

Publication Stage Representation

Ref:

(For official use only)

### Name of the Local Plan to which this representation relates:

Solihull Local Plan Draft Submission Version

Please return to <u>psp@solihull.gov.uk</u> or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59

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This form has two parts -

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details* *If an agent is appointed, please comp boxes below but complete the full conta	lete only the Title, Name and Organisatic act details of the agent in 2.	on (if a	2. Agent's Details (if applicable) applicable)
Title	C/O Agent		Mr
First Name			Tim
Last Name			Collard

Associate Job Title (where relevant) Organisation L&Q Estates (where relevant) Address Line 1 3 Brindleyplace Line 2 Birmingham Line 3 Line 4 Post Code B1 3JB **Telephone Number** E-mail Address

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to the L&Q Estates' Representations, appended, which outline responses with respect of Local Housing Need, the Duty to Cooperate and Housing Supply.

L&Q Estates' representations conclude that the Regulation 19 Draft Plan is not positively prepared, justified, effective or consistent with national policy in relation to Local Housing Need and Housing Supply, and that the Duty to Cooperate has not been complied with in relation to wider HMA needs.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the L&Q Estates' Representations appended. L&Q Estates' considers that considers that the housing target should be expressed as a minimum, that the contribution to meeting HMA needs should be increased and that additional sites should be included in the 'Summary Table of Residential Allocations' (page 65) with a specific modification to include Site 233 Land North of Balsall Street.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

L&Q Estates' participation is considered necessary to ensure the Inspector is able to clarify any matters in relation to my clients submissions.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

14/12/2020



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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details* *If an agent is appointed, please comp boxes below but complete the full conta	lete only the Title, Name and Organisation (in act details of the agent in 2.	2. Agent's Details (if applicable) f applicable)
Title	C/O Agent	Mr
First Name		Tim
Last Name		Collard

Associate Job Title (where relevant) Organisation L&Q Estates (where relevant) Address Line 1 3 Brindleyplace Line 2 Birmingham Line 3 Line 4 Post Code B1 3JB **Telephone Number** E-mail Address

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to the L&Q Estates' Representations appended with respect of:

- (i) the need to remove additional land from the Green Belt for allocation for residential development to comply with the requirements of paragraph 136 of the NPPF and to meet local housing need; and
- (ii) the need to identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs beyond the plan period to comply with the requirements of paragraph 139(c) of the NPPF.

L&Q Estates' representations conclude that the Regulation 19 Draft Plan is not justified, effective or consistent with national policy in relation to these matters.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. Please refer to L&Q Estates' representations appended which set out specific responses on matters of soundness in accordance with this form and which propose that (i) additional land be taken out of the Green Belt to support residential development in this plan period (with a specific proposal for the removal of land North of Balsall Street and its allocation for residential development (up to 287 dwellings)); and (ii) that Areas of Safeguarded Land be identified to meet needs beyond the plan period, or sooner if required as part of a review of the Local Plan.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



**No**, I do not wish to participate in hearing session(s)

	_
	Yes, I w
/	participa
	hearing s
	-

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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L&Q Estates' participation is considered necessary to ensure the Inspector is able to clarify any matters in relation to my client's submissions.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.





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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details*		2. Agent's Details (if applicable)
<b>e</b> 11 1	se complete only the Title, Name and C full contact details of the agent in 2.	rganisation (ir applicable)
Title	C/O Agent	Mr

First Name		Tim
Last Name		Collard
Job Title (where relevant) Organisation (where relevant)	L&Q Estates	Associate
Address Line 1		3 Brindleyplace
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B1 3JB
Telephone Number		
E-mail Address		

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

		-	-		
Paragraph 515-543	Policy	Policies	Мар		
4. Do you consider the L	ocal Plan is :				
4.(1) Legally compliant	Yes			No	
4.(2) Sound	Yes			No	✓
4 (3) Complies with the					
Duty to co-operate	Yes			No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Balsall Common Chapter of this Plan is not considered justified or effective, please refer to the L&Q Estates' appended to this form.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In accordance with L&Q Estates' representations in relation to Policy P5, Policy P17 and the Policies Map, L&Q Estates' has completed also a representation form for the Balsall Common section of the plan, within which its land at North of Balsall Street (Site 233) is located. L&Q Estates is promoting the removal of the site from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation in this part of the plan (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7

– Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

L&Q Estates' participation is considered necessary to ensure the Inspector is able to clarify any matters in relation to my client's submissions.

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9. Signature:

Date: 14/12/20	)20
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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details* * If an agent is appointed, please compl boxes below but complete the full conta	5	ion (if a	2. Agent's Details (if applicable) applicable)
Title	C/O Agent		Mr
	[]		·

First Name		Tim
Last Name		Collard
Job Title		Associate
(where relevant)		
Organisation	L&Q Estates	
(where relevant)		
Address Line 1		3 Brindleyplace
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B1 3JB
Telephone Number		
E-mail Address		

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This policy is not considered justified or effective. Please refer to the L&Q Estates' Representations appended which outlines specific responses on matters of soundness in accordance with this form.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC1, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

/12/2020

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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### Part A

1. Personal Details* *If an agent is appointed, please compl boxes below but complete the full conta	5	ion (if a	2. Agent's Details (if applicable) applicable)
Title	C/O Agent		Mr
First Name			Tim
Last Name			Collard
	[]		

Last Name		Collard
Job Title		Associate
(where relevant)		
Organisation	L&Q Estates	
(where relevant)		
Address Line 1		3 Brindleyplace
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B1 3JB
Fost Code		DI 3JB
Telephone Number		
E-mail Address		

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy BC2	Policies Map		
4. Do you consider the Lo	ocal Plan is :	-		
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC2, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

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### Part A

1. Personal Details*		2. Agent's Details (if applicable)
* If an agent is appointed	please complete only the Title, Name and Org	anisation (if applicable)
boxes below but complete	e the full contact details of the agent in 2.	
	Ũ	
Title	C/O Agent	Mr

	er e rigeni	
First Name		Tim
Last Name		Collard
Job Title (where relevant) Organisation (where relevant)	L&Q Estates	Associate
Address Line 1		3 Brindleyplace
Line 2		Birmingham
Line 3		
Line 4		
Post Code		B1 3JB
Telephone Number		
E-mail Address		

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

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Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC3, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

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### Part A

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Title	C/O Agent	Mr
First Name		Tim
Last Name		Collard

Job Title Associate (where relevant) Organisation L&Q Estates (where relevant) Address Line 1 3 Brindleyplace Line 2 Birmingham Line 3 Line 4 Post Code B1 3JB **Telephone Number** E-mail Address

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This policy is not considered justified or effective. Please refer to the L&Q Estates' Representations appended which outlines specific responses on matters of soundness in accordance with this form.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC4, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

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### Part A

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Title	C/O Agent		Mr
First Name			Tim
Last Name			Collard

Associate Job Title (where relevant) Organisation L&Q Estates (where relevant) Address Line 1 3 Brindleyplace Line 2 Birmingham Line 3 Line 4 Post Code B1 3JB **Telephone Number** E-mail Address

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This policy is not considered justified or effective. Please refer to the L&Q Estates' Representations appended which outlines specific responses on matters of soundness in accordance with this form.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC5, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

L&Q Estates' participation is considered necessary to ensure the Inspector is able to clarify any matters in relation to my client's submissions.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:		Date:	14/12/2020



Publication Stage Representation

Ref:

(For official use only)

### Name of the Local Plan to which this representation relates:

Solihull Local Plan Draft Submission Version

Please return to <u>psp@solihull.gov.uk</u> or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59

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This form has two parts -

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details* * If an agent is appointed, please comp boxes below but complete the full conta	lete only the Title, Name and Organisation ( act details of the agent in 2.	<ol> <li>Agent's Details (if applicable) if applicable)</li> </ol>
Title	C/O Agent	Mr
First Name		Tim
Last Name		Collard

Job Title Associate (where relevant) Organisation L&Q Estates (where relevant) Address Line 1 3 Brindleyplace Line 2 Birmingham Line 3 Line 4 Post Code B1 3JB **Telephone Number** E-mail Address

Name or Organisation:

3. To which part of the Local Plan does this representation relate?



Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Whilst raising soundness concerns about the Council's approach to site selection on the basis of how L&Q Estates' site performs to BC6, in relation to representations made to Policy P5, Policy P17 and the Policies Map, L&Q Estates' seeks Land North of Balsall Street to be removed from the Green Belt and its allocation for housing (up to 287 dwellings) and therefore proposes the inclusion of an additional site specific allocation (consistent with the proposal that the site be added to the Summary Table of Residential Allocations at page 65). The Policy may be named 'Policy BC7 – Land to the North of Balsall Street' with the site to be allocated for housing in accordance with the proposed Development Framework and subsequent Green Belt boundary submitted with these representations.

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**No**, I do not wish to participate in hearing session(s)



Yes, I wish to participate in hearing session(s)

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L&Q Estates' participation is considered necessary to ensure the Inspector is able to clarify any matters in relation to my client's submissions.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.





## Solihull Local Plan - Draft Submission Plan Regulation 19

## **Representations on Behalf of L&Q Estates**

## Land North of Balsall Street, Balsall Common

December 2020

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Appendix		Development Framework Plan
Appendix	II	Site Analysis Plans
Appendix	I	Site Location Plan

Prepared By: Tim Collard and Robert Gardner Status: Final

Date: December 2020

For and on behalf of Avison Young (UK) Limited

### 1. Introduction

- 1.1 Avison Young (AY) (formerly GVA), is instructed by L&Q Estates (formerly Gallagher Estates) to make representations in respect of the Solihull Local Plan Draft Submission Version (October 2020).
- L&Q Estates has an interest in some 16.14ha of "Land North of Balsall Street, Balsall Common" (see Appendix 1 - Site Location Plan).
- 1.3 L&Q Estates previously made joint representations on a larger parcel of land and proposed a total of 700 homes (site ref 233 in the Site Assessment October 2020) at the previous two Regulation 18 consultation stages in February 2017 and March 2019 respectively.
- 1.4 The focus for these representations is the smaller parcel (site reference 198) for up to 287 homes which is solely controlled by L&Q Estates. We maintain that the evidence base and Solihull Metropolitan Borough Council's (SMBC's) methodology used to select sites indicates that L&Q's land should be allocated for housing in the emerging Local Plan.
- 1.5 The opportunity provided by the site is outlined below and is accompanied by;
  - two Site Analysis Plans (Appendix 2) covering "Access and Infrastructure" and "Environment and Townscape";
  - the proposed Development Framework plan (Appendix 3);
  - a Transport and Access Appraisal (Appendix 4); and,
  - a Drainage and Utilities Appraisal (Appendix 5).
- 1.6 These documents demonstrate that the site is suitable, available and deliverable in the plan period.Section 2 provides further details on the site and the development proposals.
- 1.7 These representations are concerned with the soundness of the Draft Submission Plan. Our client remains firmly of the view that the Regulation 19 Draft Submission Plan, is unsound and that Land North of Balsall Street should be allocated for development as part of a package of amendments required to produce a sound plan.
- 1.8 Should any further information be required please contact:
  Robert Gardner
  Director
  T:
  F:
  F:

### 2. The Site

- 2.1 L&Q Estates' land has an area of c.16.14 hectares (see Appendix 1). The site is directly adjacent to the existing settlement and comprises a swathe of land adjacent to the north western boundary of Balsall Common. The land stretches from Balsall Street (B4181) to the Kenilworth Road (A452). The site adjoins residential development to the south east and south west. Agricultural land is located to the north and north west, which includes the existing farmhouse and associated outbuildings at Grange Farm.
- 2.2 The Site Analysis Plan "Environment and Townscape" (Appendix 2) shows that the site contains a Local Wildlife Site and a significant area of Local Green Space. The site is adjacent Willow Park, an existing park and Multi Use Games Area. In addition, the site contains an area of woodland and a strong hedgerow along its northern boundary. Balsall Street and existing houses are situated at the western most boundary.
- 2.3 The Site Analysis Plan "Access and Infrastructure" (Appendix 2) identifies three potential access points. The primary access is shown off Balsall Street with two potential secondary/ emergency access points at Grange Road and Needlers End Lane. A number of easements are also shown across the site, relating primarily to a water main and a foul sewer. Areas at risk of surface water flooding are also identified, although the proposed development areas are situated in flood zone 1.
- 2.4 The site also contains a network of pedestrian links which link it to the village centre. This site is in close proximity to the centre of Balsall Common which contains a range of services and facilities, including a supermarket, post office, and library.
- 2.5 Several bus services are easily accessible from the site, providing connections with Coventry, Solihull and Knowle. The nearest bus stops are located at the junction of Needlers End Lane/ B4101, to the west of the proposed development site, which are served by two bus routes which provides a service every 120 minutes between Solihull and Balsall Common between 0916 and 1721 on weekdays (Route 88A) and a flexi bus also runs along the same stretch of route adjacent to the site, providing an additional route between Solihull to Kenilworth (233). A number of bus stops are also provided on Station Road, which includes a service every 60 minutes from 0653 and 1453 on weekdays between Solihull and Coventry (see Appendix 4).

#### The Proposed Scheme

- A Development Framework Plan for the site is submitted with these representations (Appendix 3) and presents the proposals for a housing development of up to 287 homes. Housing densities of between 30-40 dph are shown, as required by the emerging Regulation 19 Solihull Local Plan.
- 2.7 There is potential for housing development to come forward in two phases. The first, comprising up to 142 homes would be accessed directly off Balsall Street. The second phase of up to 145 homes would connect to the first phase and would require a secondary, emergency, access. We have indicated two potential options for this. The Transport appraisal submitted in support of this layout (Appendix 4) indicates that:

"access to the site is achievable, and subject to scoping discussions with the highway authority, and traffic surveys to establish how local junctions would operate should the development come forward, there are no overriding or sustainable reasons why the development proposals should not be progressed towards a planning application."

2.8 In addition the in respect of site drainage and utilities matters the Drainage and Utilities appraisal states (Appendix 5) that:

"Overall the proposed development areas have readily-available points of discharge for surface drainage into the existing streams. SuDS systems will manage run-off quantities and water-quality. The development areas are within Flood Zone 1, the lowest risk category. Flooding from the streams is contained by the existing landform close to the stream banks. There is also a readily-available point of discharge for foul drainage in the trunk foul sewer passing through the site, subject to confirmation of available capacity. Based upon the assessment of the apparatus and subject to confirmation from utilities companies, [it is] envisage[d] that these can serve the development proposal."

- 2.9 The scheme would retain the existing local wildlife site (c.2.23ha) and the open space to the east of the site (c.4.65ha). In total, approximately 7ha, (i.e. over 42%) of the site would remain undeveloped. This would provide compensatory provision for the loss of land in the Green Belt, if required. This would be in addition to open space provision within the developable areas.
- 2.10 The existing hedgerow and tree lined boundaries around the site would also be retained and enhanced to ensure a strong and defensible boundary to the north.
- 2.11 The Development Framework Plan shows how a housing development can be progressed in a sustainable location and ensures a strong boundary to the Green Belt that is suitable for development, available and deliverable over the plan period.

## Housing Need, the Housing Target and the Duty to Co-Operate

- 3.1 The National Planning Policy Framework (NPPF) establishes a 'presumption in favour of sustainable development', which, amongst other things, requires that, "*plans should positively seek opportunities to meet the development needs of their area*" and that "*strategic policies should, as a minimum, provide for objectively assessed needs for housing*". The 'presumption' provides that if a Local Planning Authority (LPA) proposes not to meet objectively-assessed needs, this will only be where national policies provide a "*strong reason*" or where the "*adverse impacts*" of doing so would "*significantly and demonstrably outweigh the benefits*".
- 3.2 This carries through to Paragraph 35 of the NPPF, which establishes the tests of soundness that all local plans must satisfy. In order for plans to be *"positively prepared"*, the NPPF says that they must provide 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 authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development".

- 3.3 Similarly, the tests of soundness include an obligation on local planning authorities to ensure that plans are "justified" and based on "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence".
- 3.4 These requirements are also found at Paragraph 24 of the NPPF, which confirms that local planning authorities are under a duty to co-operate with each other on cross-boundary strategic matters, and at Paragraph 26, which says that *"effective and on-going joint working between strategic policy-making authorities"* is *"integral to the production of a positively prepared and justified strategy"*.
- 3.5 Further still, Paragraph 60 of the NPPF goes on to state,

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

- 3.6 It is with these matters in mind that we consider the approach the Council has taken to meeting its housing need and to meeting the unmet needs arising in the housing market area.
- 3.7 The Draft Submission Plan identifies, with reference to a Housing and Economic Development Needs Assessment (HEDNA) prepared for SMBC by GL Hearn, a need for a minimum of 807 dwellings per annum to be delivered in the Borough between 2020 and 2036. This equates to a total local housing need (LHN) of 12,912 dwellings. The figure of 807 dwellings per annum is based on the application of Government's Standard Method.
- 3.8 The HEDNA goes on to make a recommendation that SMBC should plan for in-migration and population growth associated with the delivery of the UK Central Hub Area. Making an allowance for this, the HEDNA concludes that the housing need for the Borough should be set at 816 dwellings per annum (equating to a total of 13,056 units over the plan period).
- 3.9 The Draft Submission Plan takes forward this recommendation and proposes a housing need figure of 13,056 dwellings for the Plan.
- 3.10 Solihull forms part of the Greater Birmingham Housing Market Area (GBHMA). SMBC acknowledges that the Birmingham Development Plan (BDP) (adopted in January 2017) identifies a shortfall of 37,900 homes which must be delivered in the GBHMA between now and 2031. SMBC states that it has been working with authorities in the HMA to reach agreement on how the shortfall can be addressed.
- 3.11 At Paragraph 228 of the Draft Submission Plan, SMBC states that it has given a commitment through the LPR process to test the Borough's ability to accommodate 2,000 dwellings of the shortfall arising from within the HMA. SMBC goes on to say that it has completed that testing and has concluded that it can make a contribution of 2,105 dwellings to the HMA shortfall. The Council confirms that this figure is the difference between the Borough's local housing need (12,912 dwellings) and the capacity for new residential development in the Borough (15,017 dwellings).
- 3.12 With these contextual matters in mind, we go on to comment below on the following points, which have implications for the robustness of the Council's approach, and the soundness of the Plan:-
  - The Standard Method;
  - unmet needs and the Duty to Co-Operate; and
  - safeguarding of land that is currently in the Green Belt.

#### The Standard Method (SM)

- 3.13 The Government has challenged Local Planning Authorities (LPAs) to deliver 300,000 dwellings per year in order to address what it acknowledges is a chronic shortage of housing in the UK. The LHN for each LPA in the UK, calculated using the current SM (2018), is a minimum figure. LPAs can propose higher targets if they wish to. If the minimum LHN figures for each of the LPAs (calculated using the 2018 SM) are added together, the total number of homes delivered per annum would be approximately 270,000 (i.e. 30,000 homes short of the Government target of 300,000 homes per annum).
- 3.14 SMBC has used the current (2018) version of the SM to calculate that Solihull's local housing need (LHN) figure for the plan period (2020 to 2036) is 12,912 dwellings, or 807 dwellings per year. This figure comprises the majority of the housing need figure identified in the emerging Solihull Local Plan.
- 3.15 If the Government's target is to be achieved, LPAs must deliver in excess of the minimum LHN calculated using the 2018 SM. However, very little evidence has emerged of LPAs increasing numbers beyond their minimum LHN.
- 3.16 Furthermore, the methodology deployed in the 2018 SM is, to a significant extent, based on projections of household growth. On its face, this appears appropriate. However, it has created a reverse effect in some LPAs. Historic under supply of housing in areas of high demand has lowered rates of migration and household formation which in turn has driven down projected levels of growth leading to lower LHN calculations.
- 3.17 Perhaps of greater concern is the disconnect between the 2018 SM and the target of 300,000 dwellings per year. Put simply, the current SM is failing to deliver the Government's commitments. It was this trend that induced the Government to direct LPAs to continue using household growth projections from 2014 despite the availability of more up-to-date data. This was because the 2014 figures generated higher LHN figures and were more likely to deliver the Government's overall target.
- 3.18 Finally, the reliance on household growth projections in the 2018 SM methodology led to regional imbalances throughout the UK. In simple terms, London and the South-East received very high LHNs due to a lack of affordability and high household growth. Conversely, in the Midlands and the North the 2018 SM produced lower LHN figures and failed to boost the supply of new housing equitably across the country.
- 3.19 In response to the above issues (amongst other things) the Government published its "Planning For The Future" White Paper on 6 August 2020. Alongside this, Government also launched a separate

consultation on changes to the planning system. The latter proposes a new version of the SM, which would yield 337,000 dwellings per year. The new SM seeks to address the shortcomings of the 2018 version by introducing various measures designed to distribute new homes more equitably throughout the UK.

- 3.20 If the new SM is applied to the West Midlands region the annual housing target increases from approximately 19,500 homes per year under the 2018 SM to approximately 27,500 homes. This increase, of 8,000 homes, in LHN would have to be delivered by all West Midlands authorities, including Solihull.
- 3.21 The new SM has received broad support from the housing industry. However, in November 2020, it was reported that Government was to revisit the changes to the standard method, following concerns expressed by some MPs about the outcomes of the formula which was subject to consultation in August. Whilst the outcomes of that further review remain to be seen, Government's objective remains to encourage the delivery of sufficient housing to mitigate the ongoing housing crisis in the UK. The introduction of the new SM will render the LHN figures in the emerging Solihull Local Plan out-of-date immediately. SMBC will need to recalculate and then identify additional land to deliver its increased LHN.
- 3.22 Finally, the White Paper paves the way for an alternative approach to calculating LHN which would reintroduce a Government led, nationwide, distribution of the 300,000 home target based on need and constraints. On its face, this would be similar to the previous practice of identifying overall targets for each region and then tasking the individual LPA's with delivering those targets. This third SM would remove the opportunity for LPA's to assess how much housing they believe they can deliver based on the constraints of their boroughs and districts, including the Green Belt.
- 3.23 In summary, we conclude that the Council's calculation of LHN, which is based on the 2018 SM, will soon be obsolete. Emerging Government policy suggests that Solihull's LHN will increase, leading to a requirement to release more land from the Green Belt to be allocated to housing.

#### **Unmet Needs**

- 3.24 Section 33A of the Planning and Compulsory Purchase Act 2004 establishes a "Duty to Co-operate".This is a legal test, as well as a test of soundness in the context of plan making, and is fundamental to the examination of the emerging Local Plan.
- 3.25 The Council considers the Duty to Co-operate in chapter 6 of its "Reg 19 Draft Local Plan: Overall Approach Topic Paper". The chapter outlines how the Council has engaged in cross boundary growth
issues and confirms that it has attended working groups comprised of representatives from the LPAs in the GBMHA.

- 3.26 The chapter cites "Position Statement Number 3 September 2020" as evidence that unmet need within the housing market area (HMA) has reduced from 37,572 in 2015 to 2,595 in 2019. The shortfall identified in the position statement is based, in part, on undertakings and proposals made by the authorities in the HMA. These include SMBC's undertaking to deliver approximately 2,000 homes towards unmet need in the HMA.
- 3.27 The position statement is a summary of the broad direction of travel rather than a definitive assessment of housing land supply based on commitments in adopted development plans. Accordingly, we conclude that it cannot be relied upon by SMBC to justify its very modest proposed contribution to the delivery of unmet need in the HMA.
- 3.28 There is no overarching, binding, agreement between the fourteen LPAs in the HMA which demonstrates robustly how Birmingham's shortfall will be delivered. Nevertheless, some of the adjoining LPAs have, commendably, entered into memoranda of understanding (MOU) and similar binding agreements to demonstrate how they have committed to deliver cross boundary growth. Some LPAs have confirmed these agreements in their development plans and the issue has been important in the examination of those plans.
- 3.29 SMBC has no formalised arrangement with any of its neighbouring authorities, including Birmingham City Council (BCC). Birmingham adjoins Solihull Borough. Much of the urban area of Solihull is, in effect, a suburb of Birmingham.
- 3.30 BCC has stated that it will consider a review of its adopted Local Plan this year and will set out a timetable for its review by January 2022, if appropriate. This seems very likely given the impending change to the SM which is likely to increase housing need in the West Midlands by up to 30%.
- 3.31 In August 2020 the "Association of Black Country Authorities" wrote to all authorities within the HMA to identify significant challenges facing the Black Country Joint Plan Review. These challenges relate to the supply of housing and employment land. The Black Country Authorities have sought to maximise urban capacity and have committed to release significant amounts of land from the Green Belt. Nevertheless, the level of unmet need for housing is likely to be between 4,500 and 6,500 homes up to 2039.
- 3.32 We conclude that there is a current and future requirement for SMBC for deliver a significant number of new dwellings to address unmet needs in Birmingham and the wider HMA. This obligation is only

likely to increase in the future as the new standard method is introduced and additional unmet needs in Birmingham and the Black Country filter through to the wider HMA.

- 3.33 SMBC's current approach to meeting unmet HMA needs is a commitment to test its ability to accommodate approximately 2,000 new dwellings over and above its LHN. The Council has not provided any evidence or rationale to justify either this approach or the figure chosen. This is despite numerous requests to do so. The decision to test the delivery of 2,000 homes has been taken autonomously and unilaterally, without any recourse to SMBC's neighbours, and in particular BCC.
- 3.34 We recognise that the 2020 Sustainability Appraisal, prepared by AECOM, includes the testing of 13 options (comprising of 6 main options, which are then further divided into sub-options). Those options vary from an outcome where only the Borough's needs are met (Option 1) to an outcome where the Plan makes provision for 25,000 new homes (Option 6) and a significant contribution to the shortfall arising in the HMA. Option 2 comprises an outcome whereby the needs of the Borough are met and a contribution of 2,000 dwellings is made to the HMA shortfall, although this is broken into three sub-options (2a, 2b and 2c), which test differing ways of delivering that level of growth. Options 3 to 6 then test progressively greater contributions towards the HMA shortfall, of 3,000, 6,000, 9,000 and 12,000 units respectively (and again each of these contains sub-options of different combinations for delivering those additional units).
- 3.35 In Options 3 to 6, the Appraisal tests the inclusion of 'amber sites', including the *"rounding of the Green Belt in sustainable locations such as... Widney Manor"* in addition to increasingly greater scales of development at Balsall Common.
- 3.36 At Paragraph 5.5.13, the Sustainability Appraisal concludes that, in respect of Option 3 (a contribution of 3,000 dwellings to the HMA shortfall),

"the effects are very similar to the corresponding options under scenario 2. The additional 1000 dwellings involved should therefore be possible to accommodate without generating further significant effects that would not arise under scenario 2."

