

# **Solihull Local Plan Review**

## **Draft Submission Plan**

### **Regulation 22 (1) (c) Statement**

#### **Appendix B**

**Summary of Main Issues Raised by Regulation 18 Consultation (Draft Local Plan Supplementary Consultation – 2019) and the Council’s Responses.**

**May 2021**

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## 1. Introduction

1. This document has been prepared to fulfil the requirement of Regulation 22 (1) (c) (iii) & (iv) of the Town & Country Planning Local Plan Regulations. It sets out the main issues raised in the 2019 Regulation 18 consultation on the Draft Local Plan Supplementary Consultation and how those representations were taken into account.
2. The document uses the summary of representations published in July 2017 with the addition of a paragraph under each section setting out the Council's response to the representations. This additional text is shown blue to help differentiate it.
3. The following documents formed the basis of the consultation:
  - [Draft Local Plan Supplementary Consultation Document](#).
  - [Solihull Local Plan Review - Draft Concept Masterplans](#).
  - [Draft Local Plan Supplementary Consultation: Amber Sites](#).
  - [Draft Local Plan Supplementary Consultation: Site Assessments](#).
  - [Draft Local Plan Supplementary Consultation: Site Assessments Key Plan](#).
4. In addition to the above, the [evidence base](#) for the Local Plan Review was updated and both new and existing evidence was available for reference.

### Background

5. In July 2015, the Council decided that instead of pursuing a Local Area Plan (LAP) for potential development around the HS2 Interchange, it should be pursued through a review of the Solihull Local Plan (SLP) which was adopted December 2013. Two further factors also pointed to an early review of the Plan; namely to deal with the legal challenge to the housing requirement in the SLP and to address the housing shortfall that is occurring in the wider housing market area.

### Scope, Issues and Options Consultation (Nov 2015)

6. The first stage of the LPR consultation took place from 30<sup>th</sup> November 2015 to 22<sup>nd</sup> January 2016. At this stage, views were invited on the scope of the review, the issues that ought to be taken into account and the broad options for growth that ought to be considered.
7. The consultation document (available [here](#)) set out the key issues/questions and broad options for accommodating the anticipated growth. A summary of the representations and the Council's responses to them can be found [here](#).

### Draft Local Plan (Nov 2016)

8. Consultation on the Draft Plan commenced on 5th December 2016 and finished on the 17th February 2017. The consultation was originally scheduled to run until 30th January 2017, but was extended in recognition that there had been updates to the evidence base studies that were published after the consultation commenced.
9. A copy of the Draft Local Plan can be found [here](#), and the evidence base to support the Local Plan review can be found [here](#). A summary of the representations was published in July 2017 and this can be found [here](#).

### Next Steps

10. The next stage in the plan making process is for the Council to publish the submission version of the Plan – this is the version the Council intends to submit for independent

examination. The responses to both consultations at the draft Plan stage will help shape the next version of the Plan.

11. Prior to being submitted for examination, the Plan will be subject to consultation and the representations made at that stage will be the focus of the examination.

## 2. Publicity for the Consultation

### Letters, Emails and Publicity

12. Over 2,200 emails/letters were sent to all stakeholders on the Local Plan Consultation Database. This informed them of the consultation, detailed where to get further information (including dates of drop-in sessions) and explained how to respond.
13. Over 1,200 letters were sent to those with property/land located either within, or adjacent to, one of the proposed site allocations. This outlined the Local Plan Review process and explained how to respond.
14. Stakeholders were given the option of responding to the consultation through an online consultation response portal, electronically by email, or by post.
15. The DLPSC and associated documents were available for inspection at Council (Connect) offices and all libraries within the Borough.
16. Leaflets were prepared and distributed to libraries, Council (Connect) offices and Parish Councils. Councillors and Council Officers also made these leaflets available at all consultation events.

### Web-based communication and Social Media

17. A link to the DLPSC consultation was available on the homepage of the Council's website.
18. The DLPSC and all evidence base documents were available to view on the Planning pages of the Council's website, including a link to the online consultation response portal, details of where to get further information, and alternative ways to respond.
19. The DLPSC and the consultation were promoted through Solihull 'Stay Connected' – a free email alert service that provides Council updates to registered users.
20. The DLPSC and the consultation were promoted through the Council's Twitter and Facebook accounts.

### Press Coverage

21. Press releases were issued by the Council.
22. Articles providing information on the DLP consultation and potential site allocations were published in the press over the course of the consultation period.

## Engagement with Stakeholders

23. Council Officers participated in a wide range of publicity and engagement events during the consultation on the DLP. This provided an opportunity for residents and stakeholders to raise queries regarding the proposals set out in the DLP prior to making a formal response. This included weekday/weekend drop-in sessions/exhibitions in the following locations:
- Balsall Common library
  - Chelmsley Wood library
  - Dickens Heath library
  - Knowle library
  - Shirley town centre
  - Solihull town centre
24. All parish councils and neighbourhood forums were invited to briefings that took place at the Council offices.



### 3. Respondents & Representations

25. There have been a total of 1,092 respondents to the consultation. These raised 3,807 representations in total. Each individual or organisation making a response is known as a 'respondent' and makes a single 'submission'. Each submission is reviewed to see how many of the consultation questions have been addressed and each one that has been is recognised as an individual 'representation'. So a single respondent can make multiple representations depending on the number of questions addressed.
26. Of the representations made, 415 were in support of the policy/allocation, 2,233 raised objections and 1,159 made comment. However, a degree of caution is required and reliance on the numbers alone should be avoided. This is due to the fact that some respondents caveated their response with object/support 'subject to' certain conditions/comments. It is therefore recommended that all of the summery representations to a particular question are read in order to get a rounded appreciation of the views of respondents.
27. Question 44 of the consultation provided an opportunity for any other comments to be submitted. Where this relates to individual settlements (rather than specific sites included in the consultation), the responses to this question are provided at the end of the relevant settlement chapter.

#### Summary Table – All Questions

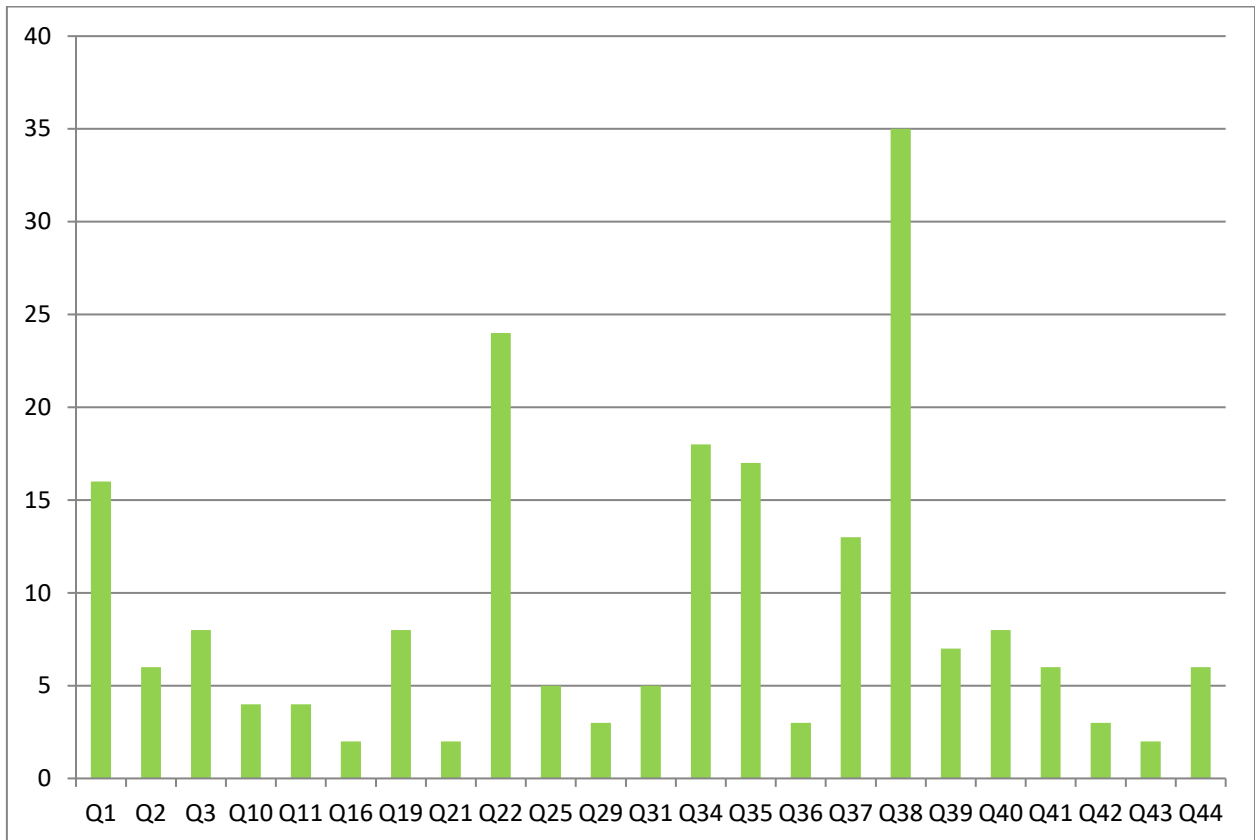
<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q1 – Local Housing Need (LHN)	16	38	63
Q2 – Site selection methodology	6	110	47
Q3 – Infrastructure requirements at Balsall Common	8	125	58
Q4 – Site 1 Barratt's Farm, Balsall Common	13	57	24
Q5 – Site 2 Frog Lane, Balsall Common	10	27	11
Q6 – Site 3 Windmill Lane, Balsall Common	5	132	17
Q7 – Site 21 Pheasant Oak farm , Balsall Common	8	33	27
Q8 – Site 22 Trevallion Stud, Balsall Common	25	17	23
Q9 – Site 23 Lavender Hall Farm, Balsall Common	26	15	26
Q10 – Green Belt changes in Balsall Common	4	93	15
Q11 – Infrastructure requirements in Blythe	4	112	51
Q12 – Site 4 land west of Dickens Heath	8	117	24
Q13 – Site 11 The Green, Shirley	6	20	21
Q14 – Site 12 land south of Dog Kennel Lane, Shirley	2	56	22

<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q15 – Site 26 Whitlock’s End Farm, Shirley	7	98	24
Q16 – Infrastructure requirements in Hampton in Arden	2	10	11
Q17 – Site 6 Meriden Road, Hampton in Arden	2	9	11
Q18 – Site 24 Oak Farm, Catherine-de-Barnes	5	5	11
Q19 – Infrastructure requirements in Hockley Heath	8	53	19
Q20 – Site 25 School Road, Hockley Heath	5	69	12
Q21 – Green Belt changes in Hockley Heath	2	56	15
Q22 – Infrastructure requirements in Knowle, Dorridge & Bentley Heath	24	46	42
Q23 – Site 8 Hampton Road, Knowle	11	43	22
Q24 – Site 9 land south of Knowle	42	59	36
Q25 – Infrastructure requirements in Solihull & the Mature Suburbs	5	97	36
Q26 – Site 16 land east of Solihull	7	25	12
Q27 – Site 17 Moat Lane/Vulcan Road, Solihull	7	10	6
Q28 – Site 18 Sharman’s Cross Road, Solihull	2	175	13
Q29 – Infrastructure requirements in Meriden	3	4	9
Q30 – Site 10 land west of Meriden	11	3	9
Q31 – Infrastructure requirements in North Solihull, Marston Green & Castle Bromwich	5	6	10
Q32 – Site 7 Kingshurst Village Centre	7	6	7
Q33 – Site 15 Jenson House, Auckland Drive	1	34	7
Q34 – Washed over Green Belt – settlements for potential review	18	37	16
Q35 – Washed over Green Belt – settlements to remain washed over	17	4	10
Q36 – Washed over Green Belt – other settlements for potential review	3	0	13

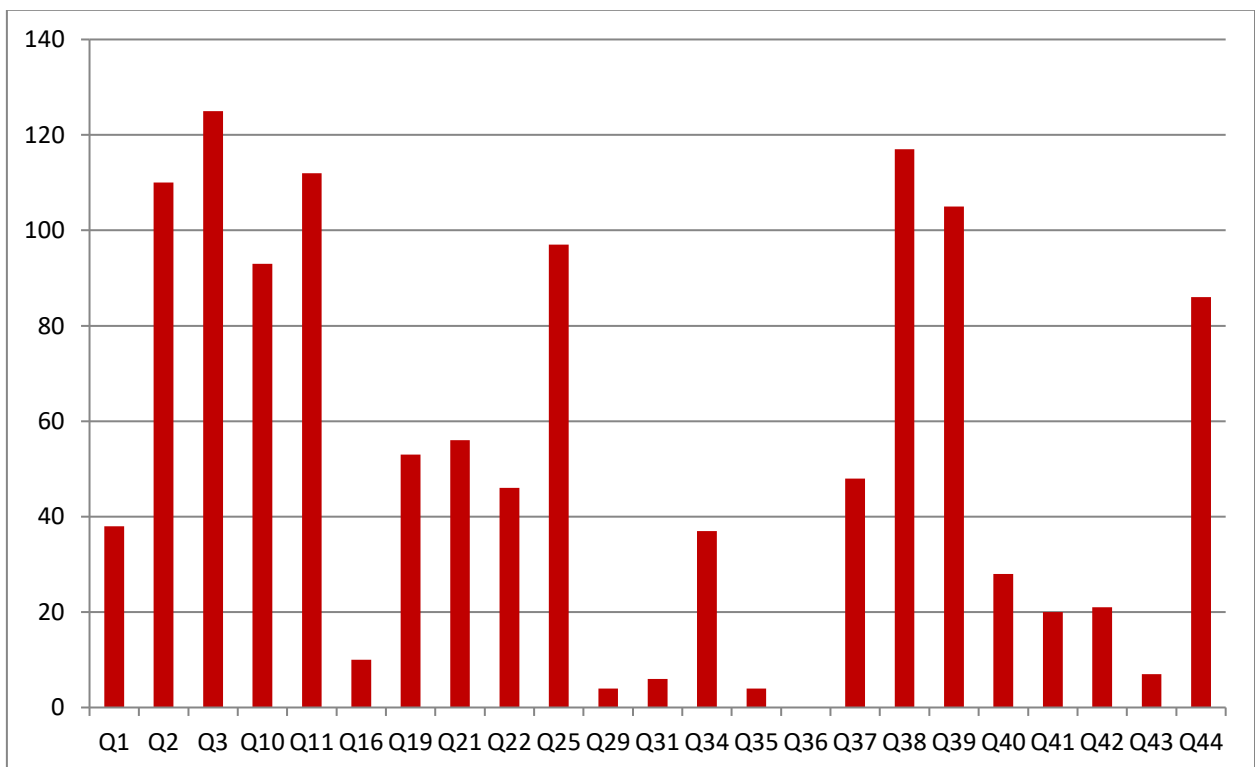
DLP Supplementary Consultation Summary of Representations & Responses

<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q37 – Compensatory provision for removal of land from the Green Belt	13	48	61
Q38 – Amber sites	35	117	54
Q39 – Red sites	7	105	76
Q40 – Affordable housing approach	8	28	25
Q41 – Affordable housing calculation	6	20	13
Q42 – Best way of measuring developable space	3	21	13
Q43 – Incentivising smaller houses	2	7	29
Q44 – Any other comments	6	86	108

28. The following chart indicates the level of **support** for each of the subject areas (i.e. not site allocations) set out in the questions. The questions are generally phrased, 'do you agree with the approach as set out in the Plan, if not why not?'



29. The following chart indicates the level of **objection** for each of the subject areas set out in the questions.



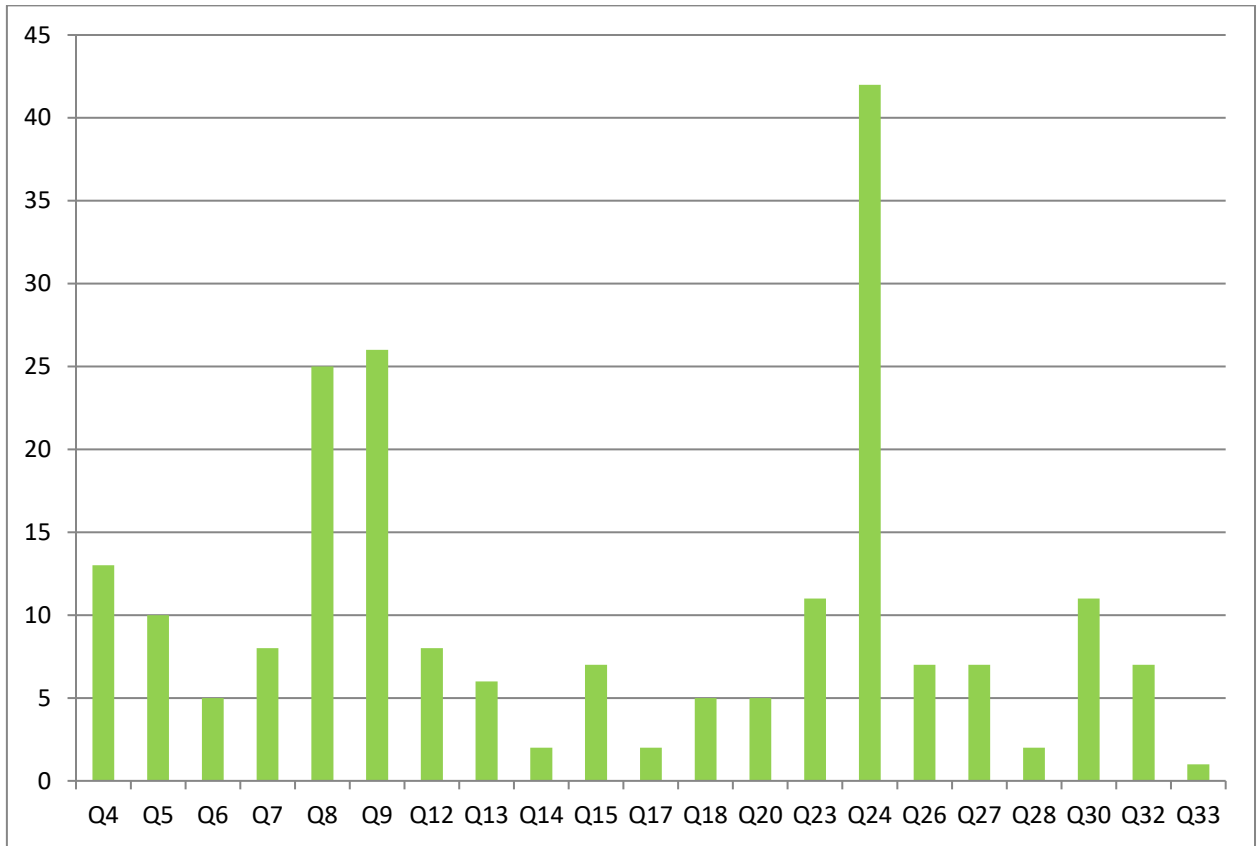
**Key to Question Numbers:**

<i>Question (non-site allocations)</i>
Q1 – Local Housing Need (LHN)
Q2 – Site selection methodology
Q3 – Infrastructure requirements at Balsall Common
Q10 – Green Belt changes in Balsall Common
Q11 – Infrastructure requirements in Blythe
Q16 – Infrastructure requirements in Hampton in Arden
Q19 – Infrastructure requirements in Hockley Heath
Q21 – Green Belt changes in Hockley Heath
Q22 – Infrastructure requirements in Knowle, Dorridge & Bentley Heath
Q25 – Infrastructure requirements in Solihull & the Mature Suburbs
Q29 – Infrastructure requirements in Meriden
Q31 – Infrastructure requirements in North Solihull, Marston Green & Castle Bromwich
Q34 – Washed over Green Belt – settlements for potential review
Q35 – Washed over Green Belt – settlements to remain washed over
Q36 – Washed over Green Belt – other settlements for potential review
Q37 – Compensatory provision for removal of land from the Green Belt
Q38 – Amber sites
Q39 – Red sites
Q40 – Affordable housing approach
Q41 – Affordable housing calculation
Q42 – Best way of measuring developable space
Q43 – Incentivising smaller houses
Q44 – Any other comments

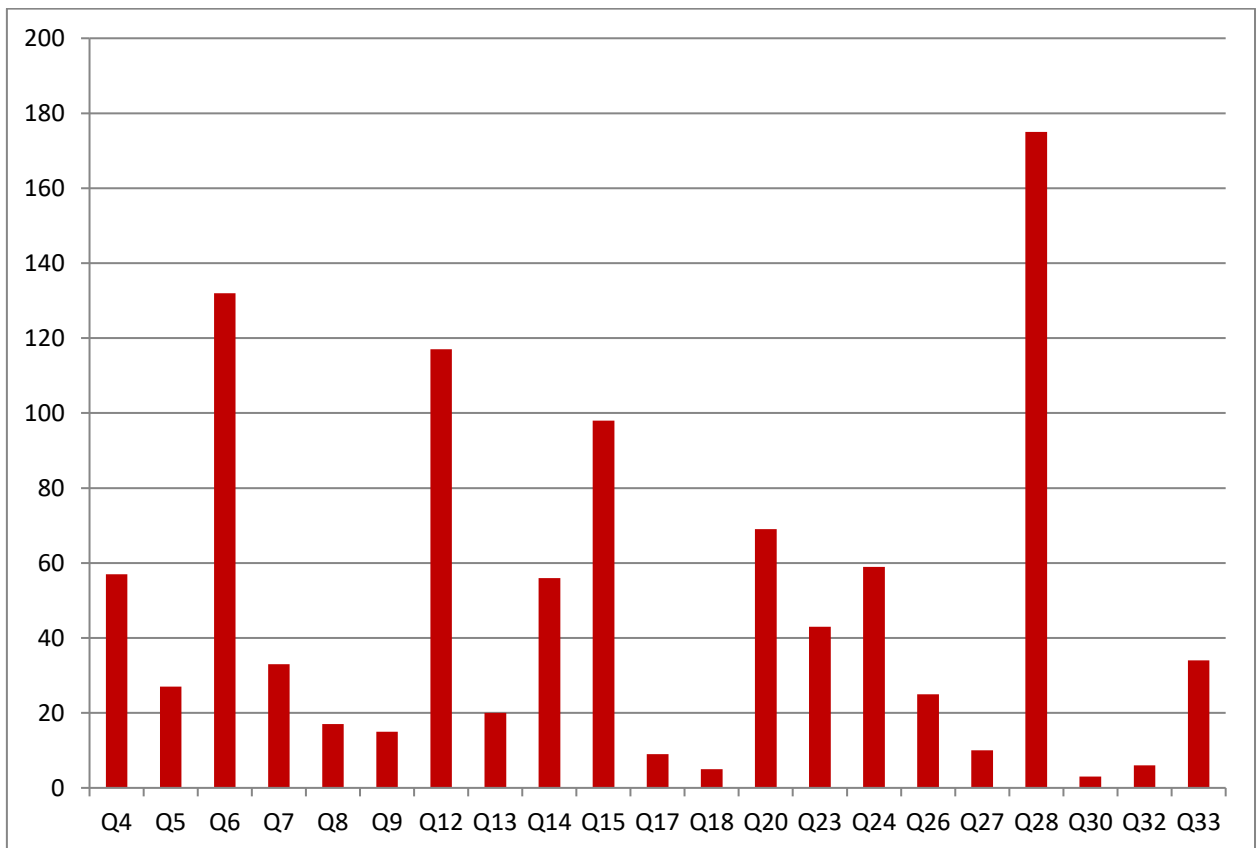
**Summary table – Allocated Sites**

<i>Question</i>	<i>Support</i>	<i>Object</i>	<i>Comment</i>
Q4 – Site 1 Barratt’s Farm, Balsall Common	13	57	24
Q5 – Site 2 Frog Lane, Balsall Common	10	27	11
Q6 – Site 3 Windmill Lane, Balsall Common	5	132	17
Q7 – Site 21 Pheasant Oak farm , Balsall Common	8	33	27
Q8 – Site 22 Trevallion Stud, Balsall Common	25	17	23
Q9 – Site 23 Lavender Hall Farm, Balsall Common	26	15	26
Q12 – Site 4 land west of Dickens Heath	8	117	24
Q13 – Site 11 The Green, Shirley	6	20	21
Q14 – Site 12 land south of Dog Kennel Lane, Shirley	2	56	22
Q15 – Site 26 Whitlock’s End Farm, Shirley	7	98	24
Q17 – Site 6 Meriden Road, Hampton in Arden	2	9	11
Q18 – Site 24 Oak Farm, Catherine-de-Barnes	5	5	11
Q20 – Site 25 School Road, Hockley Heath	5	69	12
Q23 – Site 8 Hampton Road, Knowle	11	43	22
Q24 – Site 9 land south of Knowle	42	59	36
Q26 – Site 16 land east of Solihull	7	25	12
Q27 – Site 17 Moat Lane/Vulcan Road, Solihull	7	10	6
Q28 – Site 18 Sharman’s Cross Road, Solihull	2	175	13
Q30 – Site 10 land west of Meriden	11	3	9
Q32 – Site 7 Kingshurst Village Centre	7	6	7
Q33 – Site 15 Jenson House, Auckland Drive	1	34	7

30. The following chart indicates the level of **support** for each of the allocated sites in the Plan:



31. The following chart indicates the level of **objection** for each of the allocated sites in the Plan:



### **Petitions and Similar Submissions**

32. A total of 3 petitions were submitted in relation to the draft Plan. The basis for the petition, and the number of signatures to it, is set out under the relevant chapters that follow.
33. The petitions were submitted in relation to the following sites:
  - Site 4 – Land west of Dickens Heath (1,150 signatures).
  - Site 12 – Land south of Dog Kennel Lane, Shirley (1,302 signatures).
  - Amber Site A4 – Golden End Farm, Kenilworth Road, Knowle (48 signatures).
34. In addition to the above, a number of respondents collected representations themselves and these formed part of their submissions. This included the following:
  - Site 9 – Submissions from Arden Academy (502 responses).
35. It should be noted that the tables/charts in this chapter do not include the number of signatures/expressions of support submitted via the above methods.



## 4. Housing Requirement & Current Land Supply

### Q1 – Local Housing Need

*Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so what are the exceptional circumstances and what should the alternative approach be?*

#### Representations received:

Number objecting: 38

Number supporting: 16

Number commenting: 63

#### Key Issues raised by Representations:

#### View from developers that:

- Wide agreement that the Standard Methodology (SM) for assessing Local Housing Need (LHN) is the correct approach, but also that the national Planning Practice Guidance states that the SM is a starting point and minimum figure.
- Significant concern that the Council is making too low a contribution to the housing shortfall arising in the wider Housing Market Area (HMA), and that a more comprehensive review of SMBC's contribution should be carried out.
- Council needs to reach agreement with adjoining councils in terms of its contribution to the HMA shortfall; unless the Council make additional provision in their Local Plan, it is likely that the Council will not be able to fulfil its duty to cooperate.
- Range of 4,000-6,500 proposed by developers as suitable contribution to the HMA shortfall.
- Given strong economic/demographic links between Birmingham and Solihull, should demonstrate consideration of higher figure.
- Converse view that standard methodology already takes into account need from neighbouring local authorities.
- 2016-based projections in the GL Hearn Study are more realistic.
- Should note that position may change after Government consultation on SM due before publication of 2018-based sub-national household projections.
- Barton Willmore have carried out independent housing needs assessment, which acknowledges the latest Planning Practice Guidance, which states that the local housing need figure derived from the standard methodology (SM) represents the minimum housing need and actual need may be higher. It is considered that the economic growth aspirations of the UKC Hub/HS2 Interchange area, supported by the GBSLEP, will result in 'super-growth', which exceeds the baseline job growth scenario. These additional jobs will need to be met by additional population drawn to the Borough, which in turn exceeds the population projections upon which the standard methodology is based. Consequently, to support the range of job growth identified in PBA's 2017 Employment Land Review report (baseline job growth of 800 per annum, and job growth to support the UK Hub of 1,080 jobs per annum), housing need for the Borough alone would need to be between 825 and 1,127dpa. N.B. Job growth at UKC Hub likely to be higher than 1,080 per annum.

- Barton Willmore's assessment further states that the most detailed and recent evidence in respect of unmet need in the Housing Market Area comes from the Greater Birmingham HMA Strategic Growth Study (SGS). In addition, the Black Country Urban Capacity Report (BCUCR) provides more recent analysis of capacity and need in that area. These reports suggest unmet need across the HMA sub-region ranges from a minimum of 28,000 dwellings up to 2031 (based on demographic need), and up to 80,000 dwellings (based economic need and unmet need from the Black Country identified by the BCUCR) up to 2036.
- Pegasus' assessment states there are clear exceptional circumstances to justify significantly higher housing figure taking account of the significant economic growth at UKC/Arden Cross and employment-led growth recommended in SGS. Response to DLP indicated Solihull needs of 20,000-24,000 dwellings over Plan period, without uplift for UKC/SGS.
- Justification for an alternative approach to the SM as the global promotion of UK Central Hub will generate migration demand likely to be different to the historical demand. Therefore, the demographical migration trends arising from the UK Central Hub initiative are wholly different to the norm represented by the 2014-based housing projections. Analysis of a parallel project centred on Ebbsfleet on the HS1 route indicates extraneous migration is likely to be much higher than historical migration.
- SM does not take into account growth around HS2 and its impact on local housing market and demand for new homes for commuters.
- Failure to plan for UKC Hub proposals (up to 100,000 jobs) could lead to affordability pressures, unsustainable commuting patterns and reduce the economic benefits which might be secured from HS2.
- Failure to respond to SGS means Plan not underpinned by relevant and up-to-date evidence.
- The housing target for the Borough that is ultimately proposed at Pre-Submission stage must include an evidenced, justified contribution to the unmet needs arising within the HMA.
- Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere should be provided in addition to local housing needs figure.
- Concern about lack of clarity over mechanism to agree unmet need and how Plan should provide for need.
- Unclear how LPR responds to WMCA Mayoral commitment to 215,000 homes by 2031.
- Delay in preparation of other Plans would significantly affect the HMA and risk stifling economic growth.
- DLP defers further consideration of the HMA shortfall figure (2,000) to Regulation 19 stage, which is not consistent with NPPF, as such matters should be 'dealt with rather than deferred'.
- Consideration of HMA shortfall at Regulation 19 stage inappropriate/unlawful as may require revised strategy or propose additional Green Belt releases, which ought to require further Regulation 18 consultation. Otherwise, this would be a completely new strategy resulting in a Plan that has not been previously consulted upon.

- Lack of Statement of Common Ground is contrary to NPPF.
- The Council must also assess its needs over a longer term period (stretching well beyond the normal plan period).
- Widely held view that more sites need to be included in the Plan to deliver higher housing figures.

**View from local communities that:**

- Significant concern that housing requirement is too high and unlikely to be delivered at the rates per annum that have been proposed.
- Agreement that new housing is required, but at a lower figure, and distributed more evenly across the Borough.
- Solihull has limited capacity for expansion, environmental and sustainability impacts should be taken into account more.
- Birmingham should do more to meet its own housing need. E.g. clean up brownfield sites for redevelopment.
- Council should press the Government on the use of latest projections to reduce unnecessary loss of highly performing Green Belt.
- There are exceptional circumstances to justify deviating from the SM due to the impact on the Green Belt in the Borough.
- 885 dwellings per annum is double the building rate achieved over the last 10 years and is unrealistic; unlikely that the building industry can meet the demand. Furthermore, if the contribution to the HMA shortfall were to increase, the rate of 885dpa would increase and be above the Government cap in the standard methodology.
- As a number of the sites are considered unsuitable by local communities, then the housing figures are undeliverable.
- 2016-based sub-national household projections of 550dpa, and in GL Hearn study, are more realistic and deliverable.
- Impact of HS2 construction has not been considered on deliverability/phasing of Balsall Common sites.
- Some support for using the standard methodology.
- It is now recognised that the projected housing requirement nationally is incorrect and less than originally envisaged; see the National Office of Statistics reduction of national number from 300,000 to 248,000. Birmingham for its part has reduced the actual number on their housing list significantly and the Council is not recognising this.
- The population is of above average age, therefore the standard method artificially inflates the rate of household formation. In addition, the high proportion of retired people with substantial resources creates distortion in the affordability ratio. A more accurate assessment of local need could be based on actual demographics based on records of births, marriages, and deaths.
- Deliver more affordable housing numbers in exchange for flexibility in overall requirement.

- Demographic composition of Borough residents means significant requirement for retirement/extra-care exempt from affordable housing provisions, which limits downsizing, which is confined to least affordable properties. Need to address affordability and ageing population issues together in order to avoid spate of house building that does not address need, whilst protecting more of the Green Belt.
- Any later changes in the 2020 projections will have an impact on future building rates but if it is less, then this raises the question of whether there is a need to demonstrate such land availability now.
- Plan should be more holistic, looking at needs and land stock across the region, not apportioned mathematically by local authority. Warwickshire has huge reserves of land without compromising Green Belt and labour shortages, but transport infrastructure prohibits integration with urban centres. Additional accommodation could be provided if suitable transport integration was prioritised. This should be addressed by the WMCA.
- It is very dangerous to release too much land as stated by Government Advisor Professor Wenban-Smith in his report of 27th Jan 2016 – 'Critique of West Midlands Housing Needs Assessment', paras. 24/25. Over provision can never be corrected; under provision can be corrected later, when needs are better defined.
- Failure to use the latest housing forecast data reveals a state of mind commensurate with fear of being run over by developers again in the courts and the demands of neighbouring councils in the HMA.
- Building thousands of more homes will not alleviate the affordability issues in the Borough.
- Objection raised to SM and use of affordability ratio as it is based on earnings derived from outside of Solihull and LHN is based on house prices.
- The standard methodology has landed us with a housing crisis. Too many expensive houses which are unaffordable (e.g. £200,000 houses in new development at Arran Way, Smith's Wood), plus a proliferation of social housing in certain wards. Social and co-operative housing needs to be the priority - people and communities must prevail over private profit.
- Housing need figure would be open to interpretation by Planning Officers, which could be problematic.

**Views from other stakeholders:**

- CPRE Warwickshire state that SM is not suitable, as it is based on assumption that there is no constraint to meeting full requirement. NPPF is clear that Green Belt is a reason to restrict development in the Plan area (FN5 to para. 11). Most of undeveloped land in Solihull is Green Belt. Meriden Gap performs an important function in separating cities of Birmingham and Coventry, and has been protected in successive Local Plans and regional strategies. Furthermore, there is a lot of commuting in and out of the Borough which makes it difficult to assess local housing need. Alternative method would be a capacity-led local plan strategy.

