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Our Ref 18 OVA V00

14 December 2020

Dear Mr Palmer,

**SOLIHULL LOCAL PLAN DRAFT SUBMISSION PLAN OCTOBER 2020 REGULATION 19
CONSULTATION - REPRESENTATION IN SUPPORT OF SITE SO1 EAST OF SOLIHULL**

Cushman and Wakefield (C&W) are appointed by SMBC Strategic Land and Property (acting in the Council's capacity as landowner and on behalf of the joint landowners) to submit representations in support of the allocation of Site SO1 East of Solihull for residential development as part of the Solihull Local Plan Draft Submission Plan (October 2020).

This representation is submitted on behalf of the joint landowners at Site SO1 East of Solihull and is supported by a Preferred Concept Masterplan and RIBA Stage 2 Concept Design Document prepared by Building Design Studio, which develops the project brief, related feasibility studies and concept design. Analysis provided within the Stage 2 Report has informed the Preferred Concept Masterplan (ref. 19029-BDS-XX-00-DR-A-1006-P01).

Landowners within the identified red line site boundary are identified by the Site Land Ownerships Plan provided at section 3.5 of the Stage 2 Report and are copied to this letter. The landowner group have contributed to the preparation of these representations and have approved this submission.

The Plan-Making Process and Policy Context

Regulation 19 consultation measures the Draft Submission Plan against the prescribed tests of soundness defined by the National Planning Policy Framework (NPPF, 2019), and these form the basis of this representation:

- 1) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is consistent with achieving sustainable development;
- 2) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3) Effective – deliverable over the plan period; and
- 4) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We consider the residential allocation of Site SO1 East of Solihull within the Local Plan Draft Submission (October 2020) to be sound – positively prepared, justified, effective and consistent with national policy. Site SO1 forms an important and entirely appropriate allocation which will contribute materially to the Local

Planning Authority's housing land supply, and which will support a conclusion that the Plan is sound.

The landowners fully support the proposed allocation of Site SO1 East of Solihull for development of at least 700 homes. The site will make a significant and necessary contribution towards the objectively assessed housing need and requirement for 15,017 additional homes for the borough over the Plan period.

The site is exceptionally well located, close to the town centre, and will support new housing in a location that is accessible and consistent with achieving sustainable development. It is deliverable within Phases I and II of the Plan period (0-10 years) as per the Allocated Sites Summary Table at paragraph 226, and in accordance with the NPPF Annex 2 Glossary definition and PPG (paras 007 Ref ID: 68-007-20190722, and 019 Ref ID: 68-019-20190722).

On this basis, the proposed amendment to the settlement boundary to accommodate housing on Site SO1 East of Solihull is appropriate and in accordance with the strategic objectives of the Draft Submission Plan and NPPF paras 136 and 137. We request, however, that Policy SO1 East of Solihull (and the Summary Table at para 226) and the Concept Masterplan Document, refer to the site's capacity being 'at least' 700 dwellings (to allow for flexibility at the outline planning application stage) which the Preferred Concept Masterplan and Stage 2 Report confirm is achievable.

Meeting Housing Needs and Site SO1 East of Solihull

The Draft Submission Plan sets out several challenges to be addressed. Challenge B refers to meeting housing needs across the Borough, '*including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall*', and a key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

We agree with this objective.

Draft Policy P5 Provision of Land for Housing states '*the Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036*'. Paragraph 226 includes a summary table of residential allocations. Site SO1 East of Solihull is included as a 43-ha site with capacity for 700 new homes to be delivered during Phase I (0-5 years) and II (5-10 years).

The work commissioned by the Site SO1 landowners confirms the proposed allocation of the site for at least 700 dwellings is achievable. The development will:

- Respect the setting of Grade II listed Field Farm and 239 Lugtrout Lane.
- Provide public open space including children's play.
- Retain the existing sports pitch.
- Provide for a range of market and affordable house types;
- Provide accommodation for older people in accordance with the requirements of Policy P4E as adopted, and
- Provide for Self and Custom Build Plots in accordance with the requirements of Policy 4D as adopted.

Paragraph 237 confirms *'it is important that efficient use is made of the land available to ensure delivery of sufficient new homes in the Plan period.'* Paragraph 240 recognises dwelling figures for the Allocated Housing Sites have been informed by concept masterplans, but that the eventual capacity will depend on detailed design and layout which may mean totals fall outside the indicative range. The Indicative Density table following suggests density of 30 - 40 dph within *'significant extension of urban or larger village edge'* areas, such as Site SO1 East of Solihull and apartments as appropriate.

