**TOWN AND COUNTRY PLANNING ACT 1990**

**SOLIHULL METROPOLITAN BOROUGH COUNCIL**

**SOLIHULL MBC LOCAL PLAN - DRAFT SUBMISSION PLAN**

**REPRESENTATIONS MADE ON BEHALF OF**

**HARRIS STRATEGIC LAND LIMITED AND**

**COLCHURCH PROPERTIES LIMITED**

**IN RELATION TO LAND AT**

**BARRATT’S FARM, BALSALL COMMON**

**BY**

**RICHARD BROWN PLANNING LIMITED**

**DECEMBER 2020**

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5. **Introduction**

1.1 These representations are provided in response to the Solihull Local Plan Review, Draft Submission Plan Consultation (Regulation 19) dated October 2020 and are submitted on behalf of Harris Strategic Land Limited and Colchurch Properties Limited with regard to Land at Barratt’s Farm, Balsall Common.

1.2 Land at Barratt’s Farm, Balsall Common, to which these representations relate, is currently identified as a Draft Allocation in the Local Plan Review. The allocation is covered by Draft Policy BC1 which allocates this land for 875 dwellings to be delivered in the Plan period. Harris Strategic Land and Colchurch Properties are supportive of Policy BC1 which proposes to release the land at Barratt’s Farm from the Green Belt for housing.

1.3 It is considered that land at Barratt’s Farm, provides a suitable opportunity for a sustainable urban extension to Balsall Common that is best placed to meet the requirements of paragraph 72.

1.4 Through previous representations Harris Strategic Land and Colchurch Properties have demonstrated that this site is wholly appropriate for Green Belt release, given its highly sustainable location and being well served by public transport.

1.5 Harris Strategic Land and Colchurch Properties have also demonstrated that this site is deliverable due to its suitability, availability and achievability. Harris Strategic Land and Colchurch Properties are committed to bringing this site forward without delay to ensure that the housing needs of the Borough are met.

1.6 These representations are supported by the WSP Technical Note (annexure 2) and the Bidwell’s commentary on Deliverability/Viability (Annexure 3).

1. **National Planning Policy Framework**

2.1 The National Planning Policy Framework (NPPF) requires that Local Plans be prepared in accordance with legal and procedural requirements and whether they are sound. The tests of soundness are set out in paragraph 35. Plans are ‘sound’ if they are:

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so 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 based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
4. **Consistent with national policy –** enabling the delivery of sustainable development in accordance with the policies in this Framework.

2.2 Land at Barratt’s Farm, Balsall Common, to which these representations relate, is currently identified as a Draft Allocation in the Local Plan Review. The allocation is covered by Draft Policy BC1 which allocates this land for 875 dwellings to be delivered in the Plan period. Harris Strategic Land and Colchurch Properties are supportive of Policy BC1 which proposes to release the land at Barratt’s Farm from the Green Belt for housing.

* 1. The NPPF is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport.

2.4 Furthermore, with regards to identifying land for homes, paragraph 72 of the NPPF is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. In considering suitable locations for such development which can help to meet identified needs in a sustainable way, strategic policy-making authorities should:

1. Consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;
2. Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level or self-containment), or in larger towns to which there is good access;
3. Set clear expectations for the quality of the development and how this can be maintained and sure that a variety of homes to meet the needs of different groups in the community will be provided;
4. Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation; and
5. Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.5 It is considered that land at Barratt’s Farm, provides a suitable opportunity for a sustainable urban extension to Balsall Common that is best placed to meet the requirements of paragraph 72.

2.6 Through previous representations Harris Strategic Land and Colchurch Properties have demonstrated that this site is wholly appropriate for Green Belt release, given its highly sustainable location and being well served by public transport.

2.7 Harris Strategic Land and Colchurch Properties have also demonstrated that this site is deliverable due to its suitability, availability and achievability. Harris Strategic Land and Colchurch Properties are committed to bringing this site forward without delay to ensure that the housing needs of the Borough are met.

1. **Landscape and Visual/Green Belt**

3.1 Landscape and visual matters have been consistently reviewed at all stages of the evolution of site BC1, and shared on several occasions with the Officers of Solihull MBC, with extensive landscape and visual analysis having been carried out across the Site. It is generally agreed that the character of the local landscape, specifically the Arden field enclosure pattern, can assist in shaping and influencing the form of development, and that other notable features including public rights of way and water courses/low land can be successfully integrated into a public open space strategy. Landscape and Visual constraints across the site are not considered to be significant; indeed it is considered that there are significant opportunities for landscape and visual diversity and enhancement.

3.2 The concept masterplan prepared by Solihull MBC indicates a “cellular” layout to the different areas of development. This is reflective of the local landscape character of the site, and serves to demonstrate how the landscape features can assist in the masterplan development – again this approach is supported as a fundamental masterplanning design principle. As such, it can be clearly demonstrated that landscape and visual matters have continually informed the preparation of the concept layout masterplan, and will continue to do so.

