



Vision Statement

Gentleshaw Lane
Solihull
Kler Group Limited

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Version 1.1

Document Reference:
20.218

Date of Issue:
August 2020

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Introduction

1.0 Introduction

Cerda Planning Ltd have been instructed by Kler Group Limited to promote land at Gentleshaw lane, Solihull through the Local Plan Review.

Kler Group Limited have a legal interest in the land and have engaged in the Local Plan Review process including by way of submissions to the call for sites exercise (site reference 107), the preparation of a Promotional Document demonstrating the deliverability of the site, and representations to the formal plan preparation consultation stages.

The Local Plan Review is at a reasonably advanced stage, with the final submission stage six-week consultation scheduled by the Council for October 2020. This will be the final stage of consultation before the Local Plan Review is submitted and independently examined.

This short Vision Statement has been prepared to assist and inform the Council in the preparation of the submission version Local Plan Review. It demonstrates that the land at Gentleshaw Lane does not perform a Green Belt function. Indeed exclusion from the Green Belt, if not a positive housing allocation, is supported by the approach the Council took in the drafting of the earlier, Supplementary Consultation of January 2019, as well as the evidence base underpinning the Local Plan Review.

Unlike other land being promoted for development, and inclusion in the local Plan Review, this is a land parcel where a distinction can be made between removal from the Green Belt and positive allocation for housing.

The two are entirely separate considerations, and should the Council conclude that this land parcel is not required to meet a housing need, any such conclusion should not preclude the proper consideration of the site vis-a-vis the land parcel's performance against the National Planning Policy Framework (NPPF) purposes for designating Green Belt.



● Location of Site in Solihull

Extract from Draft Local Plan Supplementary Consultation: Site Assessments





The Site

2.0 The Site

The site at Gentleshaw Lane, shown opposite, comprises of a contained land parcel extending to approximately 7.47 hectares. Levels are generally flat across this undeveloped land.

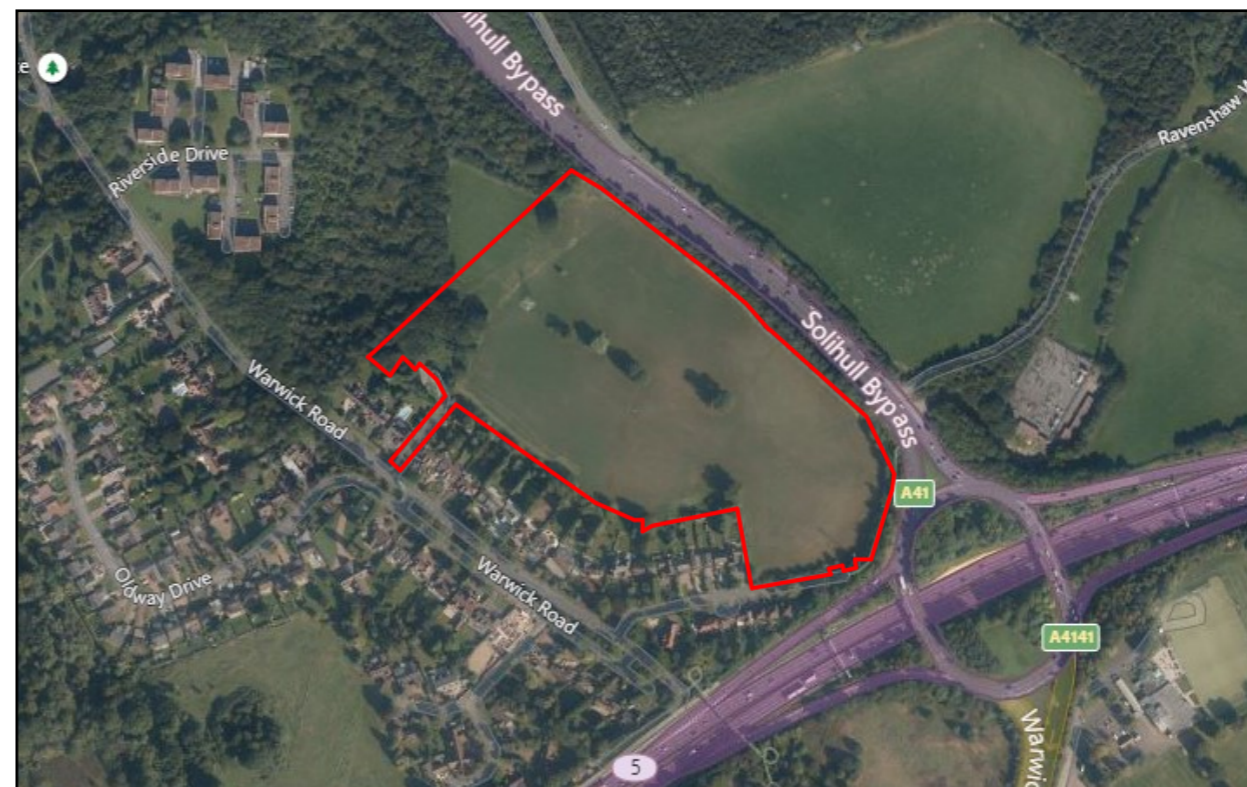
The site forms part of a wider area bound by the M42 northbound carriageway off-sliproad, the A41 Solihull bypass, and off-sliproad leading to the B4025, and Warwick Road. This area, including the Kler Group Limited land, is visually and functionally associated with Solihull town and includes residential, education, community and health uses.

It thus displays a very different characteristic to the open land to the north-east of the A41 which is clearly undeveloped open countryside extending up to junction 6 of the M42 and the Birmingham Airport/NEC/committed HS2 Hub.

As a consequence, the land parcel reads as forming part of the built up conurbation and does not have an association with the wider countryside beyond or visually reflect its Green Belt designation.

Indeed, the site has urban influences on all boundaries. These are not sporadic limited characteristics but rather they are intrinsic parts of the larger built up areas of Solihull; which is designated as a town due to its scale and the role as a retail, commercial, administrative and employment hub of the Borough.

As is set out within this document, these urban influences have increased significantly over time, and serve to reinforce the relationship of the site to the town rather than the rural area.



Gentleshaw Lane, Solihull

Central Solihull





Planning Policy Position

3.0 Planning Policy Position

When submitted, the Local Plan Review will be examined against the provisions of the February 2019 National Policy Planning Framework (NPPF).