**View from HMA local authorities:**

**Birmingham City Council**

- BCC has concerns that this Consultation does not specifically address any potential revision to the contribution that Solihull is making towards the HMA shortfall. A large amount of evidence has come forward since the last consultation and therefore scenarios which test the validity of the existing spatial strategy and the possibility of significantly higher housing provision and growth have yet to be fully considered and assessed. Assurance is required that this course of action has been fully considered and implemented prior to Submission Draft Plan stage.

#### **Black Country authorities**

- Disappointed that the consultation document does not appear to have considered the full implications of the GL Hearn Study and taken the opportunity to test the findings with regards to the growth scenarios within the study.
- Would like to seek clarity as to whether the new 'call for sites' sites, which has been published as part of the consultation, will be an additional allocation to the 2,000 dwellings.
- Solihull has a strong functional relationship with the Great Birmingham/Black Country HMA. Current work/evidence shows the Black Country cannot accommodate all of its needs within its urban area, leading to a shortfall in the region of 22,000 dwellings and 300ha of employment land. We would expect Solihull to undertake work to establish whether you can increase the contribution.
- Seek assurances that the full implications of the call for sites and the GL Hearn Study have been fully tested and justified. If this exercise results in increases in the housing numbers which can be accommodated within Solihull and/or a change in the overall Strategy, then there may be a need to include a further consultation stage prior to Publication.

#### **Bromsgrove**

- Concerns remain over justification for commitment to test potential for 2,000 dwellings towards wider HMA needs. This level does not adequately respond to HMA shortfall, given Solihull's relationship with Birmingham. Figure not agreed by HMA authorities and is not a firm basis for development strategy and site allocations.
- This is a fundamental issue that will need to be addressed in Statement of Common Ground. Addressing this at Submission stage is too late in process, as this will have significant implications for the development strategy, and knock on effects for neighbouring areas. Urge progression of Statement of Common Ground.

#### **Redditch**

- Concerns remain over justification for commitment to test potential for 2,000 dwellings towards wider HMA needs. This level does not adequately respond to HMA shortfall, given Solihull's relationship with Birmingham. Figure not agreed by HMA authorities and is not a firm basis for development strategy and site allocations.
- This is a fundamental issue that will need to be addressed in Statement of Common Ground. Addressing this at Submission stage is too late in process as this will have significant implications for the development strategy, and knock on effects for neighbouring areas. Urge progression of Statement of Common Ground.

#### **Lichfield**

- Welcome recognition of the potential need to revise the housing requirement figure in the Regulation 19 publication version, however, the concern regarding failure to meet the commitments associated with cross-boundary cooperation remains, as it is indicated that Solihull will only be updating their position in the version that is published. Without cooperation with authorities in the Housing Market Area, it remains the case that any finalised figure has not had appropriate assessment.
- Need more justification for contribution to HMA shortfall to ascertain whether land supply buffer of 726 is sufficient.

**Stratford-upon-Avon:**

- Stratford-upon-Avon District Council is supportive of Solihull's conclusion that the standard methodology should be used. Should SMBC wish to use an alternative methodology, careful consideration would need to be given to the potential wider and possible consequential implications on other authorities within the Greater Birmingham Housing Market Area.

**Comments on housing supply figures:**

- Need for sufficient supply and mix to meet the requirement and provide a realistic trajectory, to provide greater flexibility than 5% given the reliance on larger allocations, and to include more smaller allocations.
- Lack of compelling evidence for level of windfalls proposed.
- Agreement that housing need cannot be met on brownfield land alone, and that exceptional circumstances exist, in accordance with paras. 136-137 of the NPPF, to alter the Green Belt boundaries in order to allow for further housing growth.
- Council should allocate more smaller/medium-sized sites, rather than rely on a handful of larger sites, which are unlikely to deliver the housing numbers due to ownership and infrastructure issues.
- If the housing requirement increases, then more housing land may need to be released from the Green Belt.
- It is an accepted position that Solihull MBC has failed to meet the (now quashed) housing target set out in the current Solihull Local Plan. To address this, supply should be front-loaded.
- The overall land availability should be provided over a much longer term than this Local Plan suggests.
- The housing target for the Borough that is ultimately proposed at Pre-Submission stage must include safeguarded land, so that Green Belt boundaries can endure beyond the Plan period in accordance with the NPPF.
- SHMA concludes significant need for specialist housing and care home spaces, but neither DLP nor Supplementary Consultation address need.
- Housing Delivery Test is misleading given the lack of objectively assessed need in SLP 2013 and DLP requirement. Requires 20% buffer and/or Action Plan.
- SMBC needs to be confident that there is sufficient supply of sites to meet both the Borough's housing need and the wider HMA shortfall contribution.

- Density assumptions in SGS of 36dph is too high for rural areas, should be 15-20dph.
- Evidence for assumptions on housing supply, urban capacity including densities and windfall provision will need to keep up-to-date.
- Should provide more information on 1ha sites in accordance with NPPF.
- As some sites may not be delivered due to complexity/deliverability issues, more sites need to be put forward.

**Comments on text in document:**

- The document does not make a single reference to custom or self-build, or those wishing to build their own homes.

**Council Response (Draft Submission Version)**

- Since the publication of the 2019 Supplementary consultation, the standard methodology to assess Local Housing Need has been formally introduced in the revised NPPF and PPG.
- The Council agree that the standard methodology is the right approach and that the LHN is the minimum housing requirement figure.
- In response to the issues raised in the 2019 Supplementary consultation, the Council commissioned an update to the 2016 SHMA as a 'Housing Economic and Development Needs Assessment' (HEDNA) to ensure that the housing and employment growth were both taken into account in assessing the housing requirement.
- The 2020 HEDNA has assessed whether the affordability and employment factors (including growth in the UKC Hub Area) would result in any further uplift, over and above the LHN, to the Borough's housing requirement.
- Solihull MBC have been an active member of the GBSLEP HMA Technical Officers Group since it was created and have contributed to all discussions relating to the delivery of unmet housing need with the GBBCHMA. The HMA has continued to engage in the Duty to Cooperate and seek levels of contribution from participating authorities.
- The latest HMA-wide position statement (September 2020) was included as part of the evidence base for the 2020 Draft Submission Plan. The Position Statement states there is a shortfall of ca. 2,600 dwellings up to 2031. The Position Statement also takes into account evidence within from Strategic Growth Study.
- Birmingham City Council have increased their housing provision over and above their 2017 Local Plan requirement, which has contributed significantly to the reduction in the wider HMA shortfall as of September 2020.
- The Council seeks to meet their full objectively assessed needs, and as such, will not add further pressure to the wider HMA shortfall. In addition, the circa 2,000 dwellings will make a sizeable contribution to the wider HMA shortfall, without compromising the Borough's local infrastructure or environmental capacity.
- The Council is seeking to enter into Statements of Common Ground with HMA partners.
- The Council has conducted a lengthy Call for Sites exercise, invited Brownfield Call for Sites and maintained a Brownfield Land Register as well as assessed capacity on Town Centre sites. Significant development is being proposed in the UKC Hub Area, as well as

distributed between urban edge, larger and smaller settlements, proportionate to their public transport accessibility, scale and facilities. Therefore, Green Belt release has been considered as a last option, and the Council is therefore justified in releasing Green Belt to meet objectively assessed needs, in accordance with the NPPF.

- Further detail on the background evidence to support the housing land supply figures, including the justification for the windfall allowance and evidence for smaller sites, are within the updated draft 2020 SHELAA document, which was published to support the 2020 Draft Submission Plan consultation.
- The Supplementary Consultation document was focused on the overall housing need and consulting on the updated site selection process and proposed residential allocations. Other than additional questions relating to how the affordable housing target should be measured, it did not include revised policies under P4 'Meeting Housing Needs'. The responses from the 2016 consultation and updates to national guidance were taken into account in the drafting of the policies for the 2020 Draft Submission Plan. This has included P4 policies on affordable housing, rural exceptions, market mix, custom and self-build, and accommodation for older people and specialist needs.
- The concept masterplans aim to illustrate the capacity of sites, taking into account constraints and opportunities, and to front-load discussions between different landowners, stakeholders and infrastructure providers



## 5. Site Selection Process

### Q2 – Site Selection Methodology

*Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?*

#### **Representations received: 163**

Number objecting: 110

Number supporting: 6

Number commenting: 47

#### **Key Issues raised by Representations:**

##### **General**

- Agree with the Council's methodology, which accords with the NPPF.
- The approach to site selection appears to be soundly based on a sustainable approach to allocating sites based on their previously developed/greenfield status, accessibility to services and impacts for the Green Belt, in line with the NPPF approach.
- Broadly agree with the methodology, but disagree with how it has been applied to certain sites.
- Basic elements of the methodology are acceptable and workable; other elements are flawed and over-complicated.
- Site assessment process is seriously flawed and fails to meet NPPF requirements.
- The site selection process must be set in the context of the overall housing need and the spatial strategy.
- Objections to further consultation being undertaken on sites that the Council have assessed and rejected.
- A wider view of potential development is essential, as many sites have been considered in isolation.
- Assessment scorings are based on the performance of individual sites against criteria, rather than packaging sites which are geographically clustered together. This precludes the effective exploration of the potential for strategic land releases.
- The site selection methodology prejudices effective planning for the whole by assessing only its parts.
- Smaller sites should be reassessed as they have less impact and are more deliverable.
- No advantage in creating yellow, blue and subsequently amber sites. This is unnecessary and adds to confusion and complexity. Delete this element of the methodology and either allocate the amber sites or reject them as proposed allocations.
- The 'amber sites' should not have been included in this supplementary consultation, as they have been assessed by the Council and rejected. It is unclear how the Council have determined that they are 'less harmful'.
- Consideration of amber sites includes little additional analysis.

- Not supportive of colour coding sites. Summary explanation is inconsistent with diagram, as some yellow sites become red rather than amber.
- Full utilisation of brownfield sites across the West Midlands Combined Authority has not been made.
- Not appropriate to introduce physical boundaries in otherwise open Green Belt locations. Methodology should set out preferred criteria for defining defensible Green Belt boundaries.
- Factors such as accessibility, hard constraints and sustainability are subjective and require quantifiable measures, categorisation and weighting where appropriate.
- Lack of transparency in the assessment process.
- No consideration given to any assessment for highways.
- Criticism that some sites have had the methodology applied incorrectly, or that some obvious areas have been excluded.
- Methodology results in a disproportionate amount of houses allocated to Shirley.
- Various requests for sites to be reassessed based on evidence submitted.
- Key weakness is the reference to the scoring of Green Belt purposes. The Site Hierarchy Criteria has artificially moderated these scores, increasing the scoring base to 5 for lower performing Green Belt sites, condensing moderately performing sites to just 6 or 7, and increasing the range for higher performing sites to 8 or more.
- Agree in principle with the two step site selection process which applies a sequential preference towards non-Green Belt sources of supply. However, considers that step 1 and step 2 assessments should be applied to all sites which do not score red. Whilst national planning policy sets out that Green Belt land is to be considered sequentially, this should not be at the cost of other sustainability factors, site suitability and deliverability.
- Over reliance on accessibility study without considering other sustainable modes of transport.
- Inconsistency in how Local Wildlife Sites and potential Local Wildlife Sites have been considered.
- The Council should consider reviewing their Sustainability Appraisal in line with the Government's sustainability scorecard.

### **Step 1 – Site Hierarchy**

- No issues with this stage of the process.
- Agree with the approach taken. It is right to first consider brownfield sites and then other accessible locations, as required by para. 138 of the NPPF.
- Agree that brownfield sites should be prioritised, but sites which are partly brownfield and partly greenfield should be prioritised over solely greenfield.
- Accessibility should be featured more strongly in Step 1.
- Step 1 should focus on accessibility as well as Green Belt. Accessibility should be weighted similar to Green Belt.
- Five purposes of Green Belt should not be considered ahead of accessibility.

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- Over reliance on a Green Belt Assessment which has flaws.
  - UK Central should be considered as a higher priority.
  - Hierarchy criteria does not fully align with NPPF recommendations.

### **Step 2 – Refinement Criteria**

- It is appropriate to seek land for housing in low performing Green Belt, due to evidence in SHELAA on lack of supply on non-Green Belt sites.
- Second stage of the process is highly complex and numerous elements of the assessment process allow for a higher incidence of error.
- The assessment process is overly subjective with no guidance or explanation on how factors for and against are weighted/ranked. Without such an explanation, it is not clear how the individual, or relative, merits of sites are assessed.
- Assessment framework does not allow for constraints to be weighed differently and does not allow for mitigation of soft constraints.
- Some assessment comments do not correspond with evidence base, or the evidence base is too high level as a basis for individual site assessments.
- Planning judgement has not been applied consistently, on a like-for-like basis across sites within a single settlement, or that are comparable in character and/or size.
- Application of methodology is subjective and inconsistent, e.g. some sites with similar characteristics have been assessed differently.
- Flawed judgements or lack of sound reasons why some sites allocated/rejected/de-allocated.
- Significant inconsistencies in the application of the methodology, which undermine the integrity of the whole site selection process.
- The categorisation is based on entirely subjective assessments. The differences between them cannot be judged objectively. Indeed, priorities 2 and 6b have identical names.
- Objections to the way in which certain sites have been assessed using the methodology and refinement criteria.
- Methodology does not allow for the cumulative harm of sites to be considered.
- Sites are considered in isolation with no consideration given to the surrounding area.
- Site specific benefits have not been considered.
- Should include the capacity of centres to meet demand.
- Consideration must be given to the impact of new development on the physical, economic and social infrastructure of settlements, and on their character and distinctiveness.
- All reasonable alternatives have not been examined, including options put forward by the strategic growth study.
- Flawed, as there are greenfield sites in preference to brownfield sites.
- Difficult to see how some sites fall into the 'Green category when they clearly have high impact.

- Failure to give significance to the actual efficiency/capacity/ reliability of public transport.
- Failure to consider the best location for affordable housing the Borough.
- Failure to consider agricultural land quality.
- Failure to consider availability of school places.
- Failure to take into account the relative public amenity benefit of sites, in terms of their public accessibility and contribution to wellbeing.
- The methodology places great weight on the Green Belt Assessment, which is not reliable or refined enough.
- Heavy reliance of the Sustainability Appraisal. The use of the Sustainability Appraisal in assessing sites has not provided a firm framework for the individual evaluation of potential sites.
- The SA excludes some smaller sites and there are missed opportunities for some red and amber sites to come forward in lesser performing Green Belt locations.
- Criteria b.) i.) and ii.) of the sequential approach in DLP 2016 should be merged to reflect para. 138 of the NPPF, as no distinction between previously developed land well-served by public transport.
- The reference to land lost to committed development should be deleted, as this is not consistent with NPPF.
- Ignores NPPF requirement for a proportion of housing to be met on sites of less than 1ha.
- Step 2 refinement is contrary to NPPF. Not appropriate to introduce physical boundaries in otherwise open Green Belt areas. Methodology should set out preferred criteria for defining clear defensible boundaries.
- Approach should not be driven by 'cherry picking' most desirable sites to achieve numbers, but from a strategic settlement expansion plan.
- Step 2 should include sites well served by public transport as a 'factor in favour'.
- Need to consider capacity of existing physical, economic and social infrastructure.
- A better approach would be to develop a strategic plan taking into account the locations best suited for new residents/infrastructure.
- Stratford-upon-Avon utilises a better assessment methodology that is consistent with the National Planning Practice Guidance.

#### Council Response (Draft Submission Version)

- The Local Plan must allocate sufficient land in appropriate locations to ensure that there is an adequate supply to address objectively assessed needs over the Plan period. The NPPF recognises the importance of making effective use of land and states that 'strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land'. Para. 138 of the NPPF goes on to state that where it has been concluded that it is necessary to release Green Belt land for development, plans should

give first consideration to land which has been previously developed and/or is well served by public transport.

- The Site Assessments Document considers each of the Call for Sites in relation to a range of supporting evidence and constraints, and takes into account site characteristics. The consideration of reasonable alternatives is one of the key tests of soundness and the site selection process. Assessing how sites perform against each other is therefore relevant to satisfying this test.
- The spatial strategy seeks to focus developments in locations that are, or can be made, accessible and sustainable. These locations will typically be on the edge of the urban area, or within rural settlements that have a greater range of services.
- This approach does not seek to 'allocate' a particular number to be accommodated by each settlement in a top-down manner, but rather to test the appropriateness of sites, both in themselves and in relation to the existing settlement and urban edge, and whether they could make a sustainable contribution towards the Borough-wide supply.
- The Council have commissioned Sustainability Appraisal updates throughout the development of the Local Plan. The SA appraises clusters of sites and broad locations, as well as individual sites.

## 6. Balsall Common

### Q3 – Infrastructure Requirements for Balsall Common

*Do you agree with the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 125

Number supporting: 8

Number commenting: 58

#### Key Issues raised by Representations:

##### General

- Welcome identified infrastructure needs, but additional issues need to be addressed.
- No objection in principle with additional development providing benefits, supporting businesses and viability of centre.
- Too vague and does not give confidence that will be adopted, or in what form.
- Barely adequate to cope with existing population given the level of neglect and unrealistic to think this can be transformed.
- Query whether requirements adjusted for housing increase.
- Consider/recognise infrastructure needs identified in emerging NDP.
- Scale of growth is disproportionate in single rural settlement and no justification for extent of Green Belt development.
- Limit to the number of buildings that an area can take without there being fundamental damage to the environment and quality of life for existing residents.
- Should avoid expanding areas with poor transport infrastructure and lack of local employment without improvements to connectivity to integrate with rest of Borough/employment areas.
- Green Belt proposals will put considerable pressures on further growth, with insufficient consideration how this will be managed/provided for.
- Ability of market to deliver multiple sites in one location requires review.
- Assumption that settlement is prime target for growth needs challenging.
- Lack of capacity study of settlement assessing functions and issues.
- Lack of infrastructure/phasing plan to show how this scale of growth will be managed across the settlement, alongside the construction of HS2, to ensure provision of schools, shops and bypass.
- Improvements need to be in place before development, not afterwards.
- Ambitious infrastructure requirements will require additional housing allocations.
- No explanation how infrastructure improvements will be funded.
- Settlement has good access to growth hubs despite low level of employment.

- Concept of a totally new village/settlement with dedicated services seems much more sensible.
- Well over 20% of SHELAA assessments are wrong (incorrect or inaccurate), which has profound implications for the soundness of the Plan.

### Highways

- Welcome opportunity to work with Solihull MBC to understand the implications of proposals for traffic in the A452 and A4177 corridors generally, but specifically within Kenilworth town centre and on the section of the A452 between Kenilworth and the County boundary. Need continued dialogue on longer term strategic road and rail initiatives.
- Highway infrastructure doesn't cope with existing traffic, with accidents happening in village on a daily basis.
- No assessment of highway infrastructure has been undertaken to show how it will cope until a bypass is provided.
- No rigorous assessment undertaken to demonstrate need for bypass, or for route, which was removed from previous plans and appears pre-determined.
- Case for bypass not proven, as through capacity constrained at peak times but low traffic levels otherwise, no increase in through traffic since bypass line removed.
- Bypass will attract more traffic, be unattractive to through traffic due to junctions, draw trade from centre, and cause hardship and inconvenience to residents.
- Bypass not viable, design inadequate for through traffic, Hall Meadow Road inappropriate, should consider options to west of settlement.
- Bypass essential to meet JLR/UKC needs and must take account of wider A46/A45 link, so western route with wide sweep to discourage development more appropriate.
- Bypass would sever 15 or so rights of way in the Borough and no adequate proposals to address. Infrastructure needs to take account of walking routes and existing footpaths.
- Bypass would impact on environmental mitigations already hard won from HS2 Ltd and the Kenilworth Greenway.
- Bypass needed to relieve congestion on A452, but no proposals for Kenilworth Road through settlement.
- Ignores advantages of western bypass with sites available at Grange Farm and elsewhere.
- Oppose principle of bypass, as solution needs to provide genuine alternatives to car travel.
- Need evidence of funding and timing for bypass.
- No evidence of impact of bypass on landscape character or heritage assets, or how route compares with alternatives.
- Kenilworth Road wide and busy only in peak hours, so focus should be on discouraging car use and encouraging alternatives, rather than accommodating traffic on bypass.
- Routes through Knowle and Hampton are key corridors and will struggle with growth regardless of whether a bypass is constructed or not.

- Improvements to Hob Lane are essential before new housing built.
- Need for interconnected cycle ways linking Balsall Common to surrounding settlements/workplaces, plus local cycle infrastructure.

### **Public Transport**

- Settlement does not meet criteria for high frequency public transport, so accessibility assessment incorrect.
- Public transport inadequate with infrequent services.
- Increased rail capacity and frequency, and enhanced bus timetables with express services for commuting required.
- No evidence to suggest train services can be improved without very substantial expenditure.
- Inadequate reference to parking issues around station, significant additional parking and other improvements such as cycle parking required.
- Station parking issues result from NEC visitors and Tile Hill station overflow, which will not be addressed by Plan proposals.
- Station improvements required.
- Does not adequately reflect impact of construction and disruption from HS2 until completion, alongside bypass and A46 proposals.
- Plan does not accurately reflect area of HS2 Safeguarded Land.

### **Education**

- Primary school is full, with no further capacity until new school is provided.
- Primary school is 4 form entry, not 3 form.
- New 2 form entry primary not supported, as better solution financially and educationally would be relocating existing to form 5 form entry school.
- Proposals will require two new primary schools and further places for secondary provision.
- No land for expansion of secondary school and undesirable to reduce catchment.
- Re-site secondary and combine land of existing schools for new primary.

### **Health**

- Issue of primary care/GP not included in infrastructure requirements. Balsall Common doctors and dentists practise already over-stretched and require expansion.
- New doctors surgery will be required.

### **Village Centre**

- Welcome proposal for the Council to lead and involve Parish Councils/Residents Association/Society. Requires significant investment in retail, community space, and parking/improved maintenance of public realm.
- Lack of clear vision for enhancements.
- Centre is struggling and requires major investment in retail, civic and community space.
- Need for large food-based store, shops and parking.



- Limited opportunities to expand and will be overwhelmed by scale of growth, unless more flexible approach is enabled.
- Need for older persons housing/retirement village close to centre.
- Must find additional parking as given distance to centre, a greater proportion of new residents will use cars. Consider Partco site for multi-storey parking.

#### **Green Infrastructure**

- No ecological assessments have been published.
- Strategic approach to green infrastructure provision required, reflecting multi-functional benefits.
- Green infrastructure, recreational areas, walking and cycling routes are inadequate for level of growth.
- Vital to retain rural feel/natural habitats of Balsall Common.
- Need for Local Green Spaces and improvements to rights of way.

#### **Young People/Recreation**

- Provision for youth inadequate, need for land for multi-purpose sports centre.
- Should include the requirement to provide new leisure facilities and to enhance existing.
- More sports facilities required, especially all-weather pitch. Could be provided in conjunction with existing facilities or on site earmarked for housing.

#### **Other issues**

- Inadequate drainage provision.
- High level sewer capacity assessment highlights some possible risks to sewerage and surface water network, which will require further consideration. Identifies high and medium impact areas in settlement.
- Need for power and water supply improvements.
- There is a buried high pressure fuel pipeline running through this area, and the easement (3m each side) needs to be kept protected.
- Need additional provision for employment land/work opportunities, which could be allocated alongside bypass/HS2 or outside settlement.
- Need for site for hotel, with Site 43 providing option.
- Include crime reduction measures and response times for emergency services.
- Lack of positive references to the need to provide Police infrastructure undermines the delivery of safe and secure development. Requires express reference to the need for financial contributions towards additional expenditure burden placed on WM Police as a consequence of the proposed growth.
- All CIL funding should be spent in settlement, and higher share warranted by level of growth.

#### **Council Response (Draft Submission Version)**

- Distribution of growth considered through spatial strategy and takes account of

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Strategic Growth Study.

- Settlement has rail links to Birmingham, Coventry and UK Central Hub Area with access to employment areas.
- SHELAA has been updated where relevant.
- Initial options assessment for bypass continued to be appraised following the 2019 consultation and were published as part of the evidence base for the draft Submission Plan.
- New primary school and enhancement to station parking to be provided as part of Site 1 proposals.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water (STW), and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites are at a more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy and Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.
  - Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- Master-planning work for Balsall Common village centre to be progressed.
- Ecological Assessments have since been published on the evidence base webpage.
- Playing Pitch requirements identified through Playing Pitch Strategy.
- Following comments made by Environment Agency (EA) in the 2016 and 2019 consultations, sites screened in the Level 1 Strategic Flood Risk Assessment were included in Level 2 SFRA, e.g. Site 1.
- Detailed requirements for developments to be set out in Settlement Chapter and Concept Masterplans.
- Reference to Neighbourhood Plan status for Berkswell and Balsall to be included in

## Q4 – Site 1 Barratt’s Farm

*Do you believe that Site 1 Barratt’s Farm should be included as allocated site, if not why not?  
Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 57

Number supporting: 13

Number commenting: 24

### Key Issues raised by Representations:

#### Principle of Site

- Allocation of Site would contravene purposes of Green Belt and role as part of Meriden Gap.
- Site selection criteria not applied correctly, as large part of site is higher performing within BA4 in GBA and should be priority 7 (not 5) in Step 1, unlikely allocation. There are other sites, such as Grange Farm that perform better as priority 5.
- Green Belt Assessment flawed and expansion further into Green Belt invalidates assessments.
- No defensible Green Belt boundaries.
- Likely that Site performs better in GBA than RP51 to north-west of settlement.
- Will reduce gap between Balsall Common and Burton Green/Coventry already compromised by National Grid Site and line of HS2.
- Not efficient use of land, as increase in site area and Green Belt loss is not reflected in additional capacity. Concern that pressure for greater number of houses will be irresistible once out of Green Belt.
- Fails to demonstrate that alternatives have been considered and there must be better options than large Green Belt incursion in the narrowest part of Meriden Gap, which will not be available until later in Plan period.
- Growth better focussed on town centre where can build more efficient homes.
- Too large and should be deleted in favour of alternative sites put forward by community.
- Focussing growth on one site appears best option compared with number of sites across settlement.
- Capacity too high compared with surroundings and given constraints including Green Belt and heritage assets and need for green space.
- Should include land to south, Site 101 and 102 to widen range of builders involved.
- Poorly accessible as remote from good quality bus services, and remote/poorly related to employment areas.
- Seems to be included to justify/fund bypass for which no evidence presented.

- Should be no development before assessment and management of speed, traffic and parking problems. Traffic calming measures on Meeting House Lane are ineffective and lack of pavements mean safety is at risk.
- Air and noise pollution likely to exceed standards, including increase in noise projections from HS2.
- Value for agriculture, countryside, environment, recreation and biodiversity, and as buffer to settlement underestimated.
- Will result in loss of footpath links and countryside access highly valued by community.
- Much of the site will be sterilised by a statutory duty to consider the preservation of the setting of several affected listed buildings.
- Fails to take account of visibility of heritage assets from south.
- Heritage Impact Assessment will provide evidence of suitability and appropriate design solution.
- Site performs poorly in sustainability appraisal and there are better options adjacent settlement.
- HS2 provides defensible boundary and potential for higher densities, but impacts should be mitigated by opportunities provided by development.
- Complex ownerships, so doubts about deliverability, especially with uncertainty over HS2.
- Object to development of Catholic Church land with access via Oxhays Close, which should be retained for recreation purposes.
- Exclude Site 30 due to ecological, landscape and historical importance.
- Infrastructure inadequate to meet additional population's needs.
- Whilst difficulty meeting housing need is recognised, site is too large.
- Plan should reference Berkswell NDP.
- Environment Agency recommends hydraulic modelling of watercourse as part of a Level 2 Strategic Flood Risk Assessment to inform developable area and capacity, as mapping of risk has not been undertaken to this ordinary watercourse with a catchment of less than 3 square km.
- Site should be phased after completion of HS2 and bypass.
- Suitable if design, green spaces and concept plans agreed.
- Support in principle, as most appropriate site for strategic growth in area, sustainable location, well related to settlement which needs growth to meet needs, but employment land required.

### **Concept Masterplan**

- Support medium density closer to existing homes, inclusion of public green space and identification of ecological areas.
- Blocks of different densities inappropriate, should be intermixed and graded.

- Area close to HS2, should be allocated to medium/high-density housing, as sound insulation and noise reduction steps will bring internal noise levels well within WHO Guidelines.
- High density development along bypass is out of character, will create urbanising affect and poor environment.
- Better to place higher density housing toward centre with low density next to Green Belt.
- Ignores/contrary to emerging Berkswell Parish NDP, as fails to locate green space between existing and new housing and proposes access from existing residential roads when not required.
- Building should be in-keeping with settlement's character and rural setting.
- Car parking for station essential.
- Unclear where access/egress roads to development will be.
- All access should be from bypass, as access from Meeting House Lane is unacceptable due to loss of character/highway safety.
- How can bypass with two accesses/egresses cater for this number of houses?
- Does not consider increased traffic, impact of village centre, or parking.
- Risk of isolation from rest of settlement can be addressed by combination of pedestrian and cycle paths to encourage green travel opportunities.
- Fuel pipeline recently constructed will be constraint on development.
- This land interacts with the buried high pressure pipeline in this location, and the easement (3m each side) needs to be protected.
- Area at risk of flooding in northern part of site needs to be addressed. Minimal sustainable drainage shown, but requires permeable surface treatments, SUDS and flood management plan.
- Flood plain should not be included, as green space is not accessible for much of year.
- Environment Agency recommends that an unobstructed green corridor should be maintained along the banks of the watercourse to maintain/protect the green/blue infrastructure.
- Results in significant loss of access to Green Belt and recreation field.
- Primary school can be increased in capacity by multi-storey building of 5 form entry on same footprint within Site 1, providing sound and visual barrier against HS2.
- School should include community recreation land.
- Provision of primary education using a Section 106 agreement is unlawful.
- Control of parking near school essential.
- Unclear why corridor adjacent HS2 excluded from masterplan, as para. 103 indicates Barratt's Farm is to be phased later in Plan period. Should be medium/high density, as building to BS standards will ensure noise levels within WHO guidelines.
- Public open space in least accessible location and insufficient for size of site/number of houses, or to compensate for loss of Green Belt.

- Lack of published ecological assessment.
- Object to identification of western part as area of significant ecological value, as not species rich or of high value, but support developer's masterplan showing land developable with access from Meeting House Lane.
- Prefer SMBC Concept Masterplan, as provides better protection for significant ecological features.
- Mature trees should be integrated into design.
- Requires affordable housing and adequate areas for recreation.
- Concept Masterplan should indicate extent of land subject to HS2 safeguarding. Welcome later phasing to avoid conflict with delivery of HS2.
- Site should include Dragonflies, Waste Lane as surrounded by new development and bypass, to enable more capacity and easier access to Waste Lane.
- Support recognition that housing is appropriate on Catholic Church land. Density should be considered in context and site is self-contained.
- Attach limited weight to developer's proposal, given Council's indications of its shortcomings.

#### Council Response (Draft Submission Version)

- Site name changed to BC1.
- Draft Submission Plan introduces specific site policies setting out principles for site's development, including enhancement to infrastructure, and supported by Concept Masterplans.
- Whilst part of site is within higher performing Green Belt, this area will be cut off from wider Green Belt by line of HS2 and contribution of Site likely to be reduced.
- Firm, defensible Green Belt boundary provided.
- Site area in Draft Submission Plan reduced slightly to 90ha to exclude Old Waste Lane.
- Numbers reduced slightly to 875 dwellings, from 900.
- Sustainability Appraisal has mixed outcomes, but concept masterplan addresses many concerns and site well-related to rail station.
- Concept masterplan takes full account of constraints.
- Main landowners are working together and concept masterplan shows coordinated approach.
- Church land and Site 30 excluded from development areas.
- Submission Plan references Berkswell NDP and concept masterplan takes account of NDP policies.
- Level 2 SFRA carried out since 2019, following comments from the EA, and better identified flood risks from different sources to take into consideration
- Further work to be progressed on Balsall Common bypass, whilst evidence indicates need within Plan period regardless of development of Site 1.
- Vehicular access to be from Relief Road, not Meeting House Lane.
- Air and noise pollution considered unlikely to exceed standards; air quality and noise

matters will be addressed at planning application stage in compliance with Policy P14.

- 2020 Supplementary Heritage Impact Assessment covers wider site area.
- Ecological Assessments have been updated and published on the evidence base webpage.
- Retained potential ribbon of development between proposed bypass and HS2 line for post-Plan period.
- Additional car parking for Berkswell station.
- Concept masterplan continues to include a 2 form entry primary school, which will be located close to existing village centre, and close to medical centre.
- Prioritisation of pedestrian and cycling links are set out in the concept masterplan, including links to the countryside.
- Much further work progressed on Balsall Common bypass.
- Significant green space to be provided and access enabled to Kenilworth Greenway.

## Q5 – Site 2 Frog Lane

*Do you believe that Site 2 Frog Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 27

Number supporting: 10

Number commenting: 11

### Key Issues raised by Representations:

#### Transport

- Will worsen highway congestion in Balsall Street near to the Holly Lane/Alder Lane hot spot and the use of the road as a single carriageway by buses due to parking.
- Pedestrian/vehicle/emergency access remains inadequate, with an unsuitable path to Balsall Street East. There is no cycle access and no indication how parking will be restricted at the access
- Frog Lane would need to be widened and a footpath created, with traffic calming in the area of blind double bends.
- Frog Lane is a narrow country lane and there is a blind corner to negotiate in order to access the junction onto Balsall Street East. There have been frequent collisions, including vehicles and livestock. Junction with Holly Lane is also a substantial bend. Both access points would not safely sustain the volume of traffic associated with the development.
- Would impact on the rural character of Frog Lane.
- Roads are too small to accommodate approximately 170 cars.
- Would increase traffic on an already congested road, threatening children's lives as there are many families with children living on the street.