3.3 It is considered that this landscape led approach to masterplanning will successfully deliver, as a minimum, the 875 no. residential units, local centre and primary school as indicated on the SMBC Concept Masterplan, together with the areas of POS (Public Open Space).

* 1. It is further considered that the POS will comprise areas of Green Infrastructure, biodiversity enhancement (wildlife corridors etc.) and recreational areas (inc. equipped local and neighbourhood play).

This could potentially include an area of parkland between the existing settlement in the vicinity of Meeting House Lane and newly proposed development in the vicinity of Barrett’s Farm and Pool Orchard, where POS could be laid out across those areas considered to be of importance for the setting of the listed buildings.

3.5 With regard to the land currently operating as HS2 safeguarded areas, there is opportunity to significantly enhance the existing landscape post HS2 e.g. with the reinstatement of former hedgerow networks, as well as provide a form of “linear park” along the Kenilworth Green Way/HS2 boundary, again as illustrated on the Solihull MBC’s Concept Masterplan.

3.6 In terms of the extension of the Draft Allocation site up to the alignment of HS2 (which will form the new Green Belt boundary) and the B4101 to the south, this makes robust and valid masterplanning and Green Belt boundary logic, and is supported. With specific respect to the Green Belt boundary, and NPPF paragraph 139 (f), which states:

*“(When defining Green Belt boundaries, plans should)….(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

3.7 The definition of the new Green Belt boundary along the route of HS2 rail line to the north-east, to accommodate Draft Allocation BC1, aligns with this policy wording very well.

3.8 With direct reference to the wording for policy BC1 – Barratt’s Farm, Balsall Common, Section 2, where criteria i = xii are relevant to landscape and visual matters, it is considered that all such criteria will be comfortably delivered. Furthermore, within the Green Infrastructure network that this will create, all those criteria relevant to heritage, masterplanning, drainage and flood, highways access, accessibility and distribution and type of housing type and mix, will similarly be comfortably delivered.

3.9 Section 3 of the policy relates specifically to Green Belt enhancements. Again all items set out under criteria i – iii, as described above, will be delivered and contribute to these enhancements, both on site, and where accessibility is concerned, off-site into the wider Green Belt land. Specifically on this point, the site will be fully accessible, and include extensive extended facilities for walking and cycling, and further seek to link up comprehensively to adjacent land that is remaining in the Green Belt, which is also in accordance with NPPF paragraph 138, and the reference to Green belt compensatory improvements.

1. **Heritage**

4.1 With regards to heritage issues, it is clear from comparison between the SMBC and the Pegasus Group masterplan that we are very closely aligned in terms of the capacity of the site to accommodate development and the placing of development, with both showing the ways in which the quantum of development will be delivered to respect the setting of the heritage assets. Both masterplans have been informed by consideration of the heritage assets and their settings.

4.2 Whilst there are minor differences in the placement of development in the vicinity of Pool Orchard and Barretts Lane Farm, the two masterplans are in agreement that development can be accommodated in these areas and still maintain views to the assets from Barretts Lane and provide appropriate open space in their vicinity.

4.3 With regards to the land to the south-east of the Brick Layer’s Arms, whilst no development was placed in this location on the Pegasus masterplan, it is recognised that there are only filtered views into this area of the site from the asset, and there is potential for sensitively designed development in this location.

1. **Access/Transport**

5.1 A fundamental role that the Site will play within the delivery of the Plan is the ability to accommodate and deliver the Balsall Common Relief Link Road. This route will run from Hallmeadow Road in the north, through the site, connecting to the south at B4101 Waste Lane. The Councils aspiration is that the Balsall Common Relief Link Road will continue further to the south beyond the Barratt’s Farm Site in order to provide a highway connection towards the A452 and A4177.

5.2 The role of this route will be threefold; it will

* provide traffic relief along the A452 corridor through the central area of Balsall Common;
* accommodate wider traffic growth arising from the Plan, particularly towards the HS2 Hub; and
* provide all modes access to the Site.

5.3 Dialogue with the Highway Authority has confirmed that access points from the Balsall Common Relief Road to serve development should be limited such that the attractiveness of the route to draw traffic away from the centre of the Village is not diminished. The promotor is supportive of this approach.

5.4 The Site will provide permeability, with the opportunity to provide a number of secondary all modes access points to serve development, these being complimentary to the Relief Link Road and providing non-car and emergency access routes connecting to the main site.

5.5 Given the extensive network of existing rights of way, including the Kenilworth Greenway, within and adjacent to the Site, there will be opportunities to improve access to the surrounding countryside for both future and existing residents of Balsall Common.

5.6 From the phasing perspective, initial development can be promoted via secondary access points from the south and north ahead of the Relief Link Road being provided. Supported by a high quality and permeable development layout, some 400 dwellings could be served via a first phase of the Relief Link Road ahead of its connection to B4101 Waste Lane.

