages a diverse developmental environment. The site cannot be expanded without the acquisition of more land.

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

No.

The site selection is based on deeply flawed Green Belt and Accessibility analyses (see §2.1 and §2.2 above), which were skewed to secure a dividend from the proposed housing to support the proposed by-pass.

The expansion of the development site into further areas of Green Belt, in this latest Draft Plan, invalidates the assessments made in the earlier version. The site has no proper defensible Green Belt boundaries, and in fact has a high value in separating the major conurbations.

The value of the site for productive farming, the environment, and public recreation has been under-estimated. In addition, the need to preserve large areas for ecological mitigation means that there is poor housing yield from the loss of such a large area of Green Belt.

The site is poorly accessible by public transport and by road, and is remote from employment growth areas at Blythe Valley and UK Central.

The masterplan fails to take account of the arc of visibility of the heritage assets at the Farm itself - these are mainly visible from the south, not the north-east.

The proposed public open space is in the least accessible location, and should be moved to be adjacent to the existing housing area to mitigate the loss of amenity.

Arranging the houses of different density in blocks is out-moded and inappropriate. For social integration, there should be inter-mixing and gradation of the density around the site.

Retention of the mature trees is very important for the ecology and appearance of the development. However, they need to be integrated into the design of the scheme to allow different settings, and the appreciation of the trees in groups, around water features, and as individuals.

5. Do you believe that Site 2 Frog Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

Yes.

The proposed layout simply takes the available space and fills it with houses. The proposal would be less intrusive if the adjacent playing fields, and possibly the allotments, were redistributed to create green spaces between the houses. While incurring extra cost and disruption, it would create a far more attractive area, and there would be an opportunity to provide access onto Holly Lane.

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

No.

Although it is a less valuable part of the Green Belt, the site is an inaccessible location with poor housing yield due to ecological factors. It is clearly outside walking distance of all the facilities in the village of Balsall Common, and the resulting growth in vehicle traffic will have a major impact on the A452/ B4101 cross-roads and traffic lights.

The masterplan should include provision of a footway southwards along the A452 to link with Public Footpath M181 through the site.

7. Do you believe that Site 21 Pheasant Oak Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No.

Part of the proposed site could be released from the Green Belt without undue harm, but there is no defensible boundary beyond the current buildings to the east of the site. The proposed by-pass is unlikely to be constructed in the foreseeable future (see §2.3 above), and would pass well to the east.

In addition, any development proposal needs to include space for the caravan storage, as this facility is still needed within the area.

Overall, housing development should be restricted to the western half of the proposed site.

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

Yes.

While the site is well positioned for access to employment sites at UK Central and the NEC, the proposed accesses onto the A452 and Wootton Green Lane are unacceptable. A better access would be from the nearby roundabout and through the car park of the *George in the Tree*. Further land acquisition would be required.

Provision should be made in the site for a north-south road, starting from the A452 and replacing one segment of Wootton Green Lane. This would provide access to other development sites on the west of Balsall Common and be an element of a western by-pass toward Fen End and the JLR works. Higher density housing could be used to provide the same number of units.

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

Only if HS2 is constructed. Cancellation of HS2 would remove the defensible Green Belt boundary that is required.

Given the shortage of housing land, the opportunity should be taken to build at a higher density, as opposed to low- and medium-density shown on the masterplan.

A key infrastructure requirement is the provision of a segregated route for walkers, cyclists and horse-riders parallel to Lavender Hall Lane, and going through the development site, across Hall Meadow Road, and into Lavender Hall Park. This would provide connection with a SW-NE route parallel to Hall Meadow Road, linking with the existing Kenilworth Greenway.

A new bridge for non-motorised users would be required across the Rugby and Birmingham Railway, possibly adjacent to the aqueduct over the railway, which only has pedestrian access for maintenance purposes.

10. Do you have any comments to make 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 changes are unacceptable and unjustified, and ignore the high value placed on the Green Belt in that area.

All areas, beyond those taken for housing during the currency of the Local Plan, should retain Green Belt protection due to the narrowness of the Meriden Gap.

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 new boundaries should be drawn tightly around the currently-developed curtilages, and Local Green Space designation should be used to provide continued protection of valued areas within the settlements.

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

Yes.

37. What compensatory provision should be made for land being removed from the Green Belt? Where relevant please give examples that are specific to individual sites proposed for allocation.

The primary aim should be to improve public access, subject to recognition that much of the land would be working farmland. The current *Solihull Rights of Way Improvement Plan 2016* sets out numerous opportunities for improvement that have not been funded.

It is important that improvements to public access are done in a way to facilitate and encourage use by people of all ages and ability. Path surfaces should be improved as necessary, properly drained, and protected from poaching by grazing animals. All boundary structures should be provided and maintained in conformance with BS 5709:2018⁴.

New routes should be provided to develop walking or riding circuits. Enhancements should be made to the amenity of routes.

More should be done to encourage the registration of unrecorded access rights.

Attention should be paid to providing safe routes along and across roads, for non-motorised users, which might entail the acquisition of adjacent land.

All of these improvements would entail expenditure that should be supported by Section 106 agreements or Community Infrastructure Levies.

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?

Some of the sites designated as Amber have a lot of merit for allocation as housing sites. In particular, those on the east side of Dorridge have good accessibility to employment opportunities and public transport.

⁴ British Standard 5709:2018 *Gaps, gates, and stiles - Specification*

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

There are a large number of smaller sites around the fringe of the built-up area of Kowle, Dorridge, and Bentley Heath, which would seem to have good accessibility and relatively low impact on the Green Belt.

However, the largest missed opportunity is the rejection of the concept of new settlements. Post-war housing strategy has stressed the need to create well-proportioned settlements, rather than to allow urban sprawl. This gave rise to the development of many New Towns. These were found to have problems of low density, inappropriate zoning, and poor construction, but these issues are all avoidable.

The new settlement opportunity identified in the G L Hearn study⁵ falls into the area of Sites 76 and 212 at Mercote, between Balsall Common and Hampton-in-Arden. The huge area of some 170 ha includes areas of land reinstated after quarrying, and areas of active gravel extraction and agriculture. However, the area is well sited for access to UK Central and the major road network. Good quality high frequency bus services already operate through Meriden and could be extended.

The area is not considered to have high Green Belt value, and the location has been supported by Berkswell Parish Council. Staged multi-year development at Mercote should be given priority over many of the allocations favoured in the Draft Plan, which would have poor accessibility, cause serious harm to the Green Belt, and would perpetuate urban sprawl.

40. Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floorspace incentivise developers to build more smaller market housing?

No.

The Planning Authority should take an objective view of housing needs and ensure they are delivered. There is little doubt that density has been too low, given the shortage of land and the need created for motorised transport. Consequently, the Planning Authority should control the housing density to appropriate levels through all the sites.

Many surveys indicate a view there is a shortage of mid-size dwellings suitable for young couples. These should be provided in adequate numbers on all sites.

43. What other measures would incentivise developers to build more smaller market housing?

A clear policy detailing the mix of houses to be provided in each part of the Borough would allow applications for excessive numbers of large dwellings to be refused.

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⁵ Greater Birmingham HMA Strategic Growth Study, GL Hearn, Figure 38 p207, February 2018