- 3.37 The Appraisal goes on to say that, across Options 4, 5 and 6 (and the various combinations of the suboptions within them) there is potential both for greater significant positive effects and significant negative effects.
- 3.38 The Sustainability Appraisal is not, of course, a document that should set the strategy that SMBC incorporates into the Plan. However, it does form part of the evidence base that underpins the Plan,

and it is apparent that it reaches a conclusion that SMBC could make a contribution of 3,000 dwellings to the shortfall in the HMA, without the impacts being materially more negative.

- 3.39 This further highlights, in our view, the absence of any published assessment undertaken by SMBC that tests whether it could make any greater contribution to the HMA shortfall, having regard to its suite of evidence base. It instead only illustrates that the decision to include a contribution of 2,000 dwellings seems entirely arbitrary.
- 3.40 We conclude that in order to robustly justify SMBC's approach towards meeting unmet need the Council should have sought agreement from its neighbours. Indeed, at Paragraph 148 of the Overall Approach Topic Paper, SMBC states that it is *"seeking"* to enter into a Statement of Common Ground with its HMA partners. That the Council has not done this before embarking on consultation of the Draft Submission Plan in accordance with Regulation 19 of the Local Plan Regulations, casts very serious doubt on the extent to which it can demonstrate that it has carried out constructive engagement with its partner authorities, and therefore demonstrate compliance with the duty to cooperate. Furthermore, the absence of a Statement of Common Ground to support the proposed approach at this stage of the plan-making process means that the Plan, in our view, is neither positively prepared nor justified.
- 3.41 In summary, we conclude that there is presently no justification for the arbitrarily selected figure of 2,000 dwellings to satisfy unmet need. We conclude that the Council should explain the process by which it has arrived at a conclusion that it could not deliver more than 2,000 dwellings towards the shortfall without unacceptable impacts on social economic or environmental interests.
- 3.42 At the very least, and without prejudice to our conclusions on the duty to co-operate, given that the Sustainability Appraisal provides significant weight to a conclusion that the Council could make a contribution of 3,000 dwellings towards the HMA shortfall with the impacts being largely the same as those which arise from the Council making a contribution of 2,000 dwellings, it appears to us that there is scope for the Council to make a contribution of at least 3,000 dwellings.

# Green Belt and Safeguarded Land

- 3.43 SMBC has concluded that there are exceptional circumstances which justify the review of its Green Belt boundaries through the preparation of its emerging Local Plan. The main driver for this is housing need, which cannot be met without the release of Green Belt.
- 3.44 Paragraph 136 of NPPF states;

"...strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period".

3.45 Paragraph 139e) states that plans should;

"... be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;"

- 3.46 The Regulation 19 version of the emerging Local Plan proposes the release of sufficient land to accommodate Solihull's LHN (calculated using the soon-to-be-replaced 2018 SM) and a modest amount of homes towards satisfying unmet need in the wider HMA. The previous incarnation of the Local Plan also only included land required to meet needs identified during the plan period.
- 3.47 We conclude that this approach is contrary to the provisions of the NPPF. In order to comply with the tests of soundness around being positively prepared and consistency with national policy, the emerging Local Plan should remove a significant amount of additional land from the Green Belt and simultaneously safeguard it for residential development at the appropriate time. Failure to do so will inevitably create the need to release more land from the Green Belt when the Local Plan is next reviewed. Paragraph 154 of the "Overall Approach" topic paper confirms that SMBC is likely to review its plan before 2031, as required by Government guidance.

# Summary

- 3.48 We conclude that the LHN identified in the emerging Local Plan will shortly become obsolete due to the introduction of a revised SM. If introduced in the form proposed currently the new SM would increase LHN across the West Midlands by up to 30%.
- 3.49 SMBC does not have any formal arrangements or agreements in place with adjoining authorities in respect of meeting unmet housing needs in the HMA. Instead, the Council has arbitrarily and autonomously chosen to test its ability to accommodate 2,000 dwellings to meet unmet needs during the plan period. It has concluded that it is able to do so and has used this exercise to justify its proposed position.
- 3.50 The Council has not assessed whether it could deliver more dwellings and has not identified the number of dwellings above which unacceptable harm would be caused to social, environmental or economic interests.

- 3.51 We conclude that the Council has not discharged its duty to cooperate and that its contribution towards unmet needs is inadequate. This is especially the case given that SMBC has most of the West Midlands "Crown Jewel" employment generators including Jaguar Land Rover, the NEC and Birmingham Airport. Furthermore, only Birmingham City will gain more economic benefit from the arrival of HS2 than Solihull. Despite this, the Borough is proposing one of the smallest contributions towards meeting unmet needs of all of the HMA LPAs.
- 3.52 The emerging Local Plan fails to identify any "safeguarded" land on which to develop new housing in the future. This will inevitably mean that Green Belt boundaries will need to be altered again when the plan is next reviewed. This is contrary to the NPPF.
- 3.53 We conclude that the plan fails the test of soundness in respect of meeting housing needs and ensuring that Green Belt boundaries in the borough will remain beyond the proposed plan period.

# 4. Housing Land Supply

- 4.1 Paragraph 67 of the NPPF confirms that LPAs must identify a supply of:
  - a) "specific, deliverable sites for years one to five of the plan period; and
  - b) specific, developable sites or broad locations for growth, for years 6 10 and, where possible, for years
     11 15 of the plan."
- 4.2 The NPPF confirms that:-

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years".

- 4.3 In respect of deliverability the NPPF establishes that sites which:
  - do not involve major development and have planning permission; and
  - all sites with detailed permission

should be considered deliverable until planning permission expires. The only exception to this is where clear evidence demonstrates that development is no longer viable.

- 4.4 In circumstances where a site:
  - has outline planning permission for major development;
  - is allocated in the development plan;
  - has a grant of permission in principle; or
  - is identified on a Brownfield Land Register (BLR)

the NPPF confirms that it should only be considered deliverable where there is clear evidence that it will deliver homes within 5 years.

- 4.5 To be developable (and included in the housing supply from year 6 onwards), the NPPF confirms that sites should "be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".
- 4.6 SMBC includes, at Page 69 of the Draft Submission Plan, a 'Housing Land Supply Table'. The same table is also found on Page 13 of the 'Meeting Housing Needs' Topic Paper. This table sets out SMBC's conclusions on its supply of sites over the proposed plan period.

- 4.7 A separate version of the supply table is also found on Page 70 of the Draft Submission Plan. This presents SMBC's conclusions on the extent to which the Council could demonstrate a five-year supply of deliverable sites at 1 April 2020 (the base date for the Plan). SMBC concludes that it could demonstrate a supply of deliverable sites of 5.37 years.
- 4.8 We have reviewed the Council's supply tables (for both the whole plan period and the first five years of the Plan). For reference, we have reproduced the 'whole plan period supply' table below.

So	urce	Capacity
1.	Sites with planning permission (started)	1,663
2.	Sites with planning permission (not started)	1,119
3.	Sites identified in land availability assessment.	320
4.	Sites identified in the Brownfield Land Register (BLR)	77
5.	Town centre sites.	961
6.	Solihull Local Plan (2013) Allocations Without Planning Permission at 1 April 2020	350
7.	Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-283
8.	Windfall Housing Land Supply (2022-2036)	2,800
9.	UK central hub area to 2036	2,740
10.	Allocated sites to 2036	5,270
To	tal Estimated Capacity (rows 1-10)	15,017

4.9

We note that the Draft Submission Plan includes a housing trajectory. which divides sites into three phases. However, two of the phases are combined by SMBC for the purposes of establishing annual housing requirements and charting the proposed housing trajectory. The phases cover the following time periods:-

- Phase I 2020 to 2026; and
- Phase II/III 2026 to 2036

- 4.10 The Council anticipates a slower rate of delivery during Phase I (851 dwellings per annum) rising to 991 homes per annum during the Phases II and III. No evidence is provided to explain why the proposed allocations have been placed into their respective phases.
- 4.11 Our comments on the Housing Supply Table are set out as follows.

### Sites with Planning Permission (Started)

4.12 We note that this figure is drawn from Appendices G and H of the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA), prepared by SMBC in 2020.

### Sites with Planning Permission (Not Started)

- 4.13 Row 2 of SMBC's supply table shows 1,119 dwellings in this category, of which 889 dwellings are to be delivered within the first five years of the Plan and therefore contribute to SMBC's five-year supply. The Council's evidence base indicates that the difference of 230 dwellings can be accounted for by one single site: The Green on Stratford Road, which is reported to benefit from an outline planning permission for 330 dwellings, but which SMBC says could contribute 100 dwellings in the first five years of the Plan.
- 4.14 The 2020 Draft SHELAA provides, at Appendices A and B, a schedule of planning permissions which are described as *"live"*. We assume this means 'extant but not implemented' and that this is where the figure for row 2 of the supply table is drawn from. We say this on the basis that: a) the total number of dwellings listed in the two appendices is 1,119; and b) because the appendices to the SHELAA can all be matched against the remaining lines of the supply table.
- 4.15 Upon reviewing the appendices, we have noted, firstly, that it includes a site at 27 Lowbrook Lane. SMBC's records show that, although the Council granted planning permission in 2017, this was quashed in the High Court later that year. Once the application was remitted to SMBC, the Council then decided to refuse the application in 2019. This site cannot therefore be included in the supply table.
- 4.16 Secondly, this row of the supply table includes a number of planning permissions that were granted during 2017. We have briefly checked SMBC's planning records for each site, and have noted that the planning permissions were required to be implemented within three years of the date of the permission being granted (and so during the course of 2020). Indeed, a number of those permissions were required to be implemented before the SHELAA was published in October of this year. On the basis that the Council has included those sites in the 'not started' category, we can only conclude that the Council holds no evidence of the consents being implemented. In the absence of such evidence,

we can only conclude that those planning permissions have now lapsed (or will lapse between the time of writing and the end of 2020). That being so, those sites would not be capable of delivering housing during the Plan period, and so should be excluded from the supply table.

- 4.17 Our analysis suggests that 44 dwellings can be discounted from row 2 of the supply table on this basis. The SHELAA indicates that a number of other sites in this category will lapse during the early parts of 2021, so that by the time the Plan may be adopted, the number of dwellings in row 2 of the supply table is likely to have decreased further.
- 4.18 These points are likely to have implications for SMBC's ability to demonstrate a five-year supply of housing when the Plan is adopted. We say this as all but one of the sites in this category of supply are expected by SMBC to be delivered in the first five years of the Plan (and therefore contribute to five-year supply). We return to consider this in later paragraphs.

## Sites Identified in Land Availability Assessments

- 4.19 Appendix E of the SHELAA shows that sites identified as being suitable for residential development in the SHELAA could contribute 320 dwellings to the supply of housing up to 2036. Of that number, the SHELAA concludes that 100 dwellings are deliverable and therefore will contribute to the Council's five-year supply. This contradicts the five-year supply table in the Draft Submission Plan, which states that 200 dwellings will be delivered on sites identified in land availability assessments.
- 4.20 In any event, none of the sites in this category are allocated for development, and are not: a) allocated in the 2013 Local Plan; or b) proposed for allocation in the Local Plan Review. The Council has not provided any evidence to demonstrate how the 100 dwellings from SHELAA sites, that it says are deliverable, would satisfy the definition of deliverable in the NPPF. At the very least, those units should not contribute to the supply of housing in the first five years of the Plan.
- 4.21 More significantly, though, in the absence of being allocated, or benefitting from planning permission, we conclude that all of the sites in this category (i.e. not just those which SMBC says are deliverable) would be more appropriately be categorised as windfalls.
- 4.22 The above casts doubt on the robustness of the Council's estimate of delivery from windfalls and suggests that sites may have been double counted, i.e. they appear in rows 3 and 9 of the supply table.
- 4.23 Accordingly, we conclude that the Council has not provided sufficient evidence to justify the inclusion of these sites in row 3 of the supply table. Row 3 should be deleted completely as a consequence.

### Sites Identified in the Brownfield Land Register

- 4.24 The table indicates that 77 dwellings will come forward from the Brownfield Land Register (BLR), all in the first five years of the Plan. As with sites in row 3 of the supply table, we are concerned that the BLR sites should either be:
  - i) identified as allocations with evidence to support the Council's conclusion that they will contribute to supply; or
  - ii) categorised as windfalls.
- 4.25 There is a very significant difference between the Council's claimed windfall supply (2,800 dwellings) and the contribution from the BLR (77 dwellings). This is despite the fact that the two sources of supply should, arguably, be broadly the same. The PPG confirms that windfall sites should be considered for inclusion in the Brownfield Land Register and that where windfall sites are deliverable they count towards 5 year land supply.
- 4.26 Given the lack of evidence to demonstrate that these sites meet the NPPF definition of deliverable, and support the inclusion of BLR sites in the supply table, we conclude that the row should be removed from the supply calculation.

### **Town Centre Sites**

- 4.27 Neither the Draft Submission Plan, nor the Meeting Housing Needs Topic Paper include details of the sites that will deliver the 961 units within the town centres. The only clarification provided is that Solihull Town Centre will deliver 861 units and Chelmsley Wood Town Centre will deliver 100 units.
- 4.28 The 2020 SHELAA advises that the Solihull Town Centre sites are carried over from the 2013 Local Plan. We note that the 2013 Local Plan identified a capacity for 950 dwellings to be delivered on sites in the Town Centre. Paragraphs 113 to 131 of the Draft Submission Plan advise that, in 2016, an Illustrative Town Centre Masterplan was prepared (and which informed the Draft Local Plan that was published for consultation in 2016). The Masterplan identified capacity for 1,500 dwellings to be constructed in the Town Centre, of which the Draft Local Plan concluded that 861 could be delivered over the forthcoming plan period.
- 4.29 SMBC now reports that updated market reviews and analyses have been procured from Amion, in order for the Council to reach a refined view on those sites in the Town Centre which can be developed over the forthcoming plan period, and the capacity of each of those opportunities. SMBC states at Paragraph 130 of the Draft Submission Plan that, although the outcomes of that assessment are not yet available, the work has indicated that the, *"level of residential development that can be*

accommodated in the town centre is expected to at least match that assumed in the Draft Local Plan, if not exceed it." SMBC goes on to say that, once the Amion work has been completed, it will update its figures on Town Centre capacity. In the meantime, SMBC states that it is relying on the figure of 861 dwellings that emerged from the 2016 Draft Local Plan.

- 4.30 Given that SMBC is currently consulting on the Draft Submission Plan (which is the version it intends to submit to the Secretary of State), it is unacceptable that the evidence around Town Centre opportunities and capacity is not available for interested parties to comment on at this stage. Those with interests in the Plan must have the opportunity to review and test SMBC's evidence as part of the current consultation, in order to reach a view on the acceptability of the Council's conclusions on the number of dwellings that can be delivered in the Town Centre over the plan period.
- 4.31 Beyond this, the 100 units which are said to be capable of being delivered in Chelmsley Wood Town Centre are reported to have emerged from the SHELAA (rather than being allocated or benefitting from planning permission). However, SMBC's re-issued Site Assessment document, dated November 2020, states that the Chelmsley Wood Town Centre sites were excluded from the SHELAA. It is therefore not at all clear from the Council's evidence base what testing has been undertaken of the potential to deliver 100 units in the Town Centre, and to justify inclusion of these dwellings in the supply calculation. In any event. we reach the same conclusions as we have in respect of other sites that are neither allocated nor the beneficiary of a planning permission; they are windfalls and so are already captured by row 8 of the supply table. On this basis, and to avoid double counting, these units must be excluded from row 5 of the supply table.

### Solihull Local Plan (2013) Allocations without Planning Permission at 1 April 2020

- 4.32 Appendix C of the 2020 SHELAA lists those sites which are to be carried forward from the 2013 Local Plan. These are:-
  - the Simon Digby site in Chelmsley Wood, which is identified as capable of delivering 175 dwellings (in the first five years of the Plan);
  - ii) land at Riddings Hill, Balsall Common, which is identified as capable of delivering 65 dwellings (in the first five years of the Plan); and
  - iii) land off Meriden Road in Hampton-in-Arden, which is identified as capable of delivering 110 dwellings (in the first five years of the Plan).
- 4.33 Like the Draft Submission Plan, the 2013 Local Plan categorised the housing sites within it into phases. The <u>Simon Digby</u> site fell within the first phase of the 2013 Local Plan, and so was expected to

be delivered between 2013 and 2018. That is has not come forward for development raises questions about its deliverability. However, SMBC has not commented on that in its evidence base. Indeed, the only reference to deliverability that we have found is in the SHELAA, were SMBC note that the site has been subject to pre-application discussions (with those relating to a scheme of 175 dwellings). However, the submission of a pre-application enquiry is no guarantee that a planning application (or permission) will follow, and so we think this falls substantially short of providing clear evidence that the site is capable of being delivered for housing, whether that is in the first five years of the Plan or in year 6 and beyond. We therefore conclude that SMBC has not justified the carrying over of this allocation, and that it should be excluded from the supply table.

- 4.34 The site at Riddings Hill, Balsall Common, was allocated to Phase II of the 2013 Local Plan (where SMBC expected development to be delivered between 2018 and 2023). It does not appear that the site has been subject to any additional assessment as part of the preparation of the Local Plan Review. It is incumbent on SMBC to provide the clear evidence that the site is deliverable, in order for it to contribute to the supply of housing in the first five years of the Plan. The NPPF is clear that it is not permissible for LPAs to simply rely on a site being allocated to demonstrate that it is deliverable. Therefore, in the absence of such evidence, we conclude that SMBC has not justified the retention of this site in the supply table, and that it should be excluded.
- 4.35 The site at Meriden Road, Hampton-in-Arden, appears to comprise agricultural land, and was located adjacent to a former ammunition depot. The 2013 Local Plan stated that delivery of the allocation was contingent upon "reclaiming the ammunition depot" for open space. It is not at all clear whether the rolling forward of the allocation into the Local Plan Review carries the same contingency. If so, SMBC must demonstrate within its evidence base that it is satisfied that the depot can be provided as open space, to facilitate development on the existing allocation.
- 4.36 We raise this because SMBC's Site Assessment (November 2020) includes an assessment of the depot, which concludes that the site may be suitable for residential development. That would, on its face, appear to challenge the ability of the depot to provide the open space that would then unlock development potential of the adjoining, existing allocation. The absence of any evidence or discussion around these matters in the Draft Submission Plan means that SMBC has failed to demonstrate, robustly, that the Meriden Road allocation is capable of delivering new housing during the forthcoming plan period. We therefore conclude that it too must be excluded from the supply table.

Less 10% to Sites with Planning Permission (Not Started), Sites Identified in Land Availability Assessments, Brownfield Land Register Sites and Solihull Local Plan (2013) Sites

4.37 The Council has not provided evidence to demonstrate why a 10% discount is appropriate as opposed to a higher figure. The discount is applied to sites identified in Land Availability Assessments, and on the Brownfield Register, which we consider should be excluded from the supply calculations on the basis that, if not allocations, they are windfalls. We reserve the right to comment on this in more detail once the evidence to support this assumption is made available.

## Windfall Housing Land Supply

- 4.38 The Council is obliged to release land from the Green Belt to meet its LHR and unmet need from the HMA. It should also be releasing land from the Green Belt and identifying it as 'safeguarded' to meet housing needs beyond the plan period, as required by the NPPF. In doing so the Council must be able to demonstrate that it has maximised opportunities to deliver dwellings on sites within the urban area and on land outside the Green Belt (albeit there is no such land in Solihull).
- 4.39 SMBC has, since the first introduction of housing land supply figures, maintained that a significant element of its supply comes from windfalls. The Inspector who examined the Solihull Local Plan, Mr Stephen Pratt, was persuaded to accept a windfall allowance of 150 dwellings per annum.
- 4.40 However, on the basis that SMBC is proposing to release land from the Green Belt as part of the Plan, it must have satisfied itself that it has exhausted capacity within the urban areas. That must cast doubt on the number of genuine windfall opportunities that may come forward over the plan period. We have already observed that sites emerging from the SHELAA or which are included on the Brownfield Register are windfalls (and which the Council is aware of). These total 397 dwellings, meaning that for the Council's windfall allowance to be met, a further 2,403 windfall dwellings would need to come forward by 2036.
- 4.41 Moreover, 2,800 dwellings makes up c. 18.6%, or nearly a fifth, of the supply of housing shown in the Draft Submission Plan.
- 4.42 In an area where non-Green-Belt opportunities have been exhausted (leading to the release of land from the Green Belt), it is contradictory for SMBC to assume that nearly a fifth of the supply will be delivered through windfalls. Further evidence-based justification is required from the Council to support such a high reliance on windfall sites, as this has a very significant bearing on the quantum of land required to deliver new homes and for the setting of appropriate Green Belt boundaries to ensure that they endure well beyond the plan period.

### UK Central Hub Area

- 4.43 The ability of the UK Central Hub Area to contribute to major growth in the Borough is not questioned. The Council increased its assumptions on the delivery of housing from UK Central Hub from 1,000 dwellings in the 2016 Local Plan Review Consultation to 2,500 in the 2019 Supplementary Consultation. Our representations at that time challenged the expectation that such a volume of dwellings could be delivered over the proposed plan period.
- 4.44 Notwithstanding that, SMBC states in the Draft Submission Plan that the UK Central Hub can deliver2,740 dwellings by 2036.
- 4.45 It remains the case that we do not challenge the contribution that the UK Central Hub can make to growth in the Borough. We cannot, though, locate any evidence to support the Council's view that 2,740 dwellings will be delivered by 2036 (it is not, for example, a figure that features in the UK Central Framework Plan).
- 4.46 In the absence of such evidence, we think that SMBC is being overly optimistic in assuming 2,740 dwellings will be delivered by the end of the plan period. It would, for example, require the hub area to deliver over 182 dwellings per annum, beginning in 2021, for that amount of housing to be delivered by 2036. However, UK Central does not feature in the five-year supply table on Page 70 of the Draft Submission Plan, which suggests that SMBC does not expect it to begin delivering until 2026 at the earliest. If that were right, then it means the Council expects the site to deliver nearly 275 dwellings per annum over 10 years. If that is the Council's position, then it needs to evidence this level of provision.
- 4.47 In reality, before the site can begin to deliver, it must firstly be released from the Green Belt (which will take place upon adoption of the Plan), and then outline planning permission must be granted. Approvals of reserved matters would subsequently need to be obtained, before pre-commencement conditions are discharged and any other technical approvals secured.
- 4.48 As we noted in our representations to the Supplementary Consultation, Avison Young has undertaken research into the delivery rates of large complex sites, such as UK Central. That has indicated that such sites may have a lead-in time of some 7 years (before the first dwelling is delivered). That being so, we maintain, as we did in 2019, that a more prudent assumption may be that the scheme begins to deliver in 2028, and that it may deliver, say, 800 dwellings by 2036 (at a rate of 100 dwellings per annum).

# Summary and Implications for the Supply of Housing

- 4.49 Our analysis of the land supply assumptions included in the Draft Submission Plan leads us to conclude that supply has been over-estimated for the following reasons.
  - Double counting, arising from several sources of supply (windfalls, BLR, sites identified in availability assessments and town centre sites) which are, on the face of it, the same, without evidence do demonstrate why the sites fall into only one category and not several.
  - Lack of evidence to demonstrate why allocated sites in the adopted Local Plan will deliver units in the new plan period but have not done so for over seven years.
  - Lack of evidence to demonstrate why a 10% discount figure has been applied and not a higher figure.
  - Over estimation of delivery from windfall sites, in particular given the NPPF requirement to maximise urban land before altering Green Belt boundaries.
  - Over reliance on early delivery from the UK Central Hub Area, combined with a lack of evidence to demonstrate how the very significant infrastructure requirements needed to facilitate housing development will be delivered.
- 4.50 Having regard to these matters, we produce below a revised version of the plan period supply table, adjusted to take account of the amendments and exclusions that we have said must be made.

So	urce	Capacity
1.	Sites with planning permission (started)	1,663
2.	Sites with planning permission (not started)	1,075
3.	Town centre sites.	861
4.	Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-108
5.	Windfall Housing Land Supply (2022-2036)	2,800
6.	UK central hub area to 2036	800
7.	Allocated sites to 2036	5,270
Tot	tal Estimated Capacity (rows 1-7)	12,361

- 4.51 It is apparent that from the above that, if the supply is adjusted to remedy the issues that we have identified, then the Council is only to demonstrate that a supply of 12,361 dwellings over the plan period. That is some 551 dwellings short of the identified housing need for the Borough of 12,912 dwellings and would mean that SMBC could not meet its own needs, nor make any contribution to unmet needs arising from Birmingham.
- 4.52 Crucially, that figure includes a windfall figure of 2,800 dwellings, which we have said cannot be relied upon, and retains a 10% non-implementation discount applied to sites with planning permission that are not started (even, though, as we have noted, SMBC has not explained why that figure should not be greater). If the supply figures were further adjusted, to show fewer windfall dwellings and / or a greater non-implementation discount, then the outcome would be that the deficiency would be exacerbated.
- 4.53 It is for this reason that we conclude that the Plan, as drafted, is not positively prepared, because, on a proper assessment of housing supply, it does not meet the housing needs of the Borough.
- 4.54 A supplementary point is that our judgements around the Council's supply figures would also have implications for the calculation of five-year supply upon adoption of the Plan. To that end, we have reproduced below the Council's five-year supply table from Page 70 of the Draft Submission Plan, and have adjusted it to take account of our comments in this Section.

So	urce	Capacity
1.	Sites with planning permission (started)	1,663
2.	Sites with planning permission (not started)	745
3.	Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-75
4.	Windfall Housing Land Supply	600
5.	Allocated sites	1170
To	tal Estimated Capacity (rows 1-5)	4,103
An	nualised Requirement	851
An	nualised Requirement + 5%	894

Five-year requirement	4,468
Five-year supply	4.59 years

- 4.55 The above table indicates that, adopting appropriate assumptions and judgements around the Council's housing supply, SMBC will not be able to adopt a five-year supply of housing on adoption of the Plan. Consequently, the Plan will not be consistent with national policy.
- 4.56 These deficiencies in supply could be remedied through the Council revisiting its supply of sites and identifying additional land for allocation. As we shall explain in subsequent Sections, our Client's interests provide a suitable location for housing, that could make a meaningful contribution to the delivery of new dwellings in the Borough.

# 5. Site Assessment: Land North of Balsall Street

- 5.1 The following paragraphs demonstrate that Land North of Balsall Street should be allocated for residential development, as demonstrated by technical evidence and application of the Council's site selection methodology.
- 5.2 The Land North of Balsall Common was considered in the site assessment (October 2020) as Land to the North West of Balsall Common (Site Reference 198).

# **Green Belt Impact**

- 5.3 A key consideration in the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.
- 5.4 L&Q Estates remain concerned that "Land North of Balsall Street" situated within with wider RP51Parcel has been incorrectly assessed in relation to Purpose 1 and Purpose 3 of this Strategic GreenBelt Assessment. The site assessment notes that the site is in a:

"Moderately performing parcel (RP51) overall with a combined score of 7. \*Highly performing in terms of purpose 3."

