

**SOLIHULL LOCAL PLAN – DRAFT SUBMISSION PLAN (REGULATION 19)**

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**REPRESENTATIONS ON-BEHALF OF GREENLIGHT DEVELOPMENTS LIMITED**

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**Introduction**

1. These representations are made on-behalf of Greenlight Developments Limited (known as “Greenlight”).
2. Greenlight has an interest in the site known as ‘BC1 : Barretts Farm’ in Balsall Common.
3. Greenlight controls 3.05 hectares (7.54 acres) of this site, on land adjacent to Meeting House Lane, which has capacity to deliver circa 50-60 dwellings from an independent vehicular access off Meeting House Lane.
4. These representations are specific to this site.

**Illustrative Concept Masterplan - General**

5. In principle, Greenlight supports the ‘BC1 : Barretts Farm’ proposed housing allocation, and the removal of its land interest from the Green Belt. However, Greenlight does not support the treatment of its land interest within the Illustrative Concept Masterplan for the site, or the Site Analysis informing this Masterplan.
6. The Illustrative Concept Masterplan currently proposes the Greenlight land holdings as an ‘area of significant ecological value’ and ‘public open space’. Greenlight’s position is that these proposed uses are not deliverable and contrary to Paragraph 34 of the NPPF. If the Illustrative Concept Masterplan were to be taken forward in the Local Plan Review, then the landowners would be unwilling and financially unable to submit a planning application for an ‘area of significant ecological value’ and ‘public open space’ due to it not being a viable development option. It should instead be designated for housing.

**Ecology**

7. Accompanying is an Ecology Report (prepared by Ecology Solutions), dated May 2019, which has been prepared in direct response to the manner in which the Greenlight site has been treated on the Illustrative Concept Masterplan as an ‘area of significant ecological value’.

8. Ecology Solutions consider that the Illustrative Concept Masterplan and the constraints map included within the 'Additional Site Options Ecological Assessment (2016 and 2019)' and 'Preliminary Ecological Report (2018)', are misguided.
9. In fact, the Council's own evidence base, in the form of its Site Assessments (October 2020) document, and Sustainability Appraisal (October 2020), when considering the Greenlight site for development, makes no reference to ecology as a constraint.
10. The classification of the site as being one where development should be avoided and (instead) ecological enhancements delivered does not fit with the available ecological baseline information when sound ecological judgement is applied.
11. It is recognised that within the planning system, weight should be afforded to the presence of habitats of ecological value and that impacts on such habitats will be of material consideration when planning applications are being determined. However, the weight afforded to any such impacts must be determined in light of the baseline situation and the ability of any development proposals to mitigate these impacts and deliver appropriate enhancements where appropriate. This is set out within adopted planning policy (including the NPPF) and relevant guidance.
12. It is clear that the site is not considered to be of high habitat distinctiveness and looking to the description of the grassland habitat included within the 'Additional Site Options Ecological Assessment (2016 and 2019)', it is clear that this neglected grassland does not comprise a species compliment which would enable a classification as species rich or of existing high ecological value. This evaluation is consistent with Ecology Solutions own findings.
13. The pond within the site can be considered to be of some ecological value and the same is true of the boundary features, however, these features could be retained and enhanced through the sensitive design of any development proposal.
14. There is no basis in legislative or planning policy terms to preclude development and available ecological information does not support the preclusion of development. It is accepted that ecological constraints exist, as they do on many sites and indeed, with reference to the documents reviewed as part of this submission, constraints will likely exist for all allocation sites. However, these can be addressed through an appropriately designed scheme, which has regard to any impacts which could arise, following detailed assessment of baseline information.
15. So long as any scheme being brought forward is sensitive to the need to maintain functional ecological links, deliver enhanced species rich grassland areas, enhanced aquatic habitat and retained / enhanced boundary habitat, all subject to long term management; there is no reason why the site could not support housing, and this is demonstrated by the Greenlight Framework Plan which has already formed part of the submission to the DLP (as part of the Vision Document for the site – re-attached for completeness).

16. The recognised value of habitats for certain protected species, means that specific mitigation would be required but it is considered that this could easily be delivered in tandem with a sensitively designed development scheme (as per the Framework Plan).
17. As such, the 'area of significant ecological value' on the Illustrative Concept Masterplan should be removed from the Greenlight site.

### **Heritage**

18. Accompanying is a Settings Assessment (prepared by Cotswold Archaeology), dated September 2019.
19. The Council's 'Site Analysis' shows that the 'zone of significance on the setting of the listed building' touches the northern corner of the Greenlight site. This listed building being 'Pool Orchard'.
20. Pool Orchard is located c.160 metres north of the Greenlight site. Its heritage significance is best experienced from within its surrounding gardens, paddock and private driveway. It is acknowledged its position on the south-eastern periphery of Balsall Common, connecting by Barretts Lane, and its location with both the immediate and wider agricultural landscape, contributes to its setting to some degree.
21. Any views of the listed building from the wider landscape are limited, due to the combined effects of screening. Due to the presence of intervening built form along Sunnyside Lane and Barretts Lane to the north-west, and vegetation along Barretts Lane to the south-east, views towards the listed building are prevented.
22. It is considered that due to the presence of intervening vegetation, and the distance from, the Greenlight site (proposed for housing) will not alter the setting of Pool Orchard. Although the site would undergo a change in character, the site does not comprise a key part of the setting of the listed building, due to limited intervisibility resulting from intervening vegetation.
23. As such, the 'zone of significance on the setting of the listed building' on the Council's 'Site Analysis' should be removed from the northern corner of the Greenlight site.

### **Access**

24. The Illustrative Concept Masterplan needs to recognise Greenlight's vehicular access onto Meeting House Lane.
25. There is no highways rationale that Greenlight is aware of that suggests this vehicular access is inappropriate.

26. Furthermore, it assists in the delivery of the site earlier within the plan period.

### **Delivery Period**

27. The Council's 'Summary Table of Residential Allocations' on Page 71 shows the Barrett's Farm site to be within indicative delivery periods II (5-10 years) and III (11-16 years).
28. The Greenlight site can be delivered independently of the wider Barrett's Farm housing allocation off its own independent vehicular access off Meeting House Lane; meaning 50-60 dwellings can be delivered much earlier, in delivery period I (0-5 years), contributing to the Council's five-year housing land supply position.

### **Conclusions**

29. Even though, Greenlight supports the 'BC1 : Barretts Farm' proposed housing allocation, it does not support the treatment of its land interest within the Illustrative Concept Masterplan for the site.
30. This currently proposes the Greenlight site as 'area of significant ecological value' and 'public open space'.
31. These proposed uses for the site are not deliverable and contrary to Paragraph 34 of the NPPF.
32. The evidence bases of both the Council and Greenlight, does not support the treatment of the site in this way, which goes to the soundness of the Local Plan.
33. To overcome this position, the Greenlight site should instead be designated for housing.