#### Location of site

- Frog Lane is not a defensible boundary and development will lead to expansion further west.
- Would set a precedent for Green Belt development south of the village, potentially opening up land to Saracen Drive.
- Site is not accessible or sustainable and will encourage car based travel. It is furthest from the station and too far from amenities in the village centre. Is only near to the overcrowded primary school.
- Balsall Street East is home to many elderly people, whom wish to have a quiet life and many individuals cannot voice their opinions.
- A settlement first approach should retain Green Belt boundary to south west of Balsall Common. Balsall Street and Balsall Street East should be the defensible boundary of development in the western side of this village. SMBC does not have a strategic plan for the development of this settlement as a whole.
- Site is poorly related to employment facilities.



- There is opportunity for better development by maximising the use of the existing town – above and behind the shops and on the unnecessarily large carpark by the Co-op.

#### **Alternative uses**

- Site could be used for expanded sports facilities with changing/toilet facilities and off-road car parking using the existing wide verge on Holly Lane, or hotel/offices with housing relocated to Grange Farm.
- It is a prime site for rebuilding three purpose-built schools. A nursery and infant school and a junior/secondary campus. With proper traffic flow management and access to each, traffic congestion could be drastically reduced. Traffic roundabouts could be installed at the junctions with Balsall Street to manage the traffic properly. The existing sites could be sold and the combined sites would allow slightly more houses (over 140) than this site would allow. It would also allow for them to be built before HS2 is completed.

#### **Nature of development**

- Medium density housing is out of character with existing mature housing and the local character of the area.
- Does not provide bungalows to meet local need.
- This allocation has already been reduced in number; questions must be raised as to whether it will be able to deliver the amount set out. Area is far too small to accommodate 110 houses.
- Development is too large for the village.
- Building hundreds of individual houses sounds very inefficient, to tackle the housing deficiency, more flats should instead be built in the town centre.

#### **Environment**

- Site has considerable worth as greenfield wildlife haven and key local habitat.
- Will result in loss of trees/hedgerows/habitats.
- The Ecological Assessment (Jan 2017) identifies areas of woodland and meadow grassland that are of significant ecological value, along with species-rich hedgerow and veteran trees.
- Unlike Baratt's Farm, the Green Belt to the south is open countryside.
- There is a lack of protection for SI Grassland.
- Is of amenity value for the local community, is popular with walkers who would no longer be able to access open countryside from surrounding homes.
- Will blight the views for miles south of the village.
- Loss of privacy and security for existing residents, whom will be overlooked which is against human rights.
- Exceptional circumstances have not been demonstrated, as required by the NPPF, to justify intrusive development in the Green Belt.

- Promotes erosion of Green Belt and habitat, development on south-facing slope will be very prominent in the landscape, however Frog Lane does offer a natural and defensible boundary.
- The negative impacts on the community and Green Belt significantly outweigh the value it can deliver as a solution to housing shortage.
- Frog Lane performs a more important role in terms of Green Belt function than Grange Farm. Frog Lane should score 7 in terms of impact, whereas Grange Farm should score 5.

#### **Infrastructure**

- Junior school would be under pressure, but if the new school on Barratt's Farm has 3 form entry, there may be capacity released.

#### **General**

- Site selection methodology is not robust.
- Is better to have fewer larger development sites that can support infrastructure improvements rather than erode character.
- Is area sufficiently protected from noise and pollution from aircraft related to Birmingham Airport?

#### **Support**

- Agree with spatial approach to development in Balsall Common, but query whether there is evidence on the deliverability of some sites, such as Barratt's Farm.
- Sustainable location for growth. Ideal site for small community development close to bus routes, schools and within meaningful distance to the centre, with a good rural outlook.
- Frog Lane will make a good defensible boundary for any development.
- Development can occur without constraint by other developments, such as HS2 or proposed bypass.
- It is easy to travel in all directions from the Site by car and is a relatively easy walk down Station Road directly to the Station.
- Given the need for housing, the site appears suitable.
- Would be bounded infill.
- Plan maintains playing fields.
- Alternative access proposed to reduce length of highway crossing grassland area, and biodiversity benefits will provide compensatory improvements for loss of Green Belt. Second access not required, as scope to provide emergency access.
- Opportunity to provide a range of dwelling types/sizes at a density that respects the adjacent settlement pattern and the Site's location on the edge of Balsall Common.
- Due to the strongly defined boundaries, housing on the Site would not be visually intrusive within the wider landscape setting of Balsall Common when viewed from the surrounding countryside.

#### **Concept Masterplan**

- Green area at the north end of Frog lane indicated, however residents of Balsall Street East were promised a bund or green corridor behind their houses. This is preferable and would provide a walkway through to the playing fields.
- Historic Impact Assessment of proposed allocation has been commissioned by SMBC which will assist in considering the Site's suitability in principle and to ensure an appropriate design response in relation to the historic environment and the delivery of sustainable development.
- Merit of master-planning exercise is acknowledged in terms of how the local authority considers how potential future development might respond to the affected heritage assets.
- Medium density housing conflicts with local character.
- The proposed layout simply takes the available space and fills it with houses.
- Would be less intrusive if the adjacent playing fields, and possibly the allotments, were redistributed to create green spaces between the houses. This would create a far more attractive area, and there would be an opportunity to provide access onto Holly Lane.
- Single point of access problematic for emergencies. There would be disruption during construction works.
- Road intersecting grassland area is a concern that needs to be addressed.
- Concerned that although the Concept Masterplan only shows development on the western half of the site, the eastern half, including the playing fields and the allotments, have also been released from the Green Belt. This would mean that the area would have little protection against development applications in the future.
- Welcome retention of playing fields, this should be reflected in the policy or removed from proposed allocation.
- Supports SMBC concept masterplan which shows the access road to one edge of the meadow grassland, which would allow better management of the space as one unit. The Pegasus masterplan retains some grassland, but dissects the field with the access road.

#### Council Response (Draft Submission Version)

- Name changed to BC2.
- Draft Submission Plan introduces specific site policy, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Vehicular access from Balsall Street and rural character of Frog Lane to be protected.
- Site has medium accessibility with good access to primary school.
- Playing fields adjacent and site are considered unsuitable for education purposes.
- Concept masterplan takes full account of constraints.
- Site is correctly assessed as greenfield on the edge of a settlement with a range of services and is supported by evidence.
- Site is more restricted with less opportunity for open space buffer.

- Level 2 SFRA carried out since 2019, following comments from the EA, and better identified flood risks from different sources to take into consideration.
- 2020 Supplementary Heritage Impact Assessment includes coverage of this site and wider area. Heritage impact zones have been taken into account.
- Playing pitches and allotments to be retained in-situ.
- Area of semi-improved grassland to be retained and enhanced as much as possible.
- One road access to accommodate different vehicles.
- Medium density, two-storey development to respond to local character.

## Q6 – Site 3 Windmill Lane

*Do you believe that Site 3 Windmill Lane should be included as allocated site, if not why not?  
Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 132

Number supporting: 5

Number commenting: 17

### Key Issues raised by Representations:

#### Principle of Site

- Overall level of growth in settlement is excessive and much greater than proposed elsewhere.
- Brownfield sites put forward as alternatives to avoid development of greenfield land, not as additional sites. Given number of brownfield sites available, site is unnecessary.
- Proposals will impact on air quality and health.
- No recognition of strategic importance of Green Belt/Site is greenfield/Green Belt in narrow part of Meriden Gap and should be protected as Mayor has pledged.
- Errors in site selection assessment which have led to identification of site as green.
- Reiterate issues with performance in Green Belt Assessment; proposed allocation performs better in Green Belt terms than alternatives.
- Site very intrusive into openness of Green Belt.
- Site performs very poorly in Sustainability Appraisal, with only 4 positive effects and 8 negative effects, 1 significant.
- Sustainability Appraisal is incorrect and should show 2 positive effects and 9 negative effects, 1 significant.
- Inaccuracies in Sustainability Appraisal, SHELAA and Green Belt Assessment.
- Other sites with lower impact on Green Belt, higher sustainability performance and lesser ecological value.
- Green Belt deletion is disproportionate to development area compared with alternatives and development would be neither efficient nor effective use of land, given ecological restrictions.

- Complex ownerships, so doubts about deliverability.
- Impact from construction noise and vibration.
- Identified as a mineral safeguarding area for coal.
- Failure to consider other alternative sites that have a higher sustainability scoring and a lesser ecological value than Site 3.
- Employment land should be allocated to support housing proposals.
- Inadequate education, health, shopping infrastructure to support housing and Site too small to provide.
- Lack of phasing plan/phasing conflicts with HS2 construction and must be postponed until HS2 completed and/or bypass opened.
- Should build more flats in centre rather than Green Belt, such as above/behind shops.
- Recommend further consultation with other residents who have recently purchased and moved to Meer Stones Road/impact on residents of Elysian Gardens.
- Site will meet need and is natural extension to settlement, with limited landscape impact, proximity to range of services, supported by Green Belt Assessment and loss of openness restricted.
- Support with inclusion of land to south which includes some previously developed land and existing access to Windmill Lane, to provide defensible Green Belt boundary.

#### **Accessibility**

- Site is not accessible to services in Balsall Common, being beyond acceptable distances to centre, medical facilities and rail station, and outside desirable distance to schools, so will be highly car dependent and unsustainable, encourage more commuting by car and require high levels of parking.
- Site is in area without transport infrastructure and local employment and will result in loss of employment, with no proposals for new premises.
- Insufficient parking at station.
- Poorly related to employment facilities.
- Extends further south than sites that SLP Inspector allowed.
- Rigorous highway assessment essential to demonstrate sustainability, or otherwise, of Site.
- Access unsuitable as Kenilworth Road already congested and Site will increase traffic accessing it, impacting on A452/B4101 crossroads/lights and diverting on to Windmill Lane/Hob Lane.
- Object to access through existing housing as roads narrow, no footpaths.
- Windmill Lane unsuitable for access/improvements to Windmill Lane required.
- Traffic calming measures on Meer Stones development (SLP 2013 Sites 23/23) not effective, so concern about speeds on Windmill Lane.
- Bypass should be built first before any housing development.

#### **Berkswell Windmill**

- Development will cause substantial harm Grade II\* listed Berkswell Windmill and its setting and allocation will need to be wholly exceptional to accord with NPPF.
- Invasive work in the vicinity of the Windmill risks causing long-term damage to this heritage asset.
- Heritage Impact Assessment is inadequate. Concerns echoed by various experts/specialists.
- Proposal significantly underestimates impact on the Windmill and its setting, with visual impact restricted to Windmill Lane which is not the case. Higher visual impact shown for heritage assets on Site 1.
- Green Belt boundary better aligned with footpath from Windmill to Kenilworth Road to protect setting.
- Lack of assessment of impact of housing on the prevailing wind, necessary to avoid disruption to flow and ensure the Windmill's function.
- Failure to engage with owner of the Windmill over issue of free flow of wind.

### **Concept Masterplan**

- Ignores/contrary to emerging Berkswell Parish NDP, as fails to locate green space between existing and new housing and proposes access from existing residential roads when not required.
- Should consider emerging Balsall Parish NDP; respect local character, mixed development with range of house types and sizes, opportunities for low carbon development, trees and hedgerows to be protected, minimum 10% bungalows or other suitable accommodation for downsizing.
- Road access to the site from Kenilworth Road through existing housing and/or from Windmill Lane is unsuitable, with traffic hazard at Kenilworth Road junction and impact on rural lane with no pavements.
- Development will impact on existing residents, as density and lack of green buffer does not respect character or amenity.
- Medium/high density not in harmony with existing character.
- Avoid 3 storey development in such narrow roads.
- Inadequate protection for protected species with road crossing protected area and no tunnels/ponds proposed.
- Fails to reflect ecological assessment recommendation for buffers around woodland, protection for semi-improved grassland, or to provide nature reserves within Site as provided for Sites 1 and 2. Proposal to offset biodiversity rather than protect areas of importance is unacceptable.
- Impact of light pollution on wildlife.
- Trees on the northern boundary bordering the extension to Kelsey Court should be protected.
- Should clarify what is meant by 'zone of significant influence' and how 'high architectural value' may be relevant in relation to the Windmill.

- Heritage Impact Assessment should inform principle of Site's suitability and appropriate design response. Should demonstrate that sufficient account taken of evidence to avoid, or minimise, harm to the Windmill's significance, that great weight attached to its conservation, and due regard paid to desirability of preservation of setting in wider landscape.
- Should include provision of a footway southwards along the A452 to link with Public Footpath M181 through the Site.
- Parking area required for the Windmill, as tourist attraction.
- Should be flexible enough to take different land interests into account, whilst ensuring comprehensive development, and not include matters that can be dealt with when development proposed, such as access points.
- Support low density housing and access via Kelsey Court for northern parcel.

#### Council Response (Draft Submission Version)

- Site name changed to BC3.
- Draft Submission Plan introduces specific site policy, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Green Belt Assessment independently prepared and provides justification for findings.
- Site correctly assessed as greenfield on the edge of a settlement with a range of services.
- Sustainability Appraisal and SHELAA have been updated.
- Site to extend no further south than existing development and is accessible to schools, with opportunities to enhance links to centre and rail station.
- Access can be provided safely.
- Site has benefitted from 2019 Heritage Impact Assessment and 2020 Supplementary HIA.
- Concept masterplan reflects recommendations in Heritage Impact Assessment and takes account of Berkswell Wind Flow study.
- Level 2 SFRA carried out since 2019, following comments from the EA, and better identified flood risks from different sources to take into consideration.
- Ecological Assessments have been updated for the Site and published on the evidence base webpage.
- Site area has been reduced to exclude area of ecological sensitivity, and capacity reduced from 220 to 120 dwellings between the 2019 and 2020 version.
- The proposed density across the Site is low, which reflects the need to respond to restrictions on development height to retain the wind movement in order for the sails at Berkswell Windmill to remain operational.
- Public Open Space is proposed on area opposite the Grade II\* listed Berkswell Windmill, where it will complement the setting of the Grade II\* listed Berkswell Windmill and benefit from the existing public rights of way.
- As such, many of the adverse effects relating to ecology, landscape, green infrastructure, historic assets and amenity can be mitigated to address concerns raised in the

## Q7 – Site 21 Pheasant Oak Farm

*Do you believe that Site 21 Pheasant Oak Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### **Representations received:**

Number objecting: 33

Number supporting: 8

Number commenting: 27

### **Key Issues raised by Representations:**

#### **Principle of Site**

- Site suggested by residents as alternative to Sites 2 and 3. The Council would appear to be paying lip service to residents' concerns and efforts to assist in finding alternative sites.
- Site assessment reveals higher performing Green Belt, low accessibility, lack of clear, firm Green Belt boundaries, whereas development should be on accessible sites that perform least well, with strong boundaries, so why allocated?
- Site selection is flawed as should not be priority 3 in process, but priority 8 for brownfield element and 10 for the remainder, so unsuitable for allocation.
- Site inappropriately designated as brownfield, as contains agricultural buildings.
- Greater part of Site in higher performing Green Belt parcel in GBA. There are other lower performing sites closer to centre that should be considered first, such as Grange Farm.
- Intrusive to openness of Green Belt and will create future problems in defending Green Belt.
- Object to inclusion of significant area of greenfield/Green Belt, as evidence supports alternatives that will not impact on openness, such as Sites 1/43 bounded by roads.
- Para. 113 is untrue, as bypass will not be within 200m of proposed boundary of Site so inclusion of greenfield land is not justified.
- Disproportionate loss of Green Belt, which would destroy huge swathe of countryside.
- Support brownfield part but greenfield element should be excluded other than for public open space which could remain in Green Belt. Suggest adopt approach as per Site 22 in SLP 2013.
- No defensible boundary beyond current buildings to east, so will lead to sprawl.
- Site beyond acceptable distance to centre/surgery/station and outside desirable distance to schools, will be highly car dependent and unsustainable.
- Needs careful assessment of traffic flows.
- Site is in area without transport infrastructure and local employment, and will result in loss of employment, with no proposals for new premises.



- Query deliverability given time required to relocate existing businesses and may be better as a commercial allocation to meet employment needs of increased population.
- Site can be accessed from existing roads, so not reliant on bypass.
- Hob Lane unsuitable for development, as busy road with no pavements or lighting, no public transport and development in Cromwell Lane.
- Burton Green can serve area.
- Poorly related to employment facilities.
- Performs poorly in sustainability appraisal, with only 3 positives against 6 negative effects, 2 significant.
- Very small area for a lot of houses.
- Object to cumulative impacts of Sites 1, 3 and 21.
- Will not 'safeguard the rural character of Hob Lane and Windmill Lane', as removal from Green Belt will result in development.
- Out of character with larger detached properties and farms in area.
- Loss of countryside, rural character and footpath recreation rapidly disappearing elsewhere.
- Noise from HS2.
- Should build more flats in centre rather than Green Belt, such as above/behind shops.
- Sustainable location which supports Strategic Growth Study and accords with spatial strategy, performs poorly in terms of Green Belt and landscape character, can contribute towards bypass and provide compensation for loss of Green Belt through net gain in biodiversity, well-connected green infrastructure links, open space and play area.
- Capacity should be increased to around 350 dwellings to reflect lack of constraints and make efficient use of land.
- Inaccuracies in documents, site reference number, area, eastern boundary cuts through fields so not strong and defensible, Site 414 identified as green but not all included and should be extended.
- Support building on brownfield sites and part of site included on BLR, but will need to provide for caravan storage.
- Support Site as part brownfield land.

#### **Concept Masterplan**

- Unclear where access will be from, where the line of the HS2 is and incomplete legend.

#### **Council Response (Draft Submission Version)**

- Site name changed to BC4.
- Draft Submission Plan to introduce specific Site policy, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.

- The western part of Site BC4 is lower performing Green Belt and the higher performing area is predominantly brownfield land.
- Deletion of Green Belt land to be minimised and firm, defensible boundary proposed.
- Waste Lane and the eastern boundary of the site will provide a firm, defensible Green Belt boundary.
- Concept masterplan was not at an advanced stage in the 2019 consultation; Site had been proposed for 100 homes. Further site capacity and density work has increased the proposed number of dwellings to 200 homes.
- Site is correctly assessed as mainly brownfield on the edge of a settlement, with a range of services and is supported by evidence.
- There are opportunities to improve accessibility, for example, to the rail station and new primary school proposed within Site BC1.
- Propose to retain area of priority semi-improved grassland habitat on north-west corner of the Site. Area of public open space along northern edge of site along Waste Lane.
- Vehicular access can be provided safely.
- Footpath links north towards Barratt's Farm.
- Sustainability Appraisal has mixed outcomes, but concept masterplan addresses many concerns.

## Q8 – Trevallion Stud

*Do you believe that Site 22 Trevallion Stud should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### **Representations received:**

Number objecting: 17

Number supporting: 25

Number commenting: 23

### **Key Issues raised by Representations:**

#### **Principle of Site**

- Site suggested by residents as alternative to Sites 2 and 3. The Council would appear to be paying lip service to residents' concerns and efforts to assist in finding alternative sites.
- Moderately performing in Green Belt Assessment, sustainability appraisal findings 5 positive and 6 negative, identified as priority 6 in Step 1 of site selection process. Yet despite unfavourable commentary highlighting indefensible boundaries, rated green in Step 2 in preference to other better performing sites.
- Although moderately performing Green Belt, likely to be lower performing if smaller refined parcel defined.
- Extension of settlement on this Site encroaches on Meriden Gap and intrusive to openness of Green Belt.
- Whilst site is in Green Belt, not in narrowest part of Meriden Gap.

- Site should be assessed separately from surrounding area in sustainability appraisal, as with other proposed allocations.
- Inappropriate designation as brownfield land. More appropriate sites elsewhere around settlement, such as at Grange Farm and at Kenilworth end of settlement within line of proposed bypass.
- Unsuitable as high visual sensitivity in Landscape Character Assessment and historic pasture land. Any past development at Stud should have been handled through enforcement, not regularised through brownfield land designation.
- Inappropriate location as remote from centre, station, medical centre and lacks transport infrastructure, so does not meet sustainability requirements. Will encourage car use and require high levels of parking.
- Should be part of comprehensive western allocation to settlement to include Grange Farm, land north of Dengate Drive, allowing for larger primary school, food store and possibility of western bypass.
- Should provide north-south link road to replace part of Wootton Green Lane, access development sites on west of settlement, and form part of western bypass.
- Poorly related to employment facilities in settlement, lacking in employment with no plans for new employment land/premises.
- Loss of farmland/Green Belt unnecessary given proposals elsewhere in settlement.
- Over-development in a rural environment and loss of rural character of Wootton Green Lane.
- Should build more flats in centre rather than Green Belt, such as above/behind shops.
- More suitable for commercial use for hotel, offices or sports facilities.
- Will add to disruption from HS2 and other sites.
- Land assembly likely to be an issue and comprehensive development or defensible Green Belt boundaries cannot be assured, so better options elsewhere around settlement. Will impact on early delivery of affordable housing.
- More appropriate option than Site 3, though more details on environmental impacts required.
- Site 159, land at 32 Wootton Green Lane and land at Stoneycroft should be added to allocation, as submitted for inclusion and/or joined consortium and suitable for housing.
- Site 172 should be removed from the Green Belt, but not included for housing.
- Only part brownfield, so question inclusion of whole site.
- Support as already ribbon development, limited landscape value and new development will not be widely prominent.
- Site is classed as brownfield and development of brownfield sites before greenfield sites is supported.
- Support as brownfield, has defensible Green Belt boundaries, good access to A452, reasonably close to station and facilities, does not affect public access, will reduce pressure on more sensitive areas, and masterplan/site assessments provide justification.

### **Concept Masterplan**

- Consider emerging Balsall Parish NDP in master-planning, including suitable measures for low carbon development and to reduce impact of aircraft noise.
- Could be improved if ideas in Berkswell Parish NDP were adopted.
- Mixed development with range of house types and sizes providing market accessible and affordable homes for younger age residents, and including at least 10% bungalows or other suitable accommodation for downsizing of mobile older residents.
- Medium density layout does not respect local character or accord with open space requirements, so capacity unrealistic.
- Higher density housing could provide link road and same number of units.
- Access onto Wootton Green Lane unacceptable, and difficult onto A452. Should be via roundabout at George in the Tree.
- Potential to encourage active travel to UK Central if appropriate cycling infrastructure provided.
- Flooding issues on Wootton Green Lane.
- Object as substantial loss of trees and inadequate protection of important natural features, trees and hedgerows. Lack of ecological evidence which Parish Council will address and expect Council to take into account.
- Vital that TPOs applied to mature trees and hedgerows retained.
- No well-defined open space/blue infrastructure.
- Additional 6 dwellings can be provided and proposals for open space included on latest concept masterplan.

#### Council Response (Draft Submission Version)

- Site name changed to BC5.
- Draft Submission Plan introduces specific Site policy, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Landscape Character Assessment is a high level study covering a wide area and more detailed landscape assessment included in concept masterplan.
- Concept masterplan was not at an advanced stage in the 2019 consultation; Site had been proposed for 300 homes. Further site capacity and density work has decreased the proposed number of dwellings to 230 homes.
- Site is correctly assessed as mainly brownfield and a large part is included in the Brownfield Land Register.
- Site has medium accessibility and good links to employment areas.
- Main access to be from A452.
- There are opportunities to enhance landscape, green infrastructure and amenity to address some concerns raised in the Sustainability Appraisal.
- Main landowners working together and concept masterplan shows coordinated approach.
- Submission Plan references Berkswell NDP and concept masterplan takes account of

NDP policies.

- Site assessed in 2020 Supplementary Heritage Impact Assessment.
- Site boundary expanded to include CFS 511.

## Q9 – Lavender Hall Farm

*Do you believe that Site 23 Lavender Hall Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 15

Number supporting: 26

Number commenting: 26

### Key Issues raised by Representations:

#### Principle of Site

- Site suggested by residents as alternative to Sites 2 and 3. The Council would appear to be paying lip service to residents' concerns and efforts to assist in finding alternative sites.
- Identified as priority 3 in Step 1, despite proximity to railway line, HS2 and dangerous access adjacent railway bridge, and being high performing in Green Belt Assessment, has more negative than positive effects in Sustainability Appraisal, yet it is rated green in Step 2.
- Query designation of entire site as brownfield.
- Site lies within highest performing parcel in Green Belt Assessment and high visual sensitivity and there are other options on lower performing Green Belt land.
- Beyond defensible Green Belt boundary east of settlement, so contributes to sprawl and relies on HS2 line for defensible boundary.
- Site should be allocated for business use, not residential. It is close to the centre, but sandwiched between two train lines with HS2 to the north and will need improvements to the narrow railway bridge.
- Lacks transport infrastructure.
- Over-development within settlement without loss of more farm land and Green Belt.
- Close to HS2 line, so unsuitable for housing and may restrict train speeds.
- Housing would be sandwiched between 2 railway lines and close to bypass likely to be main A452, so occupiers would experience poor amenity/environment. Will require exceptional design and mitigation.
- Loss of open space available to housing in area.
- Should build more flats in centre rather than Green Belt, such as above/behind shops.
- Poorly related to employment facilities in settlement, lacking in employment with no plans for new employment land/premises.

- Unclear whether any businesses would need to be relocated, but loss of employment contrary to wider ambitions of Council.
- Heritage Impact Assessment should inform approach to development.
- Site likely to be subject to contamination, which means viability is potentially affected and may be issues of deliverability.
- Support assessment as green site within priority 3 in site selection, brownfield land, small parcel of Green Belt impacted by HS2 which will perform no function and suitable settlement.
- More appropriate option than Site 3, though more details on environmental impacts required.
- Support the inclusion of this Site for medium/high density housing.
- Only if HS2 is constructed, as cancellation would remove the defensible Green Belt boundary that is required.
- Inaccuracies in documents, site reference number and scant detail means scrutiny will need to come later.
- Bypass needs to be constructed first, so traffic congestion can be kept to a minimum.
- Support use of brownfield site, with easy access to A45/motorway network without driving through settlement, station and medical centre, and fewer infrastructure requirements than other sites, such as Barratt's Farm.

#### **Concept Masterplan**

- Access to Lavender Hall Lane will need careful planning in conjunction with new HS2 bridge, as existing access problematic.
- Road/pedestrian access requires new/improved bridge.
- Footpath/bridleway/cycleway access possible to station/surgery/Hall Meadow Road and linking to Kenilworth Greenway, but will need improvement. If Hall Meadow Road becomes bypass, suitable access across road will be required.
- Potential to improve non-vehicular access to Berkswell and its school and church.
- Clarify density proposals, as text references medium/high density whilst plan shows low/medium.
- Offers opportunity for wide range of homes, including substantial proportion of affordable with greater flexibility to ensure efficient use of site.
- Limited development acceptable, but masterplan too dense.
- Should retain fishing lakes and improve access to facility.
- Concept masterplan should indicate extent of land that is subject to formal HS2 safeguarding directions. No mention of a potential need to phase this development within the Plan-period in order to avoid conflict with HS2.

#### **Council Response (Draft Submission Version)**

- Site name changed to BC6.
- Draft Submission Plan introduces specific Site policy, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept

Masterplans.

- Concept masterplan was not at an advanced stage in the 2019 consultation; Site had been proposed for 60 homes. Further site capacity and density work has increased the proposed number of dwellings to 80 homes.
- Site separated from wider Green Belt by HS2 line and due to development performs less well.
- Site is correctly assessed as mainly brownfield on the edge of a settlement, with a range of services and is supported by evidence.
- There are opportunities to enhance landscape, green infrastructure and historic assets to address some concerns in the Sustainability Appraisal.
- Site is considered suitable for residential use and employment provision is addressed elsewhere in the Plan.
- Site has medium high accessibility with footpath access to rail station.
- 2020 Supplementary Heritage Impact Assessment carried out for this site.

### Q10 – Green Belt Changes in Balsall Common

*Do you have any comments to make on potential changes to the Green Belt boundary east of the settlement that would result in the removal of the 'washed over' Green Belt from those areas not covered by a formal allocation?*

#### **Representations received:**

Number objecting: 93

Number supporting: 4

Number commenting: 15

#### **Key Issues raised by Representations:**

##### **General**

- No exceptional circumstances/justification given in the Plan and will set dangerous precedent weakening Council's position. Does not demonstrate that all other options have been explored before Green Belt proposed for removal.
- Concern that land will be included for development if housing numbers are increased.
- Predominantly highly performing Green Belt (12) contrary to Green Belt Assessment, of strategic importance to Meriden Gap, in maintaining separation of settlements and in providing setting for the Windmill. Presumption in favour of sustainable development within the NPPF for land not within the Green Belt.
- Removal of Green Belt status as proposed for land south of Old Waste/Waste Lanes will remove all protection from development and result in unstructured, random development as individual sites are promoted for development through the development management process.
- Cannot understand logic of removing land from Green Belt without it being needed for housing, or safeguarded for future needs. Suggest southern boundary formed by Waste Lane/Old Waste Lane, with Pheasant Oak Farm washed over or inset tightly around brownfield area.

- Loss of Green Belt south of Hob Lane and east of Kenilworth Road/Windmill Lane totally unnecessary.
- All areas beyond proposed allocations should be retained in Green Belt and protected in line with government and Mayoral policies, with longer term requirements dealt with as part of future planning exercise.
- Removal of Green Belt land equivalent to entire settlement and more than for new allocations in narrowest part of Meriden Gap is totally unacceptable and does not 'provide an opportunity'.
- Area east of Balsall Common under threat of development from housing, HS2, road planners and airport, including from Coventry.
- Object to scale of development being proposed for settlement which seems completely disproportionate.
- Plan should establish settlement boundary and protect Green Belt, with commitment to always use brownfield sites.
- Needs greater explanation with mapping to illustrate changes proposed and ensure principle is effective.
- Dependent on bypass and HS2 being built, or makes no sense.
- Should build more flats in centre rather than Green Belt, such as above/behind shops.
- Loss of rural character, wildlife and recreation area including safe cycling and walking routes. Unclear what will happen to Kenilworth Greenway, a key green space and heritage site that should be protected.
- Deletion of Green Belt will result in loss of historic landscape and potential adverse impacts on setting of the listed Berkswell Windmill and Berkswell Conservation Area.
- Alternative proposal for a new settlement north of Balsall Common needs serious consideration, instead of the significant expansion proposed for the settlement.

### **Site Specific**

- Land between Site 1 and Kenilworth Greenway has potential for additional housing post-HS2, and should be included in draft allocation, as an appropriate and logical location to meet additional housing needs.
- Balsall Street (East) must remain Green Belt boundary as most defensible option.
- Development of Site 3 would create the narrowest gap between settlements.
- Land both to east and west of Windmill Lane should be retained in the Green Belt as higher performing Green Belt and not required for housing.
- Support statement in Site 21 Concept Masterplan that rural character of Hob Lane/Windmill Lane should be safeguarded; this is best achieved by retaining Green Belt designation.
- Site in Old Waste Lane represents over-intensification in rural area.
- Disagree with amendment around Park Lane and proposes more logical boundary, based on committed infrastructure development and Lavender Hall Farm to east.

### **Support**



- Welcome changes to Green Belt necessary to help meet housing target. Level of growth should be seen as minimum figure.
- Welcome acknowledgement that Site 101 would fall within settlement boundary.

#### Council Response (Draft Submission Version)

- Development proposed in locations that perform less well in Green Belt terms, or where significant changes programmed.
- Green Belt boundary to be defined around Sites BC1 and BC4 to minimise loss.
- New settlement option likely to involve significantly greater Green Belt incursion.
- See Policies Map for the changes proposed.
- SHELAA Sites 1, 36, 43 and 333 to be taken into account in capacity.
- Old Waste Lane Site 101 proposed as Local Green Space which will ensure protection.

#### Q44 – Any Other Comments - Balsall Common

- Spatial Strategy flawed in respect of growth levels, as fails to provide rationale or consider cumulative impact with growth in Coventry/poor transport links.
- Scale of increase in proposed housing disproportionate and overall level of growth excessive, much greater than elsewhere in Borough and will have serious impact on rural location.
- Brownfield sites put forward as alternatives to avoid development of green field land, not as additional sites. Should maximise their use, including land used by HS2.
- Not in accordance with Strategic Growth Study which proposed new settlement around Balsall Common, and included settlement within area making principal contribution to the Green Belt.
- Site 1 Springhill 443 Station Road identified as green despite commentary indicating limited size and existing constraints.
- Ignores proposal for new settlement on Sites 76/212 Cornets End Lane to north of Balsall Common, as put forward by Parish Council.
- Need for Inset Study outside process of Draft Local Plan to provide long term planning and critical infrastructure.
- Settlement's desirability should be maintained by quality housing development, addressing issues with parking and through traffic, and provision of new facilities including hi-tech hub for young people, gym/swimming pool and green infrastructure.
- Site 172 Service Station, Kenilworth Road should be excluded from Green Belt for new food store.
- Concept masterplans need much more work, especially in protecting amenities of existing residents.
- Fails to give equivalent mention to emerging Neighbourhood Development Plans, with Meriden referenced but Berkswell omitted.
- Why the delay in bringing forward Riddings Hill (SLP 2013 Site 19)?

- Propose additional site for development at Bridle Cottage, Rough Close, Tanner's Lane, Berkswell.
- Propose additional site for development east of Nailcote Farm to meet wider Housing Market Area needs, and should be included in SHELAA.