- 5.5 A number of the comments we made in our March 2019 representations in respect of the scoring on the larger Grange Farm parcel / Green Belt parcel RP51 remain relevant, however our comments are refocused, so they are relevant to the reduced site:
  - RP51 scores '2' when assessed against Purpose 1 (to check unrestricted sprawl of large built-up areas). We believe that if considered alone and in isolation to the larger RP51 parcel, a more appropriate score for the L&Q Estates site would be '1' (parcel is lower performing). This is because the site includes development that is already present immediately to the east of the site which is adjacent to the existing settlement, and further housing development is situated on the western boundary with Saracens Drive even further west. In addition, development is already evident along Balsall Street and Needlers End Lane to the south and existing hedgerows form a clear boundary to the north. The site is therefore contained and as illustrated in the Illustrative Masterplan offers potential for rounding off the settlement edge.
  - In respect to Purpose 3 (To assist in safeguarding the countryside from encroachment), we again believe that in isolation the site has been incorrectly assessed against this Green Belt Purpose. As mentioned above, the site includes development that is already present immediately to the east of the site which is adjacent to the existing settlement, and further housing development is situated

on the western boundary with Saracens Drive even further west development that is already present immediately to the south and to the east of the site. As such, a more appropriate score would be '2' i.e. refined parcel is generally characterised by countryside and has limited development present.

5.6 In light of our comments above, we therefore consider a more appropriate score for Land North of Balsall Street is summarised below:

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Land at Grange Farm "Wider Parcel" (SMBC Score)	RP 51	2	2	3	0	7	3
Land at Grange Farm – "The Site" (Avison Young)	RP 51	1	2	2	0	5	2

- 5.7 In light of this scoring, we consider that the site is well placed, in Green Belt terms, to deliver housing required to meet SMBC's housing needs. In Green Belt terms, it is not necessary to keep it permanently open.
- 5.8 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments, that whilst Land North of Balsall Street has been categorised as a 'blue site 6' it should more appropriated have be defined as a 'yellow site 5'. It is incongruous that the Green Belt Assessment covers such broad areas and penalises sites within larger areas. The Site Assessment simply assessed a site based on the overall Green Belt area it is classified within, and thus represents a flawed approach to site selection.

# **Sustainability Credentials**

5.9 The Council has used a set of sustainability credentials to appraise each of the sites put forward for allocation in the emerging Local Plan. Each site is assessed in accordance with the following methodology.

Colour Code	Significance of Effects	Symbol	AY Scoring
Dark Green	Significant Positive Effects more likely	$\checkmark\checkmark$	+2
Green	Positive Effects likely	✓	+1
Grey	Neutral effects	-	0
Amber	Negative effects likely /mitigation necessary	×	-1
Red	Significant negative effects /mitigation essential	**	-2

- 5.10 The Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary provides a summary of the Sustainability Appraisal, which in the case of the Grange Farm "BC1" site is derived from the October 2020 SA and previous versions (2016 SA).
- 5.11 L&Q Estates strongly opposes the Council's assessment of Grange Farm "BC1/AECOM 76" against SA10, SA11. The parcel of land now being promoted by L&Q Estates is smaller than "AECOM 76", hence its sustainability credentials must be assessed afresh. We have carried out this exercise and have generated the following SA scores:
  - SA1: Deprivation and equality this remains at "-1" and is applicable for all Balsall Common sites being located within 60% of the least deprived.
  - SA2: Access to Primary and Secondary School is as per AECOM 76 and a neutral scoring (1,090m Balsall Common Primary School and 1,202m Heart of England School)
  - SA3a: Proximity to bus and train services within 400m of an infrequent bus service remains at "+1"
  - SA3b: Proximity to principle road network (0m) remains at "+1"
  - SA4a: Soils now a neutral score given site size (see below justification)
  - SA4b: Minerals remains a neutral score as per AECOM 76
  - SA7: EA Flood Zones, remains neutral as per AECOM 76 assessment.
  - SA9: Contains a local wildlife site so "+1" scoring applicable.

- SA10: Landscape Sensitivity see below our justification for a "-1" scoring
- SA11: Distance to Green Space- see below justification for a neutral score.
- SA12: Heritage Assets maintain "-1" scoring as per AECOM assessment.
- SA14: Amenity maintain "-1" scoring as per AECOM assessment.
- SA17a: Distance to Healthcare maintain "+1" scoring as per AECOM assessment
- SA17b: Distance to Leisure and Play Facilities maintain "+2" scoring as per AECOM assessment note Willow Park Recreation Ground adjacent to the site.
- SA19a: Distance to Jobs- maintain "-2" scoring as per AECOM assessment.
- SA19b: Distance to convenience store or supermarket c.550m so "+1" scoring now applicable.

### SA4a - Minimising the use of natural resources

5.12 SA4a is concerned with soils, and the scoring reflects the quantity and quality of agricultural land lost. AECOM note that "although there is little guidance, the loss of 20 hectares triggers consultation with DEFRA/Natural England, which can be considered significant." The site area has reduced significantly. A neutral score is now applicable because the developable area of the site is now 9.24ha, See Appendix 3, and thus it should be classified as a neutral score as it "contains less than 10 ha of agricultural land 1-3b".

### SA10 – Landscape Sensitivity

- 5.13 SA10 is the indicator for assessing the landscape effects of development. The categories correspond to the overall landscape sensitivity classifications as set out in the Solihull Landscape Character Assessment (November 2016).
- 5.14 The Landscape Character Assessment identified ten broad landscape character areas (with three having defined sub-areas). For each of the areas a judgement about landscape character sensitivity, visual sensitivity and the overall general capacity to accept development and change is made. These conclusions are based on standardised scoring matrices, shown below, together with a qualitative analysis of any key opportunities/constraints of the area.
- 5.15 It is made clear within the assessment of landscape capacity that it is not possible to establish a definitive baseline sensitivity to change without having details of a given development proposal, and thus a general assessment has been made.

- 5.16 Land at Grange Farm is situated in LCA 4 'Rural Centre' (and within this, positioned in sub-area 4C). In terms of LCA 4C, the overall landscape character sensitivity is considered to be **high**, the visual sensitivity to be **medium** and the landscape value to be **medium**. This results in the view that the LCA sub-area would typically have an overall **very low** capacity to accommodate change.
- 5.17 L&Q Estates consider that the approach taken is flawed and inconsistent and the Council's SA has assessed wrongly assessed the larger Grange Farm parcel (AECOM 76). In addition, when the reduced site is considered (Land North of Balsall Lane) it performs more strongly against the sustainability criteria. The site should now be considered against the extent of development set out in Appendix 3.
- 5.18 The Grange Farm site only forms a very small part of a larger area of LCA 4C. Importantly, the landscape character adjacent to Balsall Common is different to that within the remainder of this Sub-Area.
- 5.19 Considered in isolation, we believe the site is considered to be of **medium** landscape character sensitivity, as opposed to high, for the following reasons:
  - The site is not affected by any designations for landscape quality or value.
  - The site exhibits some of the characteristics of the Arden landscape and, overall, is considered to be of medium landscape quality.
  - The south-eastern and south-western areas are closely related to the existing areas of housing and lie on the south-west facing side of the ridge and are, therefore, contained.
  - This area is considered to have medium to low sensitivity to residential development.
  - The retention of existing hedgerows, trees and woodland would assist in assimilating the development within the wider landscape.
  - Development would not have a material impact on the visual amenity of local properties nor on key views from the wider area.
  - Development could deliver an extension to the village which is well connected and contained to the northwest by existing and proposed landscaping.
  - It would not result in urban sprawl, would not encroach into the open countryside, would not impact on the setting of a historic town, or lead to coalescence with a neighbouring settlement. A new defensible boundary to the Green Belt could be formed. As such, the site could be released from the Green Belt without compromising Green Belt policy.

- Specific landscape principles are recommended which are reflected in the Development Framework.
- Middle and long distance views of the site are largely unavailable and key views of the site tend to be limited to local views from nearby roads, properties and public footpaths.
- 5.20 Furthermore, the Council's evidence base is not consistent in assessing the larger parcel (AECOM 76). Grange Farm "BC1" was scored -1 in the Council's 2017 Sustainability Appraisal (SA) and -2 in October 2020. Both assessments have used the Solihull Landscape Character Assessment (November 2016) as their evidence base and so L&Q Estates are strongly of the view that this scoring change is not justified based on the above commentary and we strongly submit that the score for "BC1" and thus for the L&Q Estates parcel should be "-1" as per the 2017 SA.

## SA11 – Green Infrastructure

- 5.21 L&Q Estates questions the Council's assessment of Grange Farm ("BC1") against SA11 "*To facilitate the delivery and enhance the quality of areas providing green infrastructure*".
- 5.22 The Council's own Green Infrastructure Study (January 2012) Figure 5.1 Accessible Greenspace Provision identifies that the site is clearly within '400m from the public open space or natural greenspace of at least 2ha in size', indeed it is adjacent to such provision. Therefore, we believe that the site 'Meets one standard' of the criteria for SA11, and therefore a 'Neutral Effect' (Grey) should apply based upon the Council's scoring criteria.



Source: Figure 5.1 Green Infrastructure Study (SMBC - January 2012)

5.23 On this basis and in light of our comments above, Grange Farm "BC1" should have been given a more appropriate SA Assessment (SA11) and our assessment for the 'reduced site' is shown below:

	SA1	SAZa	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
Grange Farm AECOM Assessment (2017)	-1	0	0	+1	+1	-2	0	0	+1	-1	-1	-1	-1	+1	+2	-2	+2	-1
BC1 Grange Farm - ([82,142,198, 233,1015] AECOM 76 October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
AY assessment L&Q Estates Site (December 2020)	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1

5.24 Whilst the Council's SA assessment identifies 6 positive and 7 negative effects for the BC1 Grange Farm site (of which the reduced site is within), the AY analysis indicates that the reduced site would have 6 positive and 5 negative effects. Whilst it is acknowledged that Land North of Balsall Common is on average 'closer' to the facilities and services in Balsall Common compared to the larger "BC1 – Grange Farm" area (AECOM 76), it is considered that the scoring of the other indicators is still broadly applicable to the reduced site and thus a +1 scoring is considered appropriate for the site overall.

# 6. Balsall Common

- 6.1 L&Q Estates supports the Council's over-arching strategy of seeking to focus growth on land beyond the Green Belt. We also support the Council's strategy of proposing significant housing growth in Balsall Common. The settlement has a broad range of facilities and offers great potential to deliver sustainable growth.
- 6.2 L&Q Estates concerns relate to the way in which the Council has assessed and selected / omitted sites, both around Balsall Common and elsewhere. The approach that has been taken, and elements of the assessment have been opaque, inconsistent and in some cases flawed. In respect of Balsall Common specifically, some major concerns relate to Green Belt and Infrastructure.

## Green Belt

- 6.1 The NPPF indicates a key purpose of the Green Belt is to *"to prevent neighbouring towns merging into one another"* (Para 134b). The plan mentions the 'Meriden Gap' between Balsall Common and Coventry as being 'just 2km' (Paragraph 515). The plan also notes there have been and will be 'other development' on the western side of Coventry. It is considered that reduction of this gap is an important issue for selecting sites around Balsall Common.
- 6.2 It does not appear that this has been given weight in site selection and we contend that development to the east of Balsall Common would introduce further development into this area closing the distance to c.1.2km between Balsall Common and Coventry and the proposed relief road is proposed within this gap meaning in reality the distance between the proposed road and Cromwell Lane would be less than 1km. There are other options to avoid reducing this gap, not least my clients site North of Balsall Street to the west of the settlement.

# Infrastructure Requirements

### **Balsall Common Relief Road**

- 6.3 The submission Plan indicates the need for the Balsall Common Relief Road (Para 527). L&Q Estates have concerns about delays to the delivery of the Balsall Common Bypass which could impact the existing delivery trajectories (i.e. Barratt's Farm). This is particularly important given that:
  - this infrastructure is considered "essential" to deliver the proposed allocations around Balsall Common including Policies P8, BC1-6 (Draft Infrastructure Delivery Plan, October 2020 [DIDP] page 120);

- the relief road has an estimated cost of between £20-30 million with five separate funding sources identified to deliver it (DfT, MRN, GBS LEP, WMCA and S106/CIL).
- the Concept Masterplan (October 2020) for Barratt's Farm identifies the 'Balsall Common Bypass' as a 'potential by-pass line' and the estimated timescales for delivery is in the period 2022-2025.
- "Some of the sites, in particular Barratt's Farm, have multiple and potential complex land assembly issues. It is imperative that sites such as this are considered in a comprehensive manner to avoid piecemeal developments occurring" (SLP-DSV para 541).
- 6.4 The Balsall Common Relief Road is required to *"ease congestion access to housing development"* and the impacts can only be appropriately mitigated through the provision of a relief road through Balsall Common (Draft Infrastructure Delivery Plan page 26).
- 6.5 It does not appear that the Relief Road has been considered for assessment in the SA, October 2020 as part of the evidence base to the plan. We require the Council to confirm whether this it has been assessed for impacts. L&Q Estates submit that failure to assess the relief road in SA terms is a material error.
- 6.6 L&Q Estates contend that there are considerable risks to the effectiveness of allocations that will be impacted by the relief road, particularly Barratt's Farm given the reliance on the relief road and its deliverability. A number of factors could delay this process including land assembly issues and having sufficient funding to deliver the road by 2025. More evidence from the 'lead delivery organisation' SMBC is required to demonstrate that these issues can be overcome and to ensure the effectiveness of delivering these sites within the plan period.

# High Speed 2 (HS2)

- 6.7 In addition to this the proposed HS2 rail link (Paragraph 525) to the north of the settlement is proposed for completion in 2025 with the line opening in 2026. We raise this given the impacts of construction and delivery of this infrastructure projects. L&Q Estates are concerned that these infrastructure projects have clear potential to impact the delivery of the sites around Balsall Common along the proposed routes within the plan period.
- 6.8 As indicated by the policy, delivery of the HS2 line will be disruptive during its constructive phase and will impact the delivery of the proposed allocation in these impacted areas. The plan notes that:
  - "Enabling and construction works have now commenced ready for the line to open in 2029-33. During this period there may be an increase in construction traffic around the settlement and once

operational, due to the close proximity of the new Interchange station, there may be extra demand on services and housing." Para 7.1.4

- 6.9 This shows there is still uncertainty over the exact opening date of the line, as a range of 5 years between 2029 and 2033 is identified. It is clear a project of this scale will take time to complete and L&Q Estates have concerns that the full 875 dwellings may not be deliverable in the plan period to 2036 and that additional sites, particularly in sustainable locations around Balsall Common should be identified.
- 6.10 The construction of the HS2 line and the proposed relief road is likely to significantly impact the amenity of development and potential to deliver sites in the plan period. Given the "multiple and complex land assembly issues" it is critical that the Council demonstrate that the site is deliverable in the plan period. It is contended that land at North of Balsall Street can be delivered based on its single landownership, its suitability and availability.
- 6.11 Robust evidence is therefore required to demonstrate that the sites around Balsall Common are deliverable in the plan period and that the timeline for the HS2 proposals and the relief road are robust.
- 6.12 L&Q Estates is concerned that conflicts arising from attempting to deliver the two projects at the same time has the potential to impact the delivery of the sites within the plan period.

### Assessment of Site Performance

- 6.13 The Council's Site Selection Topic Paper confirms that in order to ensure a plan is justified "assessing how sites perform against each other is relevant to satisfying this test" (para 17).
- 6.14 As we have demonstrated in our responses in relation to individual sites, our assessment of L&Q Estates site proves that the site has strong sustainability credentials and is well placed to deliver housing growth.
- 6.15 The comparative scoring of the site against proposed Housing Allocations around Balsall Common from the October 2020 SA is set out in Table 3.1. A plan showing the proposed housing allocations is provided at Appendix 6 to contextualise Land North of Balsall Common and the sites proposed for allocation. The Council's October 2020 assessment scores the larger Grange Farm Site "BC1" site as a "-2", worse than in 2017, with no material changes in evidence to justify the alternative scoring.
- 6.16 Even before adjustment to scoring, the larger area at Grange Farm "BC1" performs significantly better in the Sustainability Appraisal (October 2020) that the land at Pheasant Oak Farm and Lavender Hall

Farm and on a par with Windmill Lane. When considering the reduced L&Q Estates land in isolation, on our assessment it outperforms all the other sites around Balsall Common, apart from Frog Lane.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142, 198, 233, 1015	BC1 Grange Farm	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
97	PO1	Barratt's Farm	-1	0	+1	+1	+1	-2	-1	0	-1	0	0	-2	0	+2	+2	-2	+1	-1
98	PO2	Frog Lane	-1	+2	+1	+1	+1	0	0	0	0	0	-1	-1	0	0	+2	-2	0	+2
99	47, 138	Windmill Lane	-1	+1	+1	+1	+1	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-2
227		Pheasant Oak Farm – Proposed for allocation	-1	-1	+1	+1	+1	0	-1	0	0	0	-1	0	-1	0	+2	-2	-2	-4
226		Trevallion Stud – Proposed for allocation	-1	-1	0	+1	+1	0	0	0	0	-2	-1	0	-1	0	+2	-1	+2	-1
81	BE5	Land at Lavender Hall Farm – Proposed for allocation	-1	-1	0	+1	+1	0	-1	0	0	-2	-1	0	-1	+1	+2	-2	+1	-3

6.17 In relation to this, we conclude that the site refinement process should lead to justifying the inclusion of Land North of Balsall Street as a proposed allocation; and merit should be given to the retention of open space within the site in protecting the northern edge of development from further expansion (see Appendix 3), and ability to create a defensible boundary. It is contended that these factors lead to a "green scoring" meaning the site should be allocated.

# 7. Policy BC1 – Barratt's Farm, Balsall Common

- 7.1 L&Q Estates are concerned that policy BC1, which allocates BC1 Barratt's Farm for 875 dwellings in the plan period, is not justified or effective.
- 7.2 The site has been assessed in the October 2020 and the January 2017 Interim SA and L&Q Estates maintains its concern with how the evidence base has been used in the site selection process to justify allocation of BC1 Barratt's Farm for 875 dwellings.

# Step 1 – Site Hierarchy Criteria

- 7.3 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.
- 7.4 It is our view that the land at Barratt's Farm performs a more important role in terms of Green Belt function than Land North of Balsall Street. As such the following observations should have been taken into account when Barratt's Farm was categorised:
  - We consider that the Green Belt Assessment must be assessed against how the site performs now and not how it may perform in a post-HS2 world.
  - We contend that development on Barratt's would reduce the gap with Coventry and would introduce further development into the Meriden Gap closing the distance between Balsall Common and Coventry. Development on the L&Q Estates site would thus result in a significantly less material impact on settlements to the north, given the considerable separation that would be maintained.
  - Additionally, land North of Balsall Street is flanked by existing development on its southern and western edges. The development is also contained by existing hedgerow boundaries and underground easements.
  - In terms of Green Belt function, the land at Barratt's Farm performs a more important role than L&Q Estates' site. Our conclusion is that Barratt's Farm should score 7 in terms of impact whereas Land North of Balsall Street should score 5 and thus should be preferred.
- 7.5 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments, that whilst Barratt's Farm has been categorised as a 'blue site 6' Land North of Balsall Street, in contrast should have been categorised as a 'yellow site 5'

### Step 2 – Refinement Criteria

- 7.6 Following this analysis, we now observe that the proposed allocation of the site for 875 homes and note that in the site analysis (October 2020) considers that the anticipated delivery of the HS2 trainline will provide a strong and defensible Green Belt boundary. The proposed line of a new bypass to Balsall Common was originally put forward as the proposed new defensible boundary to the Green Belt.
- 7.7 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and to inform site selection and varying levels of detail have been applied. The commentary in effect provides a summary of the Sustainability Appraisal which in the case of Barratt's Farm relates to the 2020 SA.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82, 142, 198, 233, 1015	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
97 - 2017 & 2020 SA Score	30, 33, 102, 169, 236, 1002	Barratt's Farm – Proposed new Allocation 604	-1	0	+1	+1	+1	-2	-1	0	-1	0	0	-2	0	+2	+2	-2	+1	-1

#### Table 6.1 Table Comparing SA scores of Barratt's Farm and the site

7.8 There are three significant negative effects identifies for Barratt's Farm, SA4a in terms of loss of agricultural land given the scale of the site (above 20ha) and SA19a in terms of distance to jobs. In addition, the indicator relating to heritage assets (SA12) is a -2 given the likely loss of "a heritage asset (listed building, ancient monument, registered parks and gardens, historic parkland, building of local interest". It is clear that in order for the Council to accept Barratt's Farm as an allocation it has taken into account mitigation of effects for some sites but not for others.

- 7.9 Our review of the Sustainability Appraisal 2020 indicates that Land North of Balsall Street would have less significant effects than Barratt's Farm and would be a more suitable alternative for development. We therefore disagree with the commentary that has led to the allocation of the site. The commentary for Barratt's Farm acknowledges that the site "would result in an indefensible boundary to the east" although note the proposed HS2 rail link "could provide a clear and firm Green Belt boundary". It is remarkable how the refinement criteria questions have not resulted in Barratt's Farm being concluded at the current time as not having a strong boundary. This is a key consideration to delivery of homes, which should not take place until the strong and defensible boundary is in place.
- 7.10 Policy BC1 Barratt's Farm requires:

Development of this site [to] be consistent with the principles of the Concept Masterplan for this site, which includes the following:

vi. Housing [to] be phased to avoid coinciding with construction of the HS2 rail line in this vicinity; vii. Access from a limited number of access points from the Relief Road;

Likely infrastructure requirements will include:

vi. Provision of the section of the Balsall Common Relief Road between Station Road and Waste Lane as the first phase of the development;

7.11 The construction and delivery of two key infrastructure projects are required to be delivered to enable all or part of Barratt's Farm to come forward for development. Whilst phasing of the site is proposed to enable development within the plan period, deliverability of the relief road and HS2 rail line is critical to achieving residential development on the site.

### **Balsall Common Bypass**

7.12 L&Q Estates have concerns about delays to the delivery of the Balsall Common Bypass which could impact the existing delivery trajectory proposed for Barratt's Farm for the reasons provided in Section 6. L&Q Estates contend that there are considerable risks to the effectiveness of the Barratt's Farm policy given the reliance on the relief road and its deliverability. A number of factors could delay this process including land assembly issues and having sufficient funding deliver the road by 2025 and evidence from SMBC the 'lead delivery organisation' is required to demonstrate that these issues can be overcome and to ensure the effectiveness of delivering 875 homes within the plan period.

# HS2 Rail Line

7.13 As indicated by the policy, delivery of the HS2 line will be disruptive during its constructive phase and will impact the delivery of the proposed allocation. Further evidence is therefore required to demonstrate that Barratt's Farm is deliverable in the plan period and that the timeline for the HS2 proposals and the relief road are robust.

#### Summary

- 7.14 In summary, our assessment of the SA indicates how there would be less significant impacts in allocating Land North of Balsall Street than Barratt's Farm.
- 7.15 As we have demonstrated in our responses in relation to individual sites, our assessment of L&Q Estates' 'Land North of Balsall Street' shows that the site has strong sustainability credentials and is well placed to deliver housing growth.
- 7.16 L&Q Estates believes that its land North of Balsall Street should be allocated for residential land in line with the objections identified to Policy P5 with respect of Housing Need and Supply because we consider the plan would be more robust and secondly, the site can contribute additional housing delivery within the plan period to provide additional flexibility as the site is not constrained by a requirement to deliver a by-pass to Balsall Common or the construction of the HS2 line.

# 8. Policy BC2 – Frog Lane, Balsall Common

8.1 Emerging Policy BC2 has a proposed allocation for 110 homes.

# Step 1 – Site Hierarchy Criteria

- 8.2 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.
- 8.3 The proposed allocation at Frog Lane is located in Refined Parcel 59 (RP 59).
- 8.4 The Green Belt Assessment identifies a score of 1 for Purpose 1 in respect of parcel 59. L&Q Estates do not agree with this position. The release of the land at Frog Lane will result in development extending southwards and would represent a clear physical extension of development into the countryside. This will significantly change the character of the environment in this location and would result in urban sprawl. On this basis, it is concluded that the land at Refined Parcel 59 performs a highly important role in Green Belt terms.

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Frog Lane	RP 59	3	1	3	0	7	3
Land North of Balsall Street (Avison Young)	RP 51	1	2	2	0	5	2

- 8.5 In our view the land at Frog Lane performs a more important role in terms of Green Belt function than the site and should have been taken into account when Frog Lane was categorised. In terms of Green Belt function, the land at Frog Lane performs a more important role than that at Grange Farm. Our conclusion was that Frog Lane should score 7 in terms of impact whereas Grange Farm should score 5 and should thus be preferred.
- 8.6 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above, that whilst Frog Lane has been categorised as a 'yellow' site it should more appropriated have be defined as a 'blue site 6' and that Grange Farm, in contrast should have been categorised as a 'yellow site 5'.

8.7 We therefore maintain our concerns with how the evidence base has been used to justify allocation of BC2 and on this basis we consider that Land North of Balsall Street should be allocated by the Council.

### Step 2 – Refinement Criteria

8.8 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary provides a summary of the site assessment process including a summary of the Sustainability Appraisal. In relation to this we noted that although Frog Lane scores higher than the wider Grange Farm area it is broadly comparable when assessed against the L&Q Estates land.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	6A9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142 ,198, 233,10 15	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
98 – 2017 & 2020 SA Score	PO2	Frog Lane	-1	+2	+1	+1	+1	0	0	0	0	0	-1	-1	0	0	+2	-2	0	+2

- 8.9 The differences in where the positive and negative effects arise, and in some cases the scale of effects, leave relatively little to choose between them in SA terms. There is really little difference between the two overall and given our concerns about the Green Belt scoring consider that the Land North of Balsall Street should be allocated particularly given the significant open space being provided as part of the redevelopment of the site.
- 8.10 We also note the following a review of the Council's concept masterplan for Frog Lane:
  - there is a lack of frontage and required habitat buffer, combined with the southern projection beyond the built-up area, reduces integration into the village.

- the Council's concept masterplan does not show a large enough development strip adjacent to the existing housing for an adequate buffer and gardens. The western block is also too small. These issues could however be designed out and the developer masterplan is better in these respects.
- The landscape, ecological, flood risk and heritage constraints has potential to further impact capacity.
- 8.11 These comments could impact capacity and would further justify an approach whereby the Council allocates Land North of Balsall Street to provide additional flexibility to meeting housing need.