This version of the NPPF sets out important provisions in relation to Green Belt. Paragraph 136 makes clear that changes to Green Belt boundaries are to be affected through a Local Plan Review process and should be fully evidenced and justified with the intention that new boundaries should be self enduring beyond the new plan period.

Paragraph 139 goes further, making clear that Green Belt should not include land which it is unnecessary to keep permanently open. Paragraph 140 is of particular relevance to the wider Gentleshaw Lane land parcel, making clear;

“If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reason, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

The Supplementary Consultation of January 2019 translates these provisions of the NPPF in to the Solihull context. It makes clear that a number of settlements in the Borough have ‘washed over’ Green Belt, which is in contrast to the typically larger settlements that are ‘inset’. Within inset settlements Green Belt policies do not apply to development proposals, whereas the policies do apply to those settlements that are washed over. The current status of washed over settlements in the Borough dates back to the 1997 Unitary Development Plan which was prepared under Planning Policy Guidance Note 2 (Green Belts) the relevant Government policy at the time, pre dating the NPPF. This had more of a focus on establishing which settlements in the Green Belt should be considered appropriate for infilling and which should not as distinct from the NPPF which now has an approach that allows limited infilling in all villages.

It is right and proper that the Local Plan Review does not roll forward the provisions of the 1997 Unitary Development Plan – itself founded upon PPG2 which has long since been superseded – but instead takes the opportunity to look forward and reflect the provisions of the NPPF against which the Local Plan Review is to be examined.

The Supplementary Consultation of January 2019 sets out those areas where a review of Green Belt

boundaries should be undertaken in the context of the NPPF vis a vis PPG2. These are Cheswick Green, Millisons Wood, Tidbury Green, Whitlock’s End and Widney Manor Road.

The land parcel incorporating Gentleshaw Lane should be included in this Green Belt boundary review.

Part of the evidence base underpinning the Local Plan Review is the Atkins Green Belt Assessment dated 2016. This takes a significant number of land parcels, categorises them as ‘refined parcels’, and assesses them against the purposes for designating Green Belt scoring each refined parcel between 0 and 3 dependant on how well the refined parcel performs.

Refined parcel 31 is situated immediately to the north and north east of the M42 and A41, adjacent to the Gentleshaw Lane wider land parcel. Under purpose 1 the Atkins assessment states that;

“RP31 boundaries to the west and south are clearly defined by the A41 (Bypass) and M42 respectively and are therefore durable”

The durability of the M42 and A41 for the purposes of redefining Green Belt boundaries are thus already confirmed in the evidence base underpinning the Local Plan Review. This approach can be applied with equal significance to the Gentleshaw Lane land parcel it would be inconsistent to take a different view.

It is also to be noted that the Atkins assessment provides general narrative on purpose 1, stating;

“Refined parcels which are lower performing against purpose 1 include parcels which are to the east of and immediately adjacent to the built up areas of Solihull. The boundaries of most of these parcels are weak and not identifiable where they meet the urban area and ribbon development is evident e.g. RP31 and RP32 between the built up area of Solihull and the M42 motorway”



3.0 Planning Policy Position

The Gentleshaw Lane land parcel falls within RP32 as described by Atkins.

So far as an overview against purpose 2, Atkins make clear that only moderately performing parcels are those which form a gap of between 1km and 5km between urban areas separating Solihull from Dorridge and Knowle i.e. parcels RP32, RP33, RP43 and RP44. The Gentleshaw Lane land parcel demonstrably falls within this category.

Turning to purpose 3, Atkins note that lower performing parcels are those;

“...which are within the urban areas or which contain ribbon or other urbanising development.”

As will be set out below, the Gentleshaw Lane land parcel includes both urban areas and ribbon development.

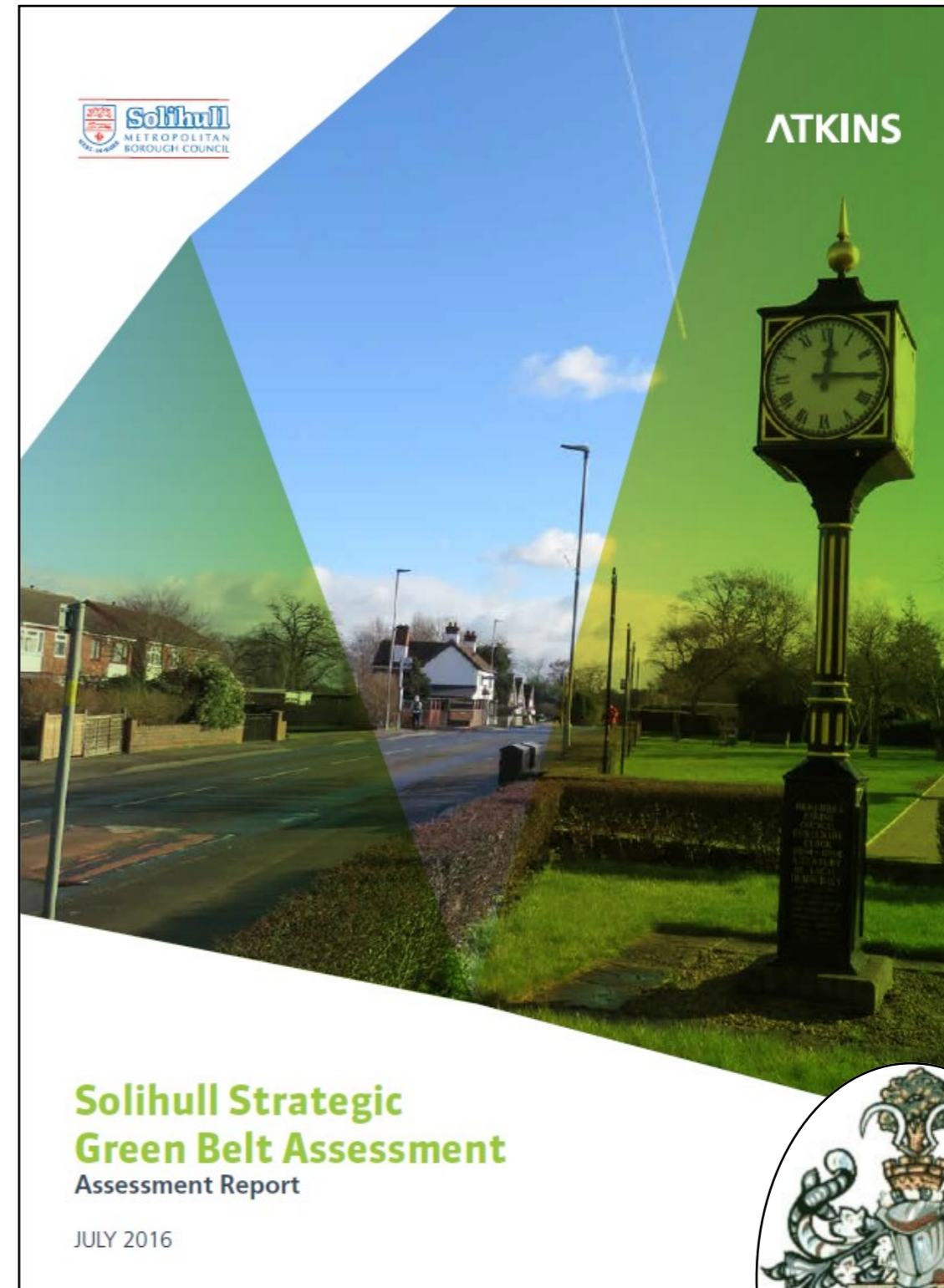
Finally, insofar as purpose 4, the Atkins assessment makes clear;