The Preferred Concept Masterplan submitted with this representation demonstrates that the site could provide at least 700 new homes in line with the requirements of Policy P5 and the Draft Submission Plan.

We request that Draft Policy SO1, its associated 'Summary Table of Residential Allocations' in paragraph 226, the Concept Masterplan Document and Illustrative Concept Masterplan are updated to refer to capacity for 'at least' 700 dwellings to more accurately reflect development opportunity.

The site is capable of being delivered within Phase I and II (0-10 years) to ensure a supply of housing is available throughout the plan period, especially in the early period (Challenge B, page 13).

Site SO1 East of Solihull is an appropriate site and will provide new housing land consistent with the aim of the Plan to achieve sustainable development (Challenge B objectives, page 14). The site will provide a range of house types to widen the local housing offer and ensure a range of market and affordable housing (Challenge B, page 13), including an opportunity for self-build (draft Policy P4D) and accessible house types for older and disabled people (draft Policy P4E).

SMBC Illustrative Concept Masterplan Document (October 2020)

The Illustrative Concept Masterplan for Site SO1 submitted with the Draft Submission Plan includes the following Site Analysis of Site SO1 East of Solihull:

The site is located on the edge of the urban area of Solihull, adjacent to Solihull Town Centre. It is bounded by Damson Parkway to the west, Hampton Lane to the south. The 2016 Draft Local Plan anticipated that the 39ha site could accommodate 650 new dwellings. The site area has since been revised. The area allocated for development now extends north to the Grand Union Canal which will form the new Green Belt boundary along with Field Lane to the east. The site area is now 43ha.

The site contains arable fields, semi-improved grassland areas, a sports club, some residential / commercial use (Lugtrout farm and associated land), an ecosite (former Pinfold nurseries) and an abandoned orchard. The site contains designated heritage assets; Field Farm on Field Lane on the eastern site edge and 239 Lugtrout Lane located opposite the north eastern site corner at the Lugtrout Lane/ Field Lane junction. The setting of the listed buildings must be carefully considered development should be set back from the immediate locality and development within the 'zone of influence' must be of high architectural value. Likewise, the historic landscape must be safeguarded, and the rural character of Field Lane retained. Development must also have regard to potential flood risk areas.

The Illustrative Concept Masterplan makes the following reference:

Low to medium density housing is appropriate in this residential, edge of settlement location and 700 homes can be accommodated on the site. The density of the housing ranges from 30–40+ dph. The layout promotes perimeter block development to maximise natural surveillance and encourage safe active streets. The setting of the Grade II Listed Field Farm and 239 Lugtrout Lane must be carefully considered. Likewise, development must respond sensitively to areas of ecological importance and any loss of habitat will require biodiversity off -setting. An integrated drainage, landscape and ecological strategy for the site will be required. Important landscape features must be retained along with the rural character of Lugtrout Lane and Field Lane. Additional tree planting is promoted across the site.

Based on 700 homes the development will need to provide 5.7 ha of Open Space. The development will require a Doorstep and Local Play Space. The closest Play areas is at Damson Park which is 1.3km away. Neighborhood play contributions to the existing facility may be appropriate. Vehicle access into the site are from Damson Parkway and Lugtrout Lane, and footpath links to neighbouring developments and Hampton Lane are promoted. The setting of the built heritage assets and existing sports pitches are safeguarded to the east of the site. The site should utilise opportunities to maximise green/ blue infrastructure and include linear conveyance SuDS in green routes and optimise layouts to ensure extreme flood flow paths are not impeded.

We agree with and support the conclusion that the site has the capacity to deliver at least 700 new dwellings to contribute towards local housing need, illustrated by the Stage 2 Report and Preferred Concept Masterplan submitted. We agree the proposed density of 30-40+ dph is appropriate and consistent with national and local planning policy.

We request the Proposed Policies Map and the Illustrative Concept Masterplan document are consistent with each other and that they include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane. Hampton Lane, the Grand Union Canal and Field Lane, with these features comprising strong defensible boundaries to the Green Belt.

The Site Analysis Plan and Landscape Assessment Plan should similarly include the correct extent of land north of Lugtrout Lane/Damson Parkway.