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

9.1 Emerging Policy BC3 has a proposed allocation for 120 homes.

## 9.2 Step 1 – Site Hierarchy Criteria

- 9.3 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.
- 9.4 The proposed allocation at Windmill Lane/Kenilworth Road, "BC3", is situated in Refined Parcel 57 (RP
  57). L&Q Estates do not agree with the Green Belt Assessment score of 1 for Purpose 1 and 3.
- 9.5 RP57 performs a more important role in terms of Green Belt function than to the North of Balsall Street. As such the following observations should have been taken into account when Windmill Lane was categorised:
  - The release of land at RP57 plays an important role in preventing development extending into the countryside and resulting in urban sprawl. The narrow shape of the land extends from the southern edge of the settlement and would have a significant negative impact on the local environment in this location.
  - The removal of the land from the Green Belt and release for development will result in a harmful urbanising impact, allowing an extension of the urban form to protrude southwards into the countryside. The narrow shape of the land extends disproportionately from the southern edge of the settlement and would have a significant negative impact upon the local environment in this location

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Windmill Lane/ Kenilworth Road	RP 59	3	2	3	0	8	3
Land North of Balsall Street (Avison Young)	RP 51	1	2	2	0	5	2
- 9.6 In terms of Green Belt function, we consider that the land at Windmill Lane performs a more important role than that at Grange Farm. Our conclusion was that Windmill Lane should score 8 in terms of impact whereas Grange Farm should score 5 and should thus be preferred.
- 9.7 In addition, it is noted that the southern boundary of the proposed allocation is demarcated by a footpath with a hedgerow. If the Council is content to adopt this approach for BC3 then the Council should accommodate the idea on Land North of Balsall Street for consistency.
- 9.8 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above, that whilst Windmill Lane has been categorised as a 'yellow' site it should more appropriated have be defined as a 'blue site 6' and that Land to the North of Balsall Street, in contrast should have been categorised as a 'yellow site 5' in the Site Assessment (October 2020).

#### Step 2 – Refinement Criteria

9.9 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary in effect provides a summary of the Sustainability Appraisal (October 2020) although it is noted that the site was also assessed in the 2017 SA.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142 ,198, 233,10 15	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
99 – 2017 SA Score	PO3	Windmill Lane	-1	+1	+1	+1	0	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-3
99 – 2020 SA Score	47, 138	Windmill Lane	-1	+1	+1	+1	+1	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-2

- 9.10 Before our reservation about the individual scoring of both sites, the proposed allocation at BC3 Windmill Lane scores -2 (AECOM ID 99), which is comparable to the Grange Farm site, but less sustainable that Land North of Balsall Street. It is noted that the October 2020 SA improved the scoring for "BC3" under "S3b" which relates to "Proximity to principal road network for employment sites" is identified as "15m", although the comment is not specific in which road this relates to or whether the previous neutral scoring for this indicator was erroneous.
- 9.11 It is clear from the concept masterplans that proposed allocation "BC3" has significant ecological and heritage constraints that affect parts of the site which will restrict the area for development in terms of building height, capacity and access. However even with this context the commentary concludes that *"the settlement is identified for significant growth and this site adjoins land that has previously been allocated for development."*
- 9.12 Notwithstanding our additional comments, the proposed allocation at Windmill Farm is considered less sustainable than L&Q Estates' land. On that basis the proposed allocation of Windmill Lane is flawed and land identified at Appendix 3 should be preferred by way of an allocation before "BC3".

## 10. Policy BC4 – Pheasant Oak Farm, Balsall Common

10.1 Proposed allocation BC4 has a proposed capacity of 200 homes and was first included in the Additional Sites Consultation (January 2019). Pheasant Oak Farm includes the farm complex (most of which is included in the Brownfield Land Register), but also adjacent land.

#### Step 1 – Site Hierarchy Criteria

- 10.2 We consider there has been an inappropriate designation of the site as brownfield land. It is noted from the NPPF that previously developed land should "exclude land that is or was last occupied by agricultural or forestry buildings". It is therefore considered that any agricultural buildings within this site should therefore not be classed as brownfield. In addition, there are greenfield elements to this wider site parcel, so the categorisation process is flawed when the entire site is included within this 'brownfield' category.
- 10.3 We note in relation to the Green Belt impacts that the site currently:
  - Performs a more important role than Land at Balsall Street overall, in relation to the impact on the Green Belt.
  - It would result in unrestricted sprawl given the current lack of a strong and defensible boundary to the east of the site.
  - It is unclear why the site is preferred to Land at Balsall Street which is less important in Green Belt terms and often more compact (less sprawling) form of development.
- 10.4 It is considered that Step 1 of the site selection process has been incorrectly applied to the site given we object to greenfield land or agricultural buildings being classified as brownfield land. We consider, that this proposed allocation should not be categorised as 'green', indeed it is at best a 7 Greenfield in accessible higher performing Green Belt Location and land to the north of Balsall Street, should be preferred before this site.
- 10.5 A key consideration with the proposed allocation of sites in the first step is how the subject land performs in Green Belt terms. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1.
- 10.6 We note that the site has been incorrectly included within priority 3 "Brownfield in accessible Green Belt Location", so the categorisation process is flawed. This clearly represents an incorrect approach where the site gets treated as a 'green' category 3 site.

10.7 The commentary which led to this site being allocated is as follows:

"Part brownfield site within high performing parcel in the Green Belt Assessment, and would result in an indefensible boundary. Site has a low to medium level of accessibility, is in an area of medium visual sensitivity with low capacity for change and is deliverable, subject to some constraints."

- 10.8 The site is situated within a "Higher performing broad area (BA04)" of the Green Belt with an overall combined score of 12. This means the site is highly performing in terms of all purposes of the Green Belt. We have also challenged the basis of the brownfield designation and in this light, it is remarkable how the site has been allocated, given the evidence from the Green Belt assessment clearly suggest this broad area is not acceptable for development. This contrasts with the much lower score within the Green Belt assessment for the Grange Farm area (RP51).
- 10.9 The commentary also notes: "Settlement is identified for significant growth and its mainly brownfield nature means the site could make a contribution, <u>subject to suitable green belt boundaries</u>"
- 10.10 There are no strong and defensible Green Belt Boundaries to the east of the site currently, and yet the approach has been to justify the allocation on the back of creating a strong and defensible boundary in the form of the proposed Balsall Common Relief Road. This is inconsistent with the approach taken in respect of other sites. It is contended that a strong and defensible boundary could also be created at Land North of Balsall Street an area where there would be less impact on the Green Belt.

#### Step 2 – Refinement Criteria

- 10.11 The site was first assessed in the Council's Sustainability Appraisal carried out in January 2019 (AECOM) and at Regulation 19 Stage (October 2020). This is considered below.
- 10.12 The January 2019 SA scoring for Land at Pheasant Oak Farm is reproduced below, with our proposed scoring of Grange Farm (as per Appendix 3). It is noted that the January 2019 SA includes a column on Housing Deliverability (SA16), which was not included in an earlier iteration. We have excluded this from the table below to enable a direct comparison of indicators.
- 10.13 It is noted that the SA identifies 4 positive and 7 negative effects, of which only the distance to key economic assets and convenience store or supermarket are significant. The table below indicates that Land North of Balsall Street scores significantly better than Pheasant Oak Farm by 6 SA points, and should therefore be preferred (the SA provides no basis for preferring BC4 over L&Q Estates site).

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142 ,198, 233,10 15	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
55 – SA 2019 Interi m	1018	BC3 Pheasant Oak Farm	-1	0	+1	+1	+1	0	-1	0	0	v	-1	0	0	0	0	-2	-2	-4
227 - 2020 SA Score		Pheasant Oak Farm – Proposed for allocation	-1	-1	+1	+1	+1	0	-1	0	0	0	-1	0	-1	0	+2	-2	-2	-4

10.14 Overall 'Land North of Balsall Street' is more sustainable than land at Pheasant Oak Farm. The Council's site selection process is therefore not justifiable and the site should be preferred above Land at Pheasant Oak Farm, as it is more sustainable.

# 11. Policy BC5 – Trevallion Stud, Balsall Common

- 11.1 Proposed allocation BC5 has a proposed capacity of 230 homes, a reduction from the 300 estimated at the Additional Sites Consultation (January 2019) when the site was first proposed as an allocation. A large part of the site is included in the Council's Brownfield Land Register. The allocation has been considered suitable given it would use strong, defensible Green Belt boundaries and due to the presence of built development in this area this smaller parcel performs less well in Green Belt terms.
- 11.2 Although this is a new allocation, the site was assessed in the January 2017 Interim SA report.

#### Step 1 – Site Hierarchy Criteria

- 11.3 We consider there has been an inappropriate designation of the site (totalling c.11ha) as brownfield land. The curtilage of the Stud should more suitably be drawn much more tightly around the Stud buildings which amount to c.2 hectares. The greenfield parts of the site around the stud at c.7.5ha (c.68%) should rightly be classed as greenfield, so the categorisation process is flawed when the greenfield element of the site is also included within the brownfield site category.
- 11.4 We note in relation to the Green Belt impacts that the site:
  - Performs a more important role than Land North of Balsall Street overall, in relation to the extent the site protrudes from Balsall Common.
  - It would result in unrestricted sprawl.
  - It is unclear why the site is preferred to Land North of Balsall Street which is less important in Green Belt terms and often more compact (less sprawling) form of development.
- 11.5 In addition, whilst we are encouraged by the fact that the Council clearly considers that it is appropriate to release land to the west of Balsall Common, it is considered that BC5 would result in development extending disproportionately from the northern edge of the settlement. This protrusion, in turn, would have a significant adverse effect on the character and expansion of the settlement and the local area. Indeed, it would have a far greater impact than Land North of Balsall Street which, as per the Development Framework at Appendix 3, would have a developable area drawn much closer and tighter to the settlement edge.
- 11.6 As Land North of Balsall Street is within the same Green Belt parcel (RP51) it is considered that the Council should have considered Grange Farm favourably against Step 1, particularly given the site lies much closer to the centre of Balsall Common. The site selection process has also not been applied

equally across the Trevallion Stud site given only c.32% could be considered previously developed. We consider that a different conclusion could have been reached on Land North of Balsall Street given it too falls within the same Green Belt parcel (i.e. category 5).

- 11.7 A key consideration with the proposed allocation of sites in Step 1 is in relation to Green Belt impact. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1. The site has been considered as being completely within priority 3 "Brownfield in accessible Green Belt Location", however this is incorrect for the whole of the site. Indeed, only a small area around the Stud buildings should be classified as brownfield.
- 11.8 In addition, this site falls within the same assessment area as L&Q Estates site, whilst part of the site is brownfield, this clearly represents an inconsistent approach where the greenfield aspect of this site gets treated as a 'green' category 3 site and not in the same category as Land at Balsall Street as per the Green Belt Assessment.

#### Step 2 – Refinement Criteria

11.9 The 2017 SA scoring for Land at Wootton Green Lane (Trevallion Stud) is reproduced below alongside the most recent SA (October 2020), it is clear that BC5 performs worse in sustainability terms '-1' from the original assessment , and worse that with our proposed scoring of Land North of Balsall Street.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142 ,198, 233,10 15	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
79 – 2017 SA score	BC2	North of Balsall Common, Kenilworth Road and Wootton Green Lane	-1	-1	0	+1	+1	0	0	0	0	-1	-1	0	-1	+1	+1	-1	+2	0
226 2020 SA Score		Trevallion Stud – Proposed for allocation	-1	-1	0	+1	+1	0	0	0	0	-2	-1	0	-1	0	+2	-1	+2	-1

11.10 The commentary which led to this site being allocated is as follows:

"Part brownfield site within moderately performing parcel in the Green Belt Assessment, and would result in a well-defined boundary. Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change. The SA identifies 5 positive and 6 negative effects. Settlement is identified for significant growth and site could make a contribution."

- 11.11 Whilst it is welcomed that the commentary now acknowledges that only part of the site is brownfield, the majority of the site should have been classified as greenfield land and in the same categorisation of Land North of Balsall Street and the greenfield aspect of this site gets treated as a 'green' category 3 site and not in the same category as Grange Farm as per the Green Belt Assessment.
- 11.12 It should be noted that only 4 positive effects are identified in the October 2020 SA compared to 6 positive effects on L&Q Estates land which is not surprising as the site is more remote from the centre of Balsall Common, so the above commentary is erroneous and based on the 2017 SA Score. The SA scoring does not provide sufficient evidence to prefer BC5 over Land North of Balsall Street.

## 12. Policy BC6 – Lavender Hall Farm, Balsall Common

12.1 Lavender Hall Farm was proposed to be added at the Supplementary Draft Plan Stage in January 2019 for 60 homes and the proposed allocation now is 80 dwellings.

#### Step 1 – Site Hierarchy Criteria

- 12.2 We query the designation of the entire site as brownfield land. It is noted from the NPPF that previously developed land should *"exclude land that is or was last occupied by agricultural or forestry buildings"*. It is therefore considered that any buildings relating to agricultural use should therefore not be classed as brownfield, so the categorisation process is flawed when the site is included within this 'brownfield' category.
- 12.3 In addition, the greenfield part of the site to the east should not be classified within the brownfield site selection category. We note in relation to the Green Belt impacts that the site, until HS2 is implemented:
  - Performs a more important role than Land North of Balsall Street overall, in relation to the impact on the Green Belt.
  - It would result in unrestricted sprawl given the current lack of a strong and defensible boundary to the north of the site.
  - It is unclear why the site is preferred to Land North of Balsall Street which is less important in Green Belt terms.
- 12.4 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1. We note that the site has been considered as being completely within priority 3 "Brownfield in accessible Green Belt Location", however this is considered incorrect, given the brownfield designation is questionable. The categorisation process is therefore flawed. The site is situated within a "higher performing broad area (BA04)" of the Green Belt with an overall combined score of 12. This means the site is highly performing in terms of all purposes of the Green Belt.
- 12.5 The site is premised on the defensible boundary of the HS2 line. Whilst the evidence clearly suggests this broad area is not acceptable for development, a flexible approach has been adopted to take into account the proposed HS2 line. We would query whether the assessment should rely on HS2 as a defensible boundary at this point given the HS2 line has not been built.

12.6 In contract the Green Belt site assessment for the Grange Farm area (RP51) is much lower and no merit is given to potential to enhance the boundary in protecting the northern edge of development from further expansion and ability to create as defensible boundary, as shown in the Development Framework (see Appendix 3). It is contended that these factors should also be taken into account in the site selection process to ensure consistency of approach.

#### Step 2 – Refinement Criteria

- 12.7 The table below shows how Lavender Hall Farm scored -1 in sustainability terms in the Council's 2017 assessment, however in the current October 2020 assessment it performs even worse at "-3". The BC1 Grange Farm sites scores -1 and our assessment of the reduced site "Land North of Balsall Street" scores +1 in our assessment of sustainability, so my clients site is more sustainable that the proposed BC6 allocation.
- 12.8 To supplement this it is also noted from the Council's Concept Masterplan document (October 2020) that Lavender Hall Farm is more remote from the main settlement with the railway as a barrier, there are poor pedestrian links including lack of pavements and heritage constraints adjacent to the site entrance. In light of this we also note the reference (p41) for the opportunity on this site to explore the provision of "specialist housing or care bed spaces." If sites allocated for C3 homes have the potential to be developed for C2 use then there will be a different impact on housing supply in the Borough and we suggest an even greater need to allocate other sites for C3 housing.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	qɛyʒ	SA4a	SA4b	SA7	6A9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	82,142 ,198, 233,10 15	BC1 Grange Farm October 2020)	-1	0	0	+1	+1	-2	0	0	+1	-2	-1	-1	-1	+1	+2	-2	+2	-2
N/A	198	Land North West of Balsall Common	-1	0	0	+1	+1	0	0	0	+1	-1	0	-1	-1	+1	+2	-2	+1	+1
81 – 2017 SA score	BE5	Land at Lavender Hall Farm	-1	0	0	+1	+1	0	-1	0	0	-1	-1	-1	0	+1	+2	-2	+1	-1
81 – 2020 SA score	BE5	Land at Lavender Hall Farm – Proposed for allocation	-1	-1	0	+1	+1	0	-1	0	0	-2	-1	0	-1	+1	+2	-2	+1	-3

- 12.9 Land North of Balsall Street is superior in sustainability terms and makes a more limited contribution to the Green Belt and so should be preferred.
- 12.10 Robust evidence is also required to demonstrate that Lavender Hall Farm is deliverable in the plan period particularly given the HS2 construction phase and potential amenity issues, which suggest employment uses may be more preferable on the site.

# 13. Summary of Position

- 13.1 Our analysis of the emerging local plan leads us to the following conclusions:
  - a) the Council's LHN is going to increase with the introduction of the revised version of the Standard Method;
  - b) the Council's approach to meeting unmet housing need is autonomous and arbitrary and fails to make an appropriate contribution to the HMA commensurate with Solihull's location adjoining Birmingham and the strength of its economic offer;
  - c) has failed to identify sufficient sites to meet its housing need;
  - d) not identified safeguarded land to ensure an enduring Green Belt beyond the plan period.
  - e) allocated sites around Balsall Common which perform worse when properly applying the evidence base to the site selection criteria.
- 13.2 L&Q Estates has a site immediately adjacent to Balsall Common which is "available", 'suitable' and 'deliverable' in the plan period, one of the most sustainable settlements in the Borough, which is unconstrained and has significant potential for growth. In terms of Green Belt function, the site performs a less important role than other proposed allocated sites.
- 13.3 Indeed, the site has the potential to deliver social, economic and environmental benefits to the local community through the delivery of sustainable residential development. The site would provide a meaningful contribution towards; the enhancement of local recreational facilities; the local wildlife site and Local Green Space. This would provide a significant area of land to compensate for any loss of existing Green Belt under NPPF paragraph 138.
- 13.4 Furthermore, the proposed development of up to 287 homes would be a smaller addition to Balsall Common than other allocated sites and would provide additional flexibility to the Council over the plan period. This would ensure that the Council meets its housing needs and would not have to review Green Belt Boundaries at the end of the plan period.
- 13.5 It is clear that the site would make a logical, suitable and, in particular, deliverable proposition with the following credentials:
  - a) is more sustainable and would lead to less impact in Green Belt terms than other allocated sites around Balsall Common.

- b) would provide a high-quality, attractive and sustainable residential community integrated with, and complementary to, Balsall Common.
- c) will be a highly desirable place to live, celebrating existing landscape and wildlife assets to provide a community set within an "Arden" context and benefitting from convenient access to key facilities and transport opportunities.
- 13.6 L&Q Estates consider that land North of Balsall Street, Balsall Common should be preferred ahead of other proposed Housing Allocations around Balsall Common and be allocated for housing development as it will assist the Council in creating a sound plan. The land (at Appendix 3) should be allocated for *"up to 287 dwellings in the plan period."*

# Appendix I Site Location Plan



PROJECT	CLIENT	SITE BOUNDARY PLAN	Drawing Number	Rev.	Dat
Land to the North of Balsall Street, Balsall Common	L & Q Estates	SITE BOONDART FLAN	SB-01	A	09-12

# Appendix II Site Analysis Plans



PROJECT	CLIENT	SITE ANALYSIS:	Drawing Number	Rev.	
Land to the North of Balsall Street, Balsall Common	L & Q Estates	ENVIRONMENT & TOWNSCAPE	SA-02	В	0

9-12-20

No. 4 Castle Court 2, Castlegate Way, Dudley, West Mids, DY I 4RH



PROJECT	CLIENT	SITE ANALYSIS:	Drawing Number	Rev.	
Land to the North of Balsall Street, Balsall Common	L & Q Estates	ACCESS & INFRASTRUCTURE	SA-01	В	(

09-12-20

# Appendix III Development Framework Plan



PROJECT		CLIENT	DEVELOPMENT FRAMEWORK
Land to the N Balsall Comm	orth of Balsall Street, on	L & Q Estates	DEVELOPMENT FRAMEWORK

Drawing Number	Rev.	D
DF-02	С	09-



No. 4 Castle Court 2, Castlegate Way, Dudley, West Mids,

Date

DYI 4RH

# Appendix IV Transport and Access Appraisal

11/12/2020

Land to the North of Balsall Street Reference number 110316 – R001B





# **FEASIBILITY REPORT**







# LAND TO THE NORTH OF BALSALL STREET

TRANSPORT AND ACCESS APPRAISAL

IDENTIFICATION TABLE	
Client/Project owner	L&Q Estates
Project	Land to the North of Balsall Street
Study	Feasibility Report
Type of document	Report
Date	11/12/2020
File name	110316 – R001B Land to the north of Balsall Street, Balsall Common – Transport and Access Appraisal
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### APPROVAL

Version	Name		Position	Date	Modifications
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	Approved by	Emma O'Neill	Associate Director	08/12/2020	
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R001A	Checked by	Jenny Bennett	Senior Consultant	10/12/2020	Client Comments
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	Journey to Work Mode Share (Solihull Census 2011) Proposed Development Residential Rates Proposed Development Trip Generation Proposed Multi-Modal Residential Trips Development Trip Assignment

### 1. INTRODUCTION

#### 1.1 Background

- 1.1.1 SYSTRA has been commissioned by L&Q Estates to provide transport advice to aid with site promotion for land to the north of Balsall Street, west of Balsall Common, approximately 11km east of Solihull. The site is currently comprised of open fields and is located to the immediate west of the existing built up area of Balsall Common.
- 1.1.2 The site has the potential to be promoted in two phases:
  - Phase One of the development has the potential to deliver up to 142 dwellings, with access promoted from Balsall Street, and
  - Phase Two has potential to deliver up to 145 dwellings, with access from Grange Road.
- 1.1.3 The total site will therefore comprise a maximum of 287 dwellings. An indicative Masterplan, and Access and Infrastructure Plan is included as **Appendix A**.
- 1.1.4 The site was submitted as part of the 2016 Strategic Housing Land Availability Assessment (SHLAA- Ref 198). It was then promoted at the 'Regulation 18' stage of planning in March 2019. The Solihull Local Plan is currently undergoing 'Regulation 19' consultation and seeking representations on both new and existing sites. The purpose of this report is to appraise the development site at Land to the North of Balsall Street with regards to both access and its sustainability credentials.
- 1.1.5 Balsall Common is identified in both the Housing Strategy and the Employment Strategy of the Draft LPR as a focus of a large amount of development growth over the next 10 to 20 years. As such, and overarching Transport Strategy was produced in October 2020 to identify the preferred alignment of a new link road required to mitigate against the impact of the expected growth.

#### **1.2** Report Structure

- 1.2.1 This Transport and Access Appraisal is structured as follows:
  - Section 2 Review of the existing conditions at the site and surrounding transport networks. In particular, this focuses on the accessibility of the site by non-car means and the prevalence of public transport services;
  - Section 3 Analysis of the development proposals in respect of the development itself as well as the access arrangements being promoted;
  - Section 4 Assessment of the number of trips that are likely to be generated by the proposed development by all modes of travel
  - Section 5 Summary of the findings of the Transport and Access Appraisal

# 2. EXISTING CONDITIONS AND SUSTAINABLE TRAVEL OPPORTUNITIES

#### 2.1 Introduction

2.1.1 This chapter outlines the existing sustainable transport network in the vicinity of the proposed development site, with consideration of the location and the existing local highway, pedestrian, cycle and public transport networks.

#### 2.2 Site Location

- 2.2.1 The site is located to the immediate north of Balsall Street in Balsall Common. The site is currently comprised of open fields and is located to the immediate west of the existing built up area of Balsall Common.
- 2.2.2 The site has the potential to be delivered in two phases, with Phase 1 shown in red Phase 2 shown in blue and Public Open Space shown in green on Figure 1 below.



#### 2.3 Pedestrian and Cycle Network

#### Walking

- 2.3.1 The proposed development site is located to the west of Balsall Common village. Its southern boundary is formed by Balsall Street, which benefits from a wide well-lit footway along the southern side of the carriageway, providing a link towards Balsall Common village centre and various local amenities.
- 2.3.2 It is envisaged that an access to the development could also be formed from Grange Road. This is an established residential area, with wide well-lit footways along both sides of the carriageway.

# 2.3.3 The existing pedestrian and cycling infrastructure in the vicinity of the site is shown in Figure 2.



- 2.3.4 The site also benefits from a number of Public Right of Ways (PRoW) within close proximity, one PRoW extends from Balsall Street (B4101) to the west of the site and Wooton Green Lane in the east., another connects with the aforementioned, diverting to the south east.
- 2.3.5 A small network of PRoWs can be found to the south of the development, providing access to Needlers End Lane, Greenfield Avenue, Glebe Way, Shortfield Close and Dengate Drive.
- 2.3.6 It is envisaged that as the Masterplan progresses further regard will be given to improving these existing PROWs, helping to promote a car free sustainable route from the development site, through to Balsall Common village centre.
- 2.3.7 There are no formal cycle routes through the village. However, there are cycle leisure routes such as the Heart of England route and Balsall Common to Hampton in Arden route both of which pass through the village. The promotion of these routes suggests local topography and traffic volumes are commensurate with cycling.
- 2.3.8 To supplement the existing provision, pedestrian and cycle links will be provided throughout the development and at the site accesses, similarly, a new footway, will be provided along the site frontage at Balsall Street, to link up with existing infrastructure, to the east of the development.

#### 2.4 Public Transport

Bus

2.4.1 Several bus services are easily accessible from the site, providing connections with Coventry, Solihull and Knowle. The existing public transport network is shown in Figure 3 whilst a summary of services is provided in Table 1.

#### Figure 3. Bus services within the vicinity of the development site



# 2.4.1 There are five bus services which operate within the vicinity of the site on Balsall Street B4101, and Station Road. These services are outlined in Table 1 below:

SERVICE	ROUTE		WEEK	SAT	SUN	
SERVICE	KUUTE	FIRST	LAST	FREQUENCY	FREQ	FREQ
87	Solihull - Balsall Common - Coventry	0653	1453	60mins	60mins	N/A
88	Solihull - Knowle - Chadwick End - JLR Fen End - Balsall Common	0833	1628	120mins	120mins	N/A
88A	Solihull - Knowle - Balsall Common	0916	1721	120mins	120mins	N/A
89	Solihull – Balsall Common - Coventry	0845	1720	4 per day	N/A	N/A
Flexibus 233	Solihull Mell Square - Kenilworth	1042	N/A	Monday and Thursday only - 1 per day	N/A	N/A

#### Table 1. Bus Service Summary

# 2.4.2 These bus routes are run by a number of operators including Johnson's, Diamond Bus and A&M Group. The 87 and 88 services provide for good public transport links to Solihull and Coventry.

2.4.3 Figure 4 below shows how the majority of the proposed development site is within 400 metres of at least one bus stop in Balsall Common.



2.4.4 The nearest bus stops are located at the junction of Needlers End Lane/ B4101, to the east of the proposed development site, which are served by two bus routes. A number of bus stops are also provided on Station Road, which are served by five routes. Bus stops within the local area all include flag stops and timetable information.