“Refined parcel RP32 is the only parcel to perform more moderately [as opposed to performing highly] against purpose 2. The parcel is immediately adjacent to the Solihull Conservation Area but benefits from only limited views”

It is then material to consider the provisions of the PBA SHELAA of 2016. The Gentleshaw Lane site was given site reference 107 and described as follows;

“...a well contained greenfield site in close proximity to the motorway junction, which could round off the settlement.”

Set in this context, the section below describes the evolution of this part of Solihull and how a review of Green Belt boundaries at the Gentleshaw Lane land parcel would not only be a missed opportunity, but would be inconsistent with the provisions of the NPPF and the evidence base underpinning the Local Plan Review.





Evolution of the Area

4.0 Evolution of the Area

The position set out in this submission is that the site at Gentleshaw Lane is to be read as part of the town of Solihull rather than forming part of the rural area.

This is justified by an analysis of the subject site and its context as it exists today - urban influences on all sides, a land parcel visually, physically and functionally operating as part of the built up area of Solihull rather than the adjacent countryside.

Given the planning policy position set out earlier in this document, and specifically that a local plan review is the forum for considering Green Belt boundary review; and furthermore, Green Belt boundary review is an entirely separate and distinct consideration from the positive allocation of land - it is important to have regard to the evolution of the area and how the context of the site has urbanised over time.

Set out over the next five pages are a series of historical maps dating from 1887. These show how the site once stood in isolation, remote from the early evolution of Solihull itself; showing how it extended and enlarged from a small settlement. It is evident that if Green Belt as a concept was in play at that time then the site clearly performed an open countryside, rural, Green Belt role.

It is demonstrated that, particularly by 1955, the context of the site had radically changed, in particular the growth of Solihull towards the site, residential development on the site's boundaries, and further residential development to the south.

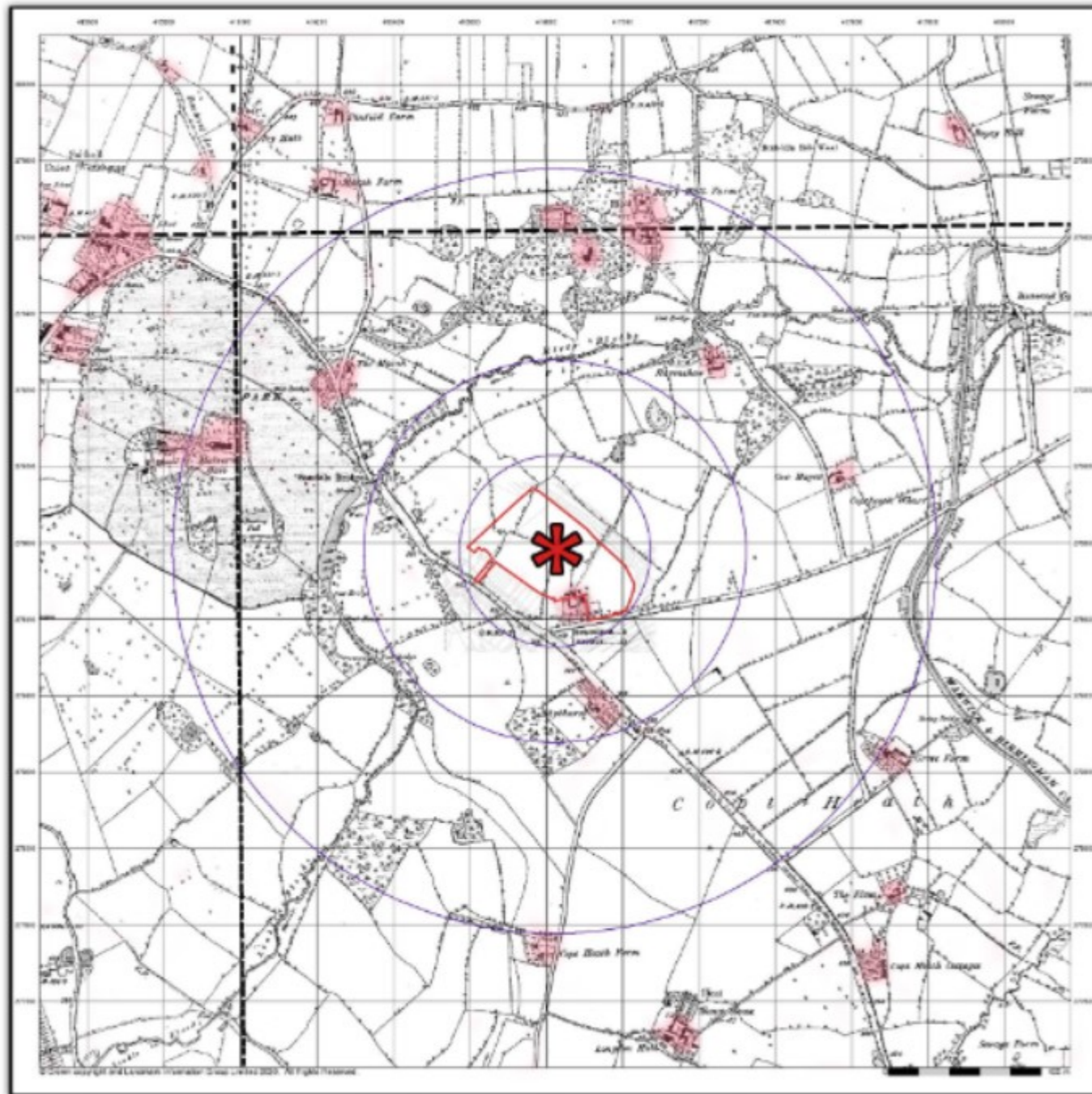
By 1968 this evolution had the effect of further urbanisation of the site's context, and then by 1978 the nature of the area was transformed further by the introduction of the M42 and the off-sliproad junction defining the sites southern and eastern site boundaries.