36. As part of the consultation drop-in session organised for Balsall Common library on 16th February 2019, plans and aerial photographs of the centre of Balsall Common were provided. Visitors to the session were invited to write down any ideas for the future of the centre on 'post it' notes and place them on the relevant parts of the plan. If an idea had already been made and a visitor wished to provide support to the suggestion, they could add a green sticky dot. Alternatively, if an idea had been placed on the plan that wasn't supported a red sticky dot could be added. The following table shows all of the comments made and whether they were supported or not:

<i>Comment</i>	<i>Support (green dots)</i>	<i>Object (red dots)</i>
Meeting House Lane - Fields? We were told the field behind our house was staying?	5	1
Signage at 'Chicahe' by church - also needs 20 mph speed limit signs		
Pull the centre down and start again		
Community Centres in one, two or even three places - Fragmentation		2
Better centre before building houses. No development till HS2 completed especially Barratt's Farm		
Give free permits or reduced fee permits for BC residents to use NEC carparks		
Make road outside bricklayers no parking zone. At the moment it is very dangerous	9	
Cars are now parked from station to centre and along Hall Meadow. Extra train station car parking is VITAL!	6	
A multi-story carpark is much needed at Berkswell Rail Station	17	
900 houses over -5-15 years = up to 1800 cars! Need firm and detailed information regarding infrastructure Roads: Capacity, Transport, Buses: reduced service routes already		
Impact on services - Electricity, gas, sewerage, schools		

<i>Comment</i>	<i>Support (green dots)</i>	<i>Object (red dots)</i>
Appalled at proposal to build high density housing in a flood-prone area, in between HS2 and a new bypass. What quality of living will occupants have?		
Create parking before building!		
Perform a feasibility study first to see how many more residents a redesigned village centre can accommodate then decide how many houses		
More car parking space at the station to avoid all the car parking on Station Rd + the bypass		
Provision for schooling from 3-18 year olds. Plus leisure facilities for these extra families		
Parking in Station Road outside shops is very dangerous and needs addressing	15	
Community Centre for size of proposed population rather than 2/3 small venues		
SMBC to buy Partco - demolish for carpark	9	
Make Co-op carpark multi-storey and preserve right of way walk through to village centre - better signage	4	4
Where is the 'rure' in the proposed 'urbs' of Balsall Common? Don't do as you did @ Elysian Fields!		
Infrastructure to support current proposed pop e.g. Schools + parking + shops. No more fast food shops	5	
Meeting House Lane Field beside old church retain as green space provides overspill parking for BC festival will be required even more in the future	5	
Better Parking on Station Road!		
Traffic Calming to stop the 'boy racers'	1	
Need: Bank Branches/ATMs, Police presence and parking space	5	
Re-design carpark. Remove barrier	3	
Angled parking & more landscaping including trees		

<i>Comment</i>	<i>Support (green dots)</i>	<i>Object (red dots)</i>
Re-design village centre (maybe knocking down). More shops + facilities + parking (Boutique, wine bar, green space)	1	
Doctors surgery needs to expand to accommodate 3-4 thousand extra people - Do not build on the land adjacent to this site.	3	
A lot of wasted space? Dentist + carpark		
Health & Safety - no additional traffic on Meeting House Lane! So no entrance/exit from new estate! Danger		
Regig Kenilworth Road now it is 30mph. Put in decent cycle lane and if possible allow parking. Remove dead area in centre of carriageway		
Find somewhere for one communal centre i.e. meeting rooms, library, swimming pool, theatre. At the moment several small meeting places i.e. Village Hall Jubilee Centre	1	
Measure air pollution on A435 K Rd park @ rush hour/M40/M42 emergency periods + have a clean air policy for this route which is adjacent to Senior Living + Senior School		
All infrastructure in place was for a small village. With extra housing need Community Centre where there is space i.e. not in centre as no way in or out or parking i.e. on brownfield site near station re swimming pool, gym, theatre, library etc.		
Against green belt development. Too many houses that will spoil the integrity of the village.		
Total anticipated population? Required parking for commuters? More shops. New schools with sports + social facilities access - A swimming pool. Please identify a site which has easy + safe access + parking for cars		
New estate - the people at Elison gardens pay a management fee for their road. Now 200 houses will use the road we are paying for	2	
Make the centre tree lined.	2	1
PC idea for central car parking pool		1
Improve bus/train frequency + provide bus stops for shelter with interactive real time travel info.	2	

<i>Comment</i>	<i>Support (green dots)</i>	<i>Object (red dots)</i>
Extend carpark next to swimming pool	3	

## Council Response (Draft Submission Version)

- Spatial strategy reflects recommendations of Strategic Growth Study, the rail links to UK Central Hub Area, Birmingham and Coventry and the range of services within the settlement.
- Insufficient brownfield land or alternatives to Green Belt incursions.
- Mineral workings considered unsuitable for new settlement.
- Site 172 proposed for housing as part of Site BC5.
- Submission Plan references Berkswell NDP and concept masterplans take account of NDP policies.
- SLP Site 19 Riddings Hill remains as an allocation under the 2013 plan.
- Additional site submissions were considered as part of updated Site Assessments document (2020).
- Settlement chapter updated for Draft Submission Plan.
- Work is being progressed to address concerns about the need for improvements to Balsall Common centre.
- Site 1 (BC1) includes expansion of parking facilities at Berkswell rail station.
- Sites 1 (BC1) and 23 (BC6) are phased toward the end of the Plan period.
- A draft Infrastructure Delivery Plan (2020) has been published to support the proposals in the draft Submission Plan. See also comments under Q3.

## 7. Blythe

### Q11 – Infrastructure Requirements in Blythe

*Do you agree with the infrastructure requirements identified for Blythe, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 112

Number supporting: 4

Number commenting: 51

#### Key Issues raised by Representations:

##### General

- Strong view from local community that there are existing infrastructure issues in the area, in particular regarding traffic congestion, parking, schools and GPs, and that these have not been adequately addressed within the consultation document.
- Concerns raised that the recent developments in the Blythe area have put pressure on infrastructure and this has not been mitigated.
- Significant objection to the scale of development proposed in the Blythe area, especially with regard to consequent impacts on infrastructure and services.
- Support from site promoters that infrastructure needs can be met through the proposed developments.

##### Transport

- Major concerns raised by local residents and Parish Councils regarding highway infrastructure, traffic congestion - especially at peak hours, parking and highway safety.
- Existing traffic congestion affecting:
  - Stratford Road/A34, especially at the retail park and by the car dealerships
  - Queuing along the Stratford Road up to Junction 4 of M42
  - Dickens Heath Road, Tanworth Lane, Blackford Road and the 'Miller and Carter' roundabout
  - Tythe Barn Lane and Tilehouse Lane
  - Lengthy delays when exiting Dickens Heath village in the morning rush hour
  - Dog Kennel Lane queueing for up to 30 minutes
  - Surrounding residential roads such as Stretton Road, Shakespeare Drive
  - Bills Lane and Haslucks Green Road in Shirley
  - Knock-on effect of additional traffic to already busy Tilehouse Lane and Haslucks Green Road in Majors Green, Worcestershire
- Traffic congestion makes it difficult for pedestrians to cross roads and considered too dangerous to cycle.

- 
- Furthermore, that potential for road improvements are limited due to nature of rural road network, e.g. lack of pavements on both sides of the road, ancient hedgerows should be retained.
  - Lack of alternative routes that can be built to alleviate existing road traffic issues.
  - Strong view that recent developments brought forward under the existing Local Plan, e.g. at Dickens Heath and Cheswick Green, have caused more congestion and adversely affected traffic flows in the area.
  - Highway safety concerns for a number of roads close to proposed developments:
    - Number of serious accidents and one fatality on Bills Lane
    - Speeding on Haslucks Green Road and dangerous bend through Major's Green
  - Reference to parking improvements are vague.
  - More off-street parking in Dickens Heath will be difficult to achieve.
  - High car ownership in the area means that uptake of public transport will be low.
  - 2,000 new homes will result in 4,000 additional cars on the roads in the area.
  - Plan does not recognise that Dickens Heath is already a 'rat run' for traffic.
  - Monkspath Hall Road should be considered as a more important route in Solihull.
  - Need to review traffic calming and preferred routes around the area to more sustainable robust roads with better infrastructure.
  - Railway bridge Road is far too narrow for traffic and pedestrians, with near misses from bus and lorry wing mirrors.
  - Public transport provision in the area is poor; bus services run infrequently, and are not reliable.
  - Whitlock's End Station carpark is over-subscribed and full before 8am. Residents will not walk to station as roads are narrow, poorly lit and crossing roads is unsafe for pedestrians.
  - Shirley Station carpark has insufficient capacity, resulting in parking on side streets.
  - Need to consider proposals to upgrade Wythall rail station and train service frequency, this in turn would increase the sustainability of locating development in Tidbury Green.
  - Need for improved parking at Earlswood Station.
  - The train line from Whitlocks End is already over-capacity during 'rush-hour' times, with standing room only on the approach into Birmingham. Limited schedule at certain times of the day (twice an hour after 6pm).
  - Site 26 should be used for station parking.
  - Shakespeare Line Promotion Group consider that Wythall and Whitlocks End Stations should be considered holistically due to the following: the need for connectivity between the two authority areas (Bromsgrove and Solihull), Birmingham City Centre and the wider West Midlands, the level of passenger demand at the two stations and different train frequencies, the impact on Whitlocks End caused by no parking at Wythall, proposed scale of housing will place significant pressure upon the rail network, benefits of a holistic approach would extend to Earlswood and Shirley. Car parking should be increased by 200/250 spaces. Support the need for improvement of

pedestrian and cycling facilities between Whitlocks End and Dickens Heath. Para. 132 is not robust enough in terms of supporting better train services and enhanced transport infrastructure using Community Infrastructure Levy powers. Whitlocks End station is the busiest unstaffed station in the West Midlands area, significant improvements will be required to accommodate growth.

- Bromsgrove District Council and Worcestershire County Council raise concerns about potential cumulative impacts of growth on Bromsgrove, in particular Wythall and Hollywood. Plan recognises poor public transport links between settlements, and public transport/highway capacity improvements must be provided. Impact on local schools and migration of pupils between local authority areas needs to be considered. Mitigation of infrastructure impacts needs to be agreed through Statement of Common Ground.
- Stratford-on-Avon District Council is concerned that development in Blythe could impact directly on Stratford-on-Avon District, for example in terms of increased cross-boundary pressure on infrastructure, for example, the highway network around Earlswood and potentially Wood End. The Council respectfully requests that SMBC engage fully with Warwickshire County Council as the relevant highway authority and with local parish councils and community groups in neighbouring areas of Stratford-on-Avon District in formulating any plans and proposals.
- High level of concern about air quality issues and pollution resulting from congestion and increased traffic.
- Concern over lorries using narrow country lanes.
- Lack of connectivity of cycle paths in Solihull; need for good off-road cycle routes that connect to main shopping areas and railway stations, with good cycle parking in appropriate places.
- Cycling is considered too dangerous.
- Currently difficult for people with mobility issues to get around Shirley/Blyth area, as poor and narrow pavements, poor crossings on site streets and parking reduces visibility when crossing the street.
- No access to Green Belt land for the disabled.

### **Education**

- Significant level of concern raised that existing schools are over-subscribed, with limited capacity to expand.
- Pupils already have to travel out of area to go to school.
- No mention has been made of need for new secondary schools in the area.
- One new primary school only would be insufficient for the area.
- Bromsgrove District Council and Worcestershire County Council state that impacts on local schools in adjoining areas must be considered and this agreed through Statement of Common Ground.

### **Healthcare**

- Strongly held view that healthcare facilities are insufficient and over-subscribed.
- Long waiting times to get an appointment at the GP surgery.



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- Concern that Solihull hospital has been downgraded and long travel times to Heartlands Hospital.
  - No provision of additional healthcare facilities made on the concept masterplans or in the text.
  - National shortage of GPs.
  - Concern that Clinical Commissioning Group is not up-to-date with what is happening.

### **Sport and Leisure**

- Significant local concern that playing pitches on Site 4 will be built on. Replacement pitches should be sufficiently re-provided, of higher quality, include ancillary facilities such as clubhouses, and be in the local vicinity.
- Loss of sports grounds is contrary to government policy.
- Inadequate provision for sports clubs could result in local clubs having to disband.
- Open Spaces Society states that requirements for the provision of play spaces as part of potential development sites should be extended across the Borough. Standards should be established with regard to the scale of provision; nearness to dwellings; phasing within the Plan period; the type and quantity of play equipment; lighting, over-looking and physical security; the segregation of public access from ecological areas; and the process for the adoption of these areas by the Local Authority.
- There is no mention in the Draft Plan of the designation of Local Green Space as set out in the NPPF para. 99.

### **Green Infrastructure**

- Local proposal that the previous draft allocation Site 13 is made into a nature reserve for children to spend time and enjoy open spaces.
- Objection to loss of parkland and recreation areas.
- Insufficient mention of provision of new public open space and play areas for children.
- Need to protect Local Wildlife Sites, e.g. ancient woodland at Tithe Barn Wood.
- Concerns over loss of wildlife habitat, trees and biodiversity.
- Impact of noise and light pollution on wildlife.
- Warwickshire Wildlife Trust state there is a requirement in this area for 'River Blythe Enhancements', which are recommended to be added to this section.

### **Flooding**

- History of flood events in Cheswick Green that will only be exacerbated by proposed development.
- Documentation does not make reference to 2019 Flood Report addressing the May 2018 flood events.
- In May 2018, Haslucks Green Road, Dickens Heath Road, Tythe Barn Lane, Truemans Heath Lane and Peterbrook Road all flooded.
- Fields in the local area regularly flood, e.g. on proposed Site 4 and Site 12.
- Site 12 will add flood risk along Mount Brook water course.

- The land for Site 26 is at an elevation above Bills Lane and whenever there is heavy rain, the spill off cascades down the lane to collect at the railway bridge.
- Concern about geology of the area, heavy boulder clay and flood impacts. Piling has been required for new housing developments.
- Buildings in Dickens Heath subject to recent flooding, contributed to by the lack of balancing ponds in/around the village. Further development of current farmland/undeveloped land around Dickens Heath can only exacerbate flooding risk.
- The EA advises that this area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Dickens Heath and Cheswick Green. As a result, the LLFA should be allowed to comment further regarding this as any development in this location could provide flood storage and should help reduce flood risk downstream. It is recommended that a Level 2 SFRA is undertaken of sites proposed in this area to consider how development in this area could alleviate existing flood risk issues.

### **Utilities**

- Need for adequate broadband provision.
- Weekly power cuts in Dickens Heath.
- Poor mobile phone signal in the area.
- Water pressure is low in Dickens Heath.
- Severn Trent Water have responded that they do not foresee any particular issues for most developments. In cases where there may be an issue, and site proposals are later in the planning stage, it would be discussed further with the Council. STW will complete any necessary improvements to provide additional capacity once STW have sufficient confidence that a development will go ahead. The following sites in Blythe have a medium impact: Sites 4, 11 and 12.

### **Other infrastructure**

- Libraries need to be considered.
- West Midlands Police are concerned about the absence of positive references to the need to provide police infrastructure, which undermines the delivery of safe and secure development. Seek engagement in preparation of Concept Masterplans and policy implementation and delivery once Plan is adopted.

### **Concept masterplans**

- Support for pedestrian and cycling proposals.
- Support for additional off-street parking improvements.
- Support proposals for children's play and open space provision with good access.
- View that new school facilities or medical practices should be provided within the proposed developments and included in the concept masterplans.

### **Funding**

- Potential boundary issues between settlements for CIL payments.
- Need to ensure funding for infrastructure is secured before developments permitted.
- Need to ensure sufficient funding for schools and medical facilities.

- There should be express reference to the need for financial contributions towards additional expenditure burden placed on WM Police as a consequence of the proposed growth.
- Future housing development at Blythe should financially support the improvement of rail services and a bigger carpark providing 200/250 spaces.
- A small number of leases are responsible for the maintenance, renewal, operational expenses etc of a number of communal sites/facilities in Dickens Heath. The legal structure put in place some 10+ years ago relating to these Common Assets is not tenable with further development around Dickens Heath.

#### **Other comments**

- Disappointment that traffic assessments were not made available as part of the consultation.
- New developments in Blythe area accounts for over 38% of planning growth, which is an unfair and disproportionate burden.
- Infrastructure needs are underestimated, proposals do not take account of developments that have been committed to already, e.g. Blythe Valley Park housing estate, extensions to Cheswick Green, Service station at Junction 4, plus the proposed amber sites.
- Shirley and Blythe are the furthest locations away from HS2 station in the Borough, therefore housing growth here will not support the station.
- Local residents in Dickens Heath and Cheswick Green do not feel assured that infrastructure improvements will go ahead.
- IM Properties agrees with the infrastructure requirements and is currently working with SMBC and other stakeholders to deliver improvements to infrastructure within Blythe and the wider Borough. Keen to further understand what specific improvements the Council intend to make to local schools and medical facilities in order to facilitate development within the ward.

#### **Council Response (Draft Submission Version)**

- Spatial strategy, Sustainability Appraisal and site assessments identify South of Shirley and West of Dickens Heath as sustainable locations for further development, with good accessibility to public transport connections, key services and employment centres.
- Proposed sites seek to retain meaningful gaps between urban edge and rural settlements to maintain the integrity of the Green Belt and prevent coalescence.
- See below for further work on concept masterplans to address concerns about landscape character, ecology, flood risk, heritage and infrastructure.
- Development will serve to meet objectively assessed housing needs for the Borough; significant new development also proposed at UKC Hub Area, urban edge to east of Solihull, and to south of Knowle and at Balsall Common.
- Council have held subsequent meetings with Worcestershire and Warwickshire County Council to address highway concerns.

- Strategic Transport Study (PRISM, 2020) takes account of cumulative new development in the Borough, including existing sites in Blythe that have come forward in the 2013 Local Plan.
- A Traffic Assessment for the sites in Blythe/South of Shirley, individually and cumulatively, was underway at the time of the 2019 consultation, as well as a Village Parking Study that includes Dickens Heath.
- Final versions of transport studies were published to support the consultation on the Draft Submission Plan. The Traffic Assessment includes potential interventions to mitigate impacts associated with specific site proposals. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- Preliminary discussions have been held with Transport for West Midlands on the potential to increase parking capacity at Whitlocks End Station, as well as improving accessibility to the station and promoting more walking and cycling to the station.
- Council building on work in Playing Pitch and Athletics Assessments and Strategy to Playing Pitch Mitigation Strategy, and seeking Sports Hubs within the Borough.
- Part of former 'Site 13' has been proposed as Local Green Space in the Draft Submission Plan.
- Neighbourhood CIL payments are distributed according to the quantum of development within each Parish, and in accordance with the CIL guidance.
- Potential developer contributions to West Midlands Police tested in the Viability Assessment.
- Council have continued to work with stakeholder and local communities to address wider flood risk concerns in the Blythe and Shirley area.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.

- Open Space Assessment recommendations, including children's play.
- Playing Pitch Strategy & Mitigation Strategy recommendations.
- Proposed impacts on police infrastructure and wider assessment of emergency services.
- Infrastructure schedule of projects, identifying partners, funding streams and timescales.

## Q12 – Site 4 - Land West of Dickens Heath

*Do you believe that Site 4 Land west of Dickens Heath should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 117

Number supporting: 8

Number commenting: 24

Petition against: 1,150 signatures

### Key Issues raised by Representations:

#### Site Allocation Support

- Welcome reduction in site numbers, but limited support for development.
- Support is expressed for SHELAA Site 130 (part of Site 4) as a proportionate extension to the village.
- Agree Akamba site should be retained.
- Site promoters state that capacity of the proposed allocation is greater than suggested in consultation, realistically around 600-650 dwellings, if development makes effective and efficient use of land. Will seek to agree relocation of sports facilities to an equivalent or better standard of provision for local sports clubs and the public. Should recognise need for clear strategy for enhancing sports provision to meet growth needs, and explore capacity within neighbouring allocations and at former Site 13. Site well-served by public transport including Whitlocks End station.

#### Site Allocation Objection

- Significant objection relating to existing infrastructure issues, in particular traffic congestion and parking, and view that any further development will only exacerbate these.
- Difficult to make road improvements due to narrow rural roads, hedgerows and parking problems in village centre.
- Concerns from residents in Major's Green about overspill of traffic on already busy roads.
- Strong local objection to loss of sports pitches in the area, and concern that they will not be adequately re-provided. Sports pitches are considered a valuable community asset and provide much-needed opportunity for sport and play for local children.

- 
- Proximity to a railway station is insufficient justification for further major development in Dickens Heath.
  - Dickens Heath has poor access to local employment.
  - Dickens Heath village has increased from original design of 850 dwellings to approx. 1,800 today. Roads and infrastructure have not been improved to accommodate vast increase in dwellings.
  - Dickens Heath was conceived as a village. Development will result in loss of village character and identity.
  - Original Dickens Heath concept was that all services/shops would be within 10 minutes' walk anywhere in the village. Site 4 will not be within easy walking distance of services/shops.
  - Birchy Close should remain a private road and not be opened up as through-route for this development.
  - Historic landscape is sensitive to development and its loss cannot be replaced.
  - Loss of Green Belt, which government has committed to protecting.
  - Would result in coalescence between Dickens Heath, Whitlocks End and Majors Green.
  - Would erode the gap between Dickens Heath and Shirley and result in coalescence with the major urban area.
  - Would erode the gap between Dickens Heath and Tidbury Green and settlements would merge.
  - Lower performing Green Belt should be chosen instead.
  - Site would have unacceptable impact on ancient woodland at Tithe Barn Coppice.
  - Loss of wildlife habitat of high ecological value, ancient hedgerows and established trees.
  - Protected species on site.
  - Land is heavy boulder clay and liable to flooding.
  - Concerns about air pollution and impacts on health and wellbeing.
  - Concerns about noise pollution.
  - Dickens Heath Primary School already over-subscribed and cannot expand.
  - Difficult to get a local doctor's appointment.
  - Disproportionate scale of development in Blythe ward.
  - Dickens Heath and Tidbury have already taken a lot of development in recent years.
  - Site 4 has been dismissed as an allocation numerous times.

**Site Allocation Comments**

- Need for new houses for first time buyers and not 4+ bedroom executive homes.
- Crime is on the rise due to lack of police resources.
- Understandable that housing is required, but this is not the right area.
- Concern about lack of affordable housing in the area.

- New developments of last 18 months have very little green garden or border areas.
- Many current houses are built on piled foundations which would impact on any new build costs.
- Seek retention of Akamba Site as a local community asset.
- Should refer to Prime Minister's statement January 2018 Environment Policy, 'We hold our natural environment in trust for the next generation... natural environment protected and enhanced for the future.'
- Sport England comments that if the Site is allocated, a requirement for the allocation policy should state the playing fields (playing pitches and ancillary facilities) should not be developed upon until replacement provision is made in line with the requirements of NPPF para. 97(b) and Sport England's Playing Fields Policy. Site promoter concept masterplan would represent a quantitative loss of playing field land, therefore it would not comply with national planning policy and Sport England policies relating to playing fields. SMBC's illustrative emerging concept masterplan retention of Shirley Town FC does not represent replacement pitches.
- The EA comments that this area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Dickens Heath. The site falls within Flood Zone 1, however, there appears to be an ordinary watercourse near the western boundary of the site with its source at Betteridge's Barn and then culverted under the Sport Pavilion Ground and Tythe Barn Lane. The EA's 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km<sup>2</sup>; as such mapping of the risk from the watercourse has not been undertaken, which is why the Site is shown to lie in low risk Flood Zone 1. We strongly recommend that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation, and to consider how development in this area could alleviate existing flood risk issues. In addition, regardless of flood risk, it is recommended an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.
- See infrastructure section for comments for neighbouring local authorities.

### **Concept Masterplans**

- Need to adequately address sustainable and active transport modes to reduce car dependency.
- Incongruous effect of housing and an urban style sports centre.
- The boundaries of the LWS to the east are incorrectly marked and therefore the ancient woodland has been misrepresented.
- Sufficient buffer around Local Wildlife Sites needs to be retained.

### **Council Response (Draft Submission Version)**

- Site name changed to BL1.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.

- Work on the Concept Masterplans has continued to test the capacity of the site, and the proposal for 350 dwellings across both parcels is retained in the Draft Submission Plan.
- Local Wildlife Sites have been removed from the red line boundary and buffers are included in the Concept Masterplans.
- Area to north of Tythe Barn Lane and west of Akamba are removed from the proposed allocation and remain within the Green Belt.
- The Council have commenced discussions with TfWM with regards to upgrades to Whitlocks End station and potential to increase parking provision.
- Concept masterplan includes reference to improved cycling and walking connectivity from the site to improve access to Whitlocks End station and reduce local reliance on car trips to the station.
- Concept masterplan takes full account of constraints, including ecology, local landscape character and flood risk.
- Main landowners working together and concept masterplan shows coordinated approach.
- Level 2 SFRA carried out since 2019, following comments from EA, and better identified flood risks from different sources to take into consideration, as well as potential for betterment downstream.
- Air quality and noise matters will be addressed at planning application stage in compliance with Policy P14.
- 2020 Supplementary Heritage Impact Assessment covers wider site area.
- Akamba Site is not proposed for redevelopment in the Plan.
- The site area to the north of Tythe Barn Lane is not considered sufficient to accommodate a Sports Hub to mitigate the loss of playing pitches to the south of Tythe Barn Lane, and is considered inappropriate as part of the site is a Local Wildlife Site, which relates well to the Tythe Barn meadows LWS complex.
- The Council has commissioned series of studies for playing pitch assessment, strategy and mitigation strategy. The Council are continuing to engage with local landowners, sports clubs, governing bodies and Sport England to progress towards an appropriate alternative site provision for the playing pitches south of Tythe Barn Lane.
- Release of Green Belt has been limited to maintain meaningful gaps with surrounding settlements.
- See also more general comments under Q11 – Infrastructure Requirements in Blythe.

### Q13 – Site 11 -The Green

*Do you believe that Site 11 The Green should be included as allocated site, if not why not?  
Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 20

Number supporting: 6

Number commenting: 21



**Key Issues raised by Representations:**

**Site Allocation Support**

- Support expressed for allocation as an alternative to building on Green Belt land.

**Site Allocation Objection**

- Concerns raised about impact on local road network due to existing congestion issues, including Dog Kennel Lane, Blackford Road and Stratford Road.
- Objection to loss of trees on site as part of proposal.
- Objection to loss of former hedge that fronted Lucas onto Stratford Road, as it was necessary for aesthetic appeal.
- Concerns that traffic impacts will cause more air pollution to the detriment of health and wellbeing of local residents.
- Concerns about existing flooding issues on gardens in Blackford Road.
- There is conflict with the employment policy within the SDLP 2016 and the future balance between employment and housing in the Borough. No indication where the B1 uses on site would be relocated.
- Disproportionate level of housing proposed in Shirley/Blythe area.

**Site Allocation Comments**

- Confusion that site is being consulted upon as an allocation, when the site received planning permission during the consultation period.
- Disappointment that part of site is used for car showrooms instead of housing; missed opportunity for more affordable homes.
- Site should be used to build houses for first time buyers - this would help property remain at realistic prices.
- Consultation by site promoters with the local community has been poor, including only a single meeting that was sparsely advertised and little time given to respond.
- See infrastructure section for comments for neighbouring local authorities.
- The EA comments that this area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Dickens Heath and Cheswick Green. Recommend a Level 2 SFRA.

**Concept Masterplans**

- Density of development is too high.
- Will look like a concrete jungle.
- Site should better relate to Site 12.

**Council Response (Draft Submission Version)**

- At the time of preparation of the Supplementary Consultation, a mixed-use proposal for residential development and car dealerships was at planning application stage. The application was approved in March 2019.

- Further work on concept Masterplan for Site 12 has taken connectivity and relationship with Site 11 into account.

## Q14 – Site 12 - Land South of Dog Kennel Lane

*Do you believe that Site 12 south of Dog Kennel Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 56

Number supporting: 2

Number commenting: 22

Petition against: 1,302 signatures

### Key Issues raised by Representations:

#### Site Allocation Support

- Site promoter agrees that site should be allocated for housing, much of the land is under the same ownership and could commence early in Plan period. The site is well located to shops, employment, public transport and schools and is therefore in a highly sustainable location. A number of studies have been carried out for the site. Overall, it is considered that a housing allocation at this site could deliver in the region of 1,200 new homes together with associated social and physical infrastructure and public open space within a well landscaped and high quality designed masterplan.
- Limited support for Site from local communities.

#### Site Allocation Objection

- Significant objection relating to existing traffic congestion issues, e.g. on Dog Kennel Lane, Dickens Heath Road, Tanworth Lane and Creynolds Lane.
- Dog Kennel Lane either at a standstill or a race track. Unsafe for pedestrians and cyclists.
- Traffic impacts will be further exacerbated by planning permission at Site 11, The Green.
- Cycle paths would be hazardous and lead to nowhere because of local congested roads.
- Impact on and provision of infrastructure and services such as schools, GPs and shops have not been properly considered.
- Allocation of site would not provide a 'meaningful' Green Belt gap; it constitutes developing into the open countryside, will result in urban sprawl and coalescence with Cheswick Green and Dickens Heath.
- Objection to loss of Green Belt and concern that Plan does not sufficiently compensate that loss.
- Existing field structure does not have a clear, contiguous, defensible Green Belt boundary to the south.
- Dog Kennel Lane is a clear and defensible Green Belt boundary. The land has the essential Green Belt character of openness. Open vistas southwards are evident from Dog Kennel Lane.

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- Site needs to be re-evaluated and assessed consistently with other sites rejected for lack of physical boundaries; it severely compromises Green Belt purposes A to C.
  - Site encroaches too much towards the now shelved Site 13. In conjunction with proposed Site 26, this would provide a pincer attack on the now abandoned Site 13, rendering it vulnerable to further inclusion in the Plan.
  - Doubtful that stated capacity is realistic.
  - Area of sensitive landscape character.
  - Loss of wildlife habitat.
  - Loss of opportunities for access to countryside for recreation/leisure and idyllic views.
  - Adverse impact on Grade II listed building and setting at Light Hall Farm.
  - Serious concerns about flood risk, both on the site, which includes areas of Flood Zones 2 and 3, as well as causing further flooding issues downstream of the Mount Brook on existing properties in Cheswick Green.
  - Present development at Cheswick Place has shown the flood defences to be inadequate.
  - Concern that loss of open space as a green buffer coupled with added traffic will increase air pollution and pose as risk to health and wellbeing.
  - Loss of privacy.
  - Concern that number of dwellings and extent of site has increased since last consultation.
  - No apparent benefits for Shirley/Blythe area, only negatives.
  - Site should be removed or reduced in size, as disproportionate level of housing proposed in Shirley/Blythe area.

#### **Site Allocation Comments**

- People will want to leave the area due to over-development.
- The only housing which should be built on this site should be a single row along Dog Kennel Lane kerbside.
- Need a mix of housing, not just 'starter' homes, or executive homes. In particular, thought should be given to those in the 60-85 generation, whose children have left but who by no means need the final step of McCarthy & Stone-type accommodation.
- Historic England acknowledge that the Heritage Impact Assessment will help inform consideration of the Site's suitability in principle and an appropriate design response to satisfy national policy, and acknowledge the merit of the concept masterplan approach. The local authority must demonstrate that it has:
  - taken sufficient account of the evidence base to avoid or minimise harm to the significance of the affected heritage assets
  - attached great weight to the conservation of those assets, and
  - had due regard to the desirability of preserving the setting of those listed buildings.
- Sport England seeks clarity as to whether any playing pitches and ancillary provision will form part of the public open requirement (of 11ha for Sites 11, 12 and 26) to meet the

demand generated from the new residents and to help address the shortfall in playing pitch provision as identified in the Council's Playing Pitch Strategy.

- The EA comments that this area has known flooding issues and Solihull MBC as the LLFA are investigating potential options to reduce flood risk within Cheswick Green. As this site lies partially within Flood Zones 2 and 3, the Sequential Test should be undertaken to demonstrate there are no alternative sites available at a lower risk of flooding. A Level 2 SFRA should also be undertaken to support this allocation. The Mount Brook (Main River) is a tributary of the River Blythe, which flows through Cheswick Green. There are known flooding problems through the village. The recent residential development at Mount Dairy Farm provided some flood storage, however further upstream storage is required to reduce the risk in Cheswick Green. I therefore recommended that an additional requirement 'to provide flood attenuation to reduce the risk of flooding in Cheswick Green' is added to the Plan.

### **Concept Masterplan**

- Site promoter states Green belt boundary should not be defined by new road, but use existing physical features such as Tanworth Lane and a combination of landform, vegetation and field boundaries. Agree importance of GI links through site, and provision of country park. Recognise importance of listed building and need to balance development and setting. Seek flexibility on school location. Propose network of walking/cycling routes and provision of priority junctions along Dog Kennel Lane.
- Concern that Public Open Space designated on Plan will only be temporary.
- Constructing a new road to form the Green Belt boundary does not conform to government policy.
- Safety concerns over location of proposed school on busy road.
- Density will be too high and houses will appear 'crammed in.'

### **Council Response (Draft Submission Version)**

- Site name changed to BL2.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Work on the Concept Masterplans has continued to test the capacity of the Site, and continued to be proposed for 1,000 dwellings in the Draft Submission Plan.
- Concept masterplan takes full account of constraints, including ecology, local landscape character and flood risk.
- Level 2 SFRA carried out since 2019, following comments from EA, and better identified flood risks from different sources to take into consideration, as well as potential for betterment downstream.
- 2020 Supplementary Heritage Impact Assessment covers wider site area.
- Proposed that density will vary across the Site, with higher density on land opposite Dog Kennel Lane and 'Site 11' residential development, with lower densities to south, west and east to create an appropriate edge to the Green Belt and preserve the setting of the Grade II Listed Light Hall Farm building.

- 2020 concept masterplan proposes multi-modal routes access points off Dog Kennel Lane to serve Site BL2, which will respond to those already established by the development to the north (Site 11), thereby promoting integration and facilitate access to the Stratford Road and its amenities.
- Location of primary school on site has been shifted further within the development, to ensure good pedestrian connectivity within the site, as well as to the bridleway and maintains good access with former Site 11.
- Zone of influence retained around Grade II listed building Light Hall farm, with potential for further development to be assessed in more detail at planning application stage.
- Trees and hedgerows along Dog Kennel Lane should be retained in order to safeguard the character of the road.
- Release of Green Belt has been limited to maintain meaningful gaps with surrounding settlements. Fields between Creynolds Lane and east of site have been removed from proposed site allocation to maintain perception of openness.
- Given extent of existing field boundaries between proposed Site and Cheswick Green village, it is considered suitable in this instance to introduce a Green Belt boundary in the form of a new permanent structure such as the outer estate road, to create a firm boundary and thus maintain a gap between Cheswick Green and the site.
- Area to south of development is in the same land ownership as the majority of the Site and has been proposed by site promoters as Country Park, which will act as Green Belt compensation and improve access to the countryside for new and existing communities.
- See also more general comments under Q11 – Infrastructure Requirements in Blythe.

### Q15 – Site 26 - Whitlocks End Farm

*Do you believe that Site 26 Whitlock's End Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 98

Number supporting: 7

Number commenting: 24

#### **Key Issues raised by Representations:**

##### **Site Allocation Support**

- Support for removal of Site Allocation 13 from the Draft Local Plan Review.
- Welcome reduction of site numbers from 600 to 300 in this area.
- Site promoters state that land could accommodate up to 1,000 houses and have put forward 3 masterplan options for 525, 750 and 1,000 homes. Sustainable location close to a range of public transport services. Full suite of studies have been carried out for the Site.