Rail

- 2.4.5 To the north of Balsall Common is Berkswell Railway Station. Train services operated by London Midland that stop at this station provide a 30-minute service between Birmingham New Street and London Euston Stations travelling via Northampton.
- 2.4.6 The walking distance from the development site to the station is approximately 1.5km which equates to around a 20-minute walk. The route being along Needlers End Lane and Station Road.

#### 2.5 Local Amenities

2.5.1 Balsall Common benefits from a range of local amenities commensurate with a busy and vibrant village. Figure 5 below shows local amenities within the vicinity of the proposed development site.

Figure 5. Local Amenities Plan



- 2.5.2 Amenities include a small Sainsbury's supermarket, both a primary and a secondary school, pubs and some small shops located around the edges of the village. In the centre of Balsall Common there is a small Co-operative supermarket and Tesco Express, a library, a post office, restaurants, estate agents and a number of other small shops. The majority of local amenities are based around the village centre on Station Road which is located approximately 15 minutes' walk, or between 5 minute' cycle from the potential site access points.
- 2.5.3 The nearest primary school is located on Balsall Street East, 1.5km east of the site, approximately 15 minutes' walk. The Heart of England secondary school is located on Gispy Lane, 1.7km east of the site.

#### 2.6 Local Highway

#### **Grange Road**

- 2.6.1 Grange Road is a cul-de-sac off Needlers End Lane. The status of this roadway has been investigated and confirmed as a public highway.
- 2.6.2 Grange Road currently serves a number of residential properties. A Highway Boundary Plan was obtained from Solihull Council which shows that there is no need for third party land to bring forward this access. The roadway is 5.5m wide and has footways either side.

#### **Balsall Street (B4101)**

- 2.6.3 Balsall Street (B4101) is a single carriageway with posted speed limit of 30mph in the vicinity of the proposed access, increasing to 40mph to the north. An illuminated speed warning sign is located south of the site towards Balsall Common village.
- 2.6.4 Balsall Street is approximately 6m wide and extends from Gipsy Lane in the southeast, and continues towards the Solihull northwest.

#### **Needlers End Lane**

2.6.5 Needlers End Lane is a single lane carriageway between Balsall Street to the west and Station Road in the east. Many of the residential streets in the west of Balsall Common are accessed from Needlers End Lane, including Grange Road. Needlers End Lane has a posted speed limit of 30mph.

#### 2.7 Existing Modal Share

The site is located within the ward of Solihull 025/017. For the purposes of robustness, only 025 has been included in the mode share calculation as this ward is similar in character to the proposed development.

2.7.1 Table 2 shows how the existing residents of this ward currently travel to work, as obtained from 2011 Census data.

MODE	SOLIHULL 025		
Walk	4%		
Cycle	1%		
Public Transport	9%		
Car Driver	81%		
Car Passenger	4%		
Other	1%		
Total	100%		

Table 2. Journey to Work Mode Share (Solihull Census 2011)

2.7.2 The census data shows that 81% of residents living in the ward drive to work, 4% walk to work, 9% use public transport services and 1% cycle to walk. The modal split shows a large proportion of local residents currently travel to work by private car.

#### 2.8 Conclusion

- 2.8.1 Existing pedestrian and cycle networks surrounding the site provide a good level of accessibility to local facilities. Local bus services currently provide links between the site and Solihull and Coventry.
- 2.8.2 There are a range of local amenities within Balsall Common village. These include schools, supermarkets, a health centre and post office; all of which are accessible within a 15 minute walk, or 5 minute cycle.
- 2.8.3 Based on the above it is evident that there are realistic alternatives available for accessing the site by modes other than by private car.

## 3. ACCESS APPRAISAL

#### 3.1 Introduction

- 3.1.1 The proposed development site is located to the north of Balsall Street to the west of Balsall Common Village and approximately 11km east of Solihull. The Masterplan for the site is still evolving, however initial proposals suggest the development could comprise up to 287 dwellings, with a mixture of size and tenure.
- 3.1.2 The site has the potential to be promoted in two phases:
  - Phase One of the development has the potential to deliver up to 142 dwellings, with primary access promoted from Balsall Street, and
  - Phase Two has potential to deliver up to 145 dwellings, with a secondary / emergency access from Grange Road.

#### 3.2 Vehicle Movement and Access

- 3.2.1 Access routes to and throughout the proposed development are shown on the indicative Masterplan, and Access and Infrastructure Plan included as **Appendix A.**
- 3.2.2 Phase One of the development includes the promotion of a simple priority junction onto Balsall Street . This new access is illustrated on Drawing No. 110316-001 which is attached as **Appendix B** of this report.
- 3.2.3 It should be noted that the proposed access is located at the gateway to the 30mph speed limit zone within the village. It is evident, however from Drawing Number 110316-001 that visibility splays of 2.4m \* 120m can be achieved at the proposed access which are appropriates for the 70kph design speed.
- 3.2.4 A secondary/emergency access which could also serve development would be promoted through the extension of the existing Grange Road where a 5.5 wide carriageway and footways of 1.8 and 3m are promoted. This is shown on SYSTRA Drawing Number 110316 -002, also included as **Appendix B**.
- 3.2.5 A third access point for emergency/ active travel has also been considered. This would be promoted off the existing farm access east of the site boundary, on Needlers End Lane.

#### 3.3 Non Vehicular Movement and Access

- 3.3.1 Careful consideration will be given with regard to the integration of the proposed development with existing facilities and infrastructure, ensuring that the potential to fully utilise these sustainable modes is fully maximised. The design of the various links will ensure that continuity is maintained between the proposed development and neighbouring areas to provide safe and convenient access for all road users.
- 3.3.2 The Masterplan will be developed on the principle of providing permeability for all modes of travel. The development proposals for walking will provide new footways within the development, which will be linked to the existing network of footways surrounding the site. The footways will be designed in accordance with the principles of Manual for Streets (MFS) and provide areas of shared space or level surface, therefore giving priority to pedestrians and cyclists.
- 3.3.3 The development proposals will open up the site to the local area by providing cycle and walking links through the site to connect with footways and Public Rights of Way along the site's eastern boundaries, linking it with the village centre.

### 4. TRAVEL DEMAND

#### 4.1 Proposed Vehicular Trip Generation

- 4.1.1 Development trip generation for the site has been estimated using the TRICS Database -Version 7.7.3. In order to provide a robust analysis vehicle trip generation has been calculated from a private dwelling trip rate only.
- 4.1.2 The TRICS surveys used were all sites in this category from within England (excluding London). The resulting output of trip rates from the TRICS database is included within **Appendix C**. The trip rates from the TRICS output are shown in Table 3.

	TRIP RATE PER DWELLING					
VEHICLES	IN	OUT	TWO WAY			
AM (0800- 0900)	0.127	0.371	0.498			
PM (1700-1800)	0.346	0.167	0.513			

Table 3. Proposed Development Residential Rates

Source: TRICS Version 7.7.3

4.1.3 Theses trip rates have been applied to the anticipated 142 dwellings in Phase 1, and 145 dwellings in Phase to ascertain the potential vehicle trip generation of the total maximum dwelling number of 287; these are shown within Table 4.

DUACE	VEHICLES	TRIP GENERATION			
PHASE		IN	OUT	TWO WAY	
	AM (0800- 0900)	18	53	71	
Phase 1 (142 Dwellings)	PM (1700-1800)	49	24	73	
Dhase 2 (145 Duvellings)	AM (0800- 0900)	18	54	72	
Phase 2 (145 Dwellings)	PM (1700-1800)	50	24	74	
Total	AM (0800- 0900)	36	106	143	
Total	PM (1700-1800)	99	48	147	

#### Table 4. Proposed Development Trip Generation

#### 4.2 Non-Vehicular Trip Generation

- 4.2.1 The number of trips that would be generated by modes of travel other than the private car have been derived from 2011 Census 'Method of Travel to Work' for the Solihull 025 MSOA. The census data shows 81% or residents drive to work, which is considered to accurately reflect the locality of the site and therefore provides a reasonable representation of all travel to and from the proposed development.
- 4.2.2 The number of journeys that are likely to be generated are summarised in Table 5 below. The car driver trips reflect those derived from the trip rates shown in Table 3, whereas the remaining modes have been calculated by applying the mode shares derived from the census data.

MODE	2011 CENSUS MODE SHARE	AM PEAK HOUR (0800-0900)			PM PEAK HOUR (1700-1800)		
		IN	OUT	TWO WAY	IN	OUT	TWO WAY
Walk	4%	2	6	7	5	3	8
Cycle	1%	1	2	2	1	1	2
Public Transport	9%	4	12	16	11	5	16
Car Driver	81%	36	106	143	99	48	147
Car Passenger	4%	2	5	7	5	2	7
Other	1%	0	1	1	1	0	1
Total	100%	45	131	176	122	59	181

Table 5. Proposed Multi-Modal Residential Trips

Source: TRICS Version 7.4.4, Census 2011, Consultant Calculations

- 4.2.3 It is evident from Table 5 that, aside from vehicular traffic, public transport and pedestrian movements will make up the largest proportion of trips. The remaining trips would comprise either cyclists or vehicular passenger journeys.
- 4.2.4 The appraisal of existing pedestrian provision set out in Section 2 of this report demonstrates that there is good access to Balsall Common. Public transport users will continue use the existing bus services that route along Balsall Street and Station Road.

#### 4.3 Forecast Trip Distribution

4.3.1 2011 Journey to Work data from the Balsall Common area was obtained from the Census database. This has been used to determine possible trip distribution across the local highway network. The forecast distribution is shown below in Figure 6.



- 4.3.2 It is estimated that the majority of trips are expected to be towards Birmingham (approximately 40%), with 20% towards Coventry, 20% towards Warwick and Kenilworth, 10% remaining within the Balsall Common area and 10% towards Solihull.
- 4.3.3 Using the distribution shown in Figure 6, and the trip generation in Table 4, all development trips have been assigned along the local highway network.

LINK	DESTINATION	% -	AM (08:	00-09:00)	PM (17:00-18:00)	
LINK			IN	OUT	IN	OUT
Balsall Street West	Towards Solihull	8%	3	9	8	4
A452 North	Towards Birmingham	39%	14	42	39	19
Lavender Hall Lane	Towards Coventry	6%	2	6	6	3
Station Road	Towards Coventry	7%	3	7	7	3

#### Table 6. Development Trip Assignment
LINK	DESTINATION	%	AM (08:00-09:00)		PM (17:00-18:00)	
LINK			IN	OUT	IN	OUT
Kelsey Lane	Towards Coventry	8%	3	9	8	4
A452 South	Towards Kenilwirh	11%	4	12	11	5
Meer End Road	Towards Warwick	9%	3	10	9	4
Station Road	Internal Balsall Common	11%	4	12	11	5
TOTAL		100%	36	106	99	48

# 4.3.4 A preliminary assignment of development trips has been undertaken at local junctions within Balsall Common. The impact is shown below on Table 7.

	0(	AM (08:00-09:00)		PM (17:00-18:00)	
JUNCTION	%	IN	OUT	IN	OUT
A452/ Hallmeadow Rd	39%	14	42	39	19
Lavender Hall Lane / A452	45%	16	48	45	22
A452 / Station Road	70%	25	74	69	33
B4101 Balsall Street / Station Road	92%	34	98	91	44
Alder Lane / Kenilworth Rd / Kelsey Lane	34%	12	36	34	16

 Table 7. Development Trips (per local junction)

- 4.3.5 The table above shows that 92% of all development trips are likely to route through the Balsall Street / Station Road junction, 70% of all development trips route through the A452 / Station Road junction. It should be noted that internalised Balsall Common trips have been equally assigned via Alder Lane / Kenilworth Rd/ Kelsey Lane and Station Road A452. As the development site progresses further interrogation will be required to refine trip assignment.
- 4.3.6 It is however evident that subject to junction modelling there is opportunity to mitigate against the impacts of the development through localised junction improvements or investment into promoting sustainable travel. These will be fully investigated in any forthcoming application.

# 5. SUMMARY AND CONCLUSIONS

# 5.1 Summary

- 5.1.1 This Transport and Access Appraisal has been prepared to aid with site promotion, and eventual planning application on land off Balsall Street in, Balsall Common.
- 5.1.2 The site has the potential to be promoted in two phases:
  - Phase One of the development has the potential to deliver up to 142 dwellings, with access promoted from Balsall Street, and
  - Phase Two has potential to deliver up to 145 dwellings, with access from Grange Road.
- 5.1.3 The total site will therefore comprise a maximum of 287 dwellings.
- 5.1.4 Existing pedestrian and cycle networks surrounding the site provide a good level of accessibility to local facilities. Local bus services currently provide links between the site and Solihull and Coventry.
- 5.1.5 There are a range of local amenities within Balsall Common village. These include schools, supermarkets, a health centre and post office; all of which are accessible within a 15 minute walk, or 5 minute cycle.
- 5.1.6 Phase One of the development includes the promotion of a new simple priority junction onto Balsall Street. A secondary/emergency access which would serve the development would be promoted through the extension of Grange Road.
- 5.1.7 There is also the potential to create an emergency / walking / cycle access off the existing farm access east of the site boundary, on Needlers End Lane.
- 5.1.8 The site when developed, could generate 143 two-way trips in the morning peak, and 147 in the evening peak. It is estimated that the majority of trips are expected to be towards Birmingham (approximately 40%), with 20% towards Coventry, 20% towards Warwick and Kenilworth, 10% remaining within the Balsall Common area and 10% towards Solihull.

# 5.2 Conclusion

5.2.1 Access to the site is achievable, and subject to scoping discussions with the highway authority, and traffic surveys to establish how local junctions would operate should the development come forward, there are no overriding or sustainable reasons why the development proposals should not be progressed towards a planning application.

# **APPENDIX A – Indicative Masterplan and Access and Infrastructure Plan**



PROJECT		CLIENT	DEVELOPMENT FRAMEWORK
Land to the N Balsall Comm	orth of Balsall Street, on	L & Q Estates	DEVELOPMENT FRAMEWORK

Drawing Number	Rev.	D
DF-02	С	09-



No. 4 Castle Court 2, Castlegate Way, Dudley, West Mids,

Date

DYI 4RH

**APPENDIX B – SYSTRA Drawings** 





# **APPENDIX C – TRICS Outputs**

Calculation Reference: AUDIT-700704-201202-1207

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use	:	03 - RESIDENTIAL
Category	:	A - HOUSES PRIVATELY OWNED
TOTAL VI	ΞH	ICLES

<u>Selea</u> 01	<u>cted regions and areas:</u> GREATER LONDON	
01	BN BARNET	1 days
	HG HARINGEY	1 days
02		2 days
	ES EAST SUSSEX EX ESSEX	3 days 1 days
	HC HAMPSHIRE	3 days
	HF HERTFORDSHIRE	1 days
	KC KENT	6 days
	SC SURREY WS WEST SUSSEX	2 days 7 days
03	SOUTH WEST	7 days
	DC DORSET	1 days
	DV DEVON	3 days
	SM SOMERSET WL WILTSHIRE	3 days
04	EAST ANGLIA	1 days
0.	CA CAMBRIDGESHIRE	2 days
	NF NORFOLK	11 days
05	SF SUFFOLK	4 days
05	EAST MIDLANDS DS DERBYSHIRE	1 days
	LE LEICESTERSHIRE	1 days
	LN LINCOLNSHIRE	1 days
0(	NR NORTHAMPTONSHIRE	1 days
06	WEST MIDLANDS SH SHROPSHIRE	2 days
	ST STAFFORDSHIRE	2 days
	WK WARWICKSHIRE	3 days
07	WM WEST MIDLANDS	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE NE NORTH EAST LINCOLNSHIRE	1 days
	NY NORTH YORKSHIRE	5 days
	SY SOUTH YORKSHIRE	1 days
	WY WEST YORKSHIRE	1 days
80	NORTH WEST CH CHESHIRE	4 days
	GM GREATER MANCHESTER	1 days
	LC LANCASHIRE	1 days
~ ~	MS MERSEYSIDE	1 days
09	NORTH DH DURHAM	2 days
	TW TYNE & WEAR	3 days 2 days
10	WALES	
	PS POWYS	1 days
11	VG VALE OF GLAMORGAN SCOTLAND	1 days
11	AG ANGUS	1 days
	FA FALKIRK	2 days
	HI HIGHLAND	1 days
12	CONNAUGHT CS SLIGO	2 days
	LT LEITRIM	1 days
	RO ROSCOMMON	2 days
13	MUNSTER	
14	WA WATERFORD LEINSTER	1 days
14	CC CARLOW	1 days
	WC WICKLOW	1 days
	WX WEXFORD	1 days
15	GREATER DUBLIN DL DUBLIN	2 dave
16	ULSTER (REPUBLIC OF IRELAND)	2 days
	CV CAVAN	2 days
	DN DONEGAL	4 days
17	ULSTER (NORTHERN I RELAND) AN ANTRIM	2 days
	DO DOWN	2 days 1 days
	TY TYRONE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

Parameter:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Actual Range: Range Selected by User:	6 to 1817 (units: ) 4 to 500 (units: )			
Parking Spaces Range:	All Surveys Included			
Parking Spaces per Dwellin	g Range: All Surveys Included			
Bedrooms per Dwelling Rar	nge: All Surveys Included			
Percentage of dwellings pri	vately owned: All Surveys Included			
Public Transport Provision: Selection by:	Include all surveys			
Date Range: 01/01/	/12 to 19/11/19			
This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.				

No of Dwellings

Selected survey days:	
Monday	23 days
Tuesday	21 days
Wednesday	26 days
Thursday	22 days
Friday	15 days
Saturday	1 days
Sunday	1 days

This data displays the number of selected surveys by day of the week.

<u>Selected survey types:</u>	
Manual count	106 days
Directional ATC Count	3 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

<u>Selected Locations:</u>	
Suburban Area (PPS6 Out of Centre)	35
Edge of Town	55
Neighbourhood Centre (PPS6 Local Centre)	19

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:	
Industrial Zone	1
Residential Zone	85
Village	12
Out of Town	1
High Street	1
No Sub Category	9

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class: C3

109 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range: All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:	
1,000 or Less	5 days
1,001 to 5,000	22 days
5,001 to 10,000	23 days
10,001 to 15,000	25 days
15,001 to 20,000	14 days
20,001 to 25,000	11 days
25,001 to 50,000	7 days
50,001 to 100,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:	
5,000 or Less	4 days
5,001 to 25,000	17 days
25,001 to 50,000	15 days
50,001 to 75,000	13 days
75,001 to 100,000	19 days
100,001 to 125,000	3 days
125,001 to 250,000	24 days
250,001 to 500,000	11 days
500,001 or More	3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:	
0.6 to 1.0	30 days
1.1 to 1.5	71 days
1.6 to 2.0	8 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

<u>Travel Plan:</u>	
Yes	22 days
No	87 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

<u>PTAL Rating:</u>	
No PTAL Present	106 days
2 Poor	2 days
4 Good	1 days

This data displays the number of selected surveys with PTAL Ratings.

SYSTRA Ltd	121 Edmund Street	Birmingham	Consortium Limited, 2020		Wednesday 02/12/20 Page 4 Licence No: 700704
	OF SITES relevant to	-			LICENCE NO. 700702
1	AG-03-A-01 KEPTIE ROAD ARBROATH	BUNGALOWS/DET.		ANGUS	
2	Suburban Area (PPS& Residential Zone Total No of Dwellings <i>Survey date:</i> AN-03-A-08 BALLINDERRY ROAD LISBURN	: <i>TUESDAY</i> HOUSES & FLATS	7 22/05/12	<i>Survey Type: MANU</i> ANTRIM	42
3	Suburban Area (PPS6 Residential Zone Total No of Dwellings <i>Survey date:</i> AN-03-A-09 SLOEFIELD DRIVE CARRICKFERGUS	::	204 <i>29/10/13</i> DETACHED	<i>Survey Type: MANU</i> ANTRIM	12
4	Edge of Town No Sub Category Total No of Dwellings <i>Survey date:</i> BN-03-A-03 SWEETS WAY WHETSTONE	s: <i>WEDNESDAY</i> MIXED HOUSES	151 <i>12/10/16</i>	<i>Survey Type: MANUA</i> BARNET	12
5	Neighbourhood Centr Residential Zone Total No of Dwellings <i>Survey date:</i> CA-03-A-05 EASTFIELD ROAD PETERBOROUGH		133 <i>10/09/19</i>	<i>Survey Type: MANUA</i> CAMBRI DGESHI RE	12
6	Suburban Area (PPS6 Residential Zone Total No of Dwellings <i>Survey date:</i> CA-03-A-06 CRAFT'S WAY NEAR CAMBRIDGE BAR HILL	::	28 1 <i>7/10/16</i>	<i>Survey Type: MANUA</i> CAMBRI DGESHI RE	<i>4L</i>
7			207 <i>22/06/18</i>	<i>Survey Type: MANUA</i> CARLOW	42
8	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> CH-03-A-08 WHITCHURCH ROAD CHESTER BOUGHTON HEATH	WEDNESDAY DETACHED	23 <i>25/05/16</i>	<i>Survey Type: MANU</i> CHESHI RE	<i>1L</i>
9	Suburban Area (PPS6 Residential Zone Total No of Dwellings <i>Survey date:</i> CH-03-A-09 GREYSTOKE ROAD MACCLESFIELD HURDSFIELD	:	11 <i>22/05/12</i>	<i>Survey Type: MANUA</i> CHESHIRE	<i>1L</i>
	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i>		24 <i>24/11/14</i>	Survey Type: MANUA	42

10	CH-03-A-10 SEMI-DETACHED & MEADOW DRIVE	TERRACED	CHESHIRE
	NORTHWICH BARNTON		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40 <i>04/06/19</i>	SURVAY TUDA MANUAL
11	<i>Survey date: TUESDAY</i> CH-03-A-11 TOWN HOUSES	04/00/19	<i>Survey Type: MANUAL</i> CHESHIRE
	LONDON ROAD		
	NORTHWICH		
	LEFTWICH Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	24	
10	Survey date: THURSDAY	06/06/19	Survey Type: MANUAL
12	CS-03-A-03 MI XED HOUSES TOP ROAD		SLIGO
	STRANDHILL		
	STRANDHILL		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village Total No of Dwellings:	30	
	Survey date: THURSDAY	27/10/16	Survey Type: MANUAL
13	CS-03-A-04 DETACHED & SEMI - R292	DETACHED	SLIGO
	STRANDHILL		
	Neighbourhood Centre (PPS6 Local Centre) Village		
	Total No of Dwellings:	63	
	Survey date: THURSDAY	27/10/16	Survey Type: MANUAL
14	CV-03-A-02 DETACHED & SEMI R212 DUBLIN ROAD	DETACHED	CAVAN
	CAVAN		
	KILLYNEBBER		
	Edge of Town		
	No Sub Category Total No of Dwellings:	80	
	Survey date: MONDAY	22/05/17	Survey Type: MANUAL
15	CV-03-A-03 DETACHED HOUSES		CAVAN
	R212 DUBLIN ROAD CAVAN		
	PULLAMORE NEAR		
	Edge of Town		
	No Sub Category Total No of Dwellings:	37	
	Survey date: MONDAY	22/05/17	Survey Type: MANUAL
16	DC-03-A-08 BUNGALOWS		DORSET
	HURSTDENE ROAD		
	BOURNEMOUTH CASTLE LANE WEST		
	Edge of Town		
	Residential Zone	20	
	Total No of Dwellings: Survey date: MONDAY	28 <i>24/03/14</i>	Survey Type: MANUAL
17	DH-03-A-01 SEMI DETACHED	21,00,14	DURHAM
	GREENFIELDS ROAD		
	BISHOP AUCKLAND		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone	FO	
	Total No of Dwellings: Survey date: TUESDAY	50 <i>28/03/17</i>	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

Wednesday	02/12/20
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<u>LIST</u>	OF SITES relevant to selection parameters (Co	<u>nt.)</u>	
18	DH-03-A-02 MI XED HOUSES LEAZES LANE BISHOP AUCKLAND ST HELEN AUCKLAND Neighbourhood Centre (PPS6 Local Centre) Residential Zone Total No of Dwellings:	125 <i>27/03/17</i>	
19	Survey date: MONDAY DH-03-A-03 SEMI -DETACHED & TE PILGRIMS WAY DURHAM		<i>Survey Type: MANUAL</i> DURHAM
	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: FRIDAY</i>	57 <i>19/10/18</i>	Survey Type: MANUAL
20	DL-03-A-09 TERRACED RATHFARNHAM ROAD DUBLIN RATHFARNHAM Neighbourhood Centre (PPS6 Local Centre) No Sub Category Total No of Dwellings:	8	DUBLIN
21	Survey date: FRIDAY DL-03-A-10 SEMI DETACHED & DE R124 MALAHIDE SAINT HELENS Edge of Town Residential Zone Total No of Dwellings:	<i>07/09/12</i> TACHED 65	<i>Survey Type: MANUAL</i> DUBLIN
22	Survey date: WEDNESDAY DN-03-A-03 DETACHED/SEMI-DET THE GRANGE LETTERKENNY GLENCAR IRISH Edge of Town Residential Zone	<i>20/06/18</i> ACHED	<i>Survey Type: MANUAL</i> DONEGAL
23	Total No of Dwellings: Survey date: MONDAY DN-03-A-04 SEMI - DETACHED GORTLEE ROAD LETTERKENNY GORTLEE Edge of Town Residential Zone Total No of Dwellings:	50 <i>01/09/14</i> 83	<i>Survey Type: MANUAL</i> DONEGAL
24	Survey date: FRIDAY DN-03-A-05 DETACHED/SEMI-DET GORTLEE ROAD LETTERKENNY GORTLEE Suburban Area (PPS6 Out of Centre)	<i>26/09/14</i> ACHED	<i>Survey Type: MANUAL</i> DONEGAL
25	Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i> DN-03-A-06 DETACHED HOUSING GLENFIN ROAD BALLYBOFEY	146 <i>03/09/14</i>	<i>Survey Type: MANUAL</i> DONEGAL
	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i>	6 <i>10/10/18</i>	Survey Type: MANUAL