These more urban characteristics continued to be reinforced through to the last of the maps dated 2020. None of the urbanising characteristics have been lost in the intervening period.

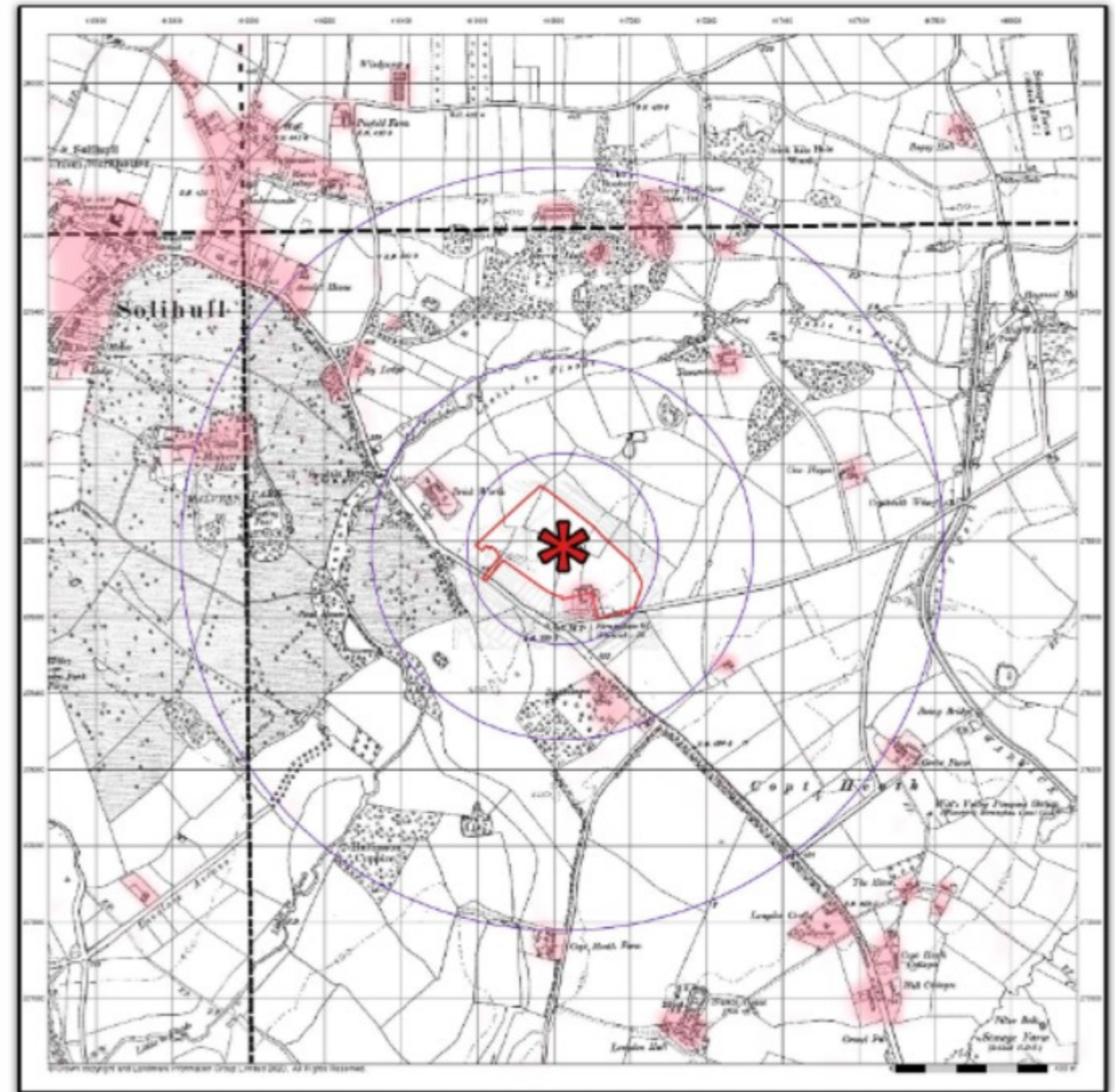
The historic maps and photographic evidence combine to show the ongoing urbanisation as the primary characteristic of the area.