##### **Site Allocation Objection**

- Significant level of objection concerned with existing traffic issues in proximity to Site, such as congestion on Bill's Lane and Haslucks Green Road, as well as highway safety (e.g. poor visibility) regarding the bend on Bill's Lane close to entrance of Woods Farm.
- Not acceptable to shift traffic from Dickens Heath Road to Bill's Lane/Hasluck's Green Road. Dickens Heath Road a safer, easier travel route to A34 and M42.
- Strong objection from local residents in Majors Green relating to knock-on effect of traffic through the village.
- Public transport is insufficient.
- Greater pressure on parking on streets around Shirley train station, e.g. Neville Road.
- Lack of major employer locally will result in more commuter traffic.
- Loss of high performing Green Belt land.
- Lack of a clear defensible boundary to site. Site needs to be assessed consistently with other sites rejected for lack of physical boundaries. Severely compromises Green Belt purposes A to C.
- Risk of coalescence between Shirley and Dickens Heath and with Bromsgrove.
- Landscape character has low capacity for change.
- Bridleway would lose its identity with surrounding housing.
- Impact on oversubscribed schools and GPs.
- Area floods regularly.
- Loss of trees at Christmas Tree farm would negatively impact air quality and carbon offsetting.
- Negative impact on local wildlife that use Site.
- Loss of invaluable buffer between Shirley and Dickens Heath and countryside area for ramblers and dog walkers.
- Further development will put pressure on the Stratford canal.
- Concern that development in this location will put pressure on previously proposed Site 13 at a later date.
- Consider that Site should be priority 7 in the Site Allocations document and should score poorly against the Step 2 'refinement criteria'. Other than accessible location, no beneficial factors warrant its allocation.
- Site 26 is no further away from Dickens Heath than Site 13. Just as Public Open Space can be used to enhance the perception of separation between Shirley and Dickens Heath, POS can also be used adjacent Dickens Heath Road to ensure separation between the urban area and the village.
- Disproportionate level of housing proposed in the Shirley/Blythe area.
- See infrastructure section for comments from neighbouring local authorities.

#### **Site Allocation Comments**

- Loss of Green Belt should be compensated with wider access to and enjoyment of the countryside, e.g. habitat creation enhancements south of Woodloes Road.

- 250 dwellings considered more appropriate.
- Where would the CIL money go?
- The EA comments that this area is being investigated by Solihull MBC as LLFA to assess potential options to reduce flood risk within Dickens Heath and Cheswick Green. An ordinary watercourse is within the south eastern corner of the site, however, the 'Flood Map for Planning' only shows the flood risk from watercourses with a catchment area greater than 3km<sup>2</sup>, mapping of the risk from the watercourse has not been undertaken and as such, this is the only reason the site is shown to lie in low risk Flood Zone 1. The assessment of flood risk and easement from the ordinary watercourse should be agreed with the LLFA, however it is strongly recommended that hydraulic modelling of the watercourse is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation. Regardless of flood risk, it is recommended an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.

### Concept Masterplans

- Documents are very light on detail.
- Local proposal put forward for area on previous draft allocation of Site 13 to be safeguarded as a nature reserve and made more accessible.
- Site 26 should be developed tastefully, reflect rural location, taking account of rich native wildlife. Historic Bridleway (Peacock Lane) and heritage asset at Whitlock's End Farm should be left undisturbed.
- Site should have its own public space and children's play area, separate to Site 12 as ¾ mile away.
- Note that shift eastwards is preferable to building around Light Hall Farm.
- Properties must be small and affordable to give local people the opportunity to get onto the housing ladder.

### Council Response (Draft Submission Version)

- Site name changed to BL3.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Work on the Concept Masterplans has continued to test the capacity of the site, and continued to be proposed for 300 dwellings in the Draft Submission Plan.
- Concept masterplan takes full account of constraints, including ecology, local landscape character and flood risk.
- Level 2 SFRA carried out since 2019, following comments from EA, and better identified flood risks from different sources to take into consideration, as well as potential for betterment downstream.
- Air quality and noise matters will be addressed at planning application stage in compliance with Policy P14.
- 2020 Supplementary Heritage Impact Assessment covers wider site area.

- A Traffic Assessment for the sites in Blythe/South of Shirley, individually and cumulatively, was underway at the time of the 2019 consultation.
- Final versions of transport studies were published to support the consultation on the Draft Submission Plan. The Traffic Assessment includes potential interventions to mitigate impacts associated with specific site proposals. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- Lower density, and off-set, development proposed around Grade II listed building.
- Native woodland planting is proposed on new Local Green Space at former 'Site 13'.
- Play areas proposed for both Site 12 and Site 26 in the 2020 concept masterplans.
- Prioritisation of pedestrian and cycling links to Bill's Lane and to enable connectivity to
- Release of Green Belt has been limited to maintain meaningful gaps with surrounding settlements.
- Proposed development in the concept masterplan falls within Dickens Heath Parish, therefore any CIL monies would be directed to the Parish.
- See also more general comments under Q11 – Infrastructure Requirements in Blythe.

#### **Q44 – Any Other Comments - Blythe**

- Dickens Heath has been overdeveloped and original design concept destroyed, with size and number of dwellings far exceeding supporting infrastructure.
- Dickens Heath and Tidbury Green have already taken disproportionately high share of recent housing development.
- Shirley has been swamped with more than its fair share of supermarkets and car show rooms making the roads carparks, so other areas should be considered for new housing.
- Does not take account of large number of retirement homes built in Blythe/Shirley which will have freed up a significant number of family homes.
- Not clear whether development at Powergen Site or The Green, Shirley have been factored into the housing calculation.
- Opportunities for infill within urban area not being pursued due to land ownership issues.
- Reference to Blythe Valley Park should provide flexibility to allow variation of proportion of residential and care units.
- No reference to HSR report into the historic past of Blythe Valley, which should have bearing on future housing proposals.
- Sustainability Appraisal scores for Site 116 146-152 Tilehouse Lane contested as gives inappropriate weight to Landscape Character Assessment, takes no account of footpath access to natural green space and delivery within 5 years, so should be 5 positive (3 significant), 11 neutral and 3 negative effects.
- Consultation document unclear as to how much of Site 122 is proposed for inclusion and commentary in Site Assessment ends mid-sentence.



- Submit additional site adjacent 237 Tythebarn Lane, Dickens Heath for inclusion within Site 4 as Local Wildlife Site boundary misrepresented, mostly previously developed, separate from adjacent open space, more suitable than Site 405, highly accessible, deliverable in first 5 years, and can be compensated by woodland enhancement.
- Welcome omission of Site 13.
- Would like a commitment that land at Site 13 won't be built on.

#### Council Response (Draft Submission Version)

- Site Assessments Document has been updated.
- The ca. 1,900 homes cited includes Sites 11, 12 and 26.
- Blythe Valley Park already has planning permission for mixed-use site, which includes up to 80 bed care home.
- Local infrastructure provision will need to be increased and/or enhanced to accommodate additional development.
- Landscape Character Assessment, Heritage Impact Assessment 2019 and Supplementary Heritage Impact Assessment 2020 have been taken into account.
- See also more general comments under Q11 – Infrastructure Requirements in Blythe.

## 8. Hampton in Arden and Catherine-de-Barnes

### Q16 – Infrastructure Requirements for Hampton in Arden

*Do you agree with the infrastructure requirements identified for Hampton in Arden, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 10

Number supporting: 2

Number commenting: 11

#### Key Issues raised by Representations:

- The Plan needs a more objective and detailed review of available infrastructure in the two settlements (of CdB & HiA).
- Hampton in Arden is a similar village to Balsall Common and Knowle, yet has not received a significant strategy for growth to match.
- The absence of positive references to the need to provide Police infrastructure undermines the delivery of safe and secure development.
- No meaningful analysis of the extent of supporting infrastructure required in the two settlements (CdB and HiA).

#### Local Facilities

- The settlement is suitable for housing with its range of services, rail and bus services.
- Primary school serving the area (HiA) is full, and would struggle with an influx of new residents.
- Concern that there is a lack of acknowledgement of the need to expand schooling facilities in the area.
- Unease regarding the current lack of provision of health services in the villages.

#### Large Scale Infrastructure

- Do not agree that development should be resituated so as not to overwhelm existing infrastructure. Development and infrastructure planning are integral to each other the purpose of the Local Plan being that development is delivered in conjunction with the appropriate level of infrastructure.
- Development should not be limited by current infrastructure in the village(s), as infrastructure such as additional school capacity can be part funded by development.
- Catherine-de-Barnes is a strategically important location to facilitate success for HS2.
- Catherine-de-Barnes is on one of two main growth and transport corridors from Solihull to HS2 and should be recognised as such.
- Future growth is required within the village and should be considered as a key area for growth in Borough, particularly with its proximity to HS2 interchange.

#### Green Belt

- Enhancements to the Green Belt should be acknowledged formally.

#### Environment

- Best possible standards and practice should be applied for the physical state of the public right of way path network. Some possible sewerage and surface water network risks which will need to be assessed in more detail.
- Concern regarding the poor drainage in the area which has to ability to be exacerbated.

#### Council Response (Draft Submission Version)

- Catherine-de-Barnes/Hampton in Arden do not contain the same level of facilities and services as Balsall Common and Knowle and are considered suitable for limited expansion only.
- Green Belt compensation set out in Draft Submission Plan.
- Sites screened in Strategic Flood Risk Assessment and Site 6 included in Level 2 SFRA.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy & Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.
  - Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- Draft Submission Plan has introduced new Policy P17 'Green Belt Compensation' that will ensure that sufficient compensation is provided with new developments that have been released from the Green Belt.

#### Q17 – Site 6 Meriden Road

*Do you believe that Site 6 Meriden Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

**Representations received:**

Number objecting: 9

Number supporting: 2

Number commenting: 11

**Key Issues raised by Representations:**

- There are physical constraints on Site which may impact deliverability.
- Site would have a poor relationship to existing development in the area.
- Development should be in conditional on the upgrading of nearby junction and pedestrian crossing to the footway on the north side of Meriden Road.
- The viability of the Site may be affected dependent upon any potential contamination issues as a consequence of the former use of the Site.
- Any shortfall of open space within Site should be made up via contributions to improvements elsewhere in settlement and an allowance made for location in Green Belt.
- The EA recommends hydraulic modelling of watercourse as part of a Level 2 Strategic Flood Risk Assessment to inform developable area and capacity, as mapping of risk has not been undertaken to this ordinary watercourse with a catchment of less than 3 square km.

**Village Facilities**

- Concern that development will add pressure to infrastructure in Hampton in Arden, much of which is operating at capacity.

**Concept Masterplan**

- The masterplan looks reasonable from initial inspection, but would need development with residents to ensure appropriate integration with the character of the village.
- Density should be appropriate to character of surroundings and allow sufficient flexibility.
- Design and material usage will be key to ensuring an attractive and beneficial development is achieved.
- Should recognise the different status of sites and ownerships meaning delivery in 3 phases to be reflected in masterplan.
- The EA recommends that an unobstructed green corridor should be maintained along the banks of the watercourse to maintain/protect the green/blue infrastructure.

**Council Response (Draft Submission Version)**

- Site name changed to HA1.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Site adjoins village, and existing SLP allocation 24, and is considered to be deliverable.

- Highway requirements to be considered as part of Concept Masterplans.
- Viability Assessment of sites undertaken.
- Green space and Green Belt compensation to be provided to meet policy requirements.
- Site included in Level 2 SFRA.
- See also more general comments under Q16 – Infrastructure Requirements for Hampton in Arden.

### Q18 – Site 24 Oak Farm

*Do you believe that Site 24 Oak Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 5

Number supporting: 5

Number commenting: 11

#### **Key Issues raised by Representations:**

- Capacity is overstated, as density is too high with limited parking facilities.
- Site should be restricted to elderly, retirement, sheltered housing as the 2012 SHLAA concluded unsuitable for family housing.
- Development should be conditional on pedestrian crossings on either side of the canal bridge, a roadside footpath to the eastside of the canal, and vehicular access from Friday Lane only.
- Brownfield part of Oak Farm should be developed; however, to avoid over urbanisation of Catherine-de-Barnes, the greenfield proportion should be removed.
- Careful treatment of the frontage to the canal needs to be established to ensure the visual impact of the Site is mitigated.
- Site lies in a strategically advantageous location and Site will make a beneficial contribution to the Borough and the village.
- New development will assist with the future viability and vitality of such settlements as Catherine-de-Barnes, provided they are proportionate to the settlement.
- The Oak Farm Site should be considered for uses other than residential, as Catherine-de-Barnes does not have the facilities to support residential development (i.e. stretched village facilities and highways/traffic issues).

#### **Concept Masterplan**

- The masterplan is scant on information, but appreciated that it is in its infancy.

#### Council Response (Draft Submission Version)

- Site name changed to HA2.

- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Concept masterplan was not at an advanced stage in the 2019 consultation; Site had been proposed for 80 homes. Site area has been extended slightly to the east to Friday Lane, and the proposed number of dwellings has been increased to 95 units in the Draft Submission Plan.
- The existing buildings on Site will be redeveloped.
- An integrated landscape, ecologically and drainage strategy for the Site is promoted to provide a place-making approach to the Site.
- Likely infrastructure requirements include encouraging pedestrian and cycle use across Hampton Lane, links to the canal towpath and highway modifications to Friday Lane.
- The proposed Site policy states that the Site may be suitable for specialist provision in accordance with proposed Policy P4E.
- A draft Infrastructure Delivery Plan has been published to support the consultation on the Draft Submission Plan.

#### **Q44 – Any Other Comments - Hampton in Arden and Catherine-de-Barnes**

- Sites 12, 85, 96, 106 and 143 in Site Assessments now in Hampton in Arden Parish.
- Chapter initially refers to both settlements, but subsequently refers to settlement in singular and uncertain which village is being referred to.

#### **Council Response (Draft Submission Version)**

- Draft Submission Plan and updated SHELAA and Site Assessment Document recognise the changes to Hampton in Arden Parish boundaries.
- Should be clear in revised settlement chapter which village is being referred to in the text.

## 9. Hockley Heath

### Q19 – Infrastructure Requirements in Hockley Heath

*Do you agree with the infrastructure requirements identified for Hockley Heath, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 53

Number supporting: 8

Number commenting: 19

#### Key Issues raised by Representations:

- There is a lack of consideration for infrastructure requirements in Hockley Heath compared to other settlements in the Borough.
- Currently limited employment opportunities in the village and would not support more residents.
- The full extent of infrastructure requirements should be studied in greater detail and should not focus on the limited times around school start and end time.
- The village is an area prime for development, given its location and ease of access to the motorway and surrounding areas.
- Village lacks local distinctiveness/character/centre, therefore would not be impacted as heavily as some other nearby villages from development.

#### Village Facilities

- Hockley Heath currently has limited facilities to support expansion (e.g. doctors, shops, pharmacy, ATM).
- An increasing population in village will make it even harder to get a doctor's appointment.
- The nearby Blythe Valley development will likely use village facilities that are already busy/lacking.
- Play and outside space improvements could be included, i.e. fitness stations and tennis courts.
- Standards should be established as to the scale and quality of infrastructure provision required, rather than dealing with lack of provision after homes are built.
- More housing in the village may result in children not being accommodated in village school, which cannot expand at a rate to match housing delivery.
- Water pressure is at a low in the village and must be addressed.
- An ATM would be a useful addition to the village, especially as the post office is due to close.

#### Public Transport

- Public transport is poor and services to Solihull and Dorridge are infrequent.
- Bus services have recently been reduced and no longer serve Knowle (this causes problems for students trying to reach Arden Academy).
- Safer and accessible walking/cycling routes should be incorporated into infrastructure plans for the village.

- Council should aim to incorporate autonomous taxi facilities to improve access for those who do not drive (and to keep up with technological advances).

### Highways

- Traffic will continue to worsen with increases to village size.
- Any development in Hockley Heath could impact directly on Stratford-on-Avon District in terms of, for example, transport infrastructure and the strategic importance of the A3400.
- No amount of traffic calming or management will reduce the inevitable congestion in the village if the village size expands.
- Blythe Valley Park will bring further traffic to the village arising from increasing vehicle use.
- Highway changes need to be discussed to mitigate the developments at Blythe Valley and those within the village.
- Stratford Road is already used as a bypass, which will only worsen with village expansion and the Blythe Valley Park development.

### Flooding

- The village, and specifically the A3400, suffers from regular flooding/ponding following even moderate sustained rainfall.
- No action plan discussed to address the flooding in 2018.
- Poor drainage in the area.

### Safety

- Absence of positive references to the need to provide Police infrastructure undermines the delivery of safe and secure development.
- Increased traffic around the school will be dangerous to pupils.
- Issues with the safety of School Road/Stratford Road traffic volume.

### Council Response (Draft Submission Version)

- Hockley Heath is considered to be appropriate for limited expansion in the spatial strategy, with a limited range of local shops and one form entry primary school.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.



- Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy & Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.
  - Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- Viability Study has tested the potential for police infrastructure contributions.

## Q20 – Site 25 Land South of School Road

*Do you believe that Site 25 land south of School Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 69

Number supporting: 5

Number commenting: 12

### Key Issues raised by Representations:

- The village needs to be protected in order to keep the quality of life for residents.
- Development is in a convenient location of a built up area of Hockley Heath, suitable for access to the village and school, thus reducing car use.
- The needs to mitigate the issues from this development go wider than the immediate area.
- Site is Green Belt and should stay as such, not to be used for development.
- Village should retain its identity and character, not swallowed up by over development.
- New development will assist with the future viability and vitality Hockley Heath, provided development is proportionate to the settlement, in the right location.
- A site in a more central location within the settlement would be preferable.
- Site represents an intrusion into the openness of the Green Belt.
- Site is remote from employment opportunities.
- Best site put forward for Hockley Heath, however, infrastructure and road access must be well considered.
- CIL income should be carefully spent within the village to mitigate the impact of the development.
- The type of homes likely to be proposed will not allow young people to live in the village.
- Hockley Heath is a suitable location for growth and it has a role to play in meeting the Borough's overall housing requirements.

### Development Size

- Development is out of proportion with the village size, and is not a limited expansion of the village.
- Development represents 12% increase in village size, with no infrastructure improvements to match growth.
- It is important to work with neighbouring authorities to ensure that the expansion of the village is proportionate and coherent.
- Development size is not characteristic of others in the area.

#### **Highways on School Road**

- Narrow road which would require expansion if development occurred.
- Parking restrictions are needed along the road, currently it is very dangerous/hazardous.
- Junction of School Road/Stratford Road is already over-trafficked and dangerous.
- Any future development should adjoin a main road, School Road is too narrow.
- Speeds should be limited on School Road to 20mph, however speed limits are currently already frequently exceeded.
- Increasing homes in Hockley Heath will only make it busier outside the school, endangering children further.
- School Road lacks a footpath.
- Building near the school will not discourage driving, as parents living on Site 25 will drop their children off 'en route' rather than walking.

#### **School Places**

- No consideration for additional local primary or secondary schools in the area.
- The school does not have the facilities/space to expand to a 2 form entry.
- More housing in the village may result in children not being accommodated in village school.

#### **Environment**

- Development here would destroy a small wildlife habitat, including Grey Herons and Woodpeckers.
- Land should be identified as an area for wildlife and to be used by the current village residents to enhance the area.
- Increased noise, air and light pollution due to more houses and cars using School Road.
- Potential risk to sewerage and water network.
- School Road is also prone to flooding which has not been addressed within the draft consultation documentation.
- Development Site is prone to flooding itself, which will need to be mitigated.
- Loss of mature trees and hedgerows which are a valuable asset.

#### **Concept Masterplan**

- The concept masterplans need to become more tightly defined during the further development of the Local Plan.
- Current desktop exercise is lacking in detail.
- Seek engagement in preparation of Concept Masterplans and policy implementation and delivery once Plan adopted.

- Large, dense development proposed which is out of proportion to area and village.
- Any detailed proposals will need to be reviewed with residents most closely impacted by the development.
- The homes built should be of a high quality (as they are in the village) and should be a range of sizes, with no more than two storeys.
- The draft concept masterplan seems to work well, though not knowing what type of houses are proposed it's difficult to fully comment.
- The promoter's concept masterplan is created as a marketing presentation, with no reference to how the proposed features of their plan will be maintained and funded for the future decades.

#### Council Response (Draft Submission Version)

- Site name changed to HH1.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Concept masterplan was not at an advanced stage in the 2019 consultation; Site had been proposed for 100 homes. Further site capacity and density work has decreased the proposed number of dwellings to 90 homes.
- Site is considered a limited and proportionate expansion to the size of the settlement.
- The Ecological Assessment work has identified an area of priority habitat to the south of the Site, which has not been proposed for development.
- Trees and hedgerows to be conserved, the semi-rural character of School Road and Sadlerswell Lane.
- The Council has engaged with the Local Education Authority throughout the Local Plan process and financial contributions to education provision as required by the Local Education Authority will be required.
- The Council has acknowledged local concern for traffic congestion. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation. The likely infrastructure requirements for the Site will include appropriate measures to promote and enhance sustainable modes of transport, including pedestrian and cycle connectivity, as well as improving pedestrian safety on School Road.
- Having been included in the Level 1 Strategic Flood Risk Assessment, flooding issues are not highlighted as being a significant issue on this Site. However, proposed Site policy HH1 and the concept masterplan include provision for suitable SUDS and flood risk management.
- See also comments under Q19 – Infrastructure in Hockley Heath.

## Q21 – Green Belt Changes in Hockley Heath

*Do you have any comments to make on potential changes to the Green Belt boundary north of School Road that would result in the removal of the 'washed over' Green Belt from this ribbon of development?*

### Representations received:

Number objecting: 56

Number supporting: 2

Number commenting: 15

### Key Issues raised by Representations:

- Would be helpful to see the existing and proposed Green Belt boundary.
- There is a lack of clarity over what is proposed in terms of changes to the Green Belt.
- The new Green Belt boundary proposed is not considered to be defensible, which is a danger to further encroachment on the land to the north of School Road.
- Concern regarding the possibility to encourage backland/garden development north of School Road.
- The sites that lie within the area to be released from the Green Belt were categorised as red and should not be included. If this is the case, land north of School Road should not be released.

### Green Belt release support

- Land is bounded by extensive built development to the west and east and partially to the north.
- Land should be release irrespective of the allocation of Site 25.
- Removal the Green Belt in Hockley Heath is in line with para. 361 of the SDLP 2016.

### Green Belt protection

- Protection is required from excessive development where it impacts on the character and attractiveness of the village, the Green Belt and the national heritage asset of the canal.
- Removal of Green Belt is not justified when there is brownfield land to be used.
- Concern that once Green Belt is removed, a potential further 50 dwellings will be built on School Road in the future, ruining the feel of the village.
- Housing should be encouraged within the current boundary of the village, without removing land from the Green Belt.
- Release of land south of School Road does not justify release of land north of School Road.

### Local distinctiveness

- The canal is a linear heritage asset requiring protection from mediocre development.
- Green Belt is required to define our villages.
- Changes to the Green Belt boundary would encourage inappropriate development that would jeopardise the character of the village.
- The Green Belt assessment fails to take into account the distinctiveness of the canal, providing quiet enjoyment and pastimes to the many people who already frequent the blue network.

- Removal of land from the Green Belt will result in higher densities being sought.
- Hockley Heath has retained its character up to now due being tightly bound Green Belt. Removing Green Belt would alter the overall character of the village.

**Environmental**

- All Green Belt land provides a valued environmental aspect, whatever the location.
- The canal will no longer be a rural retreat for cyclists, walkers and boaters which would be a detriment to the village.

Council Response (Draft Submission Version)

- Proposed site allocation is immediately adjacent to the current built-up area of the settlement inset from the Green Belt, and would represent a continuation of the existing developed area.
- The Site is considered to be in a lower performing Green Belt parcel, is relatively self-contained and the Stratford upon Avon canal provides a defensible boundary.
- Given the change that will be required to the Green Belt boundary to accommodate the Site, it is considered that the ribbon development to the north of the site, along School Road, should be removed as 'washed over' Green Belt.
- Proposed Site policy refers to need to conserve and enhance the setting of the canal towpath.
- Local landscape character and green infrastructure are key components of concept masterplan.
- See also comments above under Q19 – Infrastructure in Hockley Heath.

## 10. Knowle, Dorridge and Bentley Heath

### Q22 – Infrastructure Requirements for Knowle, Dorridge and Bentley Heath

*Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 46

Number supporting: 24

Number commenting: 42

#### Key Issues raised by Representations:

##### General

- Support the detailed assessment and agree with the infrastructure requirements identified for the settlement in the future.
- Agree that most of the infrastructure requirements for KDBH are identified, but only in vague terms with no information on how such needs can be met or consideration of whether such development will be harmful to the settlement.
- The infrastructure requirements are ambitious, necessitating the allocation of additional sites for development within the area.
- More consideration required on what impact the infrastructure changes will have on the Green Belt, the historic environment and the overall character of the settlement.
- There is a lack of evidence on infrastructure impacts and mitigation required.
- Lack of any specific infrastructure proposals to address the impact of development on the Arden Triangle (Site 9) or any other proposals to the south of Knowle and Dorridge.
- Traffic, road improvements and other infrastructure improvements are an essential part of a site's potential for development. These requirements need to be assessed at the early stage of the site selection process.
- The infrastructure pressures identified are as a result of poor site selection.
- Infrastructure requirements are significantly understated, not evidenced and too generalised.

##### Physical Infrastructure

- Lack of information on transportation issues is a serious omission and addressing this only at the submission stage is unsatisfactory.
- Absence of any detailed reports on what the impact of increased traffic will be makes it difficult to comment.
- A road infrastructure plan to cover the inevitable increase in traffic levels is required, as the local road network is currently inadequate.
- Concern about impact of additional traffic through the narrow High Street in Knowle, which will also have an impact on the historic centre of the village. New road layout/one-way system suggested.

- Concern about impact of additional traffic along Station Road, Widney Road, Warwick Road and Grove Road.
- Concern about the impact of additional traffic, particularly at peak times on the network of junctions at Hampton Road/Lodge Road and Station Road/Kenilworth/Wilson's Road.
- Major road widening will be required.
- Knowle bypass should be reinstated.
- Enhancements to encourage use of cycling (especially dedicated cycle lanes) and public transport would be welcomed.
- More infrastructure required to encourage more walking and cycling, such as improved and additional cycle paths.
- Public transport is not properly addressed.
- Improved bus services are required.
- Lack of parking in village centres of Knowle and Dorridge and at Dorridge railway station, which is full by 6.30am.
- Decking the carpark at Dorridge Station demonstrates a lack of thinking and does not constitute anything like a comprehensive solution.
- Additional parking required for Knowle Primary School.
- No assessment of additional capacity on M42, exacerbated by Arden Cross and HS2.
- No consideration has been given to mains services to proposed housing, including electricity, gas, water supply, mains drainage and telecommunications.
- Moderate likelihood that the development of Sites 8 and 9 will require sewer capacity upgrades.
- Need measures to prevent the continuing decline of Knowle High Street.
- No provision for employment uses.

### **Social Infrastructure**

- Impacts on doctor's surgeries, dentists, pre-school facilities should be included.
- Doctors are overwhelmed.
- Not enough consideration given to the services that are needed by all residents in the area. In particular, doctors and medical services and facilities for young people. They do not just go to green spaces and there isn't enough affordable facilities where they can go to locally to do activities or 'hang out' with friends.
- Play and open space provision should be required as part of development sites.
- Sports and recreation facilities are needed.
- Secondary school is at capacity.
- Inadequate schooling at junior and infant levels.
- The focus of primary school provision on the Arden Triangle site should be Catholic, to extend the current provision of St George and St Teresa, to ensure parity in the provision of places.

- St George and St Teresa Catholic School needs to demonstrate that it has suitable replacement site and build a school before the existing site can be delivered. This should be shown in the plan, or the existing site deleted.
- The absence of positive references regarding the provision of Police infrastructure undermines the delivery of safe and secure development. There should be express reference to the need for financial contributions towards additional expenditure burden placed on West Midlands Police as a consequence of the proposed growth.
- Need affordable homes, starter homes and accommodation for the elderly.

#### **Green Infrastructure**

- Additional playing fields and open space required.
- Pedestrian links to the canal network required.
- Agree with the need for Green Belt enhancements, as encouraged by para. 138 of the NPPF.

#### **Council Response (Draft Submission Version)**

- The KDBH settlement chapter of the Draft Submission Plan sets out high level future infrastructure needs for the area.
- Work on the Concept Masterplans has further tested the capacity of sites and as result the scale of development in Knowle has reduced.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy & Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.



- Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- The Council has acknowledged local concern for traffic congestion and parking issues. Traffic modelling work has been undertaken to support the preparation of the Local Plan. A Transport Study for Knowle has been commissioned, which includes potential interventions to mitigate impacts associated with specific Site proposals. A Parking Study, which specifically includes Knowle, has also been commissioned. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The Local Education Authority has been engaged throughout the Local Plan process. Given existing pressure on primary school places and to meet pupil growth from developments in Knowle, a new primary school will be required in the settlement. It is proposed that this be located on Site KN2.
- The Council is currently working with the Catholic Diocese to look at the expansion of primary and secondary school places in the Borough.
- The provision of play areas and open space will be required on site allocations. The Draft Submission Plan introduces specific Site policies, setting out the level of provision that will be expected.
- See comments on sites below for more detailed responses.

### Q23 – Site 8 Hampton Road, Knowle

*Do you believe that Site 8 Hampton Road should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 43

Number supporting: 11

Number commenting: 22

#### **Key Issues raised by Representations:**

##### **Site Allocation Support**

- Agree that the site should be included as an allocated site.
- Support the inclusion of Hampton Road as an allocation, including parts of the Site identified as 'potential area of development subject to heritage assessment'. The Council's Heritage Assessment should consider the technical work done in support of the Site.
- Impact on the setting of Grimshaw Hall can be mitigated.
- Support for the Site, provided that local people benefit by using the enhanced sporting facilities.
- Development of the Site makes sense over other Green Belt areas as it was formerly used as a commercial nursery and arguably extends existing estates.

##### **Site Allocation Objections**

- 
- The Site does not constitute 'rounding off' of the settlement and it should not be built on.
  - The Site is in the Green Belt (part of which is highly performing) and it should not be included as an allocation.
  - The new Green Belt boundary will be poorly defined.
  - The allocation is a largescale encroachment into the countryside and Green Belt, extending well beyond the built limits and natural topography of Knowle.
  - Site is poorly performing in terms of the Spatial Strategy and Sustainability Appraisal.
  - Development of the Site would cause unacceptable harm to the setting of Grimshaw Hall.
  - Due weight should be given to the conservation of the Grade I status of Grimshaw Hall. Any consideration of an allocation will need to demonstrate that sufficient account is taken of the Plan's evidence base to avoid or minimise harm to the significance of the Hall, and due regard must be had to the desirability of preserving its setting.
  - Site is unsuitable because it would create an unacceptable skyline on this approach to Knowle.
  - Knowle cannot accommodate this development alongside Site 9 as there are too many houses, resulting in additional congestion on roads and at junctions that are already at capacity.
  - Impact on historic environment, as development would urbanise open land to the north of the historic village and remove the countryside setting that remains to that side of Knowle.
  - Traffic impact on Hampton Road and on junction with Warwick Road where there are already large queues.
  - Impact on infrastructure, particularly local schools and doctor's surgeries, which are already struggling to cope.
  - The site is not accessible and does not have good access to facilities, as it is more than 1km to shops/schools.
  - There will be an adverse impact on ecology and harm to the Knowle Conservation Area from additional traffic generated by the site.
  - Development would sandwich Purnell's Brook wildlife Site, compromising its value.
  - It appears that the Local Wildlife Site cannot be retained.
  - The relocation of Knowle Football Club should be questioned. Sporting facilities should be within the community, not on the fringes.
  - No very special circumstances to justify a sports hub in the Green Belt.
  - Use of land for sports development will have an unacceptable impact on the surrounding Green Belt and light pollution will affect a very wide area. Extensive ground works will be required to overcome the natural topography which makes it unsuitable for sports development as envisaged.
  - Development runoff would increase flooding in this location.

#### **Site Allocation Comments**

- Site 8 is a better alternative to Site 9, with fewer traffic/congestion implications if the correct infrastructure solutions are found.
- Any development should prioritise and facilitate cycle and bus usage and houses should be required to be highly energy efficient.
- Development should be mixed and not high-density, include open spaces, and be sensitive to the adjacent existing housing.
- The Site in its entirety is too much of a Green Belt incursion between Knowle and Hampton. The football club site and the site of the old Thackers Nursery would be more acceptable.
- There is uncertainty about the amount of development that can realistically be delivered on this Site.
- The sports hub site needs to be specifically allocated as such.
- Recommendation from EA that hydraulic modelling of the watercourse is undertaken, as part of a Level 2 SFRA to inform the developable area and capacity of this potential allocation. Alternatively, modelling should be undertaken as part of a site specific flood risk assessment in support of a planning application. Site capacity will need to be sufficiently flexible to ensure that it can respond to unassessed flood risk issues.

### **Concept Masterplan**

- Masterplans only identify features of sites that 'may' need to be retained. Details would need to be refined through an iterative planning application process.
- The concept masterplans are a 'nice to have', but what weight will they be given as they lack specific detail particularly on highways improvements and traffic management.
- No details of how Purnell's Brook or the Streamside Trust Nature Reserve would be protected, and not all protected trees and hedgerows are shown.
- The topography and substantial changes in levels are not addressed.
- Concept masterplan needs strengthening to include features to be retained, constraints, safeguarding landscape/biodiversity, securing new planting/green framework, limiting extent of development, consideration of densities, and accessibility to sports facilities.
- Any permitted development should be mixed and not high-density, including open spaces, and sensitive to the adjacent existing housing.
- Any development should prioritise and facilitate cycle and bus usage, and houses should be required to be highly energy efficient.
- The concept masterplan indicates the LWS is to be treated as POS to serve the proposed development. This is not acceptable as the development must meet its own needs and not utilise already protected wildlife sites.
- The concept masterplan should exclude the existing Wychwood Avenue LWS and note the recent addition to the draft NPPF, 'identify, map and safeguard components of local wildlife-rich habitats'.
- Concept masterplan needs to address levels and topography issues for both housing and sports pitches, which are significant and sensitive.
- Concept masterplan needs to consider densities, as high density is inappropriate on the whole of eastern parcel, and the western part should be medium transitioning to low.