26	DO-03-A-03 DETACHED/SEMI DETACHED OLD MILL HEIGHTS BELFAST DUNDONALD	DOWN
27	Edge of Town Residential Zone Total No of Dwellings: 79 <i>Survey date: WEDNESDAY</i> 23/10/13 DS-03-A-02 MI XED HOUSES RADBOURNE LANE	<i>Survey Type: MANUAL</i> DERBYSHIRE
	Edge of Town Residential Zone	
28	Total No of Dwellings:371Survey date:TUESDAY10/07/18DV-03-A-01TERRACED HOUSESBRONSHILL ROADTORQUAY	<i>Survey Type: MANUAL</i> DEVON
29	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 37 <i>Survey date: WEDNESDAY 30/09/15</i> DV-03-A-02 HOUSES & BUNGALOWS MILLHEAD ROAD HONITON	<i>Survey Type: MANUAL</i> DEVON
30	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 116 <i>Survey date: FRIDAY 25/09/15</i> DV-03-A-03 TERRACED & SEMI DETACHED LOWER BRAND LANE HONITON	<i>Survey Type: MANUAL</i> DEVON
31	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 70 <i>Survey date: MONDAY 28/09/15</i> ES-03-A-03 MI XED HOUSES & FLATS SHEPHAM LANE POLEGATE	<i>Survey Type: MANUAL</i> EAST SUSSEX
32	Edge of Town Residential Zone Total No of Dwellings: 212 <i>Survey date: MONDAY</i> 11/07/16 ES-03-A-04 MI XED HOUSES & FLATS NEW LYDD ROAD CAMBER	<i>Survey Type: MANUAL</i> EAST SUSSEX
33	Edge of Town Residential Zone Total No of Dwellings: 134 <i>Survey date: FRIDAY</i> 15/07/16 ES-03-A-05 MI XED HOUSES & FLATS RATTLE ROAD NEAR EASTBOURNE STONE CROSS	<i>Survey Type: MANUAL</i> EAST SUSSEX
34	Edge of Town Residential Zone Total No of Dwellings: 99 <i>Survey date: WEDNESDAY</i> 05/06/19 EX-03-A-02 DETACHED & SEMI-DETACHED MANOR ROAD CHIGWELL GRANGE HILL	<i>Survey Type: MANUAL</i> ESSEX
	Edge of Town Residential Zone Total No of Dwellings: 97 Survey date: MONDAY 27/11/17	Survey Type: MANUAL

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<u>LIST</u>	OF SITES relevant to	selection parameters (0	<u>Cont.)</u>		
35	FA-03-A-01 MANDELA AVENUE FALKIRK	SEMI - DETACHED/TE	ERRACED	FALKIRK	
36	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> FA-03-A-02	s: <i>THURSDAY</i> MI XED HOUSES	37 <i>30/05/13</i>	<i>Survey Type: MANU.</i> FALKIRK	41
	FALKIRK	& SPRINGFIELD DRIVE			
	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i>		161 <i>29/05/13</i>	Survey Type: MANU,	
37	GM-03-A-11 RUSHFORD STREET MANCHESTER LEVENSHULME Neighbourhood Cent Residential Zone	TERRACED & SEMI -I	DETACHED	GREATER MANCHESTE	ĒR
38	Total No of Dwelling <i>Survey date:</i> HC-03-A-21		37 <i>26/09/16</i> DETACHED	<i>Survey Type: MANU,</i> HAMPSHI RE	42
	PRIESTLEY ROAD BASINGSTOKE HOUNDMILLS Edge of Town Residential Zone Total No of Dwelling <i>Survey date:</i>		39 1 <i>3/11/18</i>		41
39	HC-03-A-22 BOW LAKE GARDEN: NEAR EASTLEIGH BISHOPSTOKE Edge of Town Residential Zone Total No of Dwelling	MIXED HOUSES S	40	<i>Survey Type: MANU</i> HAMPSHI RE	72
40	0	<i>WEDNESDAY</i> HOUSES & FLATS	31/10/18	<i>Survey Type: MANU,</i> HAMPSHI RE	42
	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i>	S:	62 <i>19/11/19</i>	Survey Type: MANU	41
41	HF-03-A-03 HARE STREET ROAD BUNTINGFORD	MIXED HOUSES		HERTFORDSHI RE	
	Edge of Town Residential Zone Total No of Dwelling <i>Survey date:</i>		160 <i>08/07/19</i>	Survey Type: MANU	41
42	HG-03-A-01 LAWRENCE ROAD TOTTENHAM WEST GREEN	DETACHED & SEMI - re (PPS6 Local Centre)	DETACHED	HARINGÉY	
	Total No of Dwelling Survey date:		20 <i>05/11/19</i>	Survey Type: MANU	42

2/0/			
43	HI-03-A-14 SEMI-DETACHED & T KING BRUDE ROAD	ERRACED	HIGHLAND
	INVERNESS SCORGUIE		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	40	Company Trans. MAANUAA
44	<i>Survey date: WEDNESDAY</i> KC-03-A-03 MIXED HOUSES & FL	<i>23/03/16</i> Ats	<i>Survey Type: MANUAL</i> KENT
	HYTHE ROAD	415	KENT
	ASHFORD		
	WILLESBOROUGH		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	51	
	Survey date: THURSDAY	14/07/16	Survey Type: MANUAL
45	KC-03-A-04 SEMI -DETACHED & T	ERRACED	KENT
	KILN BARN ROAD AYLESFORD		
	DITTON		
	Edge of Town		
	Residential Zone	110	
	Total No of Dwellings: Survey date: FRIDAY	110 <i>22/09/17</i>	Survey Type: MANUAL
46	KC-03-A-05 DETACHED & SEMI-D		KENT
	ROCHESTER ROAD		
	BURHAM Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	8	
47	<i>Survey date: FRIDAY</i> KC-03-A-06 MI XED HOUSES & FL	<i>22/09/17</i> Ats	<i>Survey Type: MANUAL</i> KENT
17	MARGATE ROAD		
	HERNE BAY		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	363	
48	<i>Survey date: WEDNESDAY</i> KC-03-A-07 MI XED HOUSES	27/09/17	<i>Survey Type: MANUAL</i> KENT
40	RECULVER ROAD		KENT
	HERNE BAY		
	Edge of Town Residential Zone		
	Total No of Dwellings:	288	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
49	KC-03-A-08 MI XED HOUSES MAIDSTONE ROAD		KENT
	CHARING		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village Total No of Dwellings:	159	
	Survey date: TUESDAY	22/05/18	Survey Type: MANUAL
50	LC-03-A-31 DETACHED HOUSES		LANCASHIRE
	GREENSIDE PRESTON		
	COTTAM		
	Edge of Town		
	Residential Zone	30	
		32 <i>17/11/17</i>	Survey Type: MANUAL

51	LE-03-A-02 MELBOURNE ROAD IBSTOCK	DETACHED & OTHERS		LEI CESTERSHI RE
52	Neighbourhood Cent Village Total No of Dwelling <i>Survey date:</i> LN-03-A-03 ROOKERY LANE LINCOLN BOULTHAM		85 <i>28/06/18</i>	<i>Survey Type: MANUAL</i> LINCOLNSHIRE
53	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> LT-03-A-01 ARD NA SI CARRICK-ON-SHANN	s: <i>TUESDAY</i> SEMI -DETACHED & DE	22 <i>18/09/12</i> ETACHED	<i>Survey Type: MANUAL</i> LEITRIM
54	ATTIRORY Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> MS-03-A-03 BEMPTON ROAD LIVERPOOL	S:	90 <i>24/04/15</i>	<i>Survey Type: MANUAL</i> MERSEYSI DE
55	OTTERSPOOL Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> NE-03-A-02 HANOVER WALK SCUNTHORPE	S:	15 <i>21/06/13</i> TACHED	<i>Survey Type: MANUAL</i> NORTH EAST LINCOLNSHIRE
56	Edge of Town No Sub Category Total No of Dwelling <i>Survey date:</i> NF-03-A-01 YARMOUTH ROAD CAISTER-ON-SEA		432 <i>12/05/14</i> OWS	<i>Survey Type: MANUAL</i> NORFOLK
57	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> NF-03-A-02 DEREHAM ROAD NORWICH	S:	27 <i>16/10/12</i>	<i>Survey Type: MANUAL</i> NORFOLK
58	Suburban Area (PPS Residential Zone Total No of Dwelling <i>Survey date:</i> NF-03-A-03 HALING WAY THETFORD	S:	98 <i>22/10/12</i>	<i>Survey Type: MANUAL</i> NORFOLK
	Edge of Town Residential Zone Total No of Dwelling <i>Survey date:</i>	s: WEDNESDAY	10 <i>16/09/15</i>	Survey Type: MANUAL

TRA Ltd	121 Edmund Street Birm	ingham		Page Licence No: 7007
	OF SITES relevant to selectic	-		
59	NF-03-A-04 MIXEI NORTH WALSHAM ROAD NORTH WALSHAM	) HOUSES	NORFOLK	
	Edge of Town Residential Zone Total No of Dwellings:	70 SDAY 18/09/19		
60	Survey date: WEDNA NF-03-A-05 MIXEI HEATH DRIVE HOLT	D HOUSES	<i>Survey Type: MANUAL</i> NORFOLK	
	Edge of Town Residential Zone	40		
	Total No of Dwellings: Survey date: THURS	40 DAY <i>19/09/19</i>	Survey Type: MANUAL	
61	5	) HOUSES	NORFOLK	
	Residential Zone	275		
	Total No of Dwellings: Survey date: MOND		Survey Type: MANUAL	
62	NF-03-A-07 MI XEI SILFIELD ROAD WYMONDHAM	) HOUSES & FLATS	NORFOLK	
	Edge of Town			
	Out of Town Total No of Dwellings:	297		
	Survey date: SUNDA	Y 22/09/19	Survey Type: DIRECTIO	ONAL ATC COUNT
63	SIR ALFRED MUNNINGS RD NEAR NORWICH COSTESSEY Neighbourhood Centre (PPS	5 Local Centre)	NORFOLK	
	Village Total No of Dwellings:	1817		
64	Survey date: THURS NF-03-A-09 MIXEI ROUND HOUSE WAY NORWICH	<i>DAY 19/09/19</i> D HOUSES & FLATS	<i>Survey Type: MANUAL</i> NORFOLK	
	CRINGLEFORD Edge of Town Residential Zone			
	Total No of Dwellings: Survey date: TUESD	984 4 <i>Y 24/09/19</i>	Survey Type: MANUAL	
65	NF-03-A-10 MI XEI HUNSTANTON ROAD HUNSTANTON	) HOUSES & FLATS	NORFOLK	
	Edge of Town Residential Zone Total No of Dwellings:	17		
66	Survey date: WEDN		<i>Survey Type: DIRECTIO</i> NORFOLK	ONAL ATC COUNT
	Edge of Town			
	Residential Zone Total No of Dwellings:	138		
67	Survey date: TUESD NR-03-A-01 HOUS	4Y 20/10/15	<i>Survey Type: DIRECTIO</i> NORTHAMPTONSHIRE	ONAL ATC COUNT
	BOUGHTON GREEN ROAD NORTHAMPTON KINGSTHORPE Suburban Area (PPS6 Out o	Centre)		
	Residential Zone			
	Total No of Dwellings: Survey date: SATUR	102 DAY 22/09/12	Survey Type: MANUAL	

68	NY-03-A-08 TERRACED HOUSES NICHOLAS STREET YORK		NORTH YORKSHIRE
69	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i> NY-03-A-09 MI XED HOUSI NG GRAMMAR SCHOOL LANE NORTHALLERTON	21 <i>16/09/13</i>	<i>Survey Type: MANUAL</i> NORTH YORKSHIRE
70	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i> NY-03-A-10 HOUSES AND FLATS BOROUGHBRIDGE ROAD RIPON	52 <i>16/09/13</i>	<i>Survey Type: MANUAL</i> NORTH YORKSHIRE
71	Edge of Town No Sub Category Total No of Dwellings: <i>Survey date: TUESDAY</i> NY-03-A-11 PRIVATE HOUSING HORSEFAIR BOROUGHBRIDGE	71 <i>17/09/13</i>	<i>Survey Type: MANUAL</i> NORTH YORKSHIRE
72	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i> NY-03-A-13 TERRACED HOUSES CATTERICK ROAD CATTERICK GARRISON OLD HOSPITAL COMPOUND	23 <i>18/09/13</i>	<i>Survey Type: MANUAL</i> NORTH YORKSHI RE
73	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: Survey date: WEDNESDAY PS-03-A-02 DETACHED/SEMI-DET GUNROG ROAD WELSHPOOL	10 <i>10/05/17</i> FACHED	<i>Survey Type: MANUAL</i> POWYS
74	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i> RO-03-A-03 DETACHED HOUSES N61 BOYLE	28 <i>11/05/15</i>	<i>Survey Type: MANUAL</i> ROSCOMMON
75	GREATMEADOW Edge of Town No Sub Category Total No of Dwellings: <i>Survey date: THURSDAY</i> RO-03-A-04 EAGLE COURT ROSCOMMON	23 <i>25/09/14</i> OWS	<i>Survey Type: MANUAL</i> ROSCOMMON
	ARDNANAGH Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: Survey date: FRIDAY	39 <i>26/09/14</i>	Survey Type: MANUAL

YSTRA Ltd	121 Edmund Street	Birmingham			Page 1 Licence No: 70070
		selection parameters (CC	o <u>nt.)</u>		
76	SC-03-A-04 HIGH ROAD BYFLEET	DETACHED & TERRAC		SURREY	
77	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> SC-03-A-05 REIGATE ROAD HORLEY		71 <i>23/01/14</i>	<i>Survey Type: MAN</i> SURREY	UAL
78	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> SF-03-A-04 NORMANSTON DRIVE LOWESTOFT	<i>MONDAY</i> DETACHED & BUNGAL	207 <i>01/04/19</i> _OWS	<i>Survey Type: MAN</i> SUFFOLK	IJAL
79	Suburban Area (PPS& Residential Zone Total No of Dwellings <i>Survey date:</i> SF-03-A-05 VALE LANE BURY ST EDMUNDS	:	7 23/10/12	<i>Survey Type: MAN</i> SUFFOLK	VAL
80	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> SF-03-A-06 BURY ROAD KENTFORD	: <i>WEDNESDAY</i> DETACHED & SEMI-DI	18 <i>09/09/15</i> ETACHED	<i>Survey Type: MAN</i> SUFFOLK	IJAL
	Neighbourhood Centr Village Total No of Dwellings Survey date: SF-03-A-07 FOXHALL ROAD IPSWICH		38 <i>22/09/17</i>	<i>Survey Type: MANU</i> SUFFOLK	IJAL
	Suburban Area (PPS6 Residential Zone Total No of Dwellings <i>Survey date:</i> SH-03-A-05 SANDCROFT TELFORD SUTTON HILL	:	73 <i>09/05/19</i> RRACED	<i>Survey Type: MAN</i> SHROPSHIRE	UAL
	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> SH-03-A-06 ELLESMERE ROAD SHREWSBURY		54 <i>24/10/13</i>	<i>Survey Type: MAN</i> SHROPSHI RE	UAL
84	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i> SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD		16 <i>22/05/14</i>	<i>Survey Type: MANU</i> SOMERSET	VAL
	Edge of Town Residential Zone Total No of Dwellings <i>Survey date:</i>		33 <i>24/09/15</i>	Survey Type: MAN	UAL

LIST OF SITES relevant to selection parameters (Cont.)

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<u>LIST</u>	OF SITES relevant to selection parameters (C	<u>Cont.)</u>	
85	SM-03-A-02 MI XED HOUSES HYDE LANE NEAR TAUNTON		SOMERSET
	CREECH SAINT MICHAEL		
	Neighbourhood Centre (PPS6 Local Centre) Village		
	Total No of Dwellings:	42	
86	<i>Survey date: TUESDAY</i> SM-03-A-03 MIXED HOUSES	25/09/18	<i>Survey Type: MANUAL</i> SOMERSET
80	HYDE LANE NEAR TAUNTON CREECH ST MICHAEL		SUMERSEI
	Neighbourhood Centre (PPS6 Local Centre)		
	Village	44	
	Total No of Dwellings: Survey date: TUESDAY	41 <i>25/09/18</i>	Survey Type: MANUAL
87	ST-03-A-07 DETACHED & SEMI-E		STAFFORDSHI RE
	BEACONSIDE STAFFORD		
	MARSTON GATE		
	Edge of Town		
	Residential Zone Total No of Dwellings:	248	
~ ~	Survey date: WEDNESDAY	22/11/17	Survey Type: MANUAL
88	ST-03-A-08 DETACHED HOUSES SILKMORE CRESCENT		STAFFORDSHI RE
	STAFFORD		
	MEADOWCROFT PARK Edge of Town		
	Residential Zone		
	Total No of Dwellings:	26	CURVEN TURES MANUAL
89	Survey date: WEDNESDAY SY-03-A-01 SEMI DETACHED HO	<i>22/11/17</i> USES	<i>Survey Type: MANUAL</i> SOUTH YORKSHIRE
	A19 BENTLEY ROAD		
	DONCASTER BENTLEY RISE		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone Total No of Dwellings:	54	
	Survey date: WEDNESDAY	18/09/13	Survey Type: MANUAL
90	TW-03-A-02 SEMI-DETACHED WEST PARK ROAD		TYNE & WEAR
	GATESHEAD		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings: Survey date: MONDAY	16 <i>07/10/13</i>	SURVEN TUDE MANUAL
91	TW-03-A-03 MI XED HOUSES	07/10/13	<i>Survey Type: MANUAL</i> TYNE & WEAR
	STATION ROAD		
	NEAR NEWCASTLE BACKWORTH		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village Total No of Dwellings:	33	
	Survey date: FRIDAY	13/11/15	Survey Type: MANUAL
92	TY-03-A-02 SEMI DETACHED & B SANDHOLES ROAD	SUNGALOWS	TYRONE
	COOKSTOWN		
	DERRYLORAN Edge of Town		
	Industrial Zone		
	Total No of Dwellings: Survey date: THURSDAY	101 <i>14/03/19</i>	Survey Type: MANUAL
		17 17	JUIVEY TYPE. WHINDAL

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### SYSTRA Ltd 121 Edmund Street Birmingham

93	VG-03-A-01 SEMI -DETACHED & T ARTHUR STREET BARRY	ERRACED	VALE OF GLAMORGAN
94	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i> WA-03-A-04 DETACHED MAYPARK LANE WATERFORD	12 <i>08/05/17</i>	<i>Survey Type: MANUAL</i> WATERFORD
95	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: TUESDAY</i> WC-03-A-01 DETACHED HOUSES STATION ROAD WICKLOW CORPORATION MURRAGH	280 <i>24/06/14</i>	<i>Survey Type: MANUAL</i> WICKLOW
96	Edge of Town No Sub Category Total No of Dwellings: <i>Survey date: MONDAY</i> WK-03-A-02 NARBERTH WAY COVENTRY	50 <i>28/05/18</i>	<i>Survey Type: MANUAL</i> WARWICKSHIRE
97	POTTERS GREEN Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: THURSDAY</i> WK-03-A-03 DETACHED HOUSES BRESE AVENUE	17 1 <i>7/10/13</i>	<i>Survey Type: MANUAL</i> WARWICKSHIRE
98	WARWICK GUYS CLIFFE Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i> WK-03-A-04 DETACHED HOUSES DALEHOUSE LANE	23 <i>25/09/19</i>	<i>Survey Type: MANUAL</i> WARWICKSHIRE
99	KENILWORTH Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: FRIDAY</i> WL-03-A-02 SEMI DETACHED HEADLANDS GROVE	49 <i>27/09/19</i>	<i>Survey Type: MANUAL</i> WILTSHIRE
100	SWINDON Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: Survey date: THURSDAY WM-03-A-04 TERRACED HOUSES OSBORNE ROAD	27 <i>22/09/16</i>	<i>Survey Type: MANUAL</i> WEST MIDLANDS
	COVENTRY EARLSDON Neighbourhood Centre (PPS6 Local Centre) Residential Zone Total No of Dwellings: Survey date: MONDAY	39 21/11/16	Survey Type: MANUAL

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# SYSTRA Ltd 121 Edmund Street Birmingham

LIST OF SITES relevant to selection parameters (Cont.)

<u> 1131</u>		<u> </u>	
101	WS-03-A-04 MI XED HOUSES HILLS FARM LANE HORSHAM BROADBRIDGE HEATH Edge of Town		WEST SUSSEX
	Residential Zone Total No of Dwellings: <i>Survey date: THURSDAY</i>	151 <i>11/12/14</i>	Survey Type: MANUAL
102	WS-03-A-05 TERRACED & FLATS UPPER SHOREHAM ROAD SHOREHAM BY SEA		WEST SUSSEX
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i>	48 <i>18/04/12</i>	Survey Type: MANUAL
103	WS-03-A-07 BUNGALOWS EMMS LANE NEAR HORSHAM BROOKS GREEN Neighbourhood Centre (PPS6 Local Centre)		WEST SUSSEX
	Village Total No of Dwellings:	57	
104	Survey date: THURSDAY WS-03-A-08 MI XED HOUSES ROUNDSTONE LANE ANGMERING	19/10/17	<i>Survey Type: MANUAL</i> WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: THURSDAY</i>	180 <i>19/04/18</i>	Survey Type: MANUAL
105	WS-03-A-09 MI XED HOUSES & FL LITTLEHAMPTON ROAD WORTHING WEST DURRINGTON		WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: Survey date: THURSDAY	197 <i>05/07/18</i>	Survey Type: MANUAL
106	WS-03-A-10 MIXED HOUSES TODDINGTON LANE LITTLEHAMPTON WICK		WEST SÚSŠÉX
	Edge of Town Residential Zone Total No of Dwellings:	79	
107	Survey date: WEDNESDAY WS-03-A-11 MIXED HOUSES ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH	07/11/18	<i>Survey Type: MANUAL</i> WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: Survey date: TUESDAY	918 <i>02/04/19</i>	Survey Type: MANUAL
108	WX-03-A-01 SEMI-DETACHED CLONARD ROAD WEXFORD	02704717	WEXFORD
	Suburban Area (PPS6 Out of Centre) No Sub Category Total No of Dwellings: Survey date: THURSDAY	34 <i>25/09/14</i>	Survey Type: MANUAL
109	WY-03-A-01 MIXED HOUSING SPRING VALLEY CRESCENT LEEDS BRAMLEY Neighbourhood Centre (PPS6 Local Centre)	25/09/14	WEST YORKSHIRE
	Residential Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i>	46 <i>21/09/16</i>	Survey Type: MANUAL
	-		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

#### Licence No: 700704

#### TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED TOTAL VEHICLES Calculation factor: 1 DWELLS BOLD print indicates peak (busiest) period

	ARRIVALS		[	DEPARTURES			TOTALS		
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00							-		
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	109	115	0.063	109	115	0.279	109	115	0.342
08:00 - 09:00	109	115	0.127	109	115	0.371	109	115	0.498
09:00 - 10:00	109	115	0.144	109	115	0.182	109	115	0.326
10:00 - 11:00	109	115	0.123	109	115	0.147	109	115	0.270
11:00 - 12:00	109	115	0.128	109	115	0.140	109	115	0.268
12:00 - 13:00	109	115	0.156	109	115	0.152	109	115	0.308
13:00 - 14:00	109	115	0.160	109	115	0.156	109	115	0.316
14:00 - 15:00	109	115	0.175	109	115	0.180	109	115	0.355
15:00 - 16:00	109	115	0.242	109	115	0.175	109	115	0.417
16:00 - 17:00	109	115	0.269	109	115	0.161	109	115	0.430
17:00 - 18:00	109	115	0.346	109	115	0.167	109	115	0.513
18:00 - 19:00	109	115	0.293	109	115	0.171	109	115	0.464
19:00 - 20:00	3	83	0.172	3	83	0.096	3	83	0.268
20:00 - 21:00	3	83	0.104	3	83	0.056	3	83	0.160
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.502			2.433			4.935

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

Trip rate parameter range selected:	6 - 1817 (units: )
Survey date date range:	01/01/12 - 19/11/19
Number of weekdays (Monday-Friday):	112
Number of Saturdays:	2
Number of Sundays:	1
Surveys automatically removed from selection:	13
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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# Appendix V Drainage and Utilities Appraisal

10/12/2020

Grange Farm, Balsall Common Reference number 110316





# **DRAINAGE & UTILITIES APPRAISAL**







# **GRANGE FARM, BALSALL COMMON**

# DRAINAGE & UTILITIES APPRAISAL

IDENTIFICATION TABLE	
Client/Project owner	L&Q Estates
Project	Grange Farm, Balsall Common
Study	Drainage & Utilities Appraisal
Date	10/12/2020
File name	110316 – R002 Grange Farm Balsall Common – Drainage Appraisal.docx
Reference number	110316

APPROVAL						
Version	Name		Position	Date	Modifications	
	Author	L Vioque	Senior Engineer	10/12/2020		
1	Checked by	T Dawe	Associate	11/12/2020	Client Review	
	Approved by	A Crawford	Director	11/12/2020		
	Author			DD/MM/YY		
2	Checked by			DD/MM/YY		
	Approved by			DD/MM/YY		





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# **APPENDICES**

Appendix A	Site plans
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- Appendix B STW sewer records
- Appendix C Utility records
- Appendix D HS2 zoning
- Appendix E EA Information
- Appendix F Borehole logs

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# 1. INTRODUCTION & SITE LOCATION

## 1.1 Background

- 1.1.1 SYSTRA has been commissioned by L&Q Estates to provide drainage advice to aid with site promotion for land at Grange Road, Balsall Common, 12km west of Coventry. The site is currently comprised of open fields, and is located to the north-west of the existing built-up area of Balsall Common.
- 1.1.2 It is envisaged that the site will be promoted in two phases, up to a total of 287 units:
  - Phase One of the development has the potential to deliver up to 142 dwellings, and
  - Phase Two has potential to deliver up to 145 dwellings.



Figure 1. Development Site Boundary.

- 1.1.3 The development site occupies approximately 16.2 ha in size being the areas to each parcel as follows:
  - Phase One: 3.9ha
  - Phase Two: 5.7ha
  - Public Open Space (POS): 6.6 ha
- 1.1.4 The development site boundaries are shown in **Figure 1** above. An indicative Masterplan, and Access and Infrastructure Plan showing both phases is included as **Appendix A**.
- 1.1.5 The site was submitted as part of the 2016 Strategic Housing Land Availability Assessment (SHLAA- Ref 198). It was then promoted at the 'Regulation 18' stage of planning in March 2019. The Solihull Local Plan is currently undergoing 'Regulation 19' consultation and seeking representations on both new and existing sites. The purpose of this report is to appraise the development site at Land to the North of Balsall Street with regards to drainage and utility availability.
- 1.1.6 Balsall Common is identified in both the Housing Strategy and the Employment Strategy of the Draft LPR as a focus of a large amount of development growth over the next 10 to 20

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years. The site is therefore being submitted for consideration in the review of the Local Plan, with this document providing an update to the Drainage and Utilities Appraisal previously prepared by JMP in 2016.

# **1.2** Site topography

- 1.2.1 The topography of the site is such that the land forming Phase 1 falls uniformly in a northeasterly direction towards the lowest point of the site. The range in level across this parcel as measured from a high point in the southern corner of the site, near Balsall Street, to the lowest point on the site is 10m.
- 1.2.2 The main body of the Phase 2 parcel falls south or south-westerly from its northern edge towards the lowest point of the site. The eastern end of the parcel falls to a low area located to the north of Grange Road. The difference in levels in this parcel is up to 8m.
- 1.2.3 The large parcel to the east reserved for Public Open Space and also containing an existing Local Wildlife Site falls to the west or north-west to a watercourse that runs along the site boundary.
- 1.2.4 The falls of the site are shown within drawing 110316-003 contained in **Appendix A**.