Solihull Published Maps 1887 and 1905

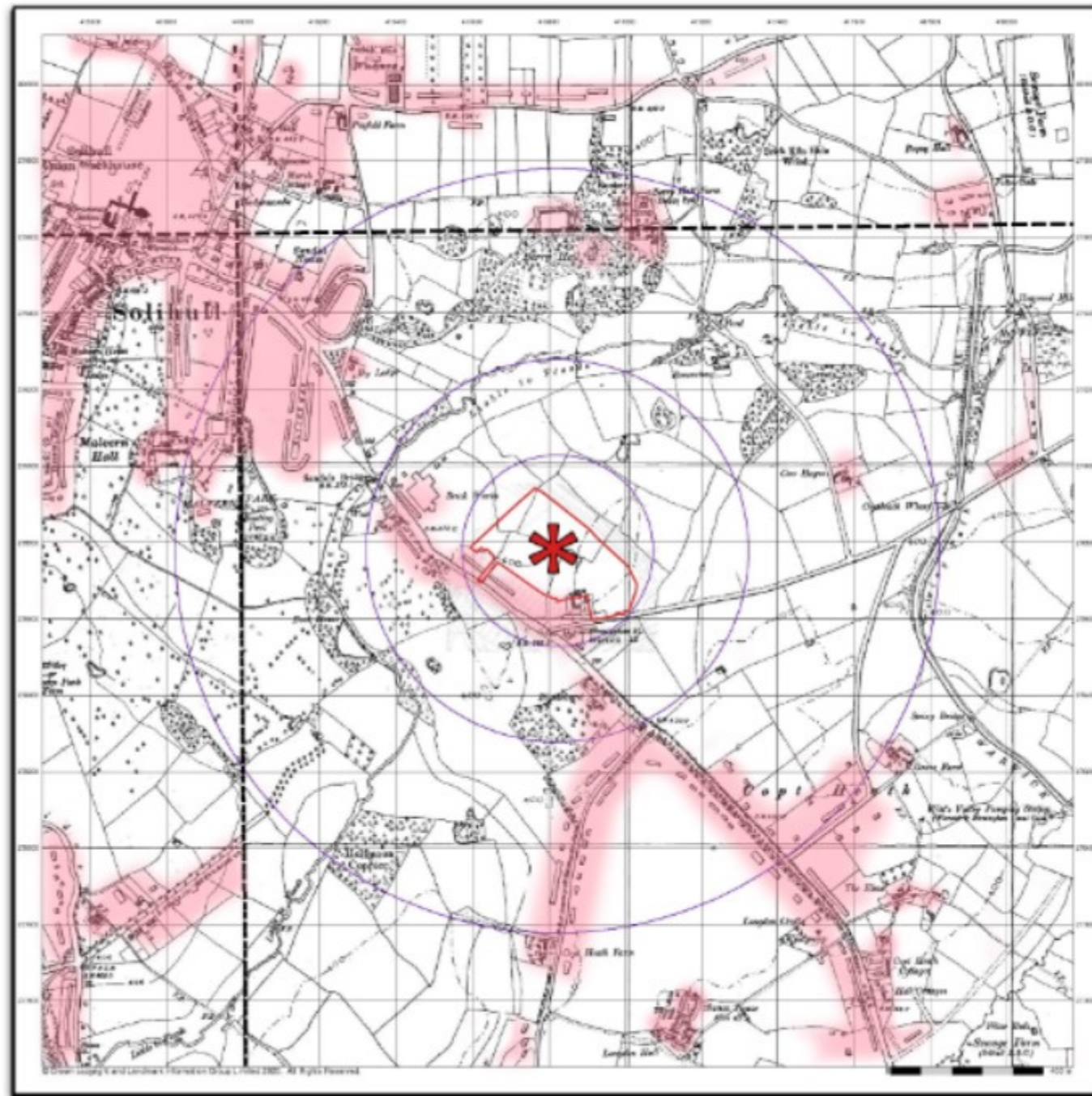


1887

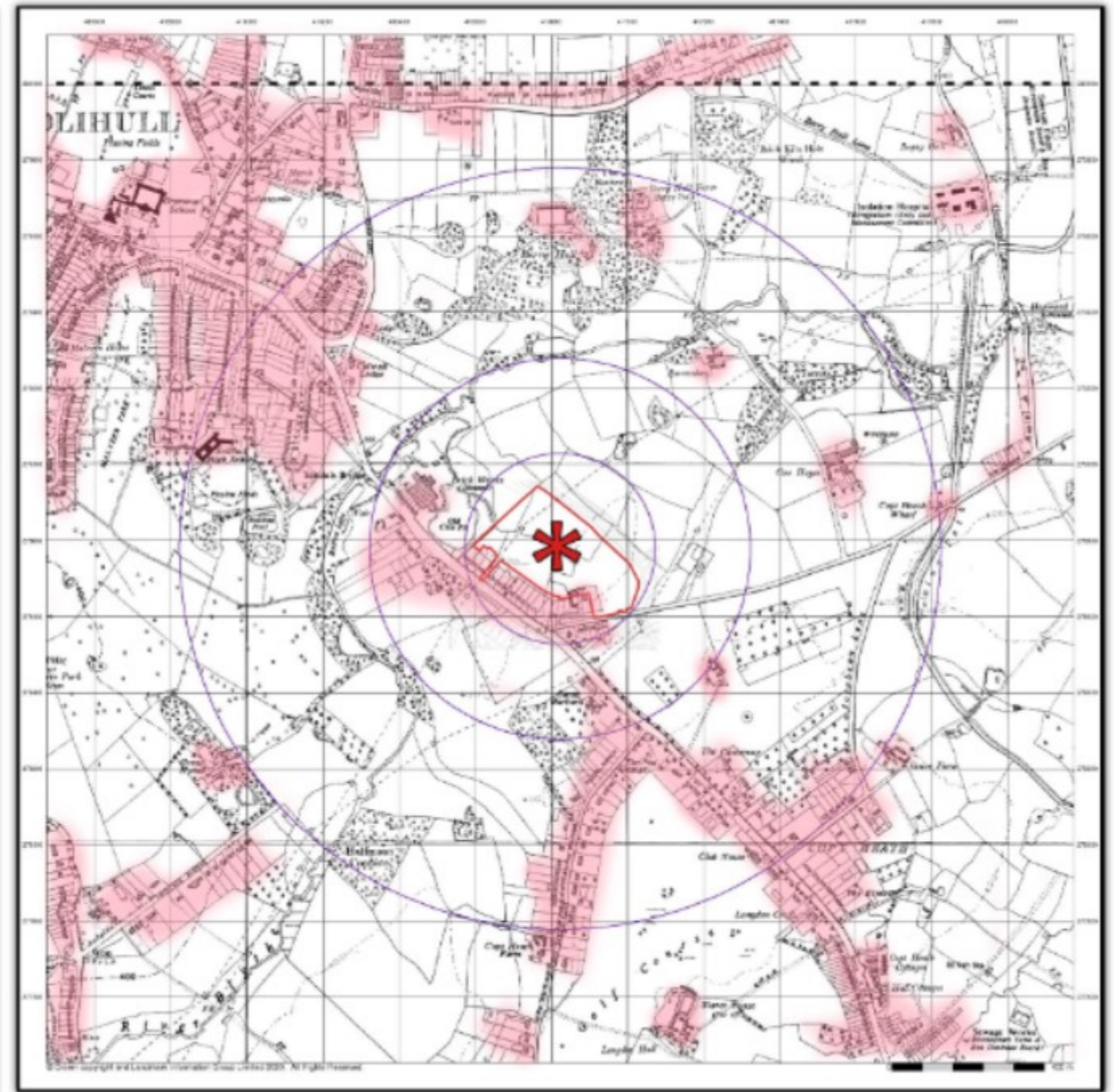


1905

Solihull Published Maps 1938 and 1955

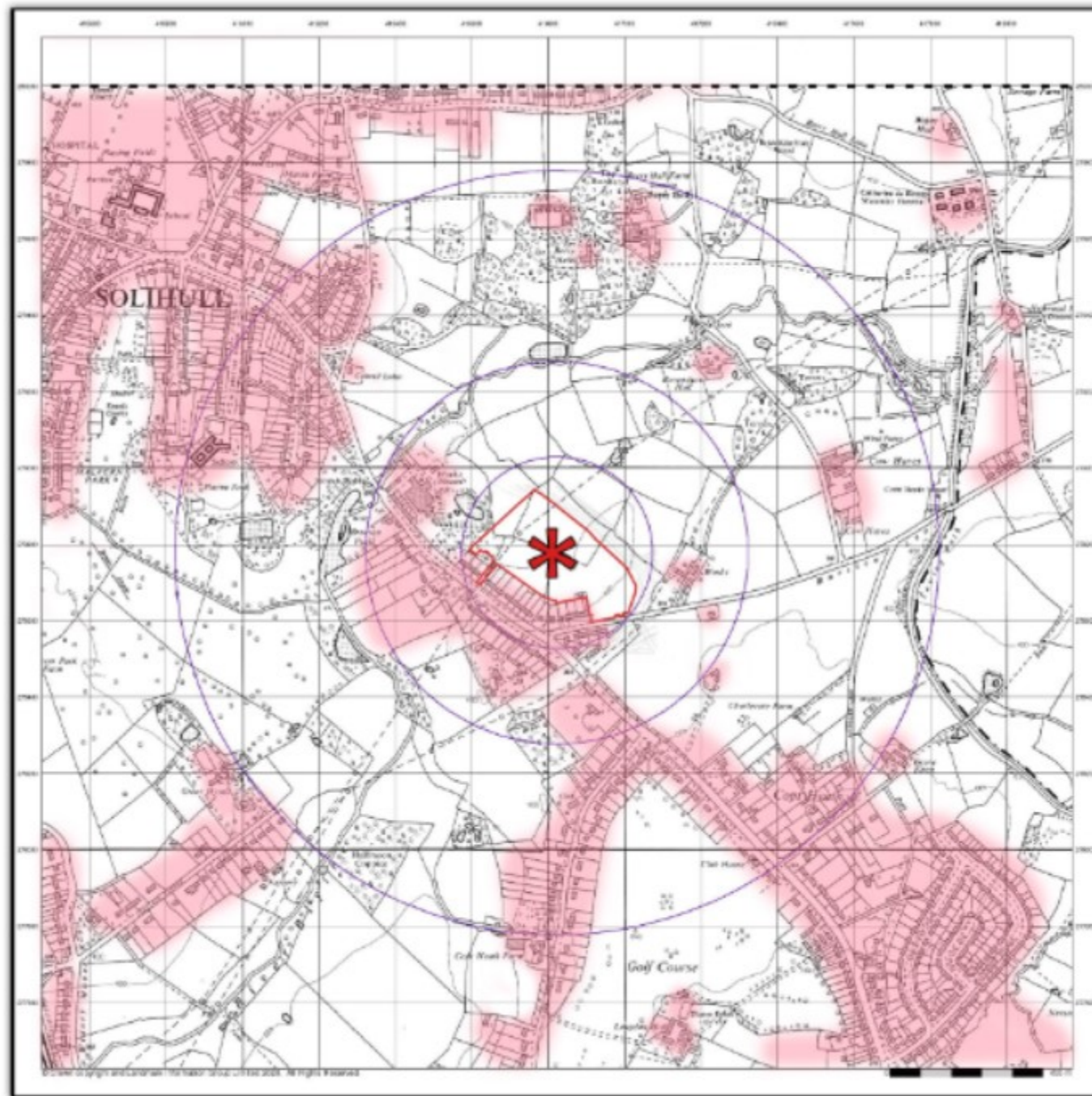


1938



1955

Solihull Published Maps 1968 and 1978



1968

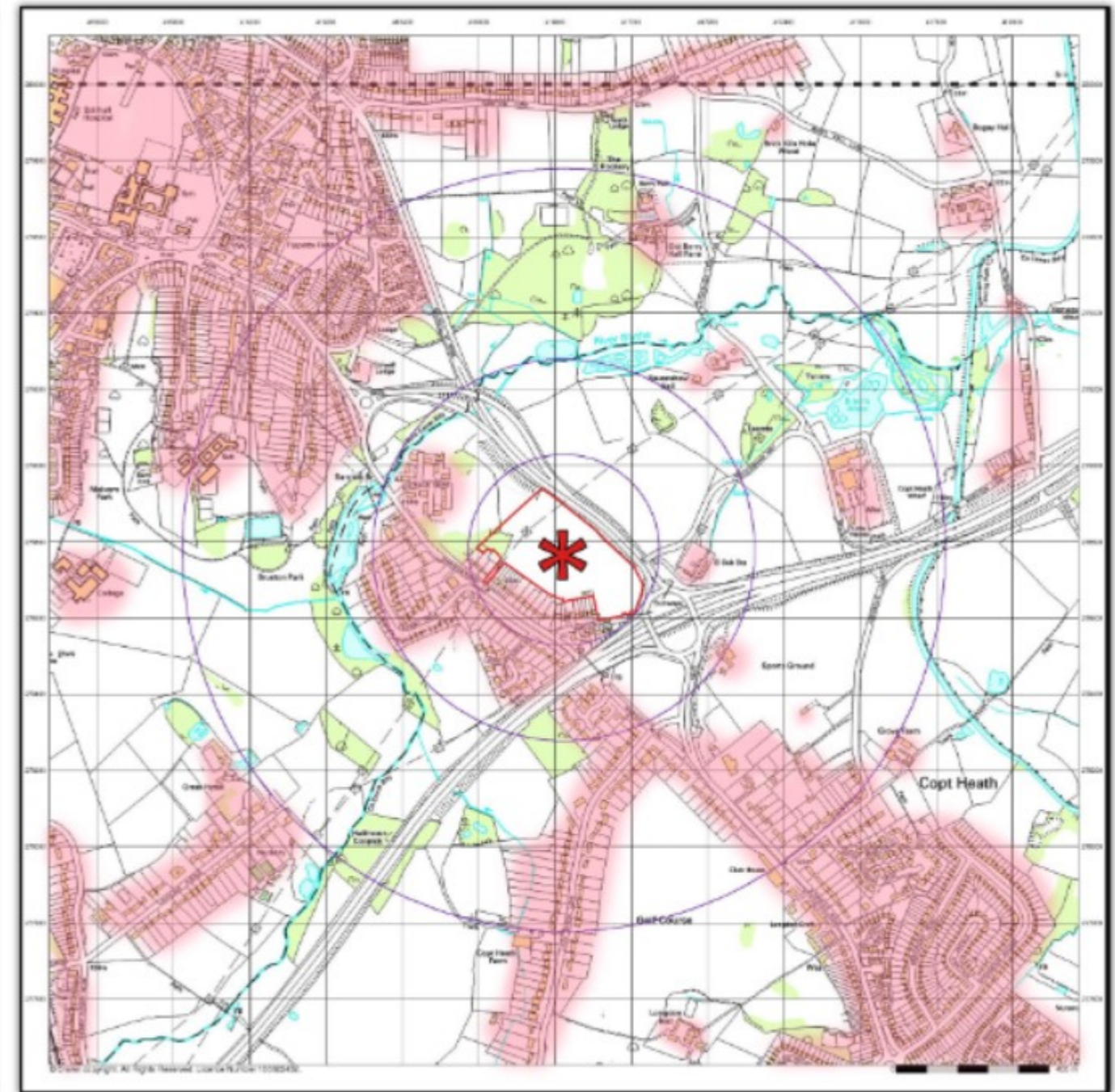


1978

Solihull Published Maps 1990 and 1999

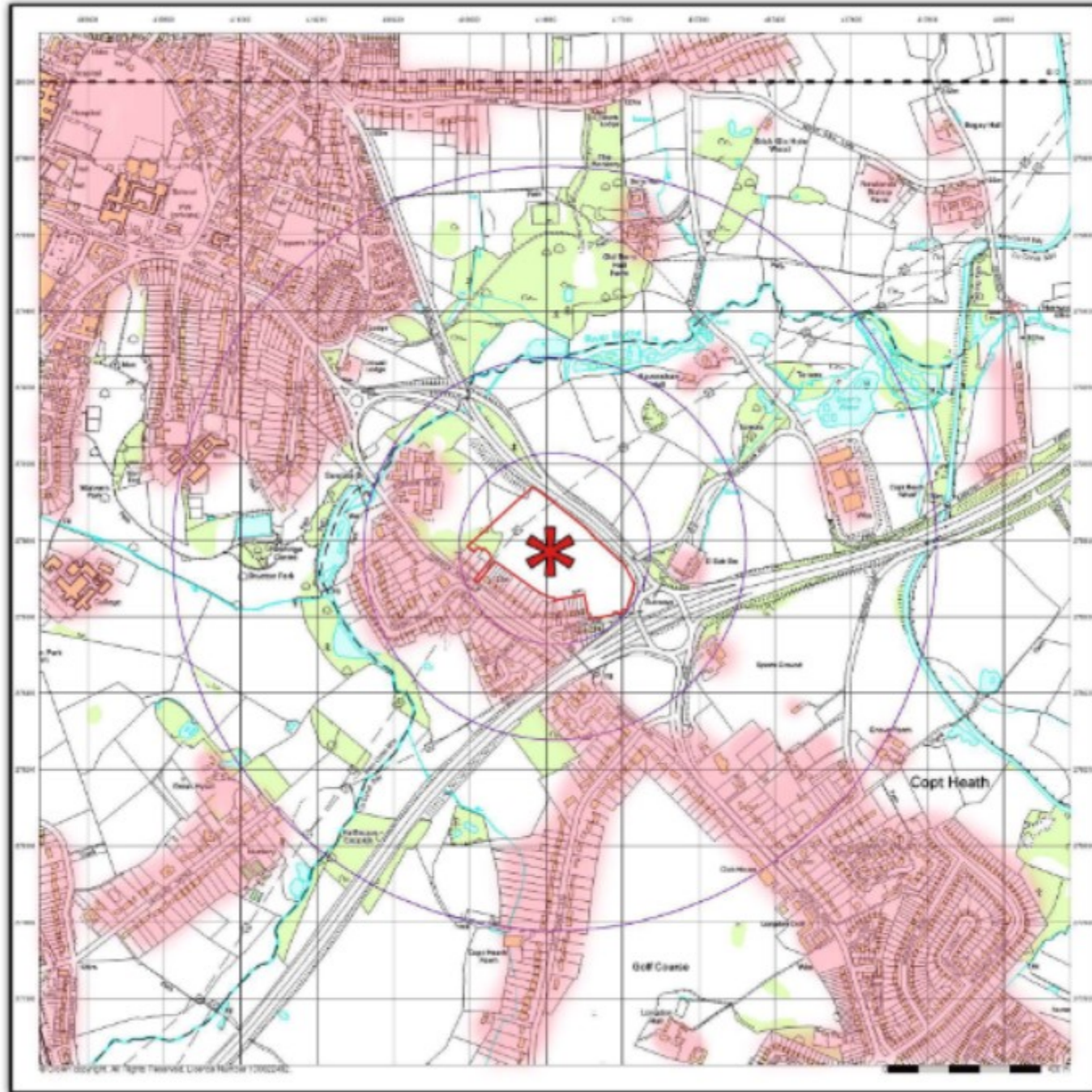


1990

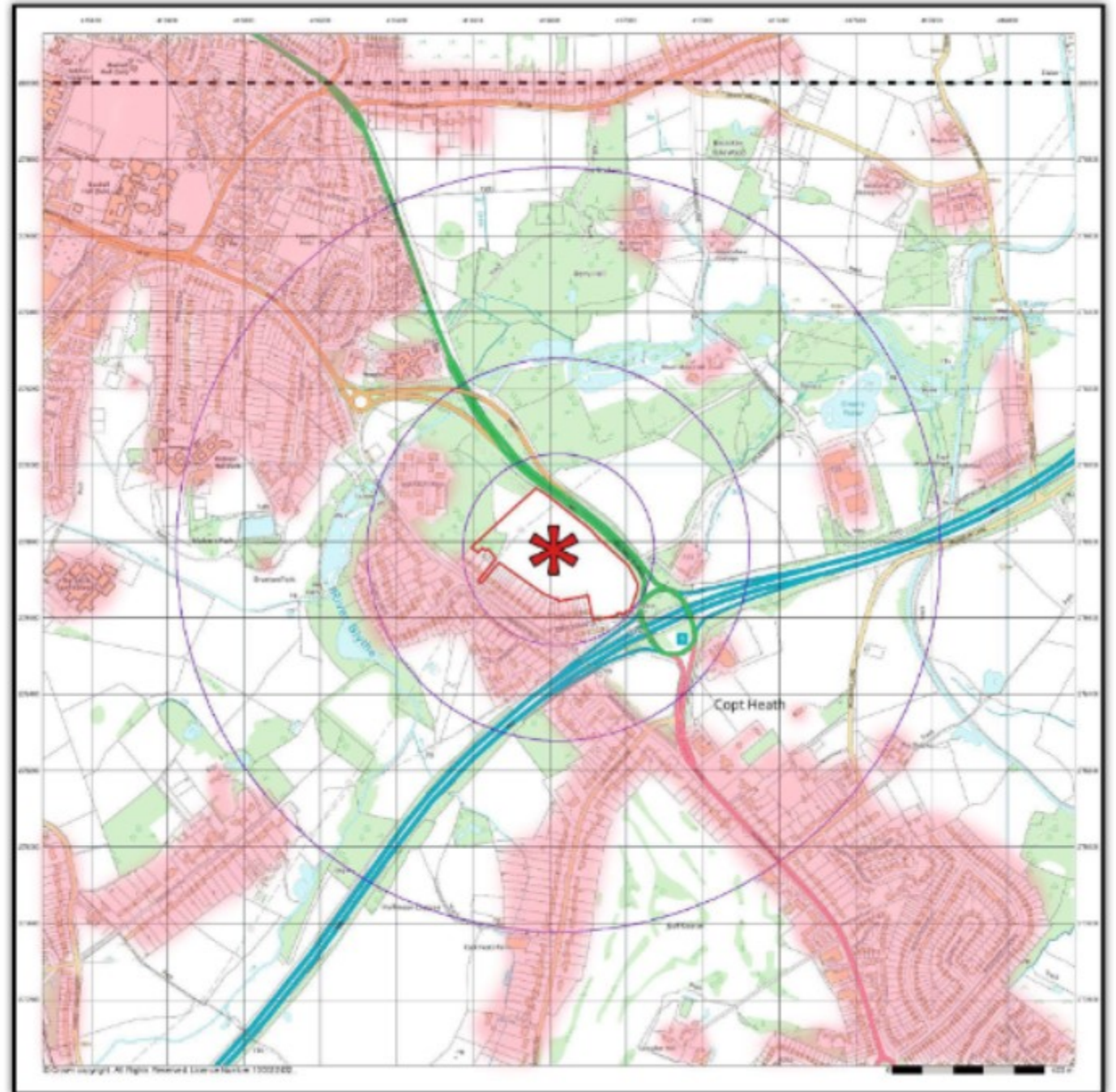


1999

Solihull Published Maps 2006 and 2020



2006



2020



Site Constraints and Opportunities

5.0 Site Constraints and Opportunities

As previously set out, the purpose of this submission is to make the case for Green Belt boundary review; an assessment distinct from the positive allocation of land.

Such an approach is consistent with the Council's evidence base and most recent draft Local Plan Consultation.

It is however noteworthy to record the specific on site characteristics which define the site at Gentleshaw Lane, which would remain notwithstanding a change to Green Belt boundary change.