Reference within SMBC Illustrative Concept Masterplan Document to “*an ecosite (former Pinfold nurseries)*” is not evidenced and we request this is removed.

The area north of Lugtrout Lane is annotated on the Illustrative Concept Masterplan as being a “*potential area of development subject to ecological assessment*”. We can confirm that this assessment has been completed as part of the preparation of the Stage 2 Report and Preferred Concept Masterplan work. A number of other site surveys have also been undertaken including a Tree Survey and Hedgerow Assessment, Ecology Surveys, Flood Risk and Drainage Assessment.

Preferred Concept Masterplan Development and Phasing

The Preferred Concept Masterplan submitted with this representation confirms that the site could be developed to provide at least 700 new homes. This is informed by detailed technical assessment and on-site surveys. The Preferred Concept Masterplan confirms the proposed allocation is positively prepared, justified, effective and consistent with national and local policy.

As stated, the site is a sustainable and accessible location, approximately 1.5km to the east of Solihull Town Centre. Birmingham International Airport is approximately 5km to the north and the M42 junction 5 is approximately 2km to the south. The site comprises a mix of grassland, agricultural land and low-quality orchard planting/scrub. Coldlands Colts Football Club is in the north eastern part of the site. Field Farmhouse south of the football club is Grade II Listed. The site gently slopes north to south.

The site is predominantly surrounded by existing residential development and a mix of further arable fields and sports fields to the North East.

The site achieves a positive score against most objectives set out in Sustainability Appraisal submitted with the Draft Submission Plan, noting potential for development to impact upon nearby heritage assets (i.e. listed buildings on Lugtrout Lane and Field Farm). The assessment considers the site suitable for development and with proximity to Solihull Town Centre providing opportunity to improve accessibility. For the purposes of the Green Belt Assessment (Atkins, 2016), the proposed allocation includes parcel RP27 (Land between Grand Union Canal and Lugtrout Lane) and RP29 (Land between B4102 Hampton Lane and Lugtrout Lane to the west of Field Lane), which have a limited score of 4 against the Green Belt tests set out in the NPPF. The highest scores are against 'Purpose 2 - to prevent neighbouring towns merging into one another', scoring 2 which is 'moderately performing'.

We consider both of these potential impacts can be mitigated through the masterplan.

Concept Design and Preferred Concept Masterplan (Building Design Studio, December 2020)

Consideration of the full extent of the opportunity that the site presents to achieve sustainable and high quality development has been informed (i) by site and context assessment prepared by SMBC to support the Local Plan process, and (ii) by a complete and robust 'evidence base' of environmental and technical assessments commissioned by the landowners.

The following technical work has been completed to inform the masterplan, and a summary is set out below:

- Access Appraisal (Phil Jones Associates)
- Arboriculture Survey and Tree Constraints Plan (Aspect Arboriculture)
- Air Quality Technical Note (Wardell Armstrong)
- Preliminary Archaeological Constraints Report and Heritage Statement (Wardell Armstrong)
- Ecological Surveys and Hedgerow Assessment (Wardell Armstrong)
- Flood Risk and Drainage Strategy (Wardell Armstrong)
- Geo-environmental Desk Study (Wardell Armstrong)
- Heritage Statement (Wardell Armstrong)

- Landscape and Visual Impact Assessment (Lathams)
- Noise Technical Note (Wardell Armstrong)
- Topographical Survey (Greenhatch)
- Utilities Survey (Greenhatch)

Access Appraisal (Phil Jones Associates)

The site is close to local amenities and Solihull town centre. Overall, the development is a highly sustainable location. There is an existing network of good quality pedestrian and cycle facilities in the vicinity of the site. Linkages to this network will be enhanced by the opportunity to provide new pedestrian and cycle access points from Pinfold Lane, Hampton Lane and Field Lane. The site is easily accessible by public transport, with bus stops located within 400m and Solihull station within 2km of the site, providing regular services to a range of destinations including Birmingham, Coventry, Worcester and London.

The preferred access strategy includes primary access via a new roundabout from Damson Parkway, with a secondary access from Lugtrout Lane. Access to the northern parcel is provided from Lugtrout Lane.

Arboriculture Survey, Tree Constraints Plan and Hedgerow Assessment (Wardell Armstrong, Aspect Arboriculture)

A Tree Survey and Hedgerow Assessment has been prepared and confirms that there are no TPO's within the site. There are two woodland areas to the northwest parcel and southeast corner. Several trees within the site are associated with field boundaries, hedgerows, and the scrubland area.