- Public open space and a structural green framework is required for both parts of the Site.
- Design Coding is required and should take account of levels, green infrastructure, landscape and visual impacts and floodlighting, together with transportation and heritage impacts.
- Given the requirement for a buffer between development and the nearby listed building, questions are raised over the whether it will be possible to deliver the number of dwellings set out in the concept masterplan.
- Public rights of way should be preserved and the feeling of space kept so the Site is not overdeveloped. Buildings should be low and floodlighting should be dealt with sensitively, so as not to disturb wildlife in the Wychwood nature reserve.
- A minimum 8m easement should be provided from each bank of Purnell's Brook to allow for essential channel maintenance. This will serve the dual purpose of protecting and maintaining green and blue infrastructure.

#### Council Response (Draft Submission Version)

- Site name changed to KN1.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- The Council's independently commissioned Heritage Impact Assessment recognises the significance of Grimshaw Hall Grade I listed building, and identifies potential harm to its setting as a result of development in the immediate vicinity. The HIA recommended that development be confined to the western part of the site and having regard to this evidence, the concept masterplan includes a significant buffer between Grimshaw Hall and the limits of any new development.
- Given the buffer provided between proposed development and Grimshaw Hall, and that the cricket club is not included in the allocation, the overall capacity of the site has been reduced to 180 dwellings from 300 in the 2019 Supplementary Consultation.
- The proposed Green Belt boundary seeks to round off the settlement in a logical manner, consistent with the existing built form.
- No development will be permitted on the Local Wildlife Site. The site allocation policy seeks to ensure the provision of an appropriate buffer to the LWS.
- The concept masterplan recognises that very special circumstances will need to be demonstrated to relocate the existing sports provision and that construction, design and lighting will need to respect the setting of the Site.
- The Site has been subject to a Level 2 Strategic Flood Risk Assessment, which has identified fluvial and surface water flood risk along Purnell's Brook. Development will therefore be limited to those parts of the Site that are located outside the higher flood zones, and the provision of suitable sustainable drainage systems will be required.
- Site policy KN1 and the concept masterplan for the Site, together with other policies in the Plan seek to ensure the development will be sympathetic to the surrounding natural, built and historic environment. Density will be informed by the need to make efficient use of land, together with the desirability of maintaining the area's character and setting.

- The concept masterplan seeks to ensure that an integrated drainage, landscape and ecological strategy for the Site is provided. The proposed Site policy seeks the retention of trees and hedgerows along Hampton Road to conserve the character of the existing approach into Knowle.
- Site policy includes requirements for open space and children's play.
- Pedestrian and cycling connectivity will be prioritised within, and beyond, the Site's boundary.
- Proposed Site policy includes Green Belt enhancements/compensation.
- Infrastructure requirements for the Site will include appropriate measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity within, and beyond, the Site boundaries.

## Q24 –Site 9 Land South of Knowle

*Do you believe that Site 9 land south of Knowle should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 59

Number supporting: 42

Number commenting: 36

Additional representations submitted by respondents: 502

### Key Issues raised by Representations:

#### Site Allocation Support

- Support inclusion of the Site as an allocation, which is supported by the evidence base.
- No objection to the allocation of the Site.
- Release of this land would provide a sustainable location for the development of new homes to help the Borough achieve its housing requirement within the Plan period.
- The Site has clear, strong defensible boundaries with the A4141 Warwick Road to the east, Grove Road to the south and the built-up residential area of Knowle to the north and west.
- The Site is close to the centre of Knowle with bus and rail services, shops and supermarkets.

#### Site Allocation Objections

- The allocation is inappropriate and has not been adequately justified.
- The scale of proposed development is inappropriate for the size of the village.
- The allocation of sites in Knowle will change the character of the area significantly.
- The Site is too big, poorly located and the boundaries are problematic.
- Scale and visibility of development will have an unacceptable impact on the surrounding area.
- Site should not be allocated. Proposals to surround Knowle village with extensive housing to its north (Site 8) and south (Site 9) would undermine the Conservation Area's

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character and setting, because Knowle would become a town in terms of population size and urban extent.

- Impact on the setting of designated heritage assets.
- Objections to building on Green Belt land.
- Not accepted that the land has a 'medium landscape character sensitivity and low visual sensitivity and the landscape value of the area is medium', and there is a sound case for excluding this Site from the plan.
- The Site is an attractive rural site and provides a green and pleasant entry to the village centre, with much mature trees and wildlife.
- Development will destroy the approach to Dorridge and its separation from Knowle.
- Inadequate regard for landscape value and capacity, traffic impacts.
- Loss of playing fields.
- The allocation will result in increased pressures on existing infrastructure, such as highways, education, open space, play provision and erode the green openness that currently exists.
- Development will add to existing traffic congestion on roads around the village, which are already busy, as well as increase pollution.
- Highway safety issues from the additional traffic accessing and egressing the Site.
- The Site is on the wrong side of the village given that most commuters will be travelling north, increasing the burden of traffic on Knowle High Street, particularly in rush hour periods and school runs.
- New housing should be spread and not heavily concentrated in Arden Triangle.
- There are more sustainable sites closer to Dorridge or Widney Manor Railway Stations.
- There are more appropriate sites nearer to the M42, which would give access to employment areas which would be better considered for development.
- The spatial strategy refers to the need for balance between largescale and dispersed developments. There is no evidence that this objective will be achieved by developing this Site to the extent envisaged.
- The Site carries a hugely disproportionate share of the future needs of the Borough.
- Unclear how Site 9 has been assessed as a 'green' site, when other sites with similar characteristics and constraints are not identified as allocations.
- Quantum of housing in relation to community/infrastructure benefits, which are unclear, are not justified by a viability assessment.
- Allocation not supported due to lack of information on which to make a decision.

#### **Site Allocation Comments**

- Recommendation from the EA that hydraulic modelling of the watercourse on Site is undertaken as part of a Level 2 SFRA to inform of the developable area and capacity of this potential allocation.
- The Site can accommodate more new houses than the allocated numbers, as well as provide significant benefits to local people.

- Too many new houses are proposed for Knowle and Site 9 in particular is very large. Prefer to see any new housing divided more equally with Dorridge and Bentley Heath.
- The number of dwellings proposed seems excessive. A lower number closer to half of that proposed seems more acceptable.
- St George and St Teresa Catholic School would like to relocate to Site 9.
- No requirement for the proposed additional facilities at Arden School as such facilities are available in Solihull.
- The allocation of Site 9 should be dependent upon the construction of a new secondary school, given that the current buildings are inefficient and do not serve the pupils or the community.
- If Arden Academy is not relocated, there is no real wider community benefit from such a scale of development, and no justification for the release of the land to the east of the Academy.
- The site to the south of Knowle should be extended to include additional land. Land east of Warwick Road and north of Wyndley Garden Centre which could deliver 70 units and disperse traffic movements.
- Land south of Cuttle Brook is high quality Green Belt and could only be developed at low density. It should be removed from the proposed allocation and alternative higher density potential sites should be considered in other areas of KDBH.
- Uncertainty over deliverability of the Site due to different land ownerships and land parcels, which risks not delivering allocated housing numbers.
- Too many outstanding issues regarding the justification for allocation. Future of Arden Academy is not resolved and there is no information on transportation impacts.
- Without the relocation of the secondary school, the site justification falls away and the allocation should be removed entirely from the Plan and replaced by other more suitable sites.

### **Concept Masterplans**

#### General Comments

- No identification/acknowledgement of highway safety problems at the Warwick Road/Grove Road junction, and no mention of any proposed improvements at this junction, which is identified as an accident hotspot.
- No access has been shown to land west of Warwick Road (just north of the LWS) and it is not clear how this land would be served, given that the Local Wildlife Site cannot be crossed from the south. At least one point of access should be sought to serve the land associated with Lansdown Farm.
- No vehicular access is shown from Warwick Road adjacent to the garden centre and this would limit the route a bus service could take.
- Access routes will exacerbate traffic congestion, parking problems and pollution.
- Accesses onto Warwick Road will be dangerous.
- The area mapped as a LWS is incorrect on both masterplans.

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- Existing hedgerows and semi-improved grassland are not accurately mapped on the Site Analysis Plan on page 69 of the Draft Concept Masterplans document,, or subsequent plans.
  - Potential opportunity to increase public appreciation and awareness of nature therefore suggest that the LWS is identified as providing POS within the Concept Masterplan options. The POS area proposed adjacent to the northwest of the LWS may not be necessary.
  - The proposed link shown on the Landscape Assessment between the Lansdowne Farm Meadows LWS and the off-site Field at Rotten Row LWS is not realistic, due to the fact that the two designations are separated by Grove Road.
  - Agree that the existing mature hedgerows be retained and inform the creation of development parcels.
  - Create new LWS around Cuttle Brook corridor.
  - Consider a wildlife underpass for the new estate road, and/or bridging the new road over Cuttle Brook.
  - Maintain wildlife corridor between the Mind site and Barn End LWS, reinforcing by keeping development back from Grove Road/Warwick Road corner.
  - Object to the concept masterplan options, as they all indicate the loss of grasslands which haven't been surveyed. The concept masterplan should seek retention of all areas of species rich grassland on a precautionary approach until such a time that a LWS survey indicates they would not qualify.
  - No detailed study in relation to landscape value, sensitivity and capacity.
  - Agree with the extent of proposed development within the large fields to the southwest of the Garden Centre.
  - Questionable why the area to the southwest of Lansdowne Farm has been excluded from the developable areas and as shown as POS. This area is visually well contained from Grove Road by the mature tree scape associated with the LWS to the south and west, while the existing built form associated with Lansdowne Farm forms a backdrop to this parcel, being located in an elevated position. There is scope to access this parcel from the parcels immediately to the north and east without compromising the key tree scape associated with the field boundaries. It is considered that the suggested POS provision can be accommodated across the allocation without the need to preclude development from this parcel.
  - The parcels immediately to the north of Grove Road could accommodate a mix of low and medium density development. It would seem appropriate to have lower densities to the southern boundary to reflect the existing townscape character to the south and southwest.
  - Densities could be increased within the northern parts of these parcels without compromising views or townscape character, and development could extend east along Grove Road without comprising the landscape setting and appreciation of the listed property at the junction.
  - The densities proposed will not be in keeping with the village.



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- Density is too high; it should reduce north to south, west to east. Open space should be separate from natural areas, which should protect linkages and be deliverable. Future of Lansdowne House unclear. Strong structural planting required.
  - With regard to housing density within the southern part of the site along Grove Road, a mixture of low and medium density housing could be accommodated without any detrimental impact on the character of Grove Road, or the setting of the built Heritage Assets.
  - There is a section of the site running alongside and adjacent to Grove Road, specified on the plan to be 'low density'. This is highly desirable, but suggestions that it is taken one step further and left as open space - if considered appropriate, I would suggest public open space.
  - The notional yield of 600 houses identified by the Council is low and does not fairly reflect the constraints and opportunities which the Site presents.
  - The extent of the zone of significance identified by the Council to Rotten Row Farmhouse is questionable, particularly with regard to the fact the farmstead is located to the eastern side of Warwick Road (outside of the Site).
  - With regard to the listed building shown to the west of the site, confirmation is required as to which heritage asset this relates to, as the National Heritage List for England records no heritage asset in the location identified. The Council's plans should be updated with regard to the correct location of the listed building, as it is likely to require the revision of the identified zone of significance, which currently extends into the Site along its western boundary.
  - Impact on Barn End Grade II listed building needs to be considered.
  - Important that assumptions about how potential future development might respond to the affected heritage assets are underpinned by adequate evidence.
  - Given that access to the Site is proposed in the area around Rotton Row Farmhouse, subject to the sensitive design of the proposed development and in conjunction with additional mitigation measures, housing could also be accommodated in this area.
  - A re-visit on the concept masterplans for Site 9 is essential in order identify the actual deliverable yield from the Site.
  - The Draft Concept Masterplan must be re-drawn to ensure that built development to the south extends no further than the existing public footpath linking Warwick Road with Grove Road.
  - The southern portion of the Site is sensitive in both Green Belt and landscape character terms. Access arrangements from the south are also difficult, and if pursued will have even greater impact on the sensitive landscape character of this part of the Site and impact on the setting of designated heritage assets.
  - Regardless of flood risk, the EA recommends an unobstructed green corridor is maintained along the banks of the watercourse for the purposes of protecting and maintaining green and blue infrastructure.
  - Concept masterplans only identify features of sites that 'may' need to be retained. Details would need to be refined through an iterative planning application process.
  - The concept masterplans are a 'nice to have', but what weight will they be given, as they lack specific detail particularly on highways improvements and traffic management?

- Any allocation should not include the Warwick Road frontage, which provides the most valuable visual amenity and would also be dangerous to access.
- No need for a new primary school when current schools are accepting children from outside the catchment area.
- The Mind garden should not be included within Site 9 to ensure for the longterm these much needed mental healthcare facilities and protect the biodiversity work undertaken.
- The Mind garden should be retained in its current position and size.
- If Arden Academy is not relocated, there is no community benefit/justification for Site against others on south and eastern edge of Knowle. No indication of location for primary school or shops/health facilities. No indication of traffic impacts or how public transport will be improved. Topography/levels not addressed.
- Opportunity to close Grove Road between Barn End and Warwick Road, rerouting traffic through Arden Triangle, and maintaining it as footway/cycleway/bridleway/wildlife corridor.
- Restore dilapidated hedge between development and Grove Road, and enhance abandoned garden between 88/98 Grove Road.
- Concept masterplans need strengthening to refer to important features that may need to be retained/constraints, safeguard landscape/biodiversity, secure new structural planting/provision of open space and wildlife corridors, limit extent of development, consider densities, confirm position of Lansdowne House, and introduce appropriateness of Supplementary Planning Guidance/Design Coding.

#### Concept Masterplan Option 1

- Support for Masterplan Option 1, which retains Arden Academy in its existing location.
- Arden Academy should not be relocated.
- Option 1 would give the Local Authority more flexibility in addressing more urgent needs.
- No objection to the building of new houses on Arden Triangle, but objection to the new school as it had a new block recently and is adequate.
- Option 1 should be the only masterplan for Site 9 as it is deliverable.
- Objections to Option 1 which retains Arden Academy in its current location.
- Objections to Option 1 masterplan, as it would not address the problems of the ageing school campus.
- Option 1 is poorly integrated with existing built-up area.
- Opposition to any new development that is not counter-balanced by the full funding of a new Arden Academy and community facilities, as these are already stretched and Arden is in desperate need of updating.

#### Concept Masterplan Option 2

- Option 2 is supported.
- Option 2 presents scope to provide more affordable housing and takes advantage of accessibility to Knowle village centre and public transport opportunities.

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- A new Arden Centre for Community Learning should form an integral part of the masterplan for this area in order to secure medium and longterm educational, social, environmental and economic benefits for the local community.
  - Support for Option 2 in principle as it includes a new secondary school, but concerned that insufficient housing land is identified to ensure the new secondary school is viable.
  - Option 2 has the potential for a larger contribution to the number of homes earmarked for Knowle and may be necessary to make Option 2 viable.
  - If the houses have to be built, then there should be benefit for the community in the shape of a new school and community facilities.
  - There is a compelling argument for a purpose built school, as the existing site and school is no longer fit for purpose.
  - Support the option to relocate Arden Academy on the Site to ensure that any new housing brings the necessary investment into local infrastructure, notably the schooling.
  - Without the new secondary school, the Site is not justified.
  - Support Option 2 in principle, but with the caveat that the Site presents the scope to realise a greater overall housing capacity than the estimated total of 600 dwellings assumed. This will be essential in order to make Option 2 commercially viable.
  - Additional capacity is achievable by increasing the density of development on the existing school site, taking advantage of existing scale and height of buildings and by including available land parcels within the overall site that are not currently proposed for development.
  - Density of between 60 and 80dph should be applied on the two proposed development parcels closest to Station Road, with 40dph across the remainder of the school site.
  - Arden Academy support Option 2 masterplan, but propose their own amendments as outlined.
  - Online questionnaire undertaken by Arden Academy had 502 responses, which indicated 90.4% of respondents agreeing that Site 9 should be included as an allocation, with 95.4% agreeing with Option 2 being developed to enable a new school to be built.
  - Support the allocation of the Site for residential development if this also includes the provision of a new Arden Academy.
  - Agree that Arden School should be relocated to an alternative location on the Site, with residential development on the site of the existing Academy.
  - Arden Academy is badly in need of repair. Change of use of the site and the development of a new school will benefit both the pupils and the community.
  - Objections to the relocation of Arden Academy.
  - It has not been proven that Arden Academy can justify the proposed relocation, or that the land swap will generate sufficient funding.
  - Relocating Arden Academy will only displace traffic congestion to other sites and will require increased allocation of houses to fund construction of the new school.
  - The proposed new site for Arden Academy will mean cars and children accessing it through a housing development.

- Arden school has had considerable investment, with construction of a £1m multi-use games area and new buildings which have cost millions to furnish. There have not been returns on these investments and reselling the land is a dubious use of S106 monies.
- No viability study available regarding the relocation of Arden Academy and moving the school will move traffic congestion to new location.
- Cost of relocating school will take all CIL, so none available for other the community assets.
- Arden Academy should remain where it is. The money spent on moving the school would be better spent on improving the infrastructure of the area to accommodate its potential expansion, in such areas as doctors and provision for young people, e.g. youth clubs.
- Concern that relocation of Arden Academy would be a private enterprise profiting from the investment of the public purse.
- Option 2 is not a proceedable option at this stage, as there are too many uncertainties over deliverability of relocating Arden Academy.
- Should the school be relocated, the playing fields and the AGP should be replaced in line with the requirements of NPPF para. 97 and Sport England's Playing Fields Policy. The replacement playing pitches, AGP and ancillary facilities should be constructed in accordance with Sport England's and relevant National Governing Bodies guidance.
- With secondary school pupil numbers set to grow by 20% over the next decade, it should be considered that the new Arden School site factors in potential additional student capacity in its design.
- Option 2 should include provision for the relocation of St George and St Teresa Catholic School.
- The siting of a new primary school as per Option 2 will encourage parking to pick up children on Station Road adjacent to Purnell's Way with high risk safety issues.
- High density homes on the site of the existing School is unsuitable, given prevailing character of the area.

#### Council Response (Draft Submission Version)

- Site name changed to KN2.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- A single option for the Site, which includes the relocation of Arden Academy, has been taken forward in the Draft Submission Plan. The Council consider there are legitimate reasons for relocating Arden Academy and in order to optimise the benefits of the Site's allocation, a comprehensive and holistic approach to the school's redevelopment is required.
- As the largest rural settlement with a full range of services and facilities, Knowle, Dorridge and Bentley Heath is well placed to accommodate growth in excess of just its own local needs. However, the Local Plan seeks to ensure that this growth responds positively to the character and context of the villages.

- Site KN2 lies immediately adjacent to the settlement, allowing for sustainable linkages to be made to Knowle village centre and the wider settlement. The Site is well contained by Warwick Road and Grove Road, which provide the readily recognisable and permanent physical features to create a new, robust and defensible Green Belt boundary.
- It is considered that development can be sensitively located on the southern part of the site. The Local Wildlife Site will be kept free of development and the density of dwellings will reduce across the site towards Grove Road to respect the character of this part of the allocation.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- A Heritage Impact Assessment has been undertaken to support the Local Plan Review. It assesses the likely impact of development on heritage assets. Having regard to this, the concept masterplan and site allocation policy recognise the importance of retaining the setting of the heritage assets in the vicinity of the Site.
- Traffic modelling work has been undertaken to support preparation of the Local Plan. This has been supplemented by more localised assessments of the impact of particular Local Plan sites on nearby traffic levels and parking provision. It includes the Knowle Transport Study 2020, which identifies a range of interventions to mitigate impacts associated with specific site proposals. A more detailed transport assessment will be required to support any future planning application, including specific on and off-site mitigation.
- Pedestrian and cycling connectivity will be prioritised within the Site, and connectivity maximised beyond the Site.
- The Infrastructure Delivery Plan considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. Developer contributions will be secured to provide for new infrastructure as a result of development. The likely infrastructure requirements for Site KN2 are set out in the policy.
- The site has been subject to a Level 2 Strategic Flood Risk Assessment, which highlights that fluvial and surface water flood risks are present along the route of the Cuttle Brook and tributaries within the site. Policy KN2 and the supporting text sets out how this will be addressed.
- There is collective support from all landowners for the site to be allocated in the Plan. The Council is continuing to work with other landowners and their representatives to ensure that a comprehensive scheme can be delivered.
- Mapping errors regarding the Local Wildlife Site have been corrected and Policy KN2 makes clear that no development will be permitted on the LWS. It is proposed that access to the south of the Site will be taken from Grove Road.
- Biodiversity off-setting will be required as a last resort.
- Policy KN2 confirms that the Mind garden will not be redeveloped.
- Any loss of playing pitches as a result of development will require re-provision.
- Proposed Site policy includes open space and play area requirements.
- Proposed Site policy includes Green Belt enhancements/compensation to be considered.

- See also more general comments under Q22 – Infrastructure Requirements in Knowle, Dorridge and Bentley Heath.

#### **Q44 – Any Other Comments - Knowle, Dorridge & Bentley Heath**

- Development should be dispersed into more smaller sites rather than fewer larger ones, and there is opportunity to do this.
- Disproportionate distribution of growth means that amber Site A5 Blue Lake Road, Dorridge should be allocated.
- Support inclusion of Site 125 Wychwood roundabout as a green site that is well-located sustainable, available and deliverable.
- Site 155 St George & Theresa school in educational use and no evidence to show suitable alternative, so should not be included in SHELAA sites calculation for housing supply.
- Planning for the educational needs of Catholic Children at St George and St Teresa School needs addressing, as has not increased capacity despite growth in catchment, and proposals in Plan will have significant implications.
- Inclusion of Brownfield Land Register BLR024 on list in para. 436 suggests site not included in Site 9, which would allow more appropriate number of dwellings to increase overall capacity.

#### **Council Response (Draft Submission Version)**

- Council consider that the ‘balanced dispersal’ approach is most appropriate for spatial strategy. A mixture of small, medium and larger sites are put forward in the proposed housing land supply to ensure of range of choice and deliverability over the Plan period.
- Council’s comments on amber Site A5 (Q38) are included below.
- CFS 125 Wychwood roundabout included in the SHELAA housing land supply.
- CFS 155 St George and Theresa school not included in the SHELAA housing land supply in the Draft Submission Plan, as Site is subject to further work on availability and achievability.

## 11. Solihull Town Centre & Mature Suburbs

### Q25 – Infrastructure Requirements for Solihull Town Centre and the Mature Suburbs

*Do you agree with the infrastructure requirements identified for Solihull Town Centre and the Mature Suburbs, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 97

Number supporting: 5

Number commenting: 36

#### Key Issues raised by Representations:

##### Restructuring of Solihull Town Centre

- The town centre has the opportunity for some new and inspirational living accommodation.
- We should be protecting our mature suburbs and looking to develop those available brownfield sites in the town centre. There is potential for hundreds of additional houses to be built within the immediate area of the town centre.
- The town centre offers the most sustainable location for housing provision and will be of key strategic importance with UK Central.
- Access to a modern, well presented town centre is essential for local areas – fully support the Plan.
- For Site 16, infrastructure delivery should focus on delivering improvements to promote connectivity between the Site and the town centre.

##### Developments in Mature Suburbs

- Plan needs more detailed review of infrastructure requirements in Catherine-de-Barnes and Hampton in Arden. Existing primary schools and doctors surgeries are full or non-existent. Public transport is inadequate.
- Infrastructure requirements for Sites 16 and 18 are not addressed, and are currently wholly inadequate.

##### Redevelopment of Solihull Rail Station

- Network rail welcomes the decision to look at options to redevelop the station in its current location.
- Chiltern Railways are aware of the proposal and will liaise with the Council.
- Good that Solihull Station is not moving.

##### Re-use of Land allocated for Business/Retail Purposes

- Whilst the Cranmore estate provides valuable employment opportunities for local people, redevelopment may be welcomed as an opportunity to address many of the issues created by the hap-hazard way in which it has developed.
- Relocation of any sports facilities impacts community.

- It is entirely appropriate that land currently used for business/retail purposes is recycled and used for the apparent housing need. Stop developing car showrooms and expensive retirement homes and use for affordable housing.

#### **Development Opportunities in Shirley Town Centre**

- Shirley has taken brunt of housing proposals. The methodology followed should be questioned. Need to acknowledge and work to reduce pressure on this area.
- Powergen and Parkgate are significant developments that have not been without opposition. Whilst there are elements residents are happy with, some are still contentious.
- Concern that major change could be directed on Shirley High Street without further warning. Residents need to be brought on board with any proposed changes.

#### **Green Belt Enhancements**

- The term 'Green Belt Enhancements' is misleading. It does not compensate enough for the permanent loss of Green Belt land.
- Potential improvements should be seen in the context of the agricultural use of much of the land, and of the prevailing Solihull Rights of Way Improvement Plan 2016 (ROWIP). Best possible standards and practice should be applied for the physical state of the path network. Registration of unrecorded access rights should be encouraged and expedited. The Local Plan should also define how funding derived from developers will be applied to the other aspects of enhancements to the Green Belt.
- The Meriden Gap is an important feature of the area. Any new development in the Hampton Lane area will impact upon this.

#### **Brownfield Land**

- Brownfield sites should be identified and developed in line with the West Midlands Combined Authority Mayor Andy Street's 'brownfield first' policy. Green Belt should only be used as a last resort.

#### **Concept Masterplans**

- Densities and plans should be drawn up to meet the needs of the local population in consultation with the local community.
- Schools and medical facilities should be included on masterplans.
- Solihull Town Centre Masterplan needs to be included, as contribution can make to housing provision should be in context with other sites considered.
- Masterplan approach is welcomed, but should be extended to all part of the Borough. The masterplans need to become more tightly defined during the further development of the Local Plan. Should show how the policies elsewhere in the Local Plan are to be implemented in each specific site. Should be clear allocation and protection of areas for public access, should be secured in perpetuity by the dedication of the land as a village green, or by dedication of access rights under Section 16 of the Countryside and Rights of Way Act 2000.

#### **Provision of affordable housing**



- The homes shown on the masterplans do not look like they are for first time buyers/renters, which is what is needed.
- Site 407 (Land at Widney Manor Road) is in area where the provision of affordable housing is identified in the DLP as being challenging. Consider site should be released for 100% affordable housing.

### **Infrastructure Delivery Plan (IDP)**

- It is important that the IDP is based upon up-to-date and robust evidence to provide clarity for developers and ensure S106 contributions are compliant with the Community Infrastructure Levy (CIL).
- Improvements needed to the highway network could be made as highlighted in the IDP.

### **Improving accessibility to and around Solihull Town Centre**

- Existing traffic congestion will be exacerbated by proposed developments. Traffic congestion, particularly in central areas (including Hampton Lane), is a big problem at peak times.
- Propose demolition of some existing properties to sort traffic congestion in centre.
- Damson Parkway should be a dual carriageway from Solihull bypass A41 to the A45 to take the extra traffic from JLR and new homes.
- Detailed consideration should be given to improving connections between the town centre and the UK Central 'Hub'.
- Consideration should be given of how passengers can travel from Solihull train station to International station without having to travel via Birmingham. Is it possible to create a new track from Widney Manor station?
- The opportunity to reduce reliance on travel by cars should be further explored. This could further give the opportunity to redevelopment existing carparks.
- Fully support improving transport links but do not presume people will not travel by car. This has been tried in the past and rarely works.

### **Highway Infrastructure**

- There is severe congestion in vicinity of proposed Sites 16 and 18 at peak times. Damson Parkway is heavily congested at rush hour and JLR shift changes. Hampton Lane, Sharman's Cross Road and surrounding roads all get very busy at peak times. Major concern how proposals will affect this and that measures are put in place to mitigate any impacts.
- Widespread concern that the overall highway network will not cope with all the additional proposed development and associated traffic.
- Pedestrian and cyclists safety should be fully addressed. In some areas (i.e. Lugtrout Lane) footpaths are non-existent.
- Existing roads are inadequate for proposed developments (i.e. Field Lane for Site 16).
- Sceptical that road congestion can be eased by improving public transport.

### **Public Transport**

- Public transport in the Lugtrout Lane/Hampton Road area is poor/non-existent.

- The overall public transport system should be discussed as part of the proposed developments.

#### **Police and Fire Infrastructure**

- There is an absence of positive references to the need to provide Police infrastructure which undermines the delivery of safe and secure development. There should be express reference to the need for financial contributions towards additional expenditure burden placed on WM Police as a consequence of the proposed growth. SMBC should engage with West Midlands Police in the preparation of concept masterplans and policy implementation and delivery once Plan adopted.
- Concern that additional population/housing could further increase crime levels.
- Concern that fire support services may not cope with additional levels of housing.

#### **Schools/Medical/shopping facilities**

- Infrastructure required to support proposed developments is totally inadequate and no details are given of what will be provided.
- Existing schools and medical facilities are already under strain and oversubscribed. They will be unable to accommodate additional population.
- Local convenience shops do not have capacity.
- Major concern is that there is no room to build new schools or create new medical facilities to service proposed developments near to location of proposed development.

#### **Flooding and Drainage**

- Need to ensure flood risk and associated mitigation is fully addressed in all proposals.
- Flooding and inadequate storm water drainage (due to inadequate Victorian drains) is a problem in various parts of the Borough. The drainage system will need to be improved.
- Severn Trent Water highlight some possible risks with proposed developments, but do not anticipate any issues of major concern. More specific comments, modelling work and necessary improvements would be undertaken once more detailed developments are confirmed.

#### **Parking requirements**

- Sufficient parking capacity should be provided for new developments. Whilst the promotion of more sustainable forms of travel is encouraged, it will not deter car ownership and will simply push parking of cars on to neighbouring roads.

#### **Environmental/Green Infrastructure**

- Additional housing and associated traffic will adversely affect air pollution levels. What measures will be in place to address this?
- Effects of development on neighbouring wildlife sites and important sites for nature conservation need to be fully addressed. (Such as SINC adjacent Site 18 and Heritage Assets (Field Farm and 237 Lugtrout Lane) and SSSI along Grand Union Canal near to Site 16).
- Loss of trees is detrimental to the health of local residents and visual amenities of the area. This should be addressed within the Plan.

- There is no mention in the Draft Plan of the designation of Local Green Space as set out in the NPPF, para. 99.

### **Recreational Infrastructure**

- Replacement sports facilities and green space need to be provided in a similar accessible locations. These (the Sharman's Cross sports pitches, Coldlands Colts FC) are important recreational infrastructure for the local community that should not be lost.
- There is already a lack of sports facilities in the Borough. Solihull should do more to encourage and promote recreational and sporting facilities, not less by building on existing facilities.
- Replacement out-of-town sports facilities do little to promote sport. Facilities need to be close to the community to encourage use.
- It should be more of a requirement that green spaces are incorporated within all developments and consideration given to play areas for local children.
- Attention should be given to the effects of any development on existing neighbouring well-served recreational facilities to ensure these will not suffer negative effects. (The Arden Tennis club may well be adversely effected by the development of Site 18 Sharman's Cross road which may affect its longterm viability. The sports uses (Coldlands Colts, Hampton and Glades) may well be adversely affected by the development at Site 16.

### **Funding**

- Need to ensure that funding is sufficient to increase capacity of existing facilities for proposed new facilities.

### **Council Response (Draft Submission Version)**

- Since the consultation on the Draft Local Plan, the Solihull Town Centre Masterplan has been under revision. The Plan refers to the imminent update of the STC Masterplan, which recognises the need for greater flexibility in use, and the decision to redevelop Solihull rail station at its current location.
- Revised Policy P2 references the Integrated Transport Hub and strengthened connectivity routes for pedestrians and cyclists.
- Transport studies have been undertaken to inform Policy P2, including possible highway improvements in town centres and is referenced in the Infrastructure Delivery Plan.
- Policy P2 recognises the strategic importance of Solihull Town Centre within the West Midlands.
- Policy P2 addresses the provision of public and private parking in Solihull Town Centre, which will be considered within the context of a parking strategy. The Council has acknowledged local concern for traffic congestion. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The housing size mix for market and affordable has been incorporated into Policy P4A and Policy 4C, detailing the mix that ought to be achieved on a site.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the

Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:

- The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy & Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.
  - Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- The Draft Submission Plan does not propose specific allocations within the main urban area of Shirley (although the housing land supply does include a Brownfield Land Register site on School Road). Windfall sites will be assessed on their planning merits at the time of the planning application.
  - See also comments above on spatial strategy and site selection process under Q1 and Q2.

## Q26 – Site 16 East of Solihull

*Do you believe that Site 16 East of Solihull should be included as an allocated site, if not why not? Do you have comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 25

Number supporting: 7

Number commenting: 12

### Key Issues raised by Representations:

#### Extent of site

- Strongly oppose inclusion of land north of Lugtrout Lane. This directly affects Green Belt gap, increases indefensible boundary and threatens loss of remaining Green Belt land between Lugtrout Lane and the canal.
- Development would lead to a reduction in the rural gap between the urban area and Catherine-de-Barnes, it will become another area of urban sprawl.
- The current strongly defensible boundary of Damson Parkway would be breached. The proposed boundary to the east (Field Lane) is not a boundary to development between the canal and Lugtrout Lane.
- Would result in loss of Green Belt and abandonment of a defensible Green Belt boundary.
- This area of Green Belt is mostly high performing agricultural land.
- Object to use of term lower performing in relation to this area of Green Belt, as it takes no account of value for biodiversity.
- Do not have a lot of Green Belt left locally, much has been lost to the JLR development and also plans for road changes off Solihull Road and Catherine-de-Barnes lane to the A45 where more Green Belt is being lost.
- Green space only of benefit in development when it could mitigate impact on existing properties.
- Site 16 was originally rejected within the 2012 SHLAA for reasons that remain unchanged.
- Site should be extended east to Catherine-de-Barnes to allow for more growth in the Solihull central area. This would have no significant impact on the wider Meriden gap beyond Catherine-de-Barnes to the east. Most land is poorly performing Green Belt with sports pitches. Additional residential development should be allowed on this land, including the Red Star Sport Ground (Site 412) which is not adequate in size for a proper sports facility.
- Site in strategically significant location in a growth corridor. It may be necessary to work on addressing infrastructure and public transport provision.
- Development should be restricted at the periphery, to provide significant undeveloped buffer strips to retain open aspect and minimise impact on existing dwellings.
- Development is inconsistent with Challenge E of the SLP 2013, contrary to 2012 SHLAA assessment which remains valid. Would have cumulative impact with HS2, M42 Junction 6 and MSA.

