

## Publication Stage Representation

### Solihull MBC Local Plan

14<sup>th</sup> December 2020

#### Policy BC3 – Kenilworth Road/Windmill Lane, Balsall Common.

1. The latest version of the Council's Local Plan appears to cover most topics sufficiently well, with the exception of allocating so much of the housing land proposed in Balsall Common to site BC3
2. In his foreword Councillor Courts referred in item 3 to the need to release Green Belt land, albeit reluctantly, due to a shortage of suitable brown field sites. "However, we have looked to minimise this and in doing so ensured the continued integrity of the significant Green Belt that remains".
3. The centre of the village, already well to the North of the area within the development boundary, would be further from this proposed site which extends down down to the Windmill Lane, Kenilworth Road junction to the South East.
4. The suggestion that the southern portion of BC3 should accommodate some open space for development is insufficient, and the dwellings intended here should be provided elsewhere.
5. There are better locations to the South West, West, and North West, balancing the sites proposed to the East, and within similar distances from the centre of the village.
6. Although Coventry City Council have approved around 2,400 new homes at Eastern Green, and infilling open space directly between the centres of Solihull and Coventry, affecting the heart of the Meriden Gap, this is not a good example to follow.

#### Justification for Promotion of Policy BC3

7. Despite the reduction in numbers following the Draft Local Plan and Supplementary Consultation indicating that the 200 dwellings originally intended would have a significant adverse impact on the ecological quality of the site and the setting of the adjacent very important Heritage Asset (in the form of Grade 2\* Listed Berkswell Windmill) the reduced number at 120 dwellings is still too many in a poor location (see Para 555).
8. Believed to be the oldest Georgian Windmill in existence, it's relatively remote setting has already been eroded too far by the expansion of Balsall Common towards the Windmill.
9. The SLP Inspector may well have concluded that "the area was not so remote that it would justify the omission of the two sites in this parcel..." as it now extends no further South than the existing housing (Para 556), but that housing is also too far from the "key economic assets" .
10. The argument in Para 557 that the area is a poorer portion of the Green Belt partly due to "the development and encroachment that has already taken place in the parcel" is no reason to make a poor situation even worse. The remaining land is clearly of significant ecological value and this provides a further reason why it should therefore remain undeveloped.

11. The admission is then made that “the site does not perform well in the Sustainability Appraisal, with twice as many negative effects as positive, including one significant negative effect due to the distance to the key economic assets...” (Para 558).
12. Since the sustainability and Green Belt issues do not appear to comply with the NPPF, the question of the setting of the extremely rare Grade 2\* Listed Building adjacent to the site and the extent of any mitigation for this and the local ecology need not have been further researched. It is difficult to understand the reasons why the site has been retained in the Local Plan at all.

## Alternative Sites

13. With the Government's intention of increasing both housing numbers and speed of delivery, there are several other sites that have been put forward that between them could more than satisfy both of these objectives. The better mix of parcel size and locations, to the North West and West of the village centre, coming forward where it is needed and capable of development without unnecessary delay would comply with Para 59 of the NPPF.
14. If the Council did reconsider the following sites which would offer an alternative location to retain a sufficient supply and mix, taking into account their availability, suitability, and likely viability NPPF Para 67, they should also prove more capable of early delivery than the larger sites which often take far longer to complete. This would inevitably help with the 5 year supply of deliverable sites, a major issue set out in Para 74 of the NPPF and one which trips up many Local Authorities when their Local Plans are tested in practice.

Site 82 Land at the rear of 152 to 172 Kenilworth Road, (including 166 and 170).  
This site is capable of taking up to 70 dwellings.

Site 421 Silver Tees Farm, Balsall Street.  
This site could take up to 16 dwellings.

Site 422 Rose Bank Balsall Street.  
This site could take up to 25 dwellings.

There are several other similar sites that may be similarly available to make up the shortfall.