It is recommended that hedgerows and woodland areas are retained within the proposals and, where necessary to achieve best design and placemaking outcomes, any loss is compensated, and this is reflected in the masterplan. Significant allowance is made within the masterplan for landscaping and planting, and a network of open spaces linking the retained woodland features.

Archaeological Constraints and Heritage Statement (BSA Heritage, Wardell Armstrong)

Development of land within the red line is anticipated to result in less than substantial harm to the significance of Field Farm and 239 Lugtrout Lane.

Field Farm (NHLE Ref: 1342884) is Grade II Listed. Future development has potential to change the setting of the listed building and an appropriate Zone of Influence is identified and reflected in the masterplan. This area provides a reflection of the historic agricultural function and rural context, both of which add to an appreciation of significance. The retention and reinforcing of existing hedgerow boundaries around the asset further retain some understanding of the rural context.

The Preferred Concept Masterplan has considered all relevant matters, including a sensitive response to the setting of Field Farm as a designated heritage asset. These matters are all reflected in the indicative layout to ensure the setting is not adversely affected. The agricultural use and organised pattern of hedgerows of the land contribute towards the appreciation of the historic function of Field Farm, and consideration of detailed design will help mitigate any impacts and maintain views across the historic landscape from Field

Farm and Field Lane.

A sensitive and considered response to the setting of Field Farm is proposed with appropriate set back from the listed building

The layout as shown would cause no harm to the significance 239 Lugtrout Lane and elements and attributes of its setting which positively add to an appreciation of its special interest are sustained.

Ecology – updated Phase 1 Habitat Survey and Phase 2 surveys (Wardell Armstrong)

The site is mainly comprised of arable land and improved grassland, habitats of low quality for wildlife. Plantation woodland, dense scrub and poor-semi improved grassland are also present with hedgerows, some with mature trees, bounding many of the fields. Four statutory designated sites and 11 non-statutory designated sites of local importance were identified within the 2km data search area, including the River Blythe SSSI and Bickenhill Meadows SSSI.

The presence of breeding birds, bats and badgers have been identified within the site area. Mitigation for these species will be accommodated within the masterplan, with additional surveys undertaken to inform this mitigation strategy.

Flood Risk Assessment and Drainage Strategy (Wardell Armstrong)

The site is located within Flood Zone 1, and at low risk of flooding from rivers or the sea. The flood risk to the site from other sources is low. To ensure that the development does not have any adverse offsite impacts and increases flood risk elsewhere surface water runoff will be sustainably managed and disposed of using SuDS techniques. The surface water drainage strategy will consider other SuDS and incorporate SuDS principles wherever possible. Infiltration testing confirms allowance for discharge to the watercourse via Severn Trent Water Storm Water Sewer.

The assessment demonstrates the proposals are compliant with NPPF, PPG and local planning policy, taking predicted climate change allowances into account, and will remain safe from flood risk and can be suitably drained for the development lifetime.

Geo-Environmental Desk Study (Wardell Armstrong)

The current and historic use of the site is not considered to represent a significant risk to the environment. It is considered suitable for the proposed end use of residential development with associated infrastructure.

Landscape and Visual Impact Assessment (Lathams)

The site is assessed as having medium Visual Sensitivity and medium Landscape Value. A buffer zone adjacent to Field Lane is recommended to protect the heritage assets and recreational space. Retaining the existing sports fields and introducing landscape mitigation enhancement planting will reduce any likely visual impact where the transition to open countryside / agricultural topology occurs. The Grand Union Canal and immediate residential settlements are identified as the key visual receptors, with significant tree cover and vegetation to reduce any likely visual impact.

Landscape enhancement and mitigation, and a strategy to integrate new development within the current hedgerow enclosure have been incorporated into the masterplan.

Planning Policy Framework

Draft Policy P5 Provision of Land for Housing allocates land for *at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036*, including Site SO1 East of Solihull with capacity for 700 new homes to be delivered during Phase I (0-5 years) and II (5-10 years).

