



**Representation on behalf of Rosconn Strategic  
Land to the Solihull Local Plan Review Draft  
Submission Plan 2020 (Regulation 19  
Consultation) in relation to**

**Three Maypoles Farm, Shirley (Site 340)  
R/O 2441 Stratford Road, Hockley Heath (Site 121)**

**DEC 2020**

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## **1. INTRODUCTION**

1.1 This Statement is the response of Rosconn Strategic Land, to the Solihull Local Plan Review Draft Submission Plan 2020 (“DSP”). The response explains why the plan is unsound and what modifications are necessary to make the Plan sound. It should be read alongside the submitted representation form.

1.2 The plan is considered to be unsound in relation to six areas

- Housing Need
- Duty to Co-operate
- Specialist Housing
- BFLR
- Windfall
- Deficiencies with allocated sites

1.3 We consider the main modifications to make the plan sound are;

- Increase in Housing figures of between 1,036 and 1,248 dpa
- Reduction in windfall allocations from 200 dpa to 150 dpa
- Reduction in BFLR allocations by 29 – from 77 to 48
- Allocation of sites specifically for specialist housing
- Deletion of Policy BL1 Land west of Dickens Heath
- Deletion of Policy BL2 Land south of Dog Kennel Lane
- Deletion of Policy BC6 Lavender Hall Farm Balsall Common
- Deletion of SO2 Moat Lane Solihull
- Deletion of SLP Site19 Riddings Hill/Hallmeadow Road

And the addition of 2 new housing allocations:

- Three Maypoles Farm Shirley (Site Ref 340) and

- Land r/o Stratford Road Hockley Heath (Site Ref 121).

1.4 The following previously submitted documents should be read alongside these reps;

- Feb 2017
- Feb 2018
- March 2019
- April 2020

## **2. WHY THE PLAN IS NOT SOUND**

### Housing Provision

2.1 Rosconn are aware that Barton Willmore ('BW'), on behalf of various developers, have carried out a Housing Need Report in response to the DSP. The report focuses on the calculation of housing need in the DSP 2020-2036 and whether the approach taken in the DSP aligns with the National Planning Policy Framework (NPPF 2019) the Planning Policy Guidance (PPG 2019) and the aims, objectives and policies of the DSP. The report also considers the unmet housing need in the wider Greater Birmingham and Black Country Housing Market Area (GBBC HMA).

2.2 It is understood the conclusions drawn from the report are:

- (i) The minimum need for Solihull (807 dpa) will need to be increased to account for expected job growth from the UK Central Hub and the 'acute' need for affordable housing in the Borough and that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario;

(ii) The deficit in unmet housing need from Birmingham City being delivered by HMA Local Plans amounts to a minimum of between 11,294 and 13,101 dwellings up to 2031, a significant increase from the 2,597 dwellings concluded by the 2020 Position Statement. This increases when the unmet need from the Black Country is considered and additional unmet need will be created post 2031.

2.3 The DSP indicates a contribution of 2,015 dwellings towards Birmingham’s identified shortfall of 37,900 to 2031. This is the difference Solihull Council has identified between their identified supply and the local housing need. However, the recent Greater Birmingham Black Country Housing Market Area (“GBBC HMA”) study, agreed by the 14 HMA authorities, to update the position relating to the housing shortfall identified in the GL Hearn Strategic Growth Study from 2018 (“SGS”), claims the total Birmingham shortfall has diminished to 2,597 dwellings. This appears somewhat a surprising figure considering the SGS minimum shortfall was identified as 28,000 dwellings in 2018 and is considered to be a highly optimistic prediction.

2.4 In its conclusions the GBBC HMA study does not state that the scale of the post 2031 shortfall is not yet known and the shortfall for the whole of the combined authorities HMA post 2031 cannot yet be calculated.

2.5 It follows that, for the reasons summarised here the DSP is clearly unsound by reference to all of the tests set out in paragraph 35 of the NPPF.

### Duty to Co-operate

- 2.6 With this uncertainty and wide variation in figures and even accepting that Solihull is confirming that a contribution will be made to the shortfall there appears to be no confirming documentary evidence that Solihull's figures have been agreed by the HMA authorities and that Solihull has met its duty to cooperate either in its evidence base or confirmed within the DSP. In the absence of a Statement of Common Ground there is no real commitment to resolving the shortfall within the GBBC HMA.

### Specialist Housing

- 2.7 The DSP fails to set out the current or future need for specialist housing for older people, in the form of either care beds or extra care units required. Whilst policy H4E requires sites of over 300 units to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older persons accommodation, there is no mechanism for delivery.
- 2.8 Rosconn is aware of work carried out by Pinders in relation to Housing Need for the elderly. The conclusion of the report is there is a compelling need for both care bed spaces and extra care units now, which increases over the next 10 years. Depending on larger sites to deliver specialist housing for the elderly will not address the current need and is likely to only exacerbate the need going forward, due to lead in times and build out rates, as well as the complex land ownership issues involved.
- 2.9 Rosconn support providing a choice of housing for all, however consider delivery of housing for the elderly is a specialist area. As such it is considered the Council should ensure that suitable sites are allocated to meet such need across a wide choice of appropriate locations rather than relying on larger sites to provide a mix that

includes such provision. These additional sites should be in addition to the allocations and numbers already identified within the DSP.

#### Brownfield Land Register

2.10 The DSP relies on the BFLR to help make up the overall numbers in the plan, equating to 77. Of the 15 sites identified in the 5YHLS report to Cabinet Member for Climate Change in July 2020 report, 12 are within the Green Belt. The Council have only completed Part 1 of the BFLR and so any Green Belt sites coming forward could only be delivered under 145(g) of the NPPF. Para 145(g), whilst allowing for redevelopment, does so on the basis there is no additional impact on the openness of the Green Belt. As the Council does not have Part 2 of the register in place there is no mechanism to deliver the numbers allocated by the BFLR. Only one site has come forward so far, with an application for 49 extra care apartments (the site was not in GB). Therefore 29 units identified need to be discounted.

#### Windfall

2.11 A total allowance of 600 windfall units is included within the DSP. The Council advises that this includes 200 dpa for years 3-5, in order to avoid double counting with extant permissions. It is clear that historically there has been a high level of windfall completions. It is unclear however from the Windfall analysis at Appendix H of the 5YHLS position July 2020, whether the windfall allowance relates to both small and large sites, nor is it clear whether this includes garden land. It is however believed the windfall allowance does include an allowance from both large site windfalls and garden land.

2.12 There appears to be no compelling evidence (as sought by NPPF Para 70) that this is a reliable source of supply. The Council simply relies

upon past trends only. In terms of garden land, the Council by their own admission in the adopted Local Plan (para 8.4.3) note that Solihull have been resisting 'garden land' development since 2003. There is no specific policy in the DSP to resist garden land development but equally there is no compelling evidence that it will come forward either.

- 2.13 Based on the evidence we do not accept 600 as a realistic windfall allowance. In the absence of any evidence to the contrary, we consider the tried and tested number set out in the adopted Local Plan, of 150 dpa, should be used.

Deficiencies with Allocated Sites

- 2.14 In considering the soundness of the DSP we have reviewed the draft housing allocations. Many issues have been identified, including some by the Council, which suggest that delivery within the Plan cannot be guaranteed or that sites should not have been allocated in the first place.
- 2.15 The deficiencies in the housing allocations are particularly noticeable within Balsall Common but are common throughout the allocations.
- 2.16 Solihull, by their own admission, at Paragraph 541 of the DSP highlight concerns that relate to some of the proposed housing allocations at Balsall Common and raise doubts over the potential for these sites to be considered achievable or deliverable within the Plan period. The paragraph states:



*"Some of the sites, in particular Barratt's Farm, have multiple and potential complex land assembly issues. It is important that sites such as this are considered in a comprehensive manner to avoid piecemeal developments occurring. This needn't necessarily preclude a phased approach where one parcel of land or part of a site may be available for development in advance of another, but this should be in accordance with an approach agreed by the Council and all relevant landowners/development promoters. This will include joint responsibility for the provision of infrastructure, and this latter point will also be relevant to other sites around the village which also need to ensure they contribute towards the provision of the required infrastructure".*

2.17 These concerns were also highlighted by the Council in the previous draft Solihull Local Plan Supplementary Consultation January 2019. Paragraph 101 stated;

*"Before being finally included in the Plan it will be necessary for the varied land interests to demonstrate they can work collaboratively and comprehensively together".*

2.18 Apart from some brief references within the SLP Concept Masterplan 2020, no evidence has been provided to demonstrate that these complex issues have been addressed. The complexities of such sites and the need to work collaboratively and comprehensively together raises serious concerns in terms of deliverability within the Plan period.

2.19 In raising justifiable concerns about the delivery of allocated sites or parts of allocated sites within the plan period and deficiencies in the housing provision figures for each site, this will have implications for the trajectory and the phasing within the Plan and consequently on the required 5 year housing land supply.

2.20 Concerns highlighted about various sites in Balsall Common and elsewhere in the Local Plan area should be addressed by increasing the land supply in the form of additional allocations within the Plan to ensure that housing needs are met.

**Balsall Common Settlement**

Policy BC1 Barratts Farm Balsall Common

2.21 The above comments regarding multiple and complex land assembly issues (*the Council's own words*) are particularly relevant to BC1. We question if the issues can be resolved and if the housing numbers can come forward within the Plan period. This has implications for the delivery of the Balsall Common Bypass, which is one of the infrastructure requirements of policy BC1 and would be dependent on contributions from all landowners/developers.

2.22 In addition, there is no certainty over the provision of either HS2 and the Balsall Common bypass in terms of construction or completion dates. This is particularly relevant to HS2, where commencement and completion dates keep moving further into the future. Whilst the master plan advises the bypass is a requirement there is no evidence in relation to viability, it has not been costed and there is no evidence to demonstrate it can be delivered by the quantum of development proposed.

2.23 This issue has knock on consequences for and raises doubts over the provision of a firm eastern Green Belt boundary to the site. The Council acknowledged within the earlier site assessment document (January 2019) that without either the bypass or HS2, it would result in an indefensible Green Belt boundary. This becomes even more

pertinent with the site being partly within a highly performing broad area within the Council’s Green Belt Assessment.

2.24 The DSP does not make clear whether the line of HS2 or the West Coast Mainline is to become the revised Green Belt boundary to the east of BC1. Both are identified as fulfilling that role within the DSP. At paragraphs 537 the West Coast Main line is heralded as the “logical” revised Green Belt boundary, however paragraph 545 refers to the line of HS2 as the “strong defensible Green Belt boundary”.

2.25 I do not consider there is sufficient evidence to conclude this site is available, deliverable and achievable.

BC4 Pheasant Oak Farm

2.26 The previous comments regarding multiple ownership and complex land assembly issues are equally relevant to this proposed allocation.

2.27 The site is also acknowledged within the Council’s most recent site assessment document (October 2020) as:

- a) “..... part high (*highest*) performing parcel in the Green Belt Assessment and would result in an indefensible Green Belt boundary to the east.
- b) “Site has a low level of accessibility.....” and
- c) “Could be considered subject to provision of clear firm Green Belt boundaries”.
- d) “Development should preferably be on land that is more highly accessible, and/or performs least well in Green Belt terms and/or provides strong defensible boundaries”.

2.28 These factors weigh heavily against the site as a draft allocation.

- 2.29 BC4 is also heavily reliant on the building of the bypass and the assembly of land outside the housing allocation site.
- 2.30 There appears to be no policy or proposal for the building of this section of the bypass adjacent to BC4, between Waste Lane and Kenilworth Road. It must be assumed this section would not to be built within the Plan period up to 2036 and there is no certainty over its provision at any stage. This adds further doubt over the provision of a firm eastern Green Belt boundary to BC4.
- 2.31 There is no consistency between the DSP and the SLP Concept Masterplans over the precise location of the Revised Green Belt boundary in relation to BC4. The DSP proposes the eastern boundary of the site (paragraph 560) as the defensible boundary, whilst the Masterplan proposes the alignment of the bypass (page 32). Similarly there is no consistency with the alignment of the bypass, which differs between that shown on the illustrative concept Masterplan (page 32) and the Draft Submission Proposals Policies Map.
- 2.32 The negative site assessment in relation to Green Belt performance, accessibility and lack of defensible GB boundary calls this allocation into serious question. The added uncertainty in relation to the location and deliverability of the bypass, together with the ownership issues result in a site that cannot be considered to be available, achievable and deliverable.

Policy BC5 Trevellion Stud

2.33 The previous comments regarding multi ownership and complex land assembly issues are also relevant to this proposed allocation. Firm and defensible Green Belt boundaries would only be created when considered in a comprehensive manner, which cannot be assured.

2.34 The site is also identified as having high visual sensitivity in the Landscape Character Assessment and from an assessment on site it is clearly evident that the land extends significantly out into open countryside, impacting considerably on the openness of the Green Belt at this point and contrary to one of the five purposes of the Green Belt, to assist in safeguarding the countryside from encroachment.

Policy BC6 Lavender Hall Farm

2.35 BC6 is a later addition to the housing allocation list. It is not clear and obvious why this site was regarded as suitable for allocation within the DSP.

2.36 This view is premised on the basis of:

- An assessment on site,
- The site assessment document,
- The sites relationship with the village,
- Its position in open countryside to the east of the West Coast Mainline.

- 2.37 The site is completely divorced from the existing settlement, having no contextual link or appropriate setting to suggest the site makes an appropriate and sensible addition to the village. This sets an inappropriate precedent for any future planned village expansion.
- 2.38 The site lies within the highest performing Green Belt Parcel and the Landscape Character Assessment identifies that the site has medium visual sensitivity. The Council's site assessment also states that development should preferably be on land that is more highly accessible, and/or performs least well in Green Belt terms and/or provides strong defensible boundaries. The allocation contradicts the Council's own assessment criteria.
- 2.39 The site already lies adjacent the West Coast Mainline and if HS2 is built the site would be positioned in a narrow belt between two highly used railway lines, thereby creating an unsuitable residential development given the environment that would result from noise, vibration and visual sensitivity.
- 2.40 The site would also lie outside the proposed firm and defensible Green Belt boundary suggested by the Council i.e. the West Coast Mainline, east of Balsall Common, contrary to the purposes of defining a firm and defensible Green Belt boundary and contrary to the principles of Policy BC1 Barrett's Farm i.e. allocating land that would not breach the proposed new GB boundary.
- 2.41 It becomes even more difficult to understand why this site has been proposed for allocation considering the text within the DSP at Paragraph 537. This provides precise detail on the amended Green Belt boundary to the east of Balsall Common and which includes the strong and defensible West Coast mainline. The document states:

*"The Green Belt boundary around Balsall Common will need to be amended to accommodate the level of growth proposed for the settlement. To provide a logical strong and defensible new eastern boundary it is proposed to use the West Coast Main <sup>45</sup> line as the new boundary from where the Kenilworth Road crosses the line to the north of the settlement to the point the HS2 line crosses the existing railway just south of Station Road".*

2.42 The reference note <sup>45</sup>, added to this paragraph and explained in the small print at the bottom of the page appear to be solely to justify the breaching of what otherwise would be a firm and defensible Green Belt boundary and to allow the allocation of Lavender Hall Farm.

2.43 It makes no logical sense to identify an extremely firm and defensible Green Belt boundary to mark the eastern most boundary of Balsall Common and then breach that boundary in endeavouring to justify allocating a further site (BC6) and create a weaker Green Belt boundary around that site.

2.44 The note reads:

*"<sup>45</sup>. With the exception of that part of the line adjacent to Lavender Hall Farm. At this point the Green Belt boundary would extend north-eastward beyond the railway line so that the DLP Site 21 (R/O Lavender Hall Farm) can be included as an allocation."*

2.45 In view of the above comments the site at Lavender Hall Farm should not be allocated and Policy BC6 and the justification deleted from the Plan.

### SLP Site19 Riddings Hill/Hallmeadow Road

- 2.46 The site was allocated in the adopted Local Plan 2013 and as far as it can be ascertained, there has been no movement on bringing the site forward for development and as such raises doubts over its future delivery and within the proposed Plan period. It has not been demonstrated that this site is available, achievable and deliverable. Its continued inclusion as an allocation in the DSP is unsound.

## **Blythe**

### Policy BL1 West of Dickens Heath

- 2.47 The DSP confirms the distinct nature of the villages in Blythe set within and separated by attractive countryside and Green Belt giving the villages a sense of remoteness. In particular Dickens Heath is described as a modern multi award winning village guided by an architect led masterplan. It goes on to say that significant new development at Dickens Heath will add vibrancy and vitality whilst retaining the intrinsic character of a distinctive village separated by open countryside.
- 2.48 The proposed allocation does not conform to the above statement. Development here would result in the coalescence of Dickens Heath with Whitlocks End and Majors Green. This is identified in the Green Belt Assessment scoring and the Site Assessment document. The Landscape Character Assessment also highlights the site as highly visually sensitive.
- 2.49 The intrinsic character of the village would be lost through an ill-thought out addition to the west of the village, having no relationship



with the original concept or masterplan. This is an insensitive treatment for an award winning settlement.

2.50 This is particularly emphasised by the illustrative masterplan which makes no reference to how it would complement or enhance the village of Dickens Heath and even goes on to say that "*Further work is needed to identify links from the new development to Dickens Heath Village Centre*". In other words no thought has been given to this process and appears somewhat of an afterthought.

2.51 BL1 has previously been dismissed as an allocation at a number of Public Local Inquiries over many years since the Solihull Local Plan has been reviewed and the concept of Dickens Heath new village emerged in the early 1990s.

2.52 Former Site 13 (Solihull Draft Local Plan 2016, which included Three Maypoles Farm) was deallocated as the Council considered it would impact on Dickens Heath and it was really important to keep a gap between any urban extension and Dickens Heath. The impact of BL1 would be considerably more devastating and the perceived coalescence with Dickens Heath, Whitlocks End and Majors Green would be the result.

2.53 In endeavouring to overcome issues of coalescence with Majors Green and Whitlocks End, master planning of the site has continually reduced the development areas but the latest reduction in developable area has not reduced the site capacity. Irrespective of what the Site Assessment commentary suggests, the perception of coalescence remains.

2.54 Of concern throughout the Local Plan review process has been the relocation of the sports pitches which has been identified at previous consultation stages. There has been no identified sites, local or otherwise, for the necessary relocation of these sports pitches, which

must be of increasing concern and specifically highlighted by the Council in the Draft submission at point 5 of Policy BL1 which states:

*"To support sustainable development within the area the site should be promoted on a comprehensive basis supporting the positively planned relocation of the existing sports facilities south of Tythebarn Lane to alternative locations within the surrounding area. Until such times as these facilities are appropriately located or robust plans have been confirmed to secure a timely relocation that would prevent the closure of any associated clubs (either for a short period of time or permanently) development of the site would not be supported".*

- 2.55 This is again highlighted within the justification at paragraph 605, referring to the 3 Football clubs involved and the problems of relocating within the site because of the impact on local wildlife sites. This situation has not been addressed at any point in the Local Plan Review process and should have been resolved before the site was allocated within the DSP. This calls the delivery of the site into question either at all or within the plan period.
- 2.56 Even though traffic impact assessments have been carried out, there is concern for the impact of development on the highway system, particularly the route to Shirley on narrow and winding roads and junctions.
- 2.57 There has been no contextual thought in the process of proposing site BL1 as an allocation. The site cannot be considered available, achievable and deliverable and should be deleted from the Plan.

### BL2 South of Dog Kennel Lane

- 2.58 Whilst accepting the Councils Strategy of urban expansion. this site raises concerns over compliance with government policy and the

Council's own methodology and site selection process, which includes using planning judgement to refine selection. Concern is raised about the proposed allocation on Green Belt grounds and Landscape Character assessment concerns.

2.59 Government policy states that The land to the south of Shirley, opposite Dog Kennel Lane clearly exhibits such openness, which is further enhanced by the land gently sloping towards Cheswick Green and clearly demonstrated when viewed from Dog Kennel Lane looking south towards Cheswick Green. This is further confirmed by the Council's site selection assessment which also identifies the site as lying within a landscape character area of high sensitivity. Development here would extend built development out into open countryside

2.60 Government policy also states at Paragraph 139: *"When defining Green Belt boundaries plans should: (f) Define boundaries clearly using physical features that are readily recognisable and likely to be permanent"*. In the DSP the proposed approach to Blythe states at Paragraph 600: *"Given that the opportunities to develop on previously developed land in Blythe are extremely limited, Green Belt release will be required and a redefined Green Belt boundary will need to be established. In accordance with national planning policy, such boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent"*. The document then goes on to say at paragraph 609: *"Site BL 2 is within a parcel of moderately performing Green Belt, and given the existing field structure, does not have a clear contiguous defensible Green Belt boundary to the south. To address this the detailed design of the resulting development will be expected to utilise internal estate roads to form the new Green Belt boundary. This will be achieved by an estate road being provided on the southern (outer) edge of the development"*.

2.61 Paragraphs 600 and 609 provide conflicting statements and constructing a new road to form the Green Belt boundary does not conform to Government policy. This being the case and given that the existing field structure between Dog Kennel Lane and Cheswick Green does not provide a clear contiguous defensible Green Belt boundary for new development, it cannot be demonstrated how coalescence with Cheswick Green would be avoided. In developing out into open countryside there would be a substantial and detrimental impact on landscape character

2.62 For the above reasons Site BL2 should be deleted from the Plan

Site BL3 Whitlocks End Farm

2.63 It is disappointing that cooperative work with the Council on preparing a workable masterplan for former Site 13 or a variation of the Site 13 has not been pursued. The preference for bringing forward Site BL3 (previously site 26) raises concerns.

2.64 Coalescence and potential coalescence with both Dickens Heath and Majors Green and the resulting gaps between settlements have been a major concern since the late introduction of this site as a potential allocation and the deletion of Site 13 in the Draft Local Plan Supplementary Consultation document 2019.

2.65 Master planning, quite reasonably, has been used in endeavouring to overcome these concerns, together with carefully worded text to promote the site, a luxury which was seemingly not afforded Site13 and which master planning could have overcome issues raised by the Council. Rosconn submitted a master plan which did just that. A copy of the master plan is attached as **Appendix 1**.

2.66 Site BL3 is no further away from Dickens Heath than the parts of site 13 and Site 340 which are intended to be built development. Just as

Public Open Space can be used to enhance the perception of the separation between Shirley and Dickens Heath POS can also be used alongside the Dickens Heath Road frontage to ensure the perception of the gap between Shirley and Dickens Heath is maintained and enhanced.

2.67 Even though traffic impact assessments have been carried out, there is concern for the impact of development on the highway system, particularly the route to Shirley on narrow and winding roads and junctions and on Bills Lane and Haslucks Green Road.

2.68 Dickens Heath Road has more recently been upgraded and provides a less onerous, less convoluted and safer route to the A34, the town centres of Shirley and Solihull, the M42 and beyond. Also, if retained within the Plan, Bills Lane and Haslucks Green Road will have to deal with traffic from BL1 as well as BL3.

2.69 Whitlocks End Farm (BL3) lies within the highly performing Green Belt parcel, whereas former allocation Site 13 lies within the moderately performing Green Belt in the Council's Green Belt Assessment document.

## **Hampton in Arden**

### Policy HA1 Meriden Road Hampton in Arden

2.70 Land to the west of this site was allocated for housing in the adopted Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available, an alternative development solution delivering open space was forthcoming. This situation still exists and so calls into question the allocation of HA1. Whilst a planning application on land to the west was submitted in

Oct 2019 it has made little progress. The combination of both allocations appears to have resulted in an overall reduction in POS. POS for the previously allocated site has now been pushed into the Green Belt outside either allocation boundary, causing further encroachment and urbanisation.

- 2.71 There is no evidence in relation to viability of the site and how this may be affected by any potential contamination issues as a consequence of the former use of the site.
- 2.72 The site cannot be said to be available, achievable and deliverable and should be removed from the plan.

**Hockley Heath**

Policy HH1 Land to the south of School Road Hockley Heath

- 2.73 It is agreed that Hockley Heath should be a settlement where limited and proportionate development is accepted. New development will assist with the future viability and vitality of Hockley Heath provided development is proportionate to the settlement and in the right location.
- 2.74 However, it is considered that the site on land r/o 2214 Stratford Road Hockley Heath, submitted originally as part of the Solihull DLP 2016 consultation (site 121) is located in a more central location within the settlement and exhibits equal if not better credentials in respect of Green Belt, accessibility, landscape and deliverability than Site 25, Land off School Road Hockley Heath (see comments on modifications necessary to make the Plan sound).

## **Solihull Town centre and Mature Suburbs**

### Policy SO2 Moat Lane Depot

- 2.75 Moat Lane Depot was first identified as a housing allocation in the Solihull Local Plan 2006. Concerns over relocation of the current uses on the site and the timing of such a relocation, have remained an ongoing issue and concern ever since.
- 2.76 No site has been identified for the relocation of the depot or referred to in the DSP, which merely states that the site is expected to become available during the Plan period. There are also particular issues which need to be resolved regarding flood risk, contamination and the removal/relocation of the telecommunications mast before the site can be redeveloped.
- 2.77 The site cannot be said to be available, achievable and deliverable and should be deleted from the plan.

### Solihull Town Centre

- 2.78 Solihull Town Centre was identified as a location for housing development totalling 950 dwellings in the adopted Plan. Identified locations within the town centre and subsequent Masterplans have yet to come to fruition.
- 2.79 The Draft Submission again refers to the Town Centre as a location to provide for 861 dwellings within the Plan period. From the conclusions that can be drawn from the adopted Plan and the experience and complexities of town centre redevelopment, particularly the specific sites identified within the Plan, it is

considered that the housing figure is over ambitious and unachievable within the Plan period.

2.80 To ensure the delivery of the appropriate number of dwellings within the Plan period the above concerns highlighted on specific sites should be addressed by additional allocations within the Plan.

### **3.0 MODIFICATIONS TO MAKE THE PLAN SOUND**

3.1 Increase in Housing figures of between 1,036 and 1,248 dpa

3.2 Reduction in windfall allocations from 200 dpa to 150 dpa

3.3 Reduction in BFLR allocations by 29 – from 77 to 48.

3.4 Allocation of specific sites for specialist housing in addition to the current allocations.

3.5 Deletion of Policy BC6 Lavender Hall Farm Balsall Common and the accompanying justification paragraphs 570 – 574.

3.6 Deletion of site BL1 Land west of Dickens Heath and the justification paragraphs 603 – 608.

3.7 Deletion of Site BL2 South of Dog Kennel Lane and the justification paragraphs 609 – 611.

3.8 Deletion of Site SO2 Moat Lane Solihull and the justification paragraphs 810 -811.

3.9 Deletion of SLP Site 19 Riddings Hill/Hallmeadow Road and para 544.



- 3.10 Addition of a new housing allocation former allocation 13 South of Shirley plus Site 340 Three Maypoles Farm Dickens Heath (in part).
- 3.11 Addition of a new allocation Site 121 land r/o 2214 Stratford Road.
- 3.12 The allocation of the additional sites is needed to deal with the increase housing numbers from;
- a reduction in supply from other sources;
  - deletion of identified draft allocations that aren't suitable, available, achievable and deliverable;
  - address the higher housing requirement evidenced by the BW work; and
  - to satisfy the DtC in respect of the wider HMA/Bham shortfall.

Reasons why former allocation Site 13 south of Shirley and site ref 340 Three Maypoles Farm Dickens Heath (in Part) should be included as an allocation within the DSP

- 3.13 This response should be read in conjunction with the responses to the Solihull Draft LP 2016 (site Ref 340) and the Supplementary Consultation Jan 2019, which identify the quality the site exhibits in respect of its suitability as an allocation together with two adjoining land holdings (Site Refs 41 & 223) i.e. former Site allocation 13 within the Solihull Local Plan Review 2016. Site 13 was made up of part of Site 340, together with parts of Site 41 and 223.
- 3.14 In making representations to the Solihull Local Plan Review 2016 and later to address concerns raised during that consultation, Rosconn sought to have Site 13 extended to include a greater portion of Site 340, in order to create a defensible Green Belt boundary and to

create an area of woodland planting and POS between the proposed allocation and the neighbouring village of Dickens Heath.

3.15 As stated above Rosconn worked with the Council and other landowners to produce a masterplan that responded positively to issues raised by local residents. The master plan sought to;

- a) Ensure a firm and defensible Green Belt boundary to avoid coalescence of Shirley with Dickens Heath,
- b) Avoid a narrow corridor between Shirley and Dickens Heath and reducing the gap between settlements,
- c) Remove the potential for vehicular access through adjacent residential development on the edge of Shirley,
- d) Avoid any perception of narrowing the gap between Shirley and Dickens Heath along Dickens Heath Road and
- e) Avoid loss of public open space and safeguarding the amenities of adjoining property owners.

3.16 Site 13 was deleted as part of the Draft Local Plan Supplementary Consultation in January 2019 in preference to Site 26 land at Whitlocks End Farm (BL3 in the DSP). In pursuing the site at Whitlocks End Farm, the Council considered it necessary to identify and justify the advantages of Site 26 had over Site 13 and have repeated these advantages in the current DSP.

3.17 These advantages and justification were based around points a) to e) above but also included concerns around congestion on Dickens Heath Road, the main vehicular access route from Shirley to Dickens Heath.

3.18 In response to the concerns raised by the Council, the following comments are made:

- a) A firm and defensible Green Belt boundary would be provided in the form of the existing clearly identifiable, substantial metalled track and mature trees and hedgerows which would be at least 300m away from the Canal marking Dickens Heath boundary, with green fields in between. This point was never picked up in the site assessment.
- b) Development on Site 13 (modified) would be no closer to Dickens Heath than development on site (BL3).
- c) Careful master planning would overcome any perceived issue of a narrow, uniform corridor of open space. It is intended that all POS would through to existing development on the edge of Shirley and would be incorporated into the masterplan design. Accessible POS would be maximised together with habitat creation and Green Belt compensation.
- d) To address concerns over vehicular access through the existing residential development, the masterplan identified the creation of a new access onto Dickens Heath Road as well as a secondary access onto Bills Lane negating the need for access through existing development.
- e) The perception of narrowing the gap between Shirley and Dickens Heath along Dickens Heath Road can be successfully master planned with all landowners involved in Site 13 (modified) owning all the land adjacent Dickens Heath Road. The masterplan for BL2 (formerly allocation 12) identifies that a similar exercise has been carried out on the other side of Dickens Heath Road.
- f) There would be no loss of public open space, indeed more substantial areas of public open space would be created as land between Site 13 and Dickens Heath would be given over to POS and woodland planting.
- g) Access and egress onto both Bills Lane and Dickens Heath Road, together with the recognised junction improvements

would overcome any potential issues of congestion issues on Dickens Heath Road.

- h) Traffic to and from Whitlocks End Farm (BL3) would have to travel along Bills Lane and Haslucks Green Road, where there would be more traffic related issues than on the recently much improved Dickens Heath Road e.g. difficult junctions, blind bends and substantial amounts of traffic accessing the two roads from existing built development, both commercial and residential. This would be exacerbated by the traffic generated from Site Policy BL1. With anticipated improvements to junctions an additional access onto Dickens Heath Road and B401 would improve traffic congestion issues.

3.7 It is disappointing that in endeavouring to overcome the various concerns and issues at the sites, Site 13 was removed from the process without explanation and particularly as discussions and solutions had been progressing well.

3.8 In respect of consistency with adjoining or nearby sites in the Site Assessment Document, no reference or criticism has been made on the issue of the reduction of the perceived gap along the roads leading to the village of Dickens Heath in relation to Site Ref 122 which contains proposed allocation BL2. Here the masterplan shows POS adjoining the roads leading to Dickens Heath, something which is entirely feasible and available at Site 13 (modified).

3.9 No critical reference has been made to firm and defensible Green Belt boundaries for Site 12, south of Dog Kennel Lane. The answer now appears to be by building a road on the southern perimeter, which is clearly contrary to National policy.

3.10 Similarly on comparison with Site Ref 176 (BL1) land west of Dickens Heath, no reference is made on the issue of coalescence between

Dickens Heath, Whitlocks End and Majors Green. Master planning has been pursued in an endeavour to overcome the issue.

3.11 Of major concern is the manner in which the sites close to Dickens Heath have been dealt with. In pursuing a policy of urban extension south of Shirley, there was inevitably that issues and concerns would arise on all sites. In the case of Site 4 (BL1) and Site 12 (BL2) these issues and concerns apparently can be dealt with through master planning and the planning process. In the case of site 13 (modified) after seemingly successful discussions on how to resolve any issues or concerns the response has been not to pursue the site and delete it from the process, introducing an alternative instead.

3.12 In brief, the site is highly accessible, of medium landscape value and within a moderately performing parcel of Green Belt. It has a recognisable firm and defensible Green Belt Boundary and would accommodate appropriate levels and areas of public open space to satisfy the Councils concerns over coalescence and narrow POS corridors. The site is marketable, readily available and achievable within the Plan period.

3.13 Site 13 as modified (which includes part of site 340) should be included as proposed allocation within the DSP. The site could be considered on its own merits or in association with BL3.

Reasons why Site 121 land r/o 2214 Stratford Road Hockley Heath should be included as an allocation within the Solihull Local Plan Draft Submission

3.14 This response to the omission site must be read in conjunction with the responses to the Solihull Draft LP 2016 (Ref 121) and the Supplementary Draft 2019 which outlines in detail the quality the site

exhibits in respect of its suitability as an allocation within the Solihull Local Plan..

- 3.15 In response to the DSP, the confirmation that Hockley Heath is a settlement for limited and proportionate expansion is supported. There is however disappointment that the site (Ref 121) Land r/o 2214 Stratford Road has not been identified as an allocated site within the Plan.
- 3.16 In comparing the School Road site (HH1) with the r/o 2214 Stratford Road site (Ref 121) through the site assessment document, there is little if any difference between the two sites other than the statement that on the r/o 2214 Stratford Road site: *"Although the site is relatively well contained by landscape features there would be an incursion of built form into the open countryside where no permanent physical features are present to establish a strong defensible Green Belt boundary"*.
- 3.17 Apart from stating that the site is well contained, which it is, the comment is strongly disputed. There is the welcomed acknowledgement that the site is well contained by landscape features and existing development on three sides. These landscape features are substantial being mature trees and hedgerows.
- 3.18 Having acknowledged this, it is strange that the Council then go on to say that there are no permanent physical features present to establish a strong Green Belt Boundary. Mature trees and strong hedgerows define the western boundary, a nationally recognised, acknowledged and well established example of a firm and defensible Green Belt boundary (NPPF) and used on other allocated sites within the DSP e.g. Site BL1 & BC3.
- 3.19 On this specific issue of GB boundaries it must to be pointed out that additional land is being taken out of the Green Belt along School

Road, opposite the School Lane allocation (HH1). This removal of land (as it is not an allocation) has a very questionable and far from firm and defensible Green Belt northern boundary. It comprises a mixture of small fencing, light hedging and open land.

3.20 With reference to “incursion into open countryside” it should be noted that the site (ref121) is bounded on three sides by development and does not extend as far out into the countryside as the existing substantial development to the north and south of the site. As such it cannot be described as an incursion into open countryside. Indeed it could be argued that the School Road site extends outward into open countryside more prominently than the Land r/o 2214 Stratford Road. A careful observation on visiting the sites would confirm the above points.

3.21 Of particular note, if comparing the two sites, the site off Stratford Road is more centrally located and has in appearance a stronger relationship to the village. It offers the opportunity of setting aside land within the site for the provision of a doctor’s surgery. Without reiterating the points raised in the original submission to the 2016 Draft Local Plan the site performs well against the Green Belt Assessment, the accessibility mapping and the Strategic Housing and Employment Land Availability Study.

3.22 Also, changes from the 2019 SLP supplementary consultation included in the DSP is the proposed revision to the Green Belt boundary along School Road, already highlighted above, and the reference to two small sites on School Road (paragraph 671) currently in the Green Belt but would now be within the revised settlement boundary and outside the Green Belt. This revision would now include a number of low density properties with very long rear gardens and small areas of open land to the rear within the settlement boundary. Release of this additional land from the Green

Belt will undoubtedly encourage additional development which may result in sporadic and haphazard development .

- 3.23 The intention of Paragraph 669 of the DSP is to release land from the Green Belt to accommodate the level of growth proposed for the settlement. For Hockley Heath this now includes both sides of School Road, Site HH1 and the land to the north of School Road (a run of low density housing). Generally the exceptional circumstances for releasing land from the Green Belt is to facilitate the need for housing within the Borough and allocated sites have then been identified as part of the local plan process. This has generally occurred in all the other settlements in Solihull within this DSP. It therefore seems unusual that the Council intends to release a substantial area of land from the Green Belt comprising sporadic housing with no policy attachment to that area to accommodate the level of growth proposed.
- 3.24 The release of the site r/o 2214 Stratford Road would be considerably more appropriate to fulfil the intention behind paragraph 669 and where housing provision could be assured within the Plan period would be achievable and policy controlled providing a master planned development with appropriate infrastructure provision and providing Green Belt enhancements as well as community benefits.
- 3.25 Consideration therefore should be given to allocating the site r/o 2214 Stratford Road site along with the School Road site. The additional development would still be regarded as limited and proportionate to the size of the settlement and therefore would not impact on Policy, would boost the housing supply and provide financial assistance to the infrastructure requirements of the settlement. The previously submitted master plan is attached as **Appendix 2.**





# **SLP DRAFT SUBMISSION PLAN REPS**

ROSCONN STRATEGIC LAND

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