# **1.3 Ground conditions**

1.3.1 British Geological Survey (BGS) information has been accessed and an extract from the superficial geology mapping is shown in Figure 2 below.



Figure 2.Superficial surface geology.Source British Geological Society website, 2020

1.3.2 Those records indicate the southern corner of the site to be Glaciofluvial Deposits, Mid Pleistocene-Sand And Gravel. The northern site of the parcel is mainly established to be Glaciolacustrine Deposits, Mid Pleistocene - Clay And Silt with two areas of Glaciolacustrine Deposits, Mid Pleistocene - Clay And Silt located at the north and east corners of the site respectively.

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- 1.3.3 A strip of Glaciolacustrine Deposits, Mid Pleistocene-Clay and Silt crosses the site bounding the western boundary of Phase 2.
- 1.3.4 The underlying bedrock geology for the site and surrounding area is the Sidmouth Mudstone formation
- 1.3.5 BGS Borehole Records locally comprise a number of ground investigations via trial pits, bore holes carried out during the 1970's, 1980's and 1990's in association with various sewerage schemes as shown in Figure 3 below: SP27NW8 being within the site boundary and SP27NW7 and SP27NW9 are in the vicinity of the site. The corresponding borehole records are contained in **Appendix F**.



Figure 3.Borehole scans.Source British Geological Society website, 2020

1.3.6 Material encountered within the boreholes are described by respectively depths in below table:

SP27NW8	SP27NW7	SP27NW9
0 – 0.3m Top soil	0 – 0.3m Top soil	0 – 0.3m Top soil
0.3m – 2m Sandy very firm clay	0.3m – 1.5m Soft clayey sand and gravel	0.3m – 1m Soft to firm sandy clay and gravel
2m-3m Silty sand	1.5m – 3.7m Soft sandy clay and gravel becoming mostly clay around 2.2m	1m – 2m Clayey sandy gravel and cobbles
3m – 5m Clayey gravelly sand with traces of silt around 4.6m	3.7m – 4.7m Becoming more silty from 3.6m	2 – 4.6m Firm fine sandy clay with some coal fragments
5m – 6m Stiff sandy clay becoming mostly sandy with some silt around 6.4m		

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- 1.3.7 Ground water was recorded as being encountered in SP27NW8 report at depths below 3m.
- 1.3.8 There are no recorded Ground Water Source Protection Zones that affect the site.
- 1.3.9 It is recommended that should development proceed a full ground investigation be undertaken, with one of the outcomes being to establish the suitability of ground conditions to support sustainable drainage methods for disposing of the surface water runoff.

# 2. DRAINAGE

2.1.1 Severn Trent Water (STW) is the Drainage Authority for the area. The sewer and water main records were obtained and plans are contained within **Appendices B and C** respectively.

## 2.2 Foul Water

- 2.2.1 A potential gravity foul connection is offered by a 675mm diameter trunk foul sewer which runs from Needlers End Lane crossing the site in the south to discharge to a nearby waste water treatment works located some 350m to the west of the site's western boundary.
- 2.2.2 A 225 300mm foul sewer crosses the southern side of the POS and the eastern side of Phase 2 parcel. This sewer runs to the south-east discharging in manhole 9003 located in Needlers End Lane.
- 2.2.3 The sewers identified will have associated easements which any housing layout will need to respect: these are normally 3m either side of the pipe but could be more for larger and/or deeper pipes.
- 2.2.4 Indicative locations of the sewers within the site boundary are shown in drawing 110316-003 **Appendix A**.
- 2.2.5 Subject to STW confirmation, it is anticipated that there will be adequate capacity in the 675mm diameter trunk foul sewer to connect the proposed scale of development.
- 2.2.6 There is a sewage rising main with 100mm diameter that runs from north-east direction, crossing Kenilworth Rd, then runs along northern verge of Dengate Drive and then connects to foul manhole ref 5453.

# 2.3 Storm Water

- 2.3.1 The site ground conditions information from BGS referred to earlier indicates that the ground condition across the site are not favourable to infiltration as a development drainage approach. A number of ponds in the vicinity show that the general ground permeability locally is poor.
- 2.3.2 STW records show twin 900mm diameter surface water sewers which enters the site close to 93 Needlers End Lane to discharge at the head of the watercourse located to south-east of the site boundary.
- 2.3.3 The sewers identified will have associated easements which any housing layout will need to respect: these are normally 3m either side of the pipe but could be more for larger and/or

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deeper pipes. The indicative locations of these sewers are shown in drawing 110316-003 in **Appendix A**.

- 2.3.4 The proposed storm run-off drainage of both Phase 1 and 2 would be to the watercourse (classified as 'main river' downstream of and partly within the site) that runs along the west site boundary of Phase 2. Its location has been shown on the Site Analysis plan drawing number 110316-003 in **Appendix A**.
- 2.3.5 If infiltration is not practicable then an attenuation-based drainage system will be needed. The pattern for restricted discharge rates equivalent to or less than Greenfield run-off rates will need to be agreed with the Lead Local Flood Authority (Solihull MBC) or with the EA depending upon the point of discharge. The stream's classification changes from 'ordinary watercourse' to 'main river' within the site.
- 2.3.6 Attenuation basins will be designed to be dry until rainfall events when they begin to flood in a safe way. Alternatively hey can be built as permanent ponds for landscape purposes if preferred, though this removes the possibility of dual functionality as POS.
- 2.3.7 The predicted impacts of climate change are difficult to quantify but are expected to lead to more intense rainfall, which in turn generates higher rates of run-off into drainage systems. Therefore, new developments need to manage the flood risk of increased volumes of water as a result. This is currently represented by increasing the rainfall rates by 40%.
- 2.3.8 The topography supports an attenuation strategy using a series of balancing basins discharging to the streams within the site as befits the development layout.
- 2.3.9 Indicative locations of the attenuation basins are shown on drawing 110316-003 included in **Appendix A**.
- 2.3.10 Other SuDS components may also be provided to assist in both quantitative and water-quality management. These features, together with the basins, offer opportunities to enhance the POS and Ecology / Landscape strategies for the site.

# 2.4 Flood risk

- 2.4.1 Investigation of the Environment Agency's (EA) Flood Mapping has shown that there are two watercourses within the site, as shown on maps contained in **Appendix E**.
- 2.4.2 The main watercourse flows north-westwards from Needlers End Lane along the western border of the Phase 2 development site. The second water feature bonds the north boundary fronting the large POS parcel.
- 2.4.3 The EA flood mapping suggests that any flooding associated with this channel is confined to a corridor along the main river, the stream fronting the north parcel to be dedicated as POS and the site's topography supports this.
- 2.4.4 An extract from the EA flood mapping for surface-water is shown in Figure 4. The patterns for fluvial flooding from the streams will be the same.

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Figure 4. Extend of surface water flooding. Source: EA website 2020

- 2.4.5 The site development lies chiefly within Flood Zone 1 and well above flood levels of either watercourse. A flood map report for planning is contained in **Appendix E**.
- 2.4.6 Any surface-water discharges to the tributary stream east of Grange Farm risk affecting the existing housing area on the corner where Needlers End Lane turns and should be managed most carefully. There is record of past flooding on Needlers End Lane and this stream may well be involved.
- 2.4.7 The developers may need an environmental permit if it is intended to carry out work in, under, over or near to a 'main river' and consent from Solihull MBC (as LLFA) for any alterations to existing 'ordinary watercourses'.
- 2.4.8 The EA's website records that the site falls within a Surface Water Safeguard Zone and Nitrate Vulnerable Zone. SWSZs are identified by the EA in relation to any raw water sources that are 'at risk' of deterioration which would result in the need for additional treatment. These zones are areas where the existing land use is causing pollution of the raw water. Action is targeted in these zones to address pollution so that extra treatment of raw water can be avoided. In the case of this particular SWSZ, nitrates (e.g. from fertilisers) and pesticides are cited as the prime concern essentially agri-chemical use. The NVZ designation applies for similar reasons. The proposed development will see use of such materials on site decrease through the change in land use, although it will create the potential for different types of pollution that will be controlled by means of the development's SuDS systems.
- 2.4.9 There are no recorded flooding risks from reservoir-failure on or close to the site boundary. EA records are shown in Figure 5 over the page.

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Figure 5. Extend of flooding from reservoirs. Source EA website, 2020

2.4.10 There are no recorded Ground Water Source Protection Zones that affect the site.

### 3. UTILITY SERVICES

3.1.1 The main utility service provider's information relating to apparatus they may have within the vicinity of the site and any restrictions they may impose on the development site has been obtained and relevant plans are contained in **Appendix C**.

### 3.2 Electricity

- 3.2.1 Western Power Distribution (WPD) is the electricity infrastructure supplier in the region.
- 3.2.2 WPD's apparatus includes LV and HV 11kV underground cables that run along Needlers End Lane, Greenfield Avenue and Dengate Drive south to east and in Wootton Green Lane and Kenilworth Road/A452 north to east of the site boundary.
- 3.2.3 The 11kV HV overhead power lines crossing the site from the north, adjacent Wootton Green Lane, towards the south west boundary at junction with Balsall Street/B4110 and Saracen Drive, with branches extending to the north west and to the south east, shown on the Site Analysis plan drawing number SA-01 contained in Appendix A and WPD utility plans contained in Appendix C.
- 3.2.4 Scottish and Southern Energy (SSE) records show 11kV HV cable along the verge of Balsall Street at the southern end of the site's boundary.
- 3.2.5 There are LV supplies serving the existing residential development located within the various public highways and their footways.
- 3.2.6 There is an electric substation compound off an access road of Needlers End Lane at the southern site boundary, shown on the WPD utility plans contained in **Appendix C**.
- 3.2.7 SYSTRA envisages that, to serve the proposed development, supplies might be fed from the HV power lines crossing the site or the 11kV underground cable entering the site adjacent the

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electric substation compound. Associated substations would be provided within the site as needed. However it is unclear whether the wider supplies to the local network have sufficient capacity or whether reinforcement works will be needed.

3.2.8 These observations have been made without WPD identifying any constraints or limitations they may wish to impose: until the quantum of development is known and loadings assessed these cannot be identified.

### 3.3 Gas

- 3.3.1 National Grid (NG) is the gas infrastructure supplier in the Solihull area.
- 3.3.2 NG records indicate that the nearest gas mains to the site are located beneath Balsall Street (125PE LP main), Needlers End Lane, Grange Road and Greenfield Avenue (90PE and 4"SI LP mains). 250PE and 4"SI LP mains are located in Kenilworth Road and off Dengate Drive.
- 3.3.3 There are 180PE and 250PE MP mains located in Kenilworth road/A542 and in verge off Dengate Drive at its junction with Kenilworth Road.
- 3.3.4 SYSTRA envisages that subject to confirmation of loadings once the number of houses are confirmed, it will be possible to extend this gas network to serve the development proposals. However it is unclear whether the wider supplies to the local network have sufficient capacity or whether reinforcement works will be needed.

### 3.4 Water

- 3.4.1 Severn Trent Water Ltd (STW) is the water infrastructure supplier in this region.
- 3.4.2 STW records show that there are two trunk water mains (27in and 36in, classified as aqueducts) that run broadly south-west to north-east through the site. These come onto the site from Balsall Street continuing north-east crossing Dengate Drive (adjacent no.10 and no.9) then exiting the site by crossing Kenilworth Road further north, shown on the Development Framework drawing in **Appendix A** and the STW Water Main Records plans contained in **Appendix C**.
- 3.4.3 The aqueducts are listed as a link between Strensham and Meriden water treatment works. STW have confirmed that there will be a minimum 12 metre easement for each of these and that working restrictions and plant protection measures will be imposed within that corridor. The size and strategic importance of this aqueduct is such that diverting the aqueduct is not considered a practicable option.
- 3.4.4 The records show 4" CI and 125 HPPE water mains located beneath Needlers End Lane and Greenfield Avenue and a 6"CI main in Balsall Street. On Kenilworth Road adjacent to the narrow access to the site the records show a 4" Asbestos Cement (AC) water main and 4"CI water main. There is a 4" AC water main in Wootton Green Avenue.
- 3.4.5 SYSTRA considers that, subject to confirmation of loadings once the number of houses are confirmed, it will be possible to extend these water mains to serve the development proposals. However it is unclear whether the wider supplies to the local network have sufficient capacity or whether reinforcement works will be needed.

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3.4.6 The EA's website has records that the site falls within a Surface Water Safeguard Zone and a Nitrate Vulnerable Zone.

### 3.5 Telecommunications

- 3.5.1 British Telecom plc (BT) records identified overhead supplies serving properties in Needlers End Lane and Balsall Street. Underground BT cables are recorded in Greenfield End Avenue.
- 3.5.2 Vodafone and Virgin Media networks are recorded along the Balsall Street/A4101.
- 3.5.3 SYSTRA envisages that, subject to confirmation from the networks providers, it will be possible to extend these networks to serve the development proposals.

### 4. SUMMARY AND CONCLUSION

- 4.1.1 The site is located 12km to the west of Coventry and is mainly agricultural farmland. The proposal is to develop this area for a residential development which will be built in two phases.
- 4.1.2 Phase one is bounded to the south-east by Balsall Street. This parcel occupies an area of approximately 3.9ha which is proposed to develop up to 142 dwellings.
- 4.1.3 Phase two, located to the north-east of Phase one, comprises an area of 5.7ha and it is proposed to develop up to 145 dwellings.

### Flood risk and Drainage Strategy

- 4.1.4 A desk-top investigation of ground conditions using BGS information has established that the site comprises silty and clayey ground above Sidmouth Mudstone. This type of ground is unlikely to support infiltration methods for disposing of surface water run-off from the development.
- 4.1.5 Investigation of the EA Flood Mapping identifies two watercourses within the site boundary One of them is partly categorised as 'main river'. The development area is chiefly within Flood Zone 1 which is the lowest-risk zone. All development types are compatible with this FZ category.
- 4.1.6 The main source of flooding risk that has been identified on the site is as a result of fluvial flooding and surface water flooding, which duplicate one another. There is minimal flood risk to areas away from the immediate vicinity of the watercourses: the site topography and indicative mapping point to flooding being confined to the watercourses and a narrow floodplain close to the stream banks.
- 4.1.7 The ground conditions do not support infiltration as a development solution. Instead attenuated discharges and on-site storage will be required, nominally in open basins at suitable locations with flow controls to manage the discharge rates. Other SuDS components may also be provided to assist in both quantitative and water-quality management.
- 4.1.8 Surface water discharges are proposed to be into the streams that cross the development area. The development areas naturally drain to these streams and the development drainage system will seek to replicate these patterns.

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	10/12/2020



- 4.1.9 The development's foul drainage is proposed to be connected to a 675mm diameter trunk foul sewer that crosses the site, subject to STW's confirmation. No pumping should be needed to accomplish this.
- 4.1.10 Overall the proposed development areas have readily-available points of discharge for surface drainage into the existing streams. SuDS systems will manage run-off quantities and water-quality. The development areas are within Flood Zone 1, the lowest risk category. Flooding from the streams is contained by the existing landform close to the stream banks. There is also a readily-available point of discharge for foul drainage in the trunk foul sewer passing through the site, subject to confirmation of available capacity.

### Utilities

- 4.1.11 A range of services operated by WPD, SEE, NG, SWT, BT Vodafone and Virgin Media apparatus are located within or close to the proposed developments.
- 4.1.12 Based upon the assessment of the apparatus and subject to confirmation from utilities companies, SYSTRA envisages that these can serve the development proposal. However it is unclear whether wider supplies to the local networks have sufficient capacity or whether reinforcement works will be needed in order to directly serve the proposed scheme.

# SYSTIA

# Appendix A: Site plans

### **Appendix A: Contents**

- O Development Framework Plan drawing no. DF-02 rev A
- Site Analysis 110316-003



PROJECT	CLIENT		Drawing Number	Rev.	D
Grange Farm, Balsall Common	L & Q Estates	DEVELOPMENT FRAMEWORK	DF-02	A	30-1

Site Boundary16.18 ha/39.98 acres approx.

Potential future development area 38.13 ha/94.21 acres

000

Potential housing area including open space (9.17 ha)\*

Local wildlife site (2.34 ha)

Existing open space retained (4.66 ha)

Indicative primary route & access

¢....

Andicative secondary routes & access

Existing pedestrian links

Water main (aqueduct) (showing 12m easement)

Foul sewers crossing site (showing 6m easement)

Note: All plotted locations are approximate

\*Total gross housing land: 9.17 ha. (approx.) with 7.03 ha (approx.) of housing and roads.

Potential dwellings numbers 25 dpha: 175 dwellings 30 dpha: 210 dwellings 35 dpha: 245 dwellings 40 dpha: 280 dwellings

Area of associated open space including watercourses and potential SUDS areas (2.14 ha)

I:5000 at A3



ate townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH



# SYSTIA

# Appendix B: STW Sewer records

### **Appendix B: Contents**

• Sewer Trent Water Records





----- Trunk Foul Use Gravity Sewer Trunk Surface Water Gravity Sewer - Combined Use Pressurised Sewer

- Foul Use Pressurised Sewer -----— → → Surface Water Pressurised Sewer
  - Highway Drain --- Combined Lateral Drain (SS)
- Foul Lateral Drain (SS)
- Surface Water Lateral Drain (SS)

Housing, Other Pipe Support Structure  $\overline{}$ ۲ Sewage Pumping Facility - $\boxtimes$ Sewer Facility Connection Inlet / Outlet

DS

\$**T**W

**Disposal Site** 

Sewage Treatment Works

Overflow Penstock Petrol Interceptor Sewer Blockage

-----

Sewer Collapse

Lamphole

Outfall

REFERENCE	COVER LEVEL	INV LEVEL UPSTR	INV LEVEL DOWNSTR	PURP	MATL	SHAPE	MAX SIZE	MIN SIZE	GRADIENT	YEAR
SP22770301	109.34	108.68	108.18	F	VC	c	150	nil	76.02	nill
SP22771301	110.30	108.14	107.79	F	VC	с	150	nil	133.20	nill
SP22771302	110.57	107.74	107.29	F	VC	с	150	nil	128.60	nill
SP22772001	108.31	107.12	106.68	F	VC	С	150	nil	138.02	nill
SP22772101	107.93	106.72	106.01	F	VC	с	150	nil	34.07	nill
SP22772202	109.63	105.72	105.43	F	vc	с	150	nil	205.31	nill
SP22772302	111.16	105.01	104.79	F	VC	с	225	nil	272.26	2007
SP22772401	111.02	104.48	103.65	F	vc	с	150	nil	87.29	nill
SP22773001	108.13	106.60	106.57	F	vc	с	150	nil	1016.00	nill
SP22773002	110.60	108.91	107.65	F	vc	с	150	nil	52.94	nill
SP22773101	109.31	106.08	105.74	F	VC	С	150	nil	214.29	nill
SP22773102	109.45	106.37	106.11	F	vc	с	150	nil	196.15	nill
SP22773103	109.23	106.55	106.37	F	VC	c	150	nil	54.72	nill
SP22773104	109.81	108.55	108.02	F	vc	с	150	nil	83.04	nill
SP22773105	111.02	108.64	108.02	F	vc	с	150	nil	104.84	nill
SP22774001	nil	nil	108.93	F	nil	nil	nil	nil	0.00	nill
SP22774002	112.33	110.78	nil	F	VC	с	150	nil	0.00	nill
SP22774201	111.03	108.99	108.65	F	VC	с	150	nil	198.88	nill
SP22774301	104.24	102.34	102.16	F	со	с	675	nil	483.83	nill
SP22774401	105.35	102.16	101.95	F	co	c	675	nil	319.62	nill

-	Sewer Chemical Injection Point
	Sewer Junction
+	Sewerage Air Valve
U	Sewerage Hatch Box Point
-	Sewerage Isolation Valve
Ŷ	Soakaway
0	Surface Water Manhole
	Vent Column
	Waste Water Storage
	Culverted Watercourse
	Pre-1937 Properties

- ASBESTOS CEMENT
- CONCRETE BOX CULVERT
- CONCRETE SEGMENTS (BOLTED)
- CONCRETE SEGMENTS (UNBOLTED)

- GLASS REINFORCED CONCRETE
- MAC - MASONRY IN REGULAR COURSES
- MASONRY RANDOMLY COURSED MAR - POLYETHLENE PE
- PITCH PF
- POLYPROPYLENE PP - PLASTIC STEEL COMPOSITE PSC
- POLYVINYL CHLORIDE PVC
- RPM - REINFORCED PLASTIC MATRIX - SPUN (GREY) IRON SI
- XXX - OTHER
- All Private Sewers are shown in magenta

## CATEGORIES

- W WEIR
- C CASCADE
- DB DAMBOARD
- SE - SIDE ENTRY

S

U

- FV FLAP VALVE BD - BACK DROP
- SIPHON S HD - HIGHWAY DRAIN S104 - SECTION 104

### SHAPE С

- CIRCULAR - EGG SHAPED E 0 - OTHER - RECTANGLE R - SQUARE
- T TRAPEZOIDAL - UNKNOWN

# **TABULAR KEY**

- A. Sewer pipe data refers to downstream sewer pipe.
- B. Where the node bifurcates (splits) X and Y indicates downstream sewer pipe.
- C. Gradient is stated a 1 in...

### PURPOSE

- C COMBINED - FINAL EFFLUENT E F - FOUL L - SLUDGE
- S SURFACE WATER

All section 104 sewers are shown in green All Sewers that have been transferred to Severn Trent Water after the 1st October 2011, but have not been surveyed and confirmed by Severn Trent Water are shown in orange





# **SYST(A**

## **Appendix C: Other utility plans**

### **Appendix C: Contents**

- Western Power Distribution
- O SEE
- National Grid Gas
- O GTC
- SWT Records
- BT Openreach
- Vodafone
- Virgin Media
- Sky Telecom
- Status Report
- Line search before U Dig



Our Ref: 8790574 Your Ref: 47681/BRK

### Monday, 18 July 2016

#### Christina Elliott





Dear Christina Elliott

Thank you for your enquiry dated Monday, 18 July 2016

I now enclose a copy of our plan showing existing Western Power Distribution (WPD) Electricity / WPD Surf Telecom apparatus in the vicinity of your proposed works. This information is given as a general guide only and its accuracy cannot be guaranteed. Please note that all WPD equipment on site should be assumed to be LIVE until WPD prove otherwise and provide you with confirmation to this effect in writing. Recent additions to our network, or service connections between the main cable and a building or street lamp may not be shown.

Damage to underground cables and contact with overhead lines can cause severe injury or may prove fatal. If you are excavating on site in the vicinity of either WPD Electrical apparatus or WPD Surf Telecom apparatus you must comply with the requirements of the following:-

Health & Safety Executive guidance HS(G)47, Avoiding Danger from underground services.

Work taking place in the vicinity of our plant is also regulated under the:-

### Electricity at Work Regulations 1989, Health and Safety Act 1974, CDM Regulations 2015. Safe working procedures should be defined and practiced

Please ensure that the use of mechanical excavators in the vicinity of our plant is kept to a minimum. WPD Surf Telecom ducts contain fibre cables, which are expensive to repair. Therefore, extreme care must be taken whilst working in the vicinity of these ducts, hand digging methods being used to determine their precise position.

If there are overhead lines crossing your site and your proposal involves building works which may infringe the clearance to our overhead system then you should call the relevant general enquiries number (see page 2 of this letter) for advice. Where overhead lines cross your site you must comply with the requirements of Health & Safety Executive guidance as laid down in GS6, Avoidance of Danger from Overhead Electric Lines.

Where diversions to WPD apparatus are needed to allow change to occur on site, the cost of these alterations may be charged to the persons responsible for the works.

If you require advice in connection with your proposals please contact the relevant general enquiries number (see page 2 of this letter)

Following consultation the local Western Power Distribution team will where necessary prepare detailed proposals and provide a quotation for any necessary alterations and/or development of our equipment on the site.

Yours sincerely WPD Map Response Team

### Western Power Distribution,

Mapping Centre Toll End Road Tipton West Midlands United Kingdom DY4 0HH

www.westernpower.co.uk

#### Map Response



WPDMapResponse @westernpower.co.uk

#### LinesearchbeforeUdig

Help Desk 0845 437 7365

Western Power Distribution PLC South West - 02366894 South Wales - 02366985 East Midlands - 02366923 West Midlands - 03600574

Registered in England and Wales

Registered Office: Avonbank Feeder Road Bristol BS2 0TB



### **Contact Us**

### **Emergency or Power Supply issues**

In an emergency call 0800 6783 105, 24 hours a day.