The draft policy framework is relevant to development of the masterplan, including the following:

- Draft Policy P5 – Provision of Land for Housing confirms appropriate density will be informed by the need to maximise the efficient use of land, the appropriate mix of housing, local character and distinctiveness and the scale, type and location of development.
- Draft Policy P4A Meeting Housing Needs – Affordable Housing requires the provision of 40% affordable housing on sites of 10 units or more.
- Draft Policy P4C – Meeting Housing Needs - Market Housing requires a mix of market dwellings having regard to local need, with 30% 1 or 2 bedrooms, 50% 3 bedrooms and 20% 4 or more bedrooms.
- Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding requires a contribution of 5% of open market dwellings on allocated sites of 100 or more as Self and Custom Build Plots.
- Draft Policy P4E Meeting Housing Needs – Housing for Older and Disabled People requires all developments of 300 dwellings or more to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older person's accommodation.
- Draft Policy P20 Provision for Open Space, Children's Play, Sport, Recreation and Leisure requires new housing developments to provide or contribute towards new open spaces or the improvement of existing provision in the area, in line with the minimum standard of 3.57 ha per 1,000 population.
- Policy SO1 – East of Solihull allocates the site for 700 dwellings.
- The Open Space Assessment (2019, Ethos Environmental Planning) submitted with the Draft Submission Plan requires sites of more than 200 homes to provide the required open space on site.

Preferred Concept Masterplan (Building Design Studio)

The Preferred Concept Masterplan submitted shows how at least 700 new homes could be delivered within a landscape-led masterplan, consistent with national, local and emerging planning policy. The site is a sustainable location with good local and regional access and strong links to Solihull Town Centre.

The site provides a development density of 35-40+ dph.

Primary access to the land south of Lugtrout Lane is provided from Damson Parkway and a new roundabout junction, with secondary access to this parcel from Lugtrout Lane. Separate and dedicated access to land north of Lugtrout Lane is also shown. Pedestrian access from Pinfold Lane, Field Lane and Hampton Lane are linked by a network of pedestrian routes and open space through the site. Development parcels respond to the landscape characteristics of the site and reinforce the proposed network of open spaces.

A significant amount of open space is provided, including a network of green corridors (retaining existing tree and hedgerow planting), connected areas for recreation and play and functional open space that will provide a range of uses. The existing sports fields are retained. The Preferred Concept Masterplan confirms that sufficient open space can be provided on site, consistent with the current policy requirement and any different requirement that might arise as a consequence of the standard set out in draft Policy P20. Areas of functional open space are distributed through the site to maximise accessibility within the new development.

Open spaces provide further opportunity for ecology and biodiversity enhancement, reflected in the landscape strategy. Sustainable attenuation measures ensure appropriate surface water management.

A sensitive and considered response to the setting of Field Farm and 239 Lugtrout Lane is proposed with appropriate set back from the listed building to ensure the setting is not adversely affected.

The design principles are summarised below (Building Design Studio Stage 2 Report):

- 1) To provide a dedicated new junction interface between Damson Parkway and the west of the site for vehicle and pedestrian and cycle accessibility.
- 2) To review the Ecological Constraints on buffer zone distances and tree buffers in general.
- 3) To retain the existing sports pitches on site.
- 4) To form a landscape led redevelopment masterplan by using where appropriate existing hedgerows to act as green corridors, connecting and linking the site across.
- 5) Working with the site's natural North-South slope, to create a sustainable urban drainage system such as swales and ponds to act as attenuation and reuse the existing ditch network as far as practicable.
- 6) To retain and enhance existing woodland areas for public open space, providing public amenity green spaces, conserving wildlife habitats and providing local play space in accordance with the Solihull Green Spaces Strategy.
- 7) To utilise the site's Grade II listed heritage asset by forming a focal point as part of a desire line.
- 8) To promote a pedestrian led site connecting links across the site and forming connections to the existing recognised cycling network.
- 9) To address the Council's Climate Change declaration (October 2019) and achieve make a full contribution to targets for carbon emissions reduction, including to be at net-zero emissions by 2041

Viability and Deliverability of the Allocation

We can confirm that the landowner group has been working together closely on a collaborative basis to bring forward the future delivery of the development for some time. This has been organised around regular landowner group meetings since early 2019, which all have been encouraged to attend. Attendance and engagement in the process has been considerable, so that these representations are presented with confidence that their content has consensus support. This further demonstrates that the site allocation is both viable and deliverable within the plan period.

The landowner group has also commissioned a detailed financial viability appraisal for the development, and is currently discussing an advanced draft Memorandum of Understanding (MoU) which will help to bring

forward the delivery of the site on the basis of agreed common objectives that are reflected in this representation.

