

**SOLIHULL METROPOLITAN BOROUGH COUNCIL
DRAFT SUBMISSION LOCAL PLAN
October 2020**

**LAND AT NORTON LANE, EARLSWOOD
(site ref 69 in the Council's Call for Sites and Supplementary Consultation Site Assessments
documents and BLR/34 in its Brownfield Land Register)**

Representations on behalf of the owners: Mr & Mrs J King

The Council is required to consider in the preparation of its Local Plan reasonable alternatives to its proposed strategy. However its Sustainability Appraisal is overly restricted in this regard with the omission of consideration of the potential of the Birmingham – Stratford rail corridor (a priority for strategic policy development in the recent past; and part of the South of Birmingham potential allocation identified by the Greater Birmingham & Black Country Housing Market Area Strategic Locations Study 2018 which is part of the Council's Evidence Base) an obvious concern.

This omission is compounded by the methodology of the Council's Green Belt Assessment which scores sites based on their individual performance against criteria rather than packaging sites which are geographically clustered together so as to explore & assess their potential for strategic land releases; and which, through comprehensive treatment of an area, could better deliver new homes, services & green infrastructure in a way which minimises impacts on landscape & the Green Belt. This approach would establish Green Belt boundaries which are clear, defensible & would endure; and would improve the performance score of the cluster compared with that of its individual component sites, particularly in respect of Green Belt boundary definition, accessibility and service provision.

Further, the Council's Accessibility Study looks only at the opportunities & constraints presented by existing infrastructure rather than by potential improvements to it that could be delivered alongside new development.

These flaws in strategic policy development and the site selection methodology undermine the soundness of the Draft Submission Plan.

The above concerns can be illustrated by reference to the cluster of sites in the Tidbury Green and Earlswood area put forward in response to the Council's Call for Sites and so where there is known landowner & developer interest. This cluster, in close proximity both to the Birmingham - Stratford railway line & stations and the built areas of Wythall, Tidbury Green and Earlswood, provides clear potential for sustainably located new development well related to existing communities. However such a prospect has not been assessed due to the failings set out above of the Sustainability Appraisal and the site selection methodology & evidence which underpins it.

It is recognised that such a proposition and its potential to be extended to adjacent administrative areas would require effective cross-boundary working between a number of different local planning authorities and so would engage the Duty to Cooperate. However this should not in any way detract from its potential or mean that it need not be considered a reasonable alternative strategy.

To exemplify this potential further - land in Norton Lane (Call for Sites ref 69) is close to the Birmingham-Stratford rail line & stations and local services, is underused, includes a vacant house and commercial buildings, is of low ecological value and is shielded from wider views by trees and by existing development in Norton Lane and Rumbush Lane. It is capable of an immediate development and so is well placed to provide a much needed boost to housing land supply; and such development would have no significant detriment to strategic Green Belt functions, support public transport provision in the immediate area and for the network of rural villages and contribute appropriately to necessary funding for Green Belt enhancements promoted by Local Plan Policy P17A.

The landowners would be happy to work with the Council and others in taking forward consideration of the development of their land either in isolation or in conjunction with nearby sites.

In conclusion, it will be seen from the above that the Draft Submitted Plan is poorly justified in that reasonable alternative strategies have not been adequately explored; that it also unreasonably constrains options for sustainable development; and so is unsound.