Should the Council elect to move beyond an evidential based review of Green Belt boundaries, and consider the positive allocation of this site for housing, the plan overleaf identifies the constraints and opportunities for development to be considered.

These include, but are not limited to:

- Potential area of development for 175 dwellings.
- Realignment of Gentleshaw Lane to provide access to site.
- Surface water balancing area proposed to north-west corner of site.
- Provision made for noise mitigation adjacent A41 and M42 to be incorporated within layout.
- Need to review overhead powerlines as part of development proposals.
- Riverside Drive local wildlife site to be retained within public open space.
- Public open space to incorporate areas of wildflower grassland for bio-diversity enhancement.
- Retention of existing woodland along north-wester boundary.
- Potential footpath link from site to Warwick Road.
- Existing trees and hedgerows to be retained and suitable buffer from development to be provided.
- Opportunity to provide equipped play area within public open space.



Conclusion

6.0 Conclusion

The Solihull Local Plan Review is a wholesale review encompassing both strategic and non strategic policies. It is neither a partial review or an interim review intending to be replaced in the short term.

It is right and proper therefore that the Local Plan Review considers not only the positive allocations of land for housing and other development needs, but also reviews existing Local Plan policies and amends these where they are inconsistent with the NPPF; with a particularly forensic approach to be taken to policies where they have been rolled forward from the Unitary Development Plan predating the Local Plan and/or where policies are founded upon guidance in play prior to the NPPF.

It is in this context that this short Vision Statement, in relation to the land parcel identified at Gentleshaw Lane, Solihull has been prepared.

The Vision Statement has explained the approach the Council are taking in relation to redefining Green Belt boundaries, and how this approach is consistent with the NPPF which sets out a policy approach distinct from the former PPG2. Reference is made to the evidence base underpinning the Local Plan Review and how this applies to the Gentleshaw Lane land parcel, either directly through assessment of this land or by application of a consistent approach to site assessment (for example in the way in which defensible boundaries are defined and described).

Kler Group Limited's submit that the Gentleshaw Lane land parcel does not perform a Green Belt function and should be excluded from the Green Belt in the Local Plan Review. An examination of the evolution of the area supports the case that Gentleshaw Lane would be a logical rounding off of Oldway Drive, Warwick Road, Riverside Drive and Pool Meadow Close - all of which have previously been developed within the Green Belt clearly inconsistent with the Green Belt objective of maintaining openness.

The Local Plan Review is the opportunity to remove areas from the Green Belt – as per the general approach advocated in the Local Plan Review Supplementary Consultation – excluding the Gentleshaw Lane land from the Green Belt would provide a logical rounding off to Solihull in accordance with the evidence base underpinning the Local Plan Review.

More than a planning consultancy

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