Development Phasing

Draft Policy P5 Provision of Land for Housing states capacity for 700 new homes to be delivered during Phase I (0-5 years) and II (5-10 years). The Preferred Concept Masterplan illustrates opportunity for land to be developed during the first two phases of the Plan (0-10 years) and that detail of phasing will be determined in due course.

Financial Viability Appraisal (Cushman & Wakefield, 2020)

A viability assessment is being prepared by Cushman & Wakefield. Paragraph 34 of the NPPF confirms Plans should set out the contributions expected from development, including affordable housing and other infrastructure. Such policies should not undermine the deliverability of the plan.

A scheme compliant with the Draft Submission Plan has been tested and confirms that no viability barriers to delivery of the site have been identified.

Memorandum of Understanding

In addition, the landowner group is considering an advanced draft Memorandum of Understanding (MoU) which will confirm and demonstrate the mutual intentions and agreement of the Parties to co-operate in bringing forward the proposed residential development in accordance with the masterplan. The MoU will be completed prior to the Examination in Public of the Draft Submission Plan. The MoU includes agreement to share information and reach agreement on a number of key development issues - design and scheme content, viability and delivery strategy, project delivery programme and timetable and responsibilities and in the delivery of the masterplan.

The objectives set out and agreed have informed development of the masterplan and include the following.

- 1) To support, in principle, the continued promotion of the site as a Draft Local Plan housing allocation until the adoption of the Local Plan Review.
- 2) Following the adoption of the Local Plan Review, to deliver a high quality residential led development on the site in accordance with an agreed masterplan.
- 3) For the masterplan to address matters of Primary Infrastructure.
- 4) To agree a mechanism for the equalisation of the value of each Party's interest to ensure the site is delivered.

With regard to the latter point, we can confirm that the landowners are strongly committed to the principles of equalisation of their interests, to ensure that the masterplan is fully deliverable. At the time of writing, an equalisation strategy is being developed and considered to ensure a collaborative approach to the delivery of the allocation.

Summary

We support the allocation of Site SO1 East of Solihull within the Local Plan Draft Submission (October 2020) for residential development and consider the proposed amendment to the settlement boundary, as shown on the Policies Map to include site SO1 East of Solihull, to be sound.

Site SO1 East of Solihull will provide land for at least 700 new homes to contribute towards the objectively assessed housing need and requirement for 15,017 additional homes across the Plan period to support the delivery of sufficient housing land supply. It is consistent with achieving sustainable development and appropriate in planning terms.

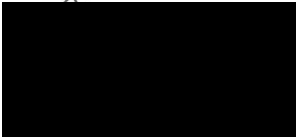
The allocation provided within the Concept Masterplan document includes the extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane. Hampton Lane, the Grand Union Canal and Field Lane create a strong defensible boundary to the Green Belt.

We consider Policy SO1 East of Solihull of the Draft Submission Plan (October 2020) to be sound – positively prepared, justified, effective and consistent with national policy, but request the following changes are incorporated into the Plan:

- Policy SO1 East of Solihull and paragraph 226 should be amended to refer to capacity for at least 700 new homes to reflect the scale of development which could be sustainably delivered on the site.
- The Concept Masterplan Document and Illustrative Concept Masterplan should be updated to reference the technical work prepared and Preferred Concept Masterplan and Stage 2 Report submitted and opportunity for at least 700 new homes.
- The red line boundary of Site SO1 East of Solihull should include the full extent of the proposed allocation, including land north of Lugtrout Lane/Damson Parkway, and the existing residential properties on Hampton Lane. Hampton Lane, the Grand Union Canal and Field Lane. The Site Location Plan, Proposed Policies Map and Illustrative Concept Masterplan document should be consistent.
- Reference in the Concept Masterplan document to Pinfold Nurseries as ‘an ecosite’ should be removed as it is not evidenced.

The site is demonstrated as an effective allocation that is deliverable over the Plan period for the reasons set out in this representation. The modifications requested in this representation will ensure the Plan accurately describes the allocation. It is financially viable and will be delivered by willing and collaborative landowners in accordance with a high-quality masterplan-led vision. The proposed development is consistent with national and emerging local planning policy.

Yours sincerely



Clare Lucey MRTPI

Associate, Development & Planning
Cushman & Wakefield

For and on behalf of the landowner group:

Caroline Elizabeth Clifton

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