### **Mapping Enquiries**

If you have an enquiry relating to this letter or the attached map plan, please contact us using the following information:

 Telephone
 0121 623 9780

 Fax
 0121 623 9223

 Email
 WPDMapResponse@westernpower.co.uk

### **General Enquiries**

If you have a general enquiry, please call us on the following telephone number: All areas 0800 096 3080

### LinesearchbeforeUdig

If you have an enquiry relating to the use of the LinesearchbeforeUdig website please contact LinesearchbeforeUdig using the following information:

Telephone 0845 437 7365

Email enquiries@linesearchbeforeudig.co.uk Website www.linesearchbeforeudig.co.uk



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Serving the Midlands, South West and Wales	Site Location	
Contact Us		→ → → +V (33kV) → → → → → → → → → → → → → → → → → → →
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General Enquiries:	IMPORTANT NOTIC	
All areas 0800 096 3080	This information is given not be shown.	en as a guide only and its accuracy cannot be guaranteed. Services or recent additions to the network may
	Cables, overhead lines & be shown.	& substations owned by other electricity network owners or private companies may be present but will not
Date Requested: 18/07/2016 Job Reference: 8790574	• You should always verify	ify exact locations of cables using a cable locator and by careful use of hand tools in accordance with HSE
Site Location: 423092 277421	<ul><li>guidance note HSG47.</li><li>When working within 10n</li></ul>	0m of any overhead electric line you should follow the requirements of HSE Guidance Note GS6.
Requested by: Ms Christina Elliott		rorking near our electricity cables or lines, call our General Enquiries number. ght from the Western Power Distribution General Enquiries team for any work that is to take place in
Your Scheme/Reference:		lerground cables and 132kV overhead lines.
47681/BRK	Rej	Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
Event On th		0800 6783 105
Exact Scales: 1:1250 Area or Circle dig site	WPD Copyright: This copy has be	Reserved. Ordnance Survey Licence numbers: EL27318X, 100024877 and 100021807. been made by or with the authority of Western Power Distribution (WPD) pursuant to Section 47 of the Copyright Designs and
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All areas 0121 623 9780 General Enquiries: All areas 0800 096 3080 Date Requested: 18/07/2016 Job Reference: 8790574	<ul> <li>IMPORTANT NOTICES</li> <li>This information is given as a guide only and its accuracy cannot be guaranteed. Services or recent additions to the network ma not be shown.</li> <li>Cables, overhead lines &amp; substations owned by other electricity network owners or private companies may be present but will not be shown.</li> <li>You should always verify exact locations of cables using a cable locator and by careful use of hand tools in accordance with HSE guidance note HSG47.</li> </ul>
Site Location: 423092 277421 Requested by: Ms Christina Elliott Your Scheme/Reference: 47681/BRK	<ul> <li>When working within 10m of any overhead electric line you should follow the requirements of HSE Guidance Note GS6.</li> <li>For further advice on working near our electricity cables or lines, call our General Enquiries number.</li> <li>Advice should be sought from the Western Power Distribution General Enquiries team for any work that is to take place in proximity to 132kV underground cables and 132kV overhead lines.</li> </ul> Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
Exact Scales: 1:1250 Area or Circle dig site 1:500 Line dig site	OBD0 6783 105           Crown Copyright © All Rights Reserved. Ordnance Survey Licence numbers: EL27318X, 100024877 and 100021807.           WPD Copyright: This copy has been made by or with the authority of Western Power Distribution (WPD) pursuant to Section 47 of the Copyright Designs and Patents Act 1988 unless that Act provides a relevant exception to copyright the copy must not be copied without the prior permission of the copyright owner           Plans generated by DigSAFE Pro (tm) software provided by LinesearchbeforeUdig







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WESTERN POWER DISTRIBUTION Serving the Midlands, South West and Wales Contact Us Mapping Enquiries: All areas 0121 623 9780	Link Box Overhead Line Site Location Line/Area HV (132kV) Underground Cable Surf Telecoms HV (11kV) HV (132kV) HV (13
General Enquiries: All areas 0800 096 3080 Date Requested: 18/07/2016 Job Reference: 8790574 Site Location: 423092 277421 Requested by:	<b>MPORTANT NOTICES</b> This information is given as a guide only and its accuracy cannot be guaranteed. Services or recent additions to the network may not be shown.         Cables, overhead lines & substations owned by other electricity network owners or private companies may be present but will not be shown.         You should always verify exact locations of cables using a cable locator and by careful use of hand tools in accordance with HSE guidance note HSG47.         When working within 10m of any overhead electric line you should follow the requirements of HSE Guidance Note GS6.         For further advice on working near our electricity cables or lines, call our General Enquiries number.         Advice should be sought from the Western Power Distribution General Enquiries team for any work that is to take place in proximity to 132kV underground cables and 132kV overhead lines.         Report damage immediately – KEEP EVERYONE AWAY FROM THE AREA
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SCALE: Not to scale	LP MAINS		
USER ID: jasm1270	MP MAINS		_
DATE: 19/07/2016	LHP MAINS		-
EXTRACT DATE: 11/03/2016	NHP MAINS		-
MAP REF: SP2277			
CENTRE: 422569, 277706			
Some examples of Plant Items:	Syphon	Diameter Mat	

This plan shows those pipes owned by National Grid Gas plc in their role as a

Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc. are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Grid Gas plc or their agents, servants or contractors for any error or

omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue. Further information on all DR4s can be determined by calling the DR4 hotline on 01455 892426 (9am-5pm) A DR4 is where a potential error has been identified within the asset record and a process is currently underway to investigate and resolve the error as appropriate.



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#### MAPS Viewer Version 5.6.7.0

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From:
Sent:
То:
Subject:
Attachments:

18 July 2016 18:30 Statutory Enquiries GTC Plant Enquiry - Ref- 279676 279676.png; GU-DPR-IG-0022 Safe working in the vicinity of utility networks.pdf

# Warning: GTC Apparatus Exists in This Area

### **Our Plant Enquiry Service Ref: 279676 Your Enquiry Ref: 47681/BRK**



Dear Chrissy,

Thank you for your enquiry concerning apparatus in the vicinity of your proposed work. For your records, the search area is shown in the attached map.

Please click on the links below to download copies of the relevant utility asset drawings locating our assets in the area which you identified. These drawings are grouped by our relevant network reference, should you need to contact us regarding any of our networks please quote this reference. Links to files will remain live for 10 days. If you do not download these files within this period you will need to submit a new enquiry – this will ensure you have an up-to-date copy of our asset records.

**PLEASE NOTE:** Where drawings are large, these have been provided in smaller segments. A drawing index is provided as the first file listed for each network reference (example of a network reference: N1234567) shown below. This is intended to help you find the drawing relevant to you more quickly. Please take care to ensure that you use the relevant drawings for every network listed below as we may have multiple networks and multiple utilities in this area.

### N7007191

Gas

- <u>N7007191-1\_1\_of\_10.png</u>
- <u>N7007191-1\_2\_of\_10.png</u>
- <u>N7007191-1\_3\_of\_10.png</u>
- <u>N7007191-1\_4\_of\_10.png</u>
- <u>N7007191-1\_5\_of\_10.png</u>
- <u>N7007191-1\_6\_of\_10.png</u>
- <u>N7007191-1\_7\_of\_10.png</u>
- <u>N7007191-1\_8 of 10.png</u>
  N7007191-1\_9 of 10.png
- <u>N7007191-1\_9\_01\_10.png</u>
   N7007191-1\_10\_of\_10.png

# N7022975

Gas

- <u>N7022975-1\_1\_of\_2.png</u>
- <u>N7022975-1\_2\_of\_2.png</u>

## N7041469

### Gas

- <u>N7041469-1\_1\_of\_2.png</u>
- <u>N7041469-1\_2\_of\_2.png</u>

This information is for guidance only and the precise position of the plant must be established, prior to your works, using hand-digging methods only. The contractor will be held responsible for any damage caused to our asset. Please note our assets now include those owned and operated by:

- GTC Pipelines Limited
- Independent Pipelines Limited
- Quadrant Pipelines Limited
- Electricity Network Company Limited
- Independent Power Networks Limited
- Independent Water Networks Limited
- Independent Fibre Networks Limited
- Independent Community Heating Limited

If you have any queries or require any further information please do not hesitate to contact us.

All works in the vicinity of our networks should be undertaken in accordance with the attached document "GU-DPR-IG-0022: Safe working in the vicinity of utility networks". Reference should also be made to HSG47 Avoiding Danger from Underground Services.

Important: The area of your proposed works may contain gas mains operating at Medium and Intermediate Pressure tiers or electric cables operating at High Voltage – please refer to the network drawings included with this email. If your proposed works are likely to involve excavation within 10 metres of any of these assets, including but not limited to gas governors and electric substations you MUST inform GTC Plant Enquiries by calling 01359 240363 and quoting your Plant Enquiries Service Reference number.

Important: Drawings provided by this service may include utility assets not owned or managed by GTC. Conversely our drawings will NOT display assets from all third parties. It is your responsibility to ensure you have requested information from all utility asset owners.

<u>Gas</u> Escape or Damage MUST be reported on 0800 111 999. National Grid / DNGT will attend to make safe and repair. <u>Electricity</u> Network Damage MUST be reported to ENC on 0800 032 6990. <u>Water</u> Network Damage MUST be reported to IWNL on 02920 028 711 Fibre Network Damage MUST be reported to IFNL on 0845 051 1669

Thank you for using the GTC Plant Enquiries Service.

Your sincerely,

**GTC Plant Enquiry Service** 

GTC Energy House Woolpit Business Park Woolpit Bury St Edmunds Suffolk, IP30 9UP



GTC Plant Enquiry. Our Ref 279676, Your Ref 47681/BRK generated for AtkinsStatutory.Enquiries@atkinsglobal.com at 18/07/2016 13:59:44. This map shows the search area of your enquiry.



























Insertion Flow Meter Point

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Water Chemical Injection Point	В	Housing, Building	MAT	ERIALS	L	INING		
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Motive Water Point	K	Tiousing, Riosk	AK	- ALKATHENE	CL	- CEMENT		
Quality Sample Point		Housing, Other	c	- CONCRETE	PL	- PLASTIC		
Quality Gample Form		Housing, Other	CI	- CAST IRON	RL	- RESIN		N
Change In Characteristic		Ding Support Structure	CU	- COPPER	0	- OTHER		1
Change In Characteristic	$\frown$	Pipe Support Structure	GF	- GLASS FIBRE				Λ
Marker Post		One Dies	GRC	- GLASS REINFORCED CONCRETE				
	-	Open Pipe	GRP	- GLASS REINFORCED PLASTIC				
Cable Junction		Discharge	HDPE	- HIGH DENSITY POLY				
	-(	Discharge	HPPE	- HIGH PERFORMANCE POLY				$W \leq \Box$
Anode		End Cap	LDPE	- LOW DENSITY POLY				
	E		LEAD	- LEAD				
Boundary Box		00014	MDPE	- MEDIUM DENSITY POLY				/
	i	SSSI Area	0	- OTHER				V
Stop tap		Access Right	PC	- PRE-STRESSED CONCRETE				C
Cross Piece		Pre-1937 Properties	PF	- PITCH FIBRE				D
0103311000			PP	- POLY PROPYLENE				
Strainer			PSC	- PLASTIC STEEL COMPOSITE				
			PVC	- POLY VINYL CHLORIDE				
Listening Post			RPM	- REINFORCED PLASTIC MATRIX				
D			SI	- SPUN IRON				
Revenue Meter			SST	- STAINLESS STEEL				

- STEEL UPVC - UNPLASTICISED PVC

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Water Chemical Injection Point	В	Housin
Motive Water Point	K	Housin
Quality Sample Point		Housin
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Strainer		
Listening Post		
Revenue Meter		

ng	MAT	ERIALS
	AC	- ASBESTOS CEMENT
	AK	- ALKATHENE
	C	- CONCRETE
	CI	- CAST IRON
	CU	- COPPER
ructure	GF	- GLASS FIBRE
	GRC	- GLASS REINFORCED CONCRET
	GRP	- GLASS REINFORCED PLASTIC
	HDPE	- HIGH DENSITY POLY
	HPPE	- HIGH PERFORMANCE POLY
	LDPE	- LOW DENSITY POLY
	LEAD	- LEAD
	MDPE	- MEDIUM DENSITY POLY
	0	- OTHER
	PC	- PRE-STRESSED CONCRETE
erties	PF	- PITCH FIBRE
	PP	- POLY PROPYLENE
	PSC	- PLASTIC STEEL COMPOSITE
	PVC	- POLY VINYL CHLORIDE
	RPM	- REINFORCED PLASTIC MATRIX
	SI	- SPUN IRON
	SST	- STAINLESS STEEL
	ST	- STEEL

UPVC - UNPLASTICISED PVC

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- PLASTIC	C
- RESIN	
- OTHER	





Our Ref: Ref shown on map

Date of issue shown on map

email: <u>DBYD@openreach.co.uk</u> Phone: 0800 023 2023. Option 5



Dear Customer,

#### NR & SW ACT 1991 - PROPOSED WORKS AT:

Prior to commencement of work: for free onsite guidance and accurate up to date location of BT plant please contact our Plant Protection Service by the following methods *Email Dial before you dig* DBYD@openreach.co.uk *Visit the website* www.dialbeforeyoudig.com

Thank you for your request of describing the above proposals.

Enclosed are copies of our drawing marked up to show the approximate locations of BT apparatus which is present in the immediate vicinity of your works. It is intended for general guidance only. No guarantee is given of its accuracy.

It should not be relied upon in the event of excavations or other works made near to British Telecommunications plc apparatus which may exist at various depths and may deviate from the marked route.

To avoid damage it is recommended that mechanical excavators or borers are not used within 600mm of British Telecommunications plc plant. If scaffolding is erected, please ensure that our equipment is not enclosed, blocked, covered or otherwise obstructed by the scaffolding.

In the event of BT apparatus being in the area of works we recommend that your plant/vehicle crossing is either resited, or apply for a budget estimate by submitting detailed plans to the above address, these will be forwarded to the appropriate department for their comments.

Please ensure you quote our reference on any future correspondence.

Yours faithfully,

Stoneycroft

Trevallion Stud

IMPORTANT WARNING	KEY TO BT SYMBOLS	S Pole	0
Information regarding the location of BT apparatus is given for	DP	Planned Pole	O
your assistance and is intended for general guidance only.	Planned DP	Joint Box	
No guarantee is given of its accuracy. It should not be relied upon in the event of excavations or	PCP	Change Of State	+
other works being made near to BT apparatus which may exist	Planned PCP	Split Coupling	×
at various depths and may deviate from the marked route.	Built	Duct Tee	
openreach	Planned	Planned Box	
openreach	Inferred 🦯	Manhole	
CLICK BEFORE YOU DIG	Building	Planned Manhole	
FOR PROFESSIONAL FREE ON SITE ASSISTANCE PRIOR TO COMMENCEMENT OF EXCAVATION WORKS	Kiosk	Cabinet	Û
INCLUDING LOCATE AND MARKING SERVICE	Hatchings	Planned Cabinet	0
ADVANCE NOTICE REQUIRED (Office hours: Monday - Friday 08.00 to 17.00) www.openreach.co.uk/cbyd		Other proposed plant is shown us BT Symbols not listed above ma Existing BT Plant may not b Information valid at time of	ybe disregarded. De recorded.
Reproduced from the Ordnance Survey map by BT by permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office (C) Crown Copyright British Telecommunications plc 100028040	openreac a BT Group business	BT Ref : SW05372K Map Reference : (centre) Easting/Northing : (centre) Issued : 19/07/2016 05	re) 423088,2

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- 606		108-545 / R 532 / R 53
IMPORTANT WARNING	KEY TO BT SYMBOLS	Pole
Information regarding the location of BT apparatus is given for	DP	Planned Pole
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other works being made near to BT apparatus which may exist	Planned PCP	Split Coupling 🗙
at various depths and may deviate from the marked route.	Built	Duct Tee
	Planned	Planned Box
openreach	Inferred	Manhole
	Building	Planned Manhole
CLICK BEFORE YOU DIG FOR PROFESSIONAL FREE ON SITE ASSISTANCE PRIOR TO COMMENCEMENT OF EXCAVATION WORKS	Kíosk.	Cabinet 🔂
TO COMMENCEMENT OF EXCAVATION WORKS INCLUDING LOCATE AND MARKING SERVICE emai	Hatchings 🗰	Planned Cabinet
ADVANCE NOTICE REQUIRED (Office hours: Monday - Friday 08.00 to 17.00) www.openreach.co.uk/cbyd		Other proposed plant is shown using dashed lines. BT Symbols not listed above maybe disregarded. Existing BT Plant may not be recorded. Information valid at time of preparation
Reproduced from the Ordnance Survey map by BT by permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office (C) Crown Copyright British Telecommunications plc 100028040	a BT Group business BT	BT Ref : APZ05406B Map Reference : (centre) SP2350177512 Easting/Northing : (centre) 423501,277 Issued : 19/07/2016 05:40:34

Grange Farm

### **IMPORTANT WARNING**

Information regarding the location of BT apparatus is given for your assistance and is intended for general guidance only. No guarantee is given of its accuracy. It should not be relied upon in the event of excavations or other works being made near to BT apparatus which may exist at various depths and may deviate from the marked route.



EY TO BT SYMBO	OLS	Pole	0
DP	0	Planned Pole	0
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		Planned Pole         Joint Box         Change Of State         Split Coupling         Duct Tee         Planned Box         Planned Box         Manhole         Planned Manhole         Planned Cabinet         Other proposed plant is shown usin         BT Symbols not listed above mayb         Existing BT Plant may not be         Information valid at time of proposed plant is shown using the plant may not be         BT Ref : HTA05419N         Map Reference : (centre) S         Easting/Northing : (centre)





Reproduced from the Ordnance Survey map by BT
by permission of Ordnance Survey on behalf of the
Controller of Her Majesty's Stationary Office
(C) Crown Copyright British Telecommunications plc 100028040

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ach BT	Easting/Northing : (centre	) 423095,277
	® ach	Image: Planned Pole         Joint Box.         Change Of State         Split Coupling         Duct Tee         Planned Box         Manhole         Planned Manhole         Planned Cabinet         Other proposed plant is shown usin         BT Ref : TYOOS415N         Map Reference : (centre) S         Exaction (Northline : Centre)



From:	FA	
Sent:	19 July 2016 10:44	
То:	Statutory Enquiries	
Subject:	RE: Plant Enquiry - 47681 - off Balsall Street, Needlers End Lane, Kenilworth Road and Wootton Green Lane, Coventry - Please respond by 20/07/2016	
Attachments:	47681.pdf; Data Key + Special Requirements.pdf	

ATKINS CHECKED

DΛ

Please accept this email as confirmation that Vodafone: Fixed <u>does</u> have apparatus within the vicinity of your proposed works.

Please see attached network information.

<u>Note</u>: Only affected part is printed and our network is not present in the remaining areas of your proposed works.

**MPORTANT - PLEASE READ = Your Next Step?:** Where apparatus is affected and requires diversion, please send all the scheme related proposals that affects the Vodafone Network to <u>c3requests@vodafone.com</u> with a request for a <u>'C3 Budget Estimate'</u>. Please ensure you include a plan showing proposed works. (A location plan is insufficient for Vodafone to provide a costing). These estimates will be provided by Vodafone directly, normally within **20 working days from receipt of your request.** Please include proof of this C2 response when requesting a C3 (*using the 'forward' option*). Diversionary works may be necessary if the existing line of the highway/railway or its levels are altered.

Kind regards

Plant Enquiries Team

T: E:

ATKINS working on behalf of Vodafone: Fixed



This response is made only in respect to electronic communications apparatus forming part of the Vodafone: Fixed electronic communications network formerly being part of the electronic communications networks of Cable & Wireless UK, Energis Communications Limited, Thus Group Holdings Plc and Your Communications Limited.

**PLEASE NOTE:** The information given is indicative only. No warranty is made as to its accuracy. This information must not be solely relied upon in the event of excavation or other works carried out in the vicinity of Vodafone plant. No liability of any kind whatsoever is accepted by Vodafone, its servants, or agents, for any error or omission in respect of information contained on this information. The actual position of underground services must be verified and established on site before any mechanical plant is used. Authorities and contractors will be held liable for the full cost of repairs to Vodafone's apparatus and all claims made against them by Third parties as a result of any interference or damage.



Please consider the environment before printing this e-mail

From:	]
Sent: 18 July 2016 18:42	
To:	





# Vodafone Network Colour:

	Ex-Cable&Wireless UK Network (now Vodafone)
	Planned & Approved Route
	Planned Route – Awaiting Approval
	Other Licensed Operator (OLO)
	Ex-Thus Network (now Vodafone)
	Ex-Energis Network (now Vodafone)
	OLO
Other:	
	Overhead Electricity Line (non Vodafone)
	Network Rail

### Other Licensed Operator (OLO).

= Ex-Cable&Wireless UK, Energis and Thus fibre-optic cable within an OLO duct. Please contact all other operators for further details of their apparatus within that area.



KaW



Virgin Media Field Services Units 1-12 Broad Lane Mayfair Business Park Bradford Yorkshire BD4 8PW

Tel:

ATKINS The Hub, 500 Park Avenue, Aztec West, Almondsbury, Bristol, BS32 4RZ

Plant Enquiry Ref:	VM.153877
Letter Date	26.07.2016
Your Ref:	47681
Date:	28.07.2016

Dear Sir/Madam,

Enquiry Location: off Balsall Street, Needlers End Lane, Kenilworth Road and Wootton Green Lane, Coventry

Thank you for your enquiry regarding work at the above location.

I enclose a copy of our above referenced drawing, marked to show the approximate position of plant owned and operated by Virgin Media.

You will be aware that you have a duty to ensure that no damage results to this equipment as a result of your proposed works. Please note that this apparatus may contain Fibre Optic, Coaxial and/or 240v Power Cables and as such, special care must be taken when excavating this area.

Should you require Virgin Media apparatus to be diverted to accommodate your works and require a detailed estimate, please send a cheque to the value of  $\pm$ 720.00 (Bus) /  $\pm$ 240.00 (Res) Inc VAT to:

Diversionary Works, Virgin Media, 1 Dove Wynd, Strathclyde Business Park Bellshill ML4 3AL

Or Call the Diversionary Team on: 0800 408 0088 Option 1

Should your request be in relation to a new development and you require an estimate to be prepared for Virgin Media to service your proposed development, please submit this request for costs along with site drawings (scale 1:500) to the New Build Team also at the above address.

Yours faithfully

National Plant Enquiries Team, email: plant.enquiries.team@virginmedia.co.uk

Please note: National Plant Enquiries are now able to accept all major cards with the exception of American Express for credit/debit card payments. If you wish to use this facility please contact us at the above telephone number. <u>Please note: National Plant</u> Enquiries Team (Bradford) cover and respond to plant enquiries for all ex ntl:Telewest franchise areas.



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Date: 28/07/16 Scale: 1:9323

Map Centre: 423066,277415

Telecoms Plan A4

Important Information - please read The purpose of this plan is to identify Virgin Media apparatus. We have tried to make it as accurate as possible but we cannot warrant its accuracy. In addition, we caution that within Virgin Media apparatus there may be instances where mains voltage power cables have been placed inside green, rather than black ducting. Further details can be found using the 'Affected Postcodes.pdf', which can be downloaded from this website. Therefore, you must not rely solely on this plan if you are carrying out any excavation or other works in the vicinity of Virgin Media apparatus. The actual position of any underground service must be verified by cable detection equipment, etc. and established on site before or agents, Virgin Media will not have any liability for any omissions or inaccuracies in the plan or for any loss or damage caused or arising from the use of and/or any reliance on this plan. This plan is produced by Virgin Media Limited (c) Crown copyright and database rights 2016 Ordnance Survey 100019209. Virgin Media Limited (c) Crown copyright and database rights 2016 Ordnance Survey 100019209.



Data updated: 03/07/16

From: Sent: To: Subject:

20 July 2016 12:08 Statutory Enquiries Sky Telecommunications Services Ltd Plant Enquiry - PEA-16-07-0229 : ATKINS -47681

Ready to Dig ATKINS atkinsstatutory.enquiries@atkinsglobal.com SKY Telecommunications S 70 Buckingh

> Tel: 0207 03 Fax: 02 email:

Date	Our Reference	Your Reference
20 July 2016	PEA-16-07-0229	47681

### RE: off Balsall Street, Needlers End Lane, Kenilworth Road and Wootton Green Lane, C E423066 277415,N422679 276833

Further to your recent enquiry at the location above, the following SKY route(s) are affected: **Virgin Media - BHCV, Birmingham to Coventry** 

Although the above SKY route(s) are affected, Telewest are responsible for the maintenance diversion of the affected route as SKY only lease Fibre or Duct from them. For further inform detailed plans for this area, please contact their Enquiry Team.

You may be able to contact Telewest (now owned by Virgin Media), by email: plant.enquiries.team@telewest.co.uk or Phone:0870 888 3116. Please be aware that this inf may no longer be valid and we do not have any further contact details for this company. Plea their company website for more information.

Yours sincerely

# NRSWA Department Network Infrastructure Sky Network Services

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# SYSTIA

# Appendix D: HS2 Safeguarding plan

## **Appendix D: Contents**

• HS2 Phase One Safeguarding plan


## **SYST(A**

### **Appendix E: EA information**

### **Appendix E: Contents**

- EA's main river
- Flood map for planning
- Extend of flooding from surface water





## Flood map for planning

Your reference Balsall St

Location (easting/northing) **422689/276858** 

Created 9 Dec 2020 11:29

Your selected location is in flood zone 1, an area with a low probability of flooding.

### This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

#### Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

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Extent of flooding from surface water

High Medium Low Very low + Location you selected

## **SYST(A**

### **Appendix F: Borehole logs**

### **Appendix F: Contents**

- SP27NW8 Borehole report
- SP27NW7 Borehole report
- SP27NW9 Borehole report



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Birmingham – Alpha Tower 8<sup>th</sup> Floor, Alpha Tower, Crowne Plaza Birmingham B1 1TT T: +44 (0)121 393 4841

Dublin 2nd Floor, Riverview House, 21-23 City Quay Dublin 2,Ireland T: +353 (0) 1 566 2028

Edinburgh – Thistle Street Prospect House, 5 Thistle Street, Edinburgh EH2 1DF United Kingdom T: +44 (0)131 460 1847

Glasgow – St Vincent St Seventh Floor, 124 St Vincent Street Glasgow G2 5HF United Kingdom T: +44 (0)141 468 4205

Leeds 100 Wellington Street, Leeds, LS1 1BA T: +44 (0)113 360 4842

Liverpool 5th Floor, Horton House, Exchange Flags, Liverpool, United Kingdom, L2 3PF T: +44 (0)151 607 2278

London 3<sup>rd</sup> Floor, 5 Old Bailey, London EC4M 7BA United Kingdom T: +44 (0)20 3855 0079

Manchester 16th Floor, City Tower, Piccadilly Plaza Manchester M1 4BT United Kingdom T: +44 (0)161 504 5026

Newcastle Floor B, South Corridor, Milburn House, Dean Street, Newcastle, NE1 1LE United Kingdom T: +44 (0)191 249 3816 **Perth** 13 Rose Terrace, Perth PH1 5HA T: +44 (0)131 460 1847

Reading Soane Point, 6-8 Market Place, Reading, Berkshire, RG1 2EG T: +44 (0)118 206 0220

#### Woking

Dukes Court, Duke Street Woking, Surrey GU21 5BH United Kingdom T: +44 (0)1483 357705

#### Other locations:

France: Bordeaux, Lille, Lyon, Marseille, Paris

Northern Europe: Astana, Copenhagen, Kiev, London, Moscow, Riga, Wroclaw

Southern Europe & Mediterranean: Algiers, Baku, Bucharest, Madrid, Rabat, Rome, Sofia, Tunis

Middle East: Cairo, Dubai, Riyadh

Asia Pacific: Bangkok, Beijing, Brisbane, Delhi, Hanoi, Hong Kong, Manila, Seoul, Shanghai, Singapore, Shenzhen, Taipei

Africa: Abidjan, Douala, Johannesburg, Kinshasa, Libreville, Nairobi

Latin America: Lima, Mexico, Rio de Janeiro, Santiago, São Paulo

North America: Little Falls, Los Angeles, Montreal, New-York, Philadelphia, Washington



# Appendix VI Balsall Common Key Sites



DY I 4RH

PROJECT	CLIENT	CONTEXT PLAN & SOLIHULL DRAFT	Drawing Number	Rev.	Date
Land to the North of Balsall Street, Balsall Common	L & Q Estates	LOCAL PLAN SITE ALLOCATIONS	LPSA-01	С	09-12-20

### **Contact Details**

**Enquiries** Robert Gardner

Visit us online avisonyoung.co.uk