### **Infrastructure**

- Existing infrastructure will not be able to cope and support a development of this size.
- No consideration has been given to mains services to proposed housing, including electricity, gas, water supply, mains drainage and telecommunications.
- Local doctor's surgeries are at full capacity. Potentially an additional 1,200 patients could be registering with the two local GP clinics.
- There is no capacity at existing schools, new provision will be necessary. There are difficulties attracting new teachers into the profession.
- Concerns regarding flooding.

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**Transport concerns**

- Concern with regard to access from Damson Parkway, a busy 40mph through road and whether Hampton Lane is able to cope with additional traffic as there are significant limitations on what carriageway works could be undertaken to improve capacity. Hampton Lane is already severely congested. Further traffic will change the relationship between Catherine-de-Barnes and Solihull Town Centre.
- Road network around Damson Parkway is already badly congested and dangerous at peak times.
- Lugtrout Lane is an unsuitable access. It is narrow with no footpath in parts and drainage ditches are on both sides of the road.
- It is very difficult to walk across the road from Pinfold to Yew Tree, particularly with young children due to the volume and speed of the traffic - building more houses will increase the traffic in the area and make this situation worse.
- Field Lane is not a suitable access road for proposed development, and widening would result in permanent loss of rural byway and ancient hedgerow. Access should be from Damson Parkway only.
- Field Lane has always been narrow and is not built for the additional traffic such a large development will bring.
- What road improvements are planned to accommodate traffic from the new homes on already heavily congested local roads?
- Concern over impact of potentially 1,200 additional cars using existing inadequate road junctions at peak times.

**Pinfold Road issues**

- No thought given to Pinfold Road residents, in relation to affordable housing, construction works, access road close to rear gardens, additional traffic on road, issues with sewers.
- Pinfold Road should remain as cul-de-sac.
- Would spoil view for Pinfold Road residents. Building road close to back of existing gardens in Green Belt would cause noise/light pollution.
- Pinfold Road would become a thoroughfare, road would be even more of a problem with parking.
- Storm flood pipe under properties will be affected, will SMBC purchase affected properties?
- Road network in area already congested, traffic junctions struggle with existing volumes of traffic.
- Southern boundary should be placed at Hampton Lane, so existing property owners are not constrained from development by Green Belt designation at the same time as adjacent land is re-designated for housing.
- There will be anti-social behaviour/security concerns in the open copse area if the boundary is not secured.

**Environment issues**

- Land rear of Pinfold Road is habitat for wildlife including foxes, badgers, deer which will be destroyed by the proposed development, this important feature should not be lost.
- Further ecological surveys are needed to identify ecological constraints and should be done before the developable area is decided.
- Orchard at the end of Pinfold Road should remain. Building on the working farm and old Orchard is unacceptable.
- Protection of two Heritage Assets (Field Farm and 237 Lugtrout Lane) and their setting is essential.
- The proposed concept masterplan does not retain the notable wildlife habitat between Hampton Lane and the agricultural land, or provide a wildlife corridor to the remaining Green Belt.

### **Deliverability**

- Site has multiple land owners and assembly issues, as well as sports pitch provision. The Council should evidence that this Site is deliverable, as well as showing that the sports pitches will be mitigated in line with the revised NPPF (2019).
- THE Council is relying on a number of largescale strategic allocations to deliver dwellings early in the emerging Plan period. Site 16 comprises 5 separate site submissions/ownerships, with no indication consortium or agreement formed. Site is subject to constraints including heritage assets, notable wildlife habitats and significant trees which will affect deliverability. Site-wide masterplan/development brief to be approved before applications made.

### **Sports pitches**

- Sport England supportive of the retention of the fields, this should be reflected in the policy allocating the Site. If facilities are to be re-provided, Sport England and the Football Foundation would welcome a discussion to understand the location and the potential impact on the adjacent clubs; Hampton FC and Glades FC. In this case, the policy allocating the site should meet the requirements of NPPF para. 97(b) and Sport England's Playing Fields Policy.
- Developers should guarantee that Sports Facilities (Coldland Colts Boys FC) shall be relocated prior to residential development or retained. It is important that sports fields are retained.
- It is unclear whether Coldland Colts playing fields are included. They would like to remain on site and form part of the new development. If relocated, they wish to retain proximity to existing ground. If the outer most boundary of the new development does end adjacent to the Coldlands Colts ground, then it is requested that a definitive boundary fence line be installed.
- Negotiate Section 106 agreement with developer to improve Site of Special Scientific Interest along Grand Union Canal from Catherine-de-Barnes to Damson Parkway.

### **Concept Masterplan**

- It is acknowledged that concept masterplan suggests how potential future development might respond to the affected heritage assets. Important that assumptions are underpinned by evidence.

- The Council will need to demonstrate it has taken sufficient account of the evidence base to avoid or minimise harm to the significance of the affected heritage assets, attached great weight to the conservation of those assets, and had due regard to the desirability of preserving the setting of those listed buildings.
- Concept masterplan should be credited for protection of sports facilities and historic buildings.
- Green space only of benefit to development when it could mitigate impact on existing properties. Layout likely to result in annoying car light pollution on the rear of some of the properties.
- Site boundary needs clarification so that Sites 143 and 339 are confirmed as green sites. Logically, the additional land to be proposed for removal from the Green Belt should be from Damson Parkway up to the Grand Union Canal to the north to provide a firm defensible and logical Green Belt Boundary, along with the inclusion of all of the land between Damson Parkway and the proposed eastern boundary of the site.
- Plans on pages 96 and 97 have significant differences which could cause confusion. The access from Damson Parkway moves by 50ft on each plan. Certain properties have been obliterated by trees in the plan on page 97, which is really insensitive.

### **Support**

- Site 16 is a suitable, sustainable site for Urban Extension. The site is immediately adjacent to the existing settlement and clear, defensible boundaries can be established.
- The proposal to move the Green Belt boundary to the Grand Union canal north of Lugtrout Lane provides a defensible boundary. The proposed inclusion of land on northern side of Lugtrout Lane would allow for sites to be developed at an earlier stage to the phased release of the Damson Parkway Site, in a sustainable manner to provide high quality, low density housing.
- NPPF-compliant approach in selecting Site 16, will allow Solihull to expand in an appropriate manner. It is a suitable, available and achievable site.
- Landscape sensitivity can be mitigated, no flood risk, no statutory or local wildlife designations, no known contamination, no significant impact to heritage assets.
- The historic assets on the eastern edge of the Site can be sensitively managed.
- Site enjoys good accessibility, within walking distance to bus services, well served by public transport.
- Masterplan would retain playing pitches, provide 600 dwellings with access off Pinfold Lane. Site could be built out between 2022-2028.
- Release of this land would provide a sustainable location for the development of new homes to help the Borough achieve its housing requirement within the Plan period.
- DLP recognises the need for infrastructure requirements to be fulfilled to ensure site deliverability.

### **Council Response (Draft Submission Version)**

- Site name changed to SO1.



- The Site is accessible and well related to the Town Centre, which has a full range of services and facilities, with excellent public transport links.
- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Having been included in the Level 1 Strategic Flood Risk Assessment, flooding issues are not highlighted as being a significant issue on this site. However, the concept masterplan seeks to ensure that any future layout should include linear conveyance SUDS in green routes and that extreme flood flow paths are not impeded. Policy P11 of the Draft Submission Plan sets out what will be expected in terms of flood risk reduction for new developments.
- Whilst the site has a number of landowner interests, they are working together to ensure that the Site comes forward in a comprehensive way. The Draft Submission Local Plan (para. 243) sets out that 'it will be expected that where there are multiple ownerships involved, the concept masterplan will show a coordinated and comprehensive approach to the development of the site that is supported by relevant site promoters/developers so that piecemeal development is avoided'.
- The Solihull Town Centre and Mature Suburbs settlement chapter of the Draft Submission Plan sets out high level future infrastructure needs for the area.
- The concept masterplan that has been developed for the site takes into consideration the site's constraints and opportunities.
- A Heritage Impact Assessment has been undertaken to support the Local Plan Review by demonstrating how the historic environment has been considered in the site allocation and concept masterplan process. The concept masterplan and site allocation policy recognise the importance of preserving the setting of the Grade II listed buildings.
- The proposed extension of the site to include land to the north of Lugtrout Lane is retained. This ensures efficient use of land (including brownfield land) is made in this sustainable location, in accordance with the spatial strategy. As a readily recognisable and permanent physical feature, the canal forms a logical and robust defensible Green Belt boundary to the site. Coupled with additional work on densities, this has enabled the Site capacity to increase to 700 dwellings in the Draft Submission Plan, whilst not compromising the Site's important assets and character.
- Field Lane will form a new and defensible Green Belt boundary to the east of the Site and will ensure a green gap between the main urban area and Catherine-de-Barnes is maintained.
- The concept masterplan seeks to ensure that an integrated drainage, landscape and ecological strategy for the site is provided. The layout seeks to retain important landscape features, the rural character of Lugtrout Lane and Field Lane, and respond sensitively to areas of ecological importance.
- No vehicular access is proposed off Field Lane or Pinfold Road.
- The Council acknowledges local concern for traffic congestion and it is recognised that

a key challenge will be to manage the anticipated increase in traffic in the area. The Draft Submission Plan notes that the Council is undertaking studies looking at key junctions within and close to the Town Centre and stresses that encouraging more cycling and walking to the Town Centre will be essential. The concept masterplan includes pedestrian links with the surrounding area and likely infrastructure requirements for the site will include appropriate measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity towards Solihull Town Centre and Elmdon.

- Strategic traffic modelling work (PRISM) has been undertaken to support preparation of the Local Plan. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The existing playing pitches on site will be retained.
- The concept masterplan states that development must respond sensitively to areas of ecological importance and any loss of habitat will require biodiversity off-setting.
- See also more general comments under Q25 – Infrastructure Requirements in Solihull & Mature Suburbs.

## Q27 - Site 17 Moat Lane/Vulcan Road

*Do you believe that Site 17 Moat Lane/Vulcan Road should be included as an allocated site, if not why not? Do you have comments on the draft concept masterplan for the site?*

### Representations received:

Number objecting: 10

Number supporting: 7

Number commenting: 6

### Key Issues raised by Representations:

#### Site Viability

- David Wilson Homes (as shown on the concept masterplan for the site) are no longer actively involved due to difficulties in delivering a commercially viable scheme.
- Site not considered to be deliverable and should be removed from the Plan.
- No indication of where existing users of the Site would be relocated to.
- There could be contaminated land issues.
- Existing telecommunications mast on site may cause problems in terms of relocation.
- Site should not be allocated without a viability assessment being carried out first.

#### Loss of employment land

- Current businesses on Site are an irreplaceable asset on a thriving industrial estate.
- No provision is made in the Plan for relocating existing Site users.
- Replacement facilities should be provided for.
- Potential conflict with Policy P3 on retention of employment land.

**Conflict with existing uses**

- Existing neighbouring employment uses are likely to create noise-sensitive issues with the proposed residential use.

**Traffic Congestion**

- There will be increased traffic congestion on Lode Lane (which is close to a school) and this is not mentioned in the Plan.

**Improvements to Site**

- Development welcomed, as would improve facilities in this strategically important location.
- Area is well suited to housing and will fit well within the Wharf Lane development.
- Relocation of old Council depot to a more central site (M42 Gateway) would be sensible.

**Site location**

- Site is in a sustainable location with good accessibility, surrounded by established residential uses.

**Good use of Brownfield Land**

- Site is brownfield land and therefore a good development option.
- Site is not in Green Belt.

**Council Response (Draft Submission Version)**

- Site name changed to SO2.
- The site allocation has been amended to include the Moat Lane Depot site only. The capacity of the site has therefore been reduced from 200 to 90 dwellings.
- The Draft Submission Plan introduces a specific Site policy, setting out principles for the Site's future development and the likely infrastructure that will be required, including financial contributions to education and healthcare provision.
- The indicative delivery of the Site is in the latter period of Plan.
- Strategic traffic modelling work (PRISM) has been undertaken to support preparation of the Local Plan. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- The site has been the subject of a Level 2 Strategic Flood Risk Assessment, which identifies that surface water flooding risks are present. The Draft Submission Local Plan recognises that any development will need careful design consideration to reduce flood risk within the site.

**Q28 - Site 18 Sharmans Cross Road**

*Do you believe that Site 18 Sharmans Cross Road should be included as an allocated site, if not why not? Do you have comments on the draft concept masterplan for the site?*

**Representations received:**

Number objecting: 175

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Number supporting: 2

Number commenting: 13

**Key Issues raised by Representations:**

**Local community opposition to development of site**

- Local residents/former users of the Site are so passionate about the retention of the Site as a sports ground for the benefit of the residents of Solihull, they set up the Sharman's Cross Action Group (SXAG) when Oakmoor Estates attempted to develop the ground in 2007/2008. The group have continued to communicate with nearly ,2000 households in the area surrounding the site Snd holds public meetings. These are attended by 90-150 people and can be very animated.

**Loss of sports/recreational/educational/community use**

- Permanent loss of previously well-used, valuable sports facilities is detrimental to the local community.
- A previous legal agreement on the Site to retain the Site for sports uses should be complied with.
- Contrary to local and national planning policy to protect and encourage sport. The NPPF states that, 'local planning authorities should take account of the needs of the local population (such as for sport)'.
- Concern over permanent loss of community playing field facilities in an area identified in Playing Pitch Assessment Strategy 2017 as being deficient in this area. Unused pitches need to be replaced if lost and no information provided to suggest an alternative.
- Oakmore Estates have charged high rents to discourage potential sports usage and turned down requests by clubs to use the pitches, thus ensuring the pitches are not used and increase the opportunity to develop the land. Various local clubs would have liked to use the facilities.
- There is a shortage of similar sports pitches in the area. Solihull is progressively decreasing sports grounds and associated facilities. Teams have had to find pitches outside of the Borough.
- Investment has already been spent (by SMBC) on the Site installing a high quality drainage system to enable the site to be used as sports pitches.
- No commitment is given to relocation of sports facilities, therefore development of Site is uncertain.
- It would not be possible to relocate such a facility in a similar accessible location.
- Site also operates as informal public open space.
- SMBC have a responsibility to retain the site as a sports ground and establish a working group of interested sports clubs/residents to develop such a facility.
- Sport England have commented that mitigation would be required for the loss of any sports facilities and this would be incorporated within the policy that allocates the Site. Appropriate mitigation would reinvested in rugby union facilities across the Borough and to meet the deficits outlined in the Council's Plating Pitch Strategy. Any design of the Site needs to ensure the tennis club is not adversely affected.

**Lease/Covenants on site**

- The lease (125 years) and covenants on the Site from SMBC when leased to the rugby club in 1965 stated that the Site (including associated club and buildings) should only be used as a private sports facility for the local community. The lease and freehold transferred to Oakmoor Estates in early 2000.
- An SMBC all party committee re-affirmed the covenants in 2013, stating that the freehold of the Site would not be sold and the covenants would not be lifted. SMBC agreed to make every effort to bring the Site back into sports use. However, nothing has come of this. Object to this covenant now being ignored. SMBC should again re-affirm the lease/covenant terms.
- Lease should never have been transferred to Oakmoor. They were aware of the lease/covenant terms when acquiring the Site and the risks they were taking. They have deterred any sports use of the Site and allowed the grounds to deteriorate. A deliberate policy to encourage planning permission on a derelict site.

#### **Planning History on Site**

- Planning applications have previously been refused on the Site and should not now be re-introduced for consultation.
- The comments at para. 271 of the Draft Local Plan Supplementary Consultation (regarding a previous planning application for housing on the Site being acceptable apart from the provision of affordable housing) are not accurate, oversimplified and distort the position.
- It is understood that the previous appeal after the refused planning application was then withdrawn by Oakmoor Estates because the project was unviable, not simply because of a lack of affordable housing.

#### **Detrimental effect on neighbouring sports/community uses**

- Concern that if the rugby ground is developed, the neighbouring Arden tennis/rackets Club, Hotpod yoga and Silhill football club will find it more difficult to survive and withstand pressure for further future infill development.
- There may be a conflict of interests with housing and use by the existing Arden tennis club, such as noise/floodlighting.
- The Arden tennis club and rugby club have historically shared car parking spaces over the two sites. Parking at this facility is already at a premium at busy times. Loss of parking for the tennis club and yoga facility could affect its long term viability.

#### **Site Access**

- Access to the Site is inadequate and would create chaos. Only proposed narrow single access on to the Site from the already busy Sharman's Cross Road.
- Concern how access to the Solihull Arden Club would be affected.

#### **Parking Capacity**

- Density of proposed development does not allow for the parking capacity needed. This would lead to parking in nearby roads, which are already congested/unsuitable for road side parking.
- Parents already cause chaos parking in the road near to the school. This would be made much worse.

#### **Increased Traffic Congestion**

- There is already considerable traffic congestion on Sharman's Cross road at peak times. The development would undoubtedly exacerbate these problems.
- The road gets very busy with parents parking for the school. This will shortly be made even worse when parents are no longer able to use the Sharman's Cross pub for parking.
- Sharman's Cross Road is a recognised emergency route, hence no speed bumps outside the school. Any increase in traffic may affect emergency vehicle movements.

#### **Pedestrian Safety**

- There is a school close very to the Site and increased traffic volumes may be dangerous for children.
- Cars already have to mount the pavement (with school children walking) to avoid congestion.

#### **Housing Density and Design**

- Site is not suitable for high density housing. The proposed scale would be totally out of character with the surrounding area – a mature suburb – it would be an 'eye sore'.
- Proposed design is out of character with area. It would destroy existing character and local distinctiveness.

#### **Health and wellbeing**

- Loss of sports facilities to encourage team sport exacerbates problem of obesity, health problems and mental illness, particularly with young people.
- Participation in sport by young adults in Solihull is low and loss of local facilities such as this make it worse.
- Fumes from increases traffic congestion. This may also deter people from walking.
- Loss of quality of life of residents due to extra traffic.
- Conflicts with NPPF promoting healthy communities policies.
- Shortage in NHS funding and removing sporting facilities will further compound ill health and strain on NHS.

#### **Housing Need**

- Site is left idle and overgrown – so support housing, but should be in keeping with area and not overdeveloped.
- Need for affordable housing, but not high-end.

#### **Sustainability of site location**

- There is no provision for cycle paths to the town centre.
- Site does not meet sustainability criteria as it is more than 800m to a town centre or train station.
- Site is not in an accessible location as required by the current NPPF. It is double the distance to local amenities as required by NPPF.

#### **Flooding and drainage**

- Existing flooding and drainage issues in Sharman's Cross Road and surrounding area will be made worse.

- The EA recommends hydraulic modelling of watercourse as part of a Level 2 Strategic Flood Risk Assessment to inform developable area and capacity, as mapping of risk has not been undertaken to this ordinary watercourse with a catchment of less than 3 square km.
- The EA recommends that an unobstructed green corridor should be maintained along the banks of the watercourse to maintain/protect the green/blue infrastructure.

#### **Schools, medical facilities associated infrastructure**

- Existing schools are oversubscribed. Sharman's Cross school has already had to expand to accommodate existing population.
- Medical facilities are already strained and will be unable to cope with additional population.
- The pace of building work in the area needs to be slowed unless amenities and infrastructure are in place to support the additional housing needs.

#### **Environmental**

- Loss of mature trees on Site (protected by Tree Preservation Orders).
- Loss of habitat for wildlife. Bats, buzzards and badgers all use the Site.
- A valuable green space and environmental asset will be permanently lost. Over the years, many green spaces in the area such as this have disappeared to be replaced by housing developments. It is time to stop and conserve what we have left.
- Air and noise pollution. Additional pollution contrary to SMBC's own Clean Air Strategy.
- Impact on SINC at Pow Wood/Grove which has been subject to recent improvements.
- Part of the site is an SSSI which supports wildlife.

#### **Surrounding Area**

- Proposal will affect privacy of surrounding dwellings.
- Proposal does nothing to protect and enhance amenities of existing residents.
- Continued developments like this will ruin Solihull's reputation as a good place to live. The site contributes to the 'urbs in rure' character of Solihull.

#### **Viability**

- Difficult to see how Site will be viable, given lease and covenant restrictions, cost of providing a replacement similar facility (with club house and changing rooms that were on the Site previously) and providing development that is in character with the area.
- The country and younger generation need affordable housing and the location is in a doubtful position for this.

#### **Council Response (Draft Submission Version)**

- Given the site assessment in the Strategic Housing and Employment Land Availability Assessment (SHELAA) and its location in the main urban area, the site is now included in the Solihull land supply as a site identified in land availability assessments. The site is no longer included in the Draft Submission Plan as a specific site allocation.
- The playing pitches would need to be re-provided in accordance with Policy P20 in the Plan.

- Appropriate buffers to the Local Wildlife Site would be required in accordance with Policy P10 in the Plan.
- Strategic traffic modelling work (PRISM) has been undertaken to support preparation of the Local Plan, including 'SHELAA' sites. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- Density and design would need to be assessed in accordance with Policies P5 and P15 in the Plan.
- Housing mix would be provided in accordance with Policy P4 in the Plan.
- Amenity concerns, including trees, impact on neighbours and air quality would need to be addressed in accordance with Policy P14 in the Plan.

#### **Q44 – Any Other Comments - Solihull Town Centre & Mature Suburbs**

- Solihull masterplan should have been included.
- Support opportunity to restructure town centre through refreshed masterplan, but should be greater recognition of role for redevelopment, improved connectivity to UK Central Hub Area, increased densities and review of car parking requirements.
- IM keen to engage/collaborate with SMBC to discuss role of town centre, particularly the scale of opportunities at Mell Square, and to understand timescales.
- Need for more affordable and less luxury apartments in town centre.
- Site 16 should be relocated into chapter on Hampton in Arden and Catherine-de-Barnes following changes to Parish boundary April 2019.
- Not all residents of Pinfold Road informed about consultation, similar to initial Draft consultation.
- Concept masterplans provide little regard to existing property owners with no details of fencing, mitigation for overlooking, wildlife impacts.
- Site 18 should include more affordable housing for first time buyers to reduce need to leave area.
- Site 163 Former Rectory and Glebe Lane Church Hill Road unsuitable/should be withdrawn as green site as drawings misrepresent area, within Conservation Area, part of group value with Church, essential for Parish activities, removal of existing occupants would cause great disruption even assuming suitable alternative sites can be found, loss of car parking to Hall, additional congestion and impact on wildlife.

#### **Council Response (Draft Submission Version)**

- Solihull Town Centre Masterplan was under revision at the time of the 2019 consultation, and finalisation was imminent during the preparation of the 2020 consultation document. Policy P2 in the Draft Submission refers to the forthcoming Town centre masterplan.
- Revision of Solihull Town Centre Masterplan has been informed by stakeholder feedback.



- CFS 163 is a site within the main urban area in a highly accessible location. Site would be assessed according to policies in the Plan at the planning application stage.
- Plan acknowledges that whilst Site 16 (SO1) is located within Hampton in Arden Parish boundary (from April 2019), it functions as part of the urban area, rather than as an expansion of one of the parish's villages. It is therefore included within the Solihull and Mature Suburbs chapter.
- Concept Masterplans are illustrative and high level in nature. Boundary treatments and sight-lines are more detailed matters that will be addressed at the planning application stage.

## 12. Meriden

### Q29 – Infrastructure Requirements at Meriden

*Do you agree with the infrastructure requirements identified for Meriden, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 4

Number supporting: 3

Number commenting: 9

#### Key Issues raised by Representations:

##### Impact on existing infrastructure

- Existing infrastructure issues in the village including transport, traffic, schools, GP access, Post Office, banks.
- Primary school is limited in its ability to take in more children.
- GP surgery is at capacity.
- High risk from the proposed development on the sewerage and surface water network.
- The access via Maxstoke Lane to this site is totally unacceptable, as the lane is narrow and already carries all traffic from Maxstoke Lane, Maxstoke Close and recently completed Gate Estate.
- 100 houses will put even greater pressure on doctors surgery, schools and traffic in the village, therefore number of homes should remain at 50.
- Further impacts need to be considered from possible HS2 Bridge across Meriden Road, Motorway Service Area, M42 Junction 6 all of which will increase traffic, noise, dust and pollution.

##### Infrastructure needed

- Infrastructure requirements should include provision for an expansion of the primary school which at capacity.
- CIL funding should provide improved infrastructure or upgrading of public open space within village.
- Enhancements should consider reclamation/enhancement of areas subject to mineral working, which could also include further development, including land south of Site 10.
- The absence of Police infrastructure undermines the delivery of safe and secure development. There should be express reference to the need for financial contributions towards additional expenditure burden placed on WM Police as a consequence of the proposed growth.
- Development must have an equal spread of privately owned, affordable/rented houses across the whole site regardless of multiple land ownership.
- With increasing traffic, it is a must that a turning circle be installed possibly at Strawberry Fields junction.

- With increased HGV use of Berkswell Road to commercial businesses sited in Berkswell, a pedestrian footpath should be installed between Heart of England Club and Berryfields.

#### Council Response (Draft Submission Version)

- Meriden Parish Council began preparation of their Neighbourhood Development Plan in 2016. The draft Meriden Neighbourhood Development Plan includes priorities for housing needs in the area and also priorities for CIL funding.
- Section 106 developer contributions will be sought to mitigate the site-specific impacts of the development so that is acceptable in planning terms.
- The Neighbourhood proportion of any CIL monies will be directed towards the Parish.
- Strategic traffic modelling work (PRISM) has been undertaken to support preparation of the Local Plan. More detailed transport assessments will be required to support any future planning applications, including specific on and off-site mitigation.
- A draft Infrastructure Delivery Plan (IDP) has been published to support the proposals in the draft Submission Plan. The IDP considers existing infrastructure capacity in the Borough and highlights the likely infrastructure requirements to support the predicted growth set out in the Local Plan. The IDP includes reference to the following:
  - The Council have engaged with the Clinical Commissioning Group to identify healthcare requirements for Draft Submission Plan, and work is ongoing.
  - Summary of transport studies and proposed strategic schemes and more local improvements for larger sites/settlements.
  - Engagement with School Place Planning team to take account of impact on growth on education provision from Early Years to secondary school, and identify locations for new schools as appropriate.
  - Outcome of consultation with utility companies, i.e. no immediate capacity concerns raised.
  - Review of Water Cycle Study and subsequent consultation with Severn Trent Water, and that any capacity issues will be addressed more fully at planning application stage. STW will provide infrastructure improvements when sites at more advanced stage of certainty.
  - Summary of flood risk assessments and proposed flood mitigation schemes.
  - Green infrastructure and biodiversity strategies and proposals.
  - Open Space Assessment recommendations, including children's play.
  - Playing Pitch Strategy & Mitigation Strategy recommendations.
  - Proposed impacts on police infrastructure and wider assessment of emergency services.
  - Infrastructure schedule of projects, identifying partners, funding streams and timescales.
- The Phase One HS2 Bill gained Royal Assent on 23rd February 2017. This, in effect, granted planning permission for HS2 and works commenced at the start of 2018. Any decision on Schedule 17 applications cannot revisit matters settled through the

parliamentary process. The remaining applications the Council will need to consider will largely focus on matters of detail with narrow parameters to be determined. Although there is no statutory duty to consult with parishes, the Council has taken the decision to notify Parish/Town Councils and Ward Members of Schedule 17 submissions once they are received.

### Q30 – Site 10 - West of Meriden

*Do you believe that Site 10 west of Meriden should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 3

Number supporting: 11

Number commenting: 9

#### **Key Issues raised by Representations:**

##### **Support comments**

- Site 10 can provide for affordable and special needs housing in Meriden.
- Accept need to identify land for housing around Meriden.
- Appropriate as extension to village without having detrimental impact on character or surrounding area.
- Excellent highway connections.
- Logical extension of Meriden that meets policy objectives and has least impact. Site is lower performing Green Belt, partly brownfield, has no constraints, high accessibility, is deliverable within a settlement identified for limited expansion, and is well-related to centre.
- Will contribute to identified local affordable housing need.

##### **Objection comments**

- Should also provide market housing to meet needs of all groups.
- Restricting development to the less sensitive southern part and utilising an alternative site, Site 197 Berkswell Road would allow more appropriate smaller scale and lower density development.
- Proposal of 100 homes on remaining 2ha would equate to 50dph; this density is too high. 3 storey development would visually conflict with character of village. Need to respect Site is gateway to village.
- Loss of potential Local Wildlife Site which should be surveyed before a decision is made to allocate this site - precautionary principle should not allocate the Site due to ecological constraint.
- Proposed access points should be reconsidered and more consideration given to residents if any construction takes place.
- Added traffic will worsen high risk associated with junction with Fillongley Road.

- Should be developed with 50 two and three-bedroom private and affordable homes.
- If this site is delivered as C2, it will not contribute towards meeting the Council's overall housing requirement and the overall affordable housing requirement.
- Site does not have capacity for 100 dwellings without significant harm to landscape character/biodiversity. Site part of green gateway to Meriden.
- The EA recommends hydraulic modelling of watercourse as part of a Level 2 Strategic Flood Risk Assessment to inform developable area and capacity, as mapping of risk has not been undertaken to this ordinary watercourse with a catchment of less than 3 square km.

#### **Draft masterplan**

- Demonstrates good use of space for open space incorporating lake.
- Density should not be too high and out of keeping.
- Concern over 100 dwellings allocation being too high, should remain at 50.
- Proposed access points should be reconsidered. Added traffic will worsen high risk associated with junction with Fillongley Road.
- Number of parking bays conflict with draft Meriden NDP.
- Vehicular access maybe better from Maxstoke Lane, or Birmingham Road.
- Need for pedestrian crossing across Fillongley Road, by Maxstoke Lane, across to shops.
- A comprehensive and collaborative approach needs to be taken on this site with the landowners.
- 1ha allocated for open space - this should not be a balancing pond/SUDS with a path leading to nowhere.
- 3 storey development would visually conflict with character of village. Need to respect site is gateway to village.
- Importance of trees/vegetation to setting recognised in LCA. Development would be uncharacteristic and loss of vegetation contrary to guidelines in LCA.
- The EA recommends that an unobstructed green corridor should be maintained along the banks of the watercourse to maintain/protect the green/blue infrastructure.

#### **Better alternative sites in Meiden**

- Sites 76 and 412 - Berkswell Quarry – have only been assessed for employment only and should be considered for housing.
- Site does not have capacity for 100 dwellings without significant harm to landscape character/biodiversity. Site part of green gateway to Meriden. Should consider other sites, such as Site 420 North of Main Road which performs better in site assessments and has no biodiversity constraint.
- Infrastructure requirements should include provision for an expansion of the primary school, which at capacity. This could be facilitated with the release of land north of Meriden between the existing settlement (and school) and the A45, including Site 81.

#### **Council Response (Draft Submission Version)**

- Site name has changed to ME1.

- Draft Submission Plan introduces specific Site policies, setting out principles for Site's development including enhancement to infrastructure, and supported by Concept Masterplans.
- Meriden is identified in the spatial strategy as a settlement suitable for limited expansion given the local range of services and primary school.
- The proposed site would be located to the west of Maxstoke Lane development, and would constitute a continuation of the development and rounding of the settlement.
- It is considered a 3 storey development would be appropriate in this location subject to design. This site provides an opportunity to create an enhanced gateway development into Meriden village.
- Following comments made by the EA in the 2016 and 2019 consultations, sites screened in the Level 1 Strategic Flood Risk Assessment were included in Level 2 SFRA, e.g. Site 10 (ME1). Flood risk mitigation recommendations have been included in the concept masterplan.
- An integrated drainage, landscape and ecological strategy should be developed for the Site. Trees and hedgerows across the site should be retained to ensure that the mature character of the site is safeguarded.
- All sites submitted for consideration as allocations for housing in the Local Plan have been assessed. Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated, taking into account the reasonable alternatives.
- The draft Meriden Neighbourhood Plan has been under development and reached Examination stage in December 2020. Although the draft NDP does not allocate any land for housing, it highlights this Site as the preferred site for housing development in the Meriden Parish area.

#### **Q44 – Any Other Comments - Meriden**

- New site south of Main Road and east of Berkswell Road submitted for allocation.

#### **Council Response (Draft Submission Version)**

- See comments above on the spatial strategy and site selection process.

## 13. North Solihull, Marston Green and Castle Bromwich

### Q31 – Infrastructure Requirements for North Solihull, Castle Bromwich and Marston Green

*Do you agree with the infrastructure requirements identified for North Solihull, Castle Bromwich and Marston Green, if not why not; or do you believe there are any other matters that should be included?*

#### Representations received:

Number objecting: 6

Number supporting: 5

Number commenting: 10

#### Key Issues raised by Representations:

##### General

- Glad to see that the Local Plan recognises that Castle Bromwich has no further capacity for development without compromising the quality of the local environment and open spaces.
- Object to development of Clopton Crescent Depot and British Legion Club.
- Object to further development on open green space in North Solihull. Green space enhancement is vital to this part of Solihull.
- There should be a greater emphasis on the provision and maintenance of public space for recreation and amenity. A uniform standard should be applied across the Borough for defining requirements for public access and green space.
- Existing facilities including schools and doctors are overcrowded. There is a lack of children's play space.
- Traffic is gridlocked.
- Poverty and inequality should be the priorities to be tackled in these areas, particularly in the 3 regeneration Wards and pockets of Castle Bromwich. Life expectancy is less in Smith's Wood than in Knowle or Balsall Common. This needs to be tackled.
- The North of Solihull (north of the A45) has areas which suffer from inadequate bus services. These affect connectivity to Solihull Town Centre, other parts of the Borough, plus Birmingham, and other out of Borough areas. This affects job prospects.
- Strongly object to SLP Site 3 Simon Digby. Residents of Heath Green Close already have the motorway on one side and the proposed HS2. There are parking and traffic safety problems opposite Heath Green Close due to the houses built on the old Simon Digby School Site. Traffic is already horrendous at peak times along the Chester Road, and this will run alongside the proposed development.
- Public services will be placed under further pressure.
- CFS 341 is designated as a Green Space Site within the Solihull Local Plan (December 2013) and within the Draft Local Plan Review Proposal Map (November 2016); however, this has not yet been secured through respective applications. There is no mechanism to secure public access. The loss of this open space proposal would not adversely affect the

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supply of open space and would be clearly outweighed by benefits of housing contributing to the Borough need.

- The high level sewer capacity assessment carried out by Severn Trent Water highlights Chelmsley Wood Shopping Centre and Jensen House, Auckland Drive as Medium Impact Sites. For most development there are no particular risks. Once detailed developments and site-specific locations are confirmed, STW will provide more specific comments and modelling of the network if required. Any necessary improvements will be completed to provide additional capacity once there is confidence that development will go ahead.

### **Kingshurst Centre**

- The Public Health approach to redeveloping Kingshurst Village Centre is to be commended.
- Improving access to employment and public space enhancements are to be commended. Sadly, there is limited space for development. This means that even small-scale developments will have the impact of creating tension.
- Providing new homes in Kingshurst centre is an excellent use of the space and the regeneration will make residents greatly happy.

### **Jenson House**

- Jenson House includes Bosworth field, which is used extensively by the community. The proposed small junior football pitch will not be beneficial to anybody. The land is currently used by dog walkers, clubs, children and used by the cars area to hold activities such as fun days and car boot sales, which brings the community together.
- There is limited green space for children to play on the estate, particularly due to heavy parking.
- Regeneration opportunities should not compromise existing open space, such as playing pitches. Assessment of value of open spaces should include survey of use by residents, as spaces are often popular and well-used.
- All green spaces are being built on, there is already a lack of green space.
- Traffic is gridlocked.
- The area is built-up enough.
- Object to the proposed amount of houses.

### **Transport**

- The changes to the Chester Road at Chelmunds Cross and Hurst Lane need an urgent review. Particularly in light of HS2 construction traffic that will use the A452/Chester Road.
- Road infrastructure in Castle Bromwich should be re-looked at. There is a strong desire in the community for the section of Chester Road around Morrison's to be changed to improve traffic flow and pedestrian safety.

### **Infrastructure**

- Failure to provide Police infrastructure will undermine the delivery of a safe and secure development. There should be reference to the need for financial contributions towards additional expenditure burden placed on WM Police as a consequence of the proposed growth.



- Kingshurst centre is in dire need of demolition. The shops are mostly vacant and attract a lot of anti-social behaviour.
- New improved shops and NHS services would provide amenities that locals desperately need. More people would use them and make residents of Kingshurst feel safer.
- Schools are overcrowded, the Council has already closed 6 schools.
- Doctor's availability is very limited and may not be able to cope with more patients.

### **Concept Masterplan**

- Seek engagement in preparation of Concept Masterplans and policy implementation and delivery once the Plan is adopted.

### **Support**

- Support desire to improve Chelmsley Wood and Kingshurst centres. There is wasted/disused space above shops and around Stephenson Drive in Chelmsley Wood Town Centre.
- Agree there is a need to improve access to public transport. Journey times to Birmingham/Solihull are very long.
- Public realm improvements much needed in places, but should not be solely linked to further development. Need to invest in public spaces to increase active travel, cycling and walking, and recreation.

### **Council Response (Draft Submission Version)**

- Significant investment has been committed to the North Solihull area since 2005, including new housing, schools, open space and play areas, employment opportunities, community infrastructure, transport improvements and two new village centres at Smith's Wood and Chelmonds Cross. The Plan proposes to continue investment in local regeneration at Kingshurst Village centre (see below).
- A draft Infrastructure Delivery Plan (2020) has been published to support the proposals in the draft Submission Plan.

### **Q32 – Site 7 - Kingshurst Village Centre**

*Do you believe that Site 7 Kingshurst Village Centre should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 6

Number supporting: 7

Number commenting: 7

#### **Key Issues raised by Representations:**

#### **Support**

- Regeneration of Kingshurst Parade is long overdue and in dire need of being demolished. The shops are mostly vacant and attract a lot of anti-social behaviour.

- Strongly support this and suggest that any further delays to this would be unacceptable.
- New improved shops and NHS services would provide amenities that locals desperately need.
- New shops would attract more people to go and use them and make residents of Kingshurst feel safer.
- Providing new homes is an excellent use of the space and the regeneration will make residents greatly happy.
- Support the Site being included as an allocated site to provide a new village centre, including a health and wellbeing centre and a community space.
- Social housing needs to be maximised.

### **Objections**

- All of the houses along Colling Walk and Church Close houses, except numbers 1 to 6 Church Close, will be demolished. These are perfectly good houses and it is not clear what will happen to owners/tenants.
- Development must not see the loss of social or co-operative housing, in and around the Kingshurst Parade development, unless it can be shown to be better than refurbishment.

### **Comments**

- To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed. Recommend that Site 7 is not relied upon as an allocation for housing.
- The level of social housing should be maintained or improved on its current level.

### **Draft Masterplan**

- The level of social housing should be maintained or improved on its current level.
- Housing should be affordable and include social housing and be built to complement the new village centre.
- A Solihull Council-owned space for voluntary and community groups to use should be provided.
- The social, economic and environmental impacts of demolition and refurbishment now being undertaken, with reference to the local energy plan and housing standards, and in conjunction with residents is vital.
- Masterplan should include a health and wellbeing centre.

### **Council Response (Draft Submission Version)**

- Site name changed to NS1.
- Welcome support for redevelopment of Kingshurst village centre.
- The Draft Submission Local Plan includes a specific Site policy, setting out principles for Site's development, and these have been incorporated into the outline planning permission.

- This Site received outline planning permission for the demolition of existing local centre and redevelopment of a new mixed-use local centre, including up to 86 residential with retail and healthcare spaces in 2020 (PL/2020/01235/MAOOT). This also includes public open space, landscaping, parking and associated infrastructure including a new connecting through road.

### Q33 – Site 15 - Jenson House/Auckland Drive

*Do you believe that Site 15 Jenson House/Auckland Drive should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?*

#### **Representations received:**

Number objecting: 34

Number supporting: 1

Number commenting: 7

#### **Key Issues raised by Representations:**

##### **Loss of green space/playing fields**

- Green space should be retained. Playing fields are used by local children, for recreation, kids activities organised by the 'Cars Area' group, dog walkers, adults for exercise and jogging, Smith's Wood football team for practice, community events (car boot sales, fun days). Is the area's biggest asset and will affect organised activities provided to residents within the area.
- Birmingham City FC Community Trust has been working in partnership with the Cars Area Together Team since August 2018 to provide a safe, secure and positive environment on the site for members of the local community to engage in a variety of sporting activities. This includes weekly sessions, holiday camps for young people and community festivals during the year.
- It is a priority area in SMBC's Green Space Strategy.
- It is a safe secure open space for families, sports leaders and dog walkers, as there's only one entrance area to watch.
- This is the only area of green space left in the north of the Borough, developing this will create more problems than it solves. Sport England would require this to be replaced nearby, however Smith's Wood and the surrounding area have little green space for relocation of such a facility.
- Site falls within the Birmingham and Solihull Local Delivery Pilot which seeks to demonstrate a significant shift in physical activity and community activism, so that people become more physically and socially active. Recent consultation exercise indicated residents wanted to retain this open space.
- Concern about the overall reduction in open community space in the area. Further 50 properties will bring more children with nowhere to play.
- Would support if playing fields retained given the lack of green space and need to promote healthy lifestyles in the ward.

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**General**

- Unclear what will be refurbished/rebuilt on the school Site following the successful Free School bid. The school field was always kept on proviso it would be used for educational facilities. As well as sporting facilities, Site should not be considered for housing, but much needed education/community/leisure.
- Could lead to the loss of a site that is needed for a new school. Reinstating the school is the sensible option in this instance. The area already has a lack of school spaces.
- Will increase density and housing concentration in an already built up area. Smith's Wood is densest populated ward in the Borough. North Solihull has a high intensity of housing.
- The Mayor, Andy Street, wants priority placed on land not in use not on green spaces.
- Concern over housing being built so close to existing properties, blocking out sunlight and the possibility of being overlooked.
- There is uncertainty over the extent of the Site available for development and hence its deliverability for 50 houses. It is inappropriate and unsound for the Site to be allocated, given national requirement for allocated sites to be deliverable.
- Amount of houses proposed is unsuitable together with a junior football pitch which will not be beneficial to anyone.
- Additional housing cannot be matched by the required infrastructure. Doctors are already oversubscribed with difficulties getting appointments, additional housing will exacerbate the issue.
- Will put a strain on utilities and services in the area, including Council services.
- Auckland Hall is a vital part of community energy and innovation, home to groups such as 'Safe and Sound', 'The Big Local', and Kingfisher Foodbank. It includes the Summerfield Educational Facility and the former Primary School.

**Traffic**

- Traffic is an issue, particularly around the Green Lane area. Will add to existing car parking problems.
- The proposed road will create a road safety issue, as currently residents can walk safely down both Alvis Walk and Lotus Walk with no traffic risk. Road outside Vauxhall Crescent will not be safe for the elderly and children.
- There will be associated air and noise pollution
- Increases in anti-social behaviour will worsen.

**Council Response (Draft Submission Version)**

- Since the consultation on the 2019 Supplementary consultation, it has been agreed that a significant part of the Jensen House (Site 15) will be used for educational purposes. The larger part of the site is now no longer available for re-development, and the Site has not been progressed to the Draft Submission Plan stage.

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**Q44 – Any Other Comments - North Solihull, Marston Green**

- Simon Digby, Chelmsley Wood (Site 3 in SLP 2013). Concerns at inclusion and scale of proposal, impact on biodiversity/Cole Bank Park Local Nature Reserve and on recreational use, impact of new road accessing site and failure to include within consultation.
- Site 54 Clopton Crescent, Chelmsley Wood/Kingshurst and Fordbridge. Residents seeking retention of green space, raising concerns about impact on infrastructure, and referring to covenant to protect site from development.
- Object to Site 54 as site intended for recreation, loss of open space, loss of facility comprising the Family Tree Club, a memorial and a grass cutting area which is well used by the community, and out of character with area. Existing Depot should be returned to open space.
- Site 341 Coleshill Heath Road meets exceptions to restricting the development of sites for open space within SLP 2013 Policy P20.
- Site 5 Chester Road/Moorend Avenue, Chelmsley Wood. Comfortable with removal of site from Plan.
- Site 5 should be reinstated for allocation for development as sustainable location, close to facilities and services, and on low grade Green Belt land.

**Council Response (Draft Submission Version)**

- The Simon Digby site was an allocation in the 2013 Solihull Local Plan. It is therefore an adopted allocation not affected by consultation on the Draft Submission Plan. The site is in the Council's ownership and its development will be fully compliant with Local Plan policies. Careful attention will be given to ensure development takes account of environmental, recreational and infrastructure concerns.
- Only the brownfield part of Clopton Crescent has been included as a potential development site within the housing land supply (as a SHELAA source).
- Development of Site 5 would be dependent on the reconfiguration of the traffic junction as part of a wider traffic improvement scheme, which on currently available evidence is unlikely to be feasible. As there is uncertainty over the ability for the Site to be delivered, it has not been progressed further since the 2016 consultation stage.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites in the settlement have been allocated taking into account the reasonable alternatives.

## 14. UK Central Hub

### Q44 – Any Other Comments - UK Central Hub Area

- Supportive of commitment to UK Central Hub Area in Draft Local Plan, particularly contribution to new housing. Plan should recognise findings of updated Growth and Infrastructure Plan/Framework Plan, provide further clarity on place-making and range of uses accommodated, and provide flexibility to develop in phased approach.
- Plan must support growth at Arden Cross in sound and evidential manner, removal of Site 19 from Green Belt essential and any delays should be kept to absolute minimum.
- BCC support the approach being taken, particularly in relation to land at Arden Cross and at the NEC and the promotion of the site for high quality, high density mixed-use development.
- Delivery of 2,500 dwellings at NEC subject to market conditions.
- National Motorcycle Museum should be included in the UK Central Hub Area and Site 19 extended south to include NMM site, due to synergies and opportunity for development. Green Belt Assessment demonstrate land is lower performing Green Belt.
- Failure to disclose the plans for The Hub alongside the Draft Masterplans is a serious omission that undermines the entire consultation process, as may show that new housing aspirations can be met without some of the sites being developed, or at lower densities.
- Requirements for green infrastructure are missing from the UK Central Hub section.
- No reference to the Historic Environment in the UK Central Hub, although scale and location of growth would affect a number of important heritage assets. Heritage Impact Assessment will help inform an appropriate design response to accord with national policy and legislation in relation to the historic environment and the delivery of sustainable development.
- Absence of positive references to the need to provide Police infrastructure/financial contributions associated with the UK Central Hub Area and particularly the residential component at Arden Cross, and the NEC undermines the delivery of safe and secure development.
- UK Central Hub/HS2 interchange site is crossed by a high voltage electricity transmission overhead line.
- The EA recommends a Sequential Test and Level 2 Strategic Flood Risk Assessment (SFRA) to support allocation of Site 19, as Holywell Brook, a main river flows through Site. All development should be outside Flood Zones 2 and 3, as shown on SFRA Climate Change Maps and a minimum 8m easement maintained along banks for flood risk access and provision of green and blue corridor.
- The EA recommends hydraulic modelling of watercourse as part of a Level 2 Strategic Flood Risk Assessment for Site 20 to inform developable area and capacity, as mapping of risk has not been undertaken to this ordinary watercourse with a catchment of less than 3 square km.
- The EA recommends that an unobstructed green corridor should be maintained along the banks of the watercourse on Site 20 to maintain/protect the green/blue infrastructure

- Support Site 20 Damson Parkway as sustainable location for commercial and industrial use.

#### Council Response (Draft Submission Version)

- Site names have been changed; Site 19 to UK1 and Site 20 to UK2.
- The Hub Framework Plan (2018) and Hub Growth and Infrastructure Vision (2019) have been taken into account in the Draft Submission Plan. Development principles set out in the Arden Cross Masterplan 2020 and updated masterplans for the NEC and Birmingham Airport will also guide the delivery of the UK Central Hub area. Since the 2019 Supplementary consultation, the Council has committed to producing an SPD to coordinate development and the delivery of infrastructure across the Hub area.
- The Draft Submission Plan removes the Arden Cross Land (known as allocation UK1) from the Green Belt. The exceptional circumstances to justify the release of this land from the Green Belt are clearly set out in para. 94 of the Draft Submission Plan. The site will be brought forward as part of the wider development of the Hub area.
- The Vision plan for The Hub area is included in the Draft Submission Plan and the Arden Cross Masterplan (2020) includes a concept plan for the Arden Cross land. A concept masterplan will be prepared for the UK2 area as work progresses on bringing forward the Site and wider proposals.
- The NEC Masterplan sets out a trajectory for the quantum of housing to be delivered. It includes provision for up to 2,500 dwellings, of which up to 2,240 will be provided during the Plan period.
- The need to ensure green infrastructure is integrated into the design and layout of The Hub area is recognised. The Arden Cross Masterplan sets out development principles for the UK1 Site, which along with the Hub Growth and Infrastructure Vision (2019) and other masterplans for the area will guide ongoing work to coordinate the delivery of green infrastructure.
- The UGC have commissioned a Utilities Study for the UKC Hub Area, and work is ongoing to address the utilities infrastructure needs for this area.
- Financial contributions will be required in line with the Infrastructure Delivery Plan, these will include necessary provision for policing. Draft Submission Policy 15 sets out principles to guide the design and layout of developments specifically referring to the need for safe streets and public spaces, and that urban design should comply with current guidance for design principles such as secured by design.
- Agreed, it is necessary to properly assess the impact of proposals at The Hub on heritage assets and set out any necessary mitigation measures this will be undertaken as part of ongoing work to progress the Hub Area as detailed proposals come forward.
- Following comments made by the EA in the 2016 and 2019 consultations, sites screened in the Level 1 Strategic Flood Risk Assessment were included in Level 2 SFRA, e.g. Sites 19 and 20. These findings will be taken into account as part of ongoing work to bring forward the UK Central Hub Area.
- Police infrastructure has been included in the draft Infrastructure Delivery Plan (2020) and proposed costs have been tested in the Viability assessment to support the Draft Submission Plan.





## 15. Green Belt

### Q34 – Green Belt Settlements

*Should the washed over Green Belt status of these settlements/areas be removed, and if so what should the new boundaries be? If not why do you think the washed over status of the settlement should remain?*

#### Representations received:

Number objecting: 37

Number supporting: 18

Number commenting: 16

#### Key Issues raised by Representations:

##### General

- Appropriate to consider whether washed over status of settlements should remain.
- Status should be determined in accordance with the 2019 NPPF (para. 139).
- Washed over Green Belt status should be removed, as settlements have changed in character and to make logical defensible boundaries.
- Settlements should be removed from Green Belt to help boost windfall housing provision and maximise delivery of sustainable homes.
- New Green Belt boundaries should be drawn tightly around currently developed curtilages and Local Green Space designation used to provide continued protection for valued areas.
- Green Belt designation should be maintained and used to promote types of homes needed, by allowing infill sites for starter homes, affordable housing and self/custom build homes only.
- Green Belt purposes have not changed and no exceptional circumstances exist for change in status/development, which will set precedent for further loss.
- Green Belt should not be removed as lost forever. What provisions are there to replace any lost?
- Text is confusing and may produce inconsistency in responses, and should be addressed by clearer explanation and mapping to enable proper assessment of impact.
- In the absence of certainty over housing numbers and contribution to the wider Housing Market Area shortfall, question to what extent decisions can be made on which settlements to inset from Green Belt.

##### Cheswick Green

- Should be removed from the 'washed over' status to allow for allocation/safeguarding of some smaller developments, such as amber sites A1 and A2 that would not affect the openness of the Green Belt and add to the housing land supply.
- Rationale for removal of Green Belt status is questionable, as based on developments that are inconsistent with Green Belt policy.
- Green Belt should be retained to protect village character.

- Settlement has strong Green Belt boundaries which would be lost if washed over status removed, weakening contribution to Green Belt functions and setting precedent for further development.

#### **Millison's Wood**

- None.

#### **Tidbury Green**

- Should review Green Belt boundaries as a whole in area not just remove built-up areas, to include land west of Rumbush Lane.
- Should remove settlement including properties along Norton Lane as far as Rumbush Lane.
- Should be removed, as significant growth proposed resulting in pockets of land that no longer fulfil Green Belt function, and should be part of site allocation proposals.
- Rationale for removal of Green Belt status is questionable, as based on developments that are inconsistent with Green Belt policy.
- Should be retained as 'washed over' Green Belt, as there has been more than an excess of recent development which has adversely affected the character of the settlement increased traffic, flood risk and impact of wildlife and landscape.
- Will lead to serious concerns about coalescence of settlements.

#### **Whitlock's End**

- Should review Green Belt boundaries as a whole in area, not just remove built-up areas.
- Should be removed, as significant growth proposed resulting in pockets of land that no longer fulfil Green Belt function, and should be part of site allocations, such as amber site A3.
- Washed over Green Belt status should be removed as does not make important contribution to Green Belt functions, and new logical defensible boundaries defined.
- Rationale for removal of Green Belt status is questionable as based on developments that are inconsistent with Green Belt policy.

#### **Widney Manor Road**

- Should be removed, as has less value for Green Belt.
- New boundary should be Widney Manor Road itself.
- Roll back of Green Belt boundary should be justified to facilitate infilling to deliver housing targets or to accommodate specific allocations, such as amber site A7.
- New Green Belt boundary should be further east up to the Local Nature Reserve to enable an affordable-led development.
- No exceptional circumstances to justify change to Green Belt boundaries, which would set precedent for further Green Belt loss between Solihull and Knowle/Bentley Heath.
- Object to removal of Green Belt status and possible inclusion of site allocations such as amber site A7 as not supported by LDF Core Strategy Assessment of Green Belt 2011 or the Green Belt Assessment 2016, and Appeal (114-118, Widney Manor Road) concluded that significant harm would be caused.

- Would not create logical boundary as land to north and south on Widney Manor Road would remain in Green Belt.
- Not previously developed land as NPPF para. 138 excludes residential gardens.
- Implications of change for traffic needs detailed assessment.
- Object to removal of land at amber site A7 (r/o 168-200 Widney Manor Road) from Green Belt as inappropriate/hazardous for development close to Widney Lane junction, would create additional pollution and loss of wildlife/mature trees.
- Should assess alternatives to releasing Green Belt such as focussing on brownfield sites.
- Land to east of Widney Manor Road should remain Green Belt.

#### Council Response (Draft Submission Version)

- Settlements can be retained in Green Belt where character contributes to openness and/or there are no allocations on or nearby them that would necessitate redrawing of the Green Belt boundaries.

### Q35 – Green Belt Villages

*Should the washed over status of these settlements/areas remain? If not why not?*

#### Representations received:

Number objecting: 4

Number supporting: 17

Number commenting: 10

#### Key Issues raised by Representations:

##### General

- Opportunity to rationalise and re-define Green Belt boundaries designated within very different planning context.
- Must demonstrate exceptional circumstances for any changes to washed over status.
- Washed over Green Belt imposes unnecessary development restrictions that prevent fully inclusive places, and is overly restrictive compared to NPPF, which allows limited infilling.
- Quality of Green Belt generally poor agriculturally with limited economic benefit.
- Disagree that settlements contribute to openness as infilling over time. Should not be washed over unless layout precludes definition of logical boundary.
- Text is confusing and may produce inconsistency in responses, and should be addressed by clearer explanation and mapping to enable proper assessment of impact.
- Washed over status remains appropriate, as provides protection from inappropriate development and limits encroachment and sprawl.

##### Barston

- Should remain as washed over Green Belt if there is no proposal to release land for housing.

**Chadwick End**

- The settlement of Chadwick End which has distinct north and south parts should be taken out of the Green Belt and a settlement boundary drawn around it to recognise opportunities for infilling and safeguard land in between.

**Berkswell**

- Should remain as washed over Green Belt if there is no proposal to release land for housing.
- Village is part of countryside and Green Belt and should remain washed over to protect the Meriden Gap.

**Bickenhill**

- Should remain as washed over Green Belt if there is no proposal to release land for housing.

**Others**

- Agree Grove Road should remain washed over Green Belt, as preserves character of entrance to Dorridge, and provides clear boundary to residential area.

## Council Response (Draft Submission Version)

- Settlements can be retained in Green Belt where character contributes to openness.

**Q36 – Other Green Belt Areas**

*Are there any other areas of the Borough where washed over status should be reviewed, if so which areas and why?*

**Representations received:**

Number objecting: 0

Number supporting: 3

Number commenting: 13

**Key Issues raised by Representations:****General**

- Status should be determined in accordance with the 2019 NPPF (para. 139).
- Policy relating to washed over Green Belt is overly restrictive compared to NPPF, which allows limited infilling.
- Text is confusing and may produce inconsistency in responses, and should be addressed by clearer explanation and mapping to enable proper assessment of impact.

**Specific areas**

- Areas surrounding Knowle and Dorridge and around the Meriden Gap where washed over and do not contribute to openness.
- Developed land north of Jacobean Lane and south of Grove Farm, Copt Heath which perform no Green Belt function, do not contribute to openness and are part of Knowle.

- Developed land at Gentleshaw Lane, Oldway Drive, Pool Meadow Drive, Riverside Drive off Warwick Road, Solihull which do not contribute to openness.
- Either side of Hampton Lane, east of Solihull.
- Oak Farm, Hampton Lane, Catherine-de-Barnes.

#### Council Response (Draft Submission Version)

- Land should only be removed from Green Belt in exceptional circumstances.

### Q37 – Compensation for Green Belt Loss

*What compensatory provision should be made for land being removed from the Green Belt? Where relevant please give examples that are specific to individual sites proposed for allocation.*

#### **Representations received:**

Number objecting: 48

Number supporting: 13

Number commenting: 61

#### **Key Issues raised by Representations:**

##### **General**

- Green belt should be protected rigorously so no need for compensation.
- Given scale of Green Belt loss compensation is essential and should grant even greater protection for remaining green spaces.
- What provisions are being made to replace the Green Belt land being lost for development?
- Compensation will not make up for loss of Green Belt and development or impact on infrastructure.
- Compensatory measures should be framed around the provisions of para. 141 of the NPPF.
- Compensatory provisions for the loss of landscape and open areas should not be confused with Green Belt issues.
- Compensatory measures should involve qualitative provision, such as improved access, rather than additional Green Belt land.
- Any current Green Belt site over say 2ha proposed for development should allocate 50% to be retained as open landscape and other acceptable Green Belt functions.
- Should provide benefit to compensate for loss of openness and be provision over and above that required for development, in the area of the loss. Could include on and off-site enhancements and needs element of control such as ownership.
- Sites being removed from the Green Belt should incorporate compensatory provision as part of the masterplanning approach.

- Should recognise the multiple threats posed against the Meriden Gap by HS2, M42 Junction 6 and MSA, which could increase pressure for further development and result in loss of gap between urban area and Catherine-de-Barnes.
- Improving public access, safety and maintenance of footpaths should be priority, based on Rights of Way Improvement Plan.
- Improvements to access to Sites of Special Scientific Interest or other designations and protection of heritage assets and their settings, taking account of views from the designated areas/assets.
- Provision of nature reserves as a lot of these areas will be lost and the wildlife eradicated.

### **Proposed Housing Allocations**

- Create Country Parks on former Site 13 south of Woodloes Road, Shirley, on old Berry Hall Estate between Solihull bypass and Ravenshaw Lane, and adjoining Balsall Common to compensate for loss of Green Belt in those areas.
- No enhancements can compensate for loss of Green Belt and recreational footpaths for Site 1 Barratt's Farm given development, HS2, proposed bypass and threat of A46-A45 link, which will erode Meriden Gap between Balsall Common and Coventry.
- Concerned about loss of easy access to countryside from east Balsall Common currently provided by network of footpaths on Barratt's Farm. Suggest creation of circular walks, cycleway/footpath linking Berkswell and Balsall Common/Kenilworth Greenway, extension of footpath M196 north of Railway Inn and woodland planting behind Sainsbury PFS on A452.
- Support principle, but rural setting of Kenilworth Greenway being destroyed by HS2 and will not be reinstated to former condition. Link to station meaningless as it will be footpath to a carpark.
- Site 1 Barratt's Farm there should be large areas of public open space to compensate for loss of Green Belt.
- Site 1 Barratt's Farm provision of Local Green Space on Site 169 Catholic Church land, Meeting House Lane.
- Site 2 Frog Lane can provide biodiversity enhancements and provision for accessible play areas to improve environment and access.
- Site 4 West of Dickens Heath can provide biodiversity enhancements and provision for accessible play areas to improve environment and access.
- Site 8 Hampton Road protection of heritage asset and setting.
- Site 9 Knowle should include extension to Local Wildlife Site to retain amenity and encourage public access.
- Essential that significant compensation provided in Blythe/Shirley given scale of growth to protect all remaining Green Belt.
- Compensation cannot make up for loss of Green Belt land in South Shirley.
- Former Site 13 should be designated as a Country Park with separate consultation/bidding process, be public open space or given to community as Village Green and/or Nature Reserve.

- Sites 13 and 26 should be protected in perpetuity as compensation for loss of Green Belt on Site 12.
- The gap between Shirley and Dickens Heath will be narrow, so there should be protection of the Green Belt.
- Provision of safe accessible open space around Cheswick Green.
- Improvements to public transport, park and ride, off road cycle paths, enhanced sports and recreational facilities in South Shirley.
- Site 16 East of Solihull includes coppice r/o Pinfold Road which should be widened and extended to provide buffer and wildlife corridor.
- Site 16 improvements to access to Grand Union canal and protection of heritage assets and their settings.
- Site 21 has potential to reinforce the urban edge as set out in the Landscape Character Assessment Guidelines, to enhance Green Infrastructure and habitat corridors, and to link into the existing public right of way to the north.

#### **Other Sites**

- Amber Site A7 Widney Manor Road could not provide any compensation for loss of Green Belt, given its shape and size.
- Site 5 Grove House, Jacobean Lane masterplan shows compensatory planting to enhance the canal as well as area large areas of Public Open Space.
- Site 62 Stratford Road, Shirley could include improvements to Shirley Golf Club and the environmental quality and accessibility of the golf course.
- Site 99 Tanworth Lane, Shirley could include biodiversity enhancement and accessible play areas.
- Site 104 Blue Lake Road, Dorridge includes proposal for a new country park for the eastern part of the site.
- Site 110 Kenilworth Road, Knowle includes an area of land omitted from the site that could provide access to open areas adjacent to Knowle Locks for recreational purposes and preserve and improve biodiversity along the canal corridor.
- Site 305 North of Balsall Common will comprise a landscape-led masterplan and will enhance Green Infrastructure and linkages to the wider countryside.
- Site 313 Fulford Hall Farm can provide improvements to environment; enhancement of green infrastructure, net gain of trees, management of ancient woodland, provision of open space, play areas and/or playing fields including further provision for Dickens Heath Sports Club and improved access between Tidbury Green and school, facilities and land to east.
- Site 407 Widney Manor Road will provide a direct link into the public right of way to the south.
- Site 416 School Road, Hockley Heath will provide opportunity to link into the wider movement network and nearby public rights of way to encourage accessibility beyond the village into the surrounding countryside.
- Site 417 Stratford Road, Hockley Heath suitable for the provision of sports pitches. Provision of playing pitches to north or west of the site would assist in the transition

between the development and the countryside and maximise the gap between the village and Blythe Valley/Cheswick Green.

- Site 420 Main Road, Meriden can provide extensive green infrastructure; public open space, recreation areas, play space, attenuation areas, community garden and parkland to improve environmental quality with element of public access for existing and new residents. Would support access to Green Belt/countryside to east and improvements to existing right of ways. Further tree/hedgerow planting could be achieved.

#### Council Response (Draft Submission Version)

- Proposed site policies in Draft Submission Plan set out ways in which loss of Green Belt can be offset by compensatory improvements.



## 16. Omitted Sites

### Q 38 - Amber sites

*Do you have any comments on these amber sites, i.e. is it right they should be omitted, or do you believe they should be included, if so why?*

#### Representations received:

Number objecting: 117

Number supporting: 35

Number commenting: 54

#### Key Issues raised by Representations:

### Land r/o 575A to 587 Tanworth Lane, Cheswick Green (ref A1)

#### Support

- Opportunity to infill land within built up area utilising brownfield land and garden land which would not impact on openness.
- Should be included in preference to developing site 26 and Site 4.
- Sustainable location, ideally located close to Cheswick Green village services, school and existing bus services, well served by pavements.
- There are no constraints so site should be categorised as green. Object to inclusion as priority 5 in site selection assessment as a proportion of the site is on brownfield land. Should be priority 3 for brownfield area and 5 for remainder as lower performing Green Belt. SHELAA site assessment misleading, should be Category 1 as there is no bad neighbour use or wildlife site, is not back land development and only one dwelling requires demolition.
- Is within established settlement boundary of Cheswick Green village. Development should be judged on the merit of each proposal independently of the washed over status of the village.

#### Object

- Cheswick Green cannot cope with more development. There has already been too much. Residents have had to cope with years of disruption, noise and site traffic from the Cheswick Place development.
- There is no need to change the Green Belt status of the area in order to deal with proposals to develop any of the sites.
- There are not enough facilities compared with the amount of houses.
- No new schools or doctors are proposed.
- Tanworth Lane is over 1 mile long and there are no bus services, public transport is very poor in the areas.
- The road has a narrow walkway on either side which is not safe for pedestrians and there is no traffic control or pedestrian crossing. The road has a blind bend and has had to cope with excess traffic since the new estate was built between Tanworth Lane and Coppice Walk.

- Concern over the impact of more housing on flooding. The site is close to Blythe flood plain area and already floods significantly. There could be an increased risk of flash flooding.
- Cross roads garage is an active fuel station, contamination from potential flooding would be a big worry for residents on this road. There would also be environmental concerns if removal of the underground tank from the garage was necessary.
- Creating public access to rear gardens will reduce security.
- Development is unlikely to be in keeping with the character of the area, as the majority of properties are low rise and open.

#### Council Response (Draft Submission Version)

- Whilst the site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This Site is not therefore being taken forward as an allocation.

### Land at Mount Dairy Farm, Cheswick Green (ref A2)

#### Support

- Support all amber sites being included. This site should be subject to careful checking in terms of flood risk.
- Is within established settlement boundary of Cheswick Green village. Development should be judged on the merit of each proposal independently of the washed over status of the village.

#### Object

- There is no need to change the Green Belt status of the area in order to deal with proposals to develop any of the sites.
- There is already over development. Development would overshadow neighbouring gardens. Rainwater would run from higher ground onto Archer Drive which gets bogged.
- Mount Dairy Farm is part of the local heritage of the village. This land should under no circumstances be developed. Will turn a rural location into a dense urban corner of a beautiful village.
- Would impact on urban sprawl and lead to overdevelopment.
- Flooding to the rear of Coppice Walk is prevalent, in May 2018 gardens and houses could not cope with the flood waters from the garages, houses and land behind.
- There is contamination of the ground from the petroleum pumps on the garage.
- Access would be on an accident hot spot which is currently a 40mph speed limit.

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**Council Response (Draft Submission Version)**

- Whilst the Site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This Site is not therefore being taken forward as an allocation.

**Land r/o 146 to 152 Tilehouse Lane, Whitlocks End, Tildbury Green (ref A3)**

- Strongly supported along with other Amber sites also being included.
- Support inclusion of this site and that it is extended to include Site 84.
- Object that new homes will not be creating a community.
- Object to impact on already overstretched roads.
- Less fields would create more surface water run off with the potential for increased flood risk.
- Object to loss of sports facilities and the impact of this on the local community from a health and social perspective.
- Site should be assessed as green and allocated:
  - The housing, railway line and road provide strong defensible boundaries.
  - It is located in a sustainable location near the station and existing bus services and close to local facilities.
  - The site has no significant constraints and is available.
  - SHELAA assessment is misleading, should be Category 1.
- Object to inclusion as priority 8 in site selection methodology as the site is medium accessibility and part brownfield.

**Council Response (Draft Submission Version)**

- Whilst the Site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This Site is not therefore being taken forward as an allocation.

**Golden