5.7 The Site is in a highly sustainable location and benefits from pedestrian access to the existing facilities within Balsall Common and immediate access to Berkswell Station. Through the provision of facilities within the Development, such as the Primary School and other complimentary uses such as on site retail provision and leisure facilities, general day to day purposes of future residents will be further accommodated without the need to travel by car away from the Site.

5.8 The Promoter is engaging with Network Rail as to the form of the enhanced parking facilities to serve Berkswell Station. It is anticipated that this will consist of an extension to the car park, together with improved cycle parking facilities to cater for those who wish to access the station by bicycle. The Promotor will also develop measures to prevent on street parking associated with the station on existing and future roads.

5.9 A high quality development layout will be provided that would facilitate ease of movement for those travelling either on foot or by bicycle towards Berkswell Station together with the existing shops, services and amenities that Balsall Common provides. The development layout will provide suitable infrastructure to accommodate bus movement, with access by this mode of travel to be provided via the Relief Road.

1. **Housing Mix/Affordable**

6.1 The proposed allocation BC1 provides an opportunity for mixed tenure residential development with associated local centre and community facilities. Solihull HEDNA 2020 research concludes that an appropriate market housing mix for the plan period to 2036, subject to variation for local needs influences, would be:

I bed     0 -10%

2 bed    20 – 30%

3 bed    45 – 55%

4 bed    15 – 25%

6.2 It is anticipated that residential housing allocated at Barratts Farm will be able to provide a full range of  market housing for a variety of purchasers including single persons, young couples (starter homes), small and large families, and specialised accommodation for old people and those requiring more accessible housing.

6.3 In respect of affordable housing we recognise the requirement of SLP (2013) Policy 4a to provide 40% affordable housing on qualifying sites, of an appropriate mix determined on a site by site basis. We note that this policy is evidenced by the output of the Solihull HEDNA 2020 which confirms that the delivery of affordable housing is an important and pressing issue; to address an annual affordable housing need of 578 dwellings for the period between 2020 and 2036.

6.4 In the context of the above, we can confirm that periodic discussions with the Solihull MBC housing department confirm that they recognise the importance of the site in helping to address the shortfall in affordable housing provision. Given its scale it is understand that their focus would be on meeting Borough wide need although there would be scope to incorporate accommodation for the specific needs of Balsall Common residents who met Council eligibility criteria for affordable homes. We are, in this context, informed that the Council would consider a Local Lettings Plan to give existing residents in Balsall Common some priority.

6.5 Additional Council feedback indicates that the affordable housing should be split roughly two thirds social/affordable rent with the remaining third being intermediate tenure (shared ownership preferred). The site provides the scope to provide integrated affordable homes for a range of occupier groups from single persons up to extended families. It is envisaged that this accommodation would be transferred, in phases, to Registered Providers to ensure long term affordability and management. It is understood that the partner Registered Provider would grant nomination rights to Solihull MBC.

6.6 The sustainable nature of the Barratts Farm site provides scope to address both the market and affordable needs of older persons and other occupier groups who require more specialist accommodation. Bungalows and other forms of self-contained mobility dwellings are capable of being provided. In addition, consideration is being given to incorporating nursing care bedspaces in a purpose built facility (likely to be minimum 60 bedspaces), subject to operator requirements. This would help address the current shortfall in the Borough which has been assessed at 313 bedspaces.

6.7 The requirement to provide plots for self/custom build is also recognised. Whilst the location of these plots needs to carefully managed there is a commitment to provide 5% of the open market housing at Barratts Farm as self/custom build land.

1. **Ecology**

7.1 The site is criss-crossed by mature hedgerows and trees, as well as a small watercourse.  These are being retained where possible, and will form the basis of green infrastructure corridors across the site.

7.2 There are areas of significant ecological value which are also being retained, and will be linked together via wide green corridors to create ecological connectivity across the site and to the wider landscape.

7.3 GCN – a small population of Great Crested Newts is present in a pond at Pool Orchard (off Barretts Lane) – we’ve allowed a wide buffer around the site to maintain terrestrial habitat for the population.

7.4 Badgers – a sett has been found in the area of significant ecological value that lies almost opposite Pool Orchard along Barretts Lane.  This also contains an active Fox earth.  The grassland is quite rich botanically.  This area will remain undisturbed.

7.5 Birds – 43 species identified to date, but no rare or notable breeding birds noted.  An abundance of suitable nesting and foraging habitat is being retained.

7.6 Reptiles – a full survey in 2017 revealed no reptiles on the original site area.  A survey is planned for the wider site, but irrespective of the presence or absence of reptiles, large areas of open space are being retained, so there will be no loss of suitable habitat for reptiles if any are subsequently found.

7.7 Bats – no bats were found roosting in any trees on site in 2017, and activity surveys revealed only low levels of bat foraging/commuting by just three common  species – Common Pipistrelle, Brown long-eared and Noctule.  Darkened corridors for bat foraging are being retained.

**Richard Brown MSc**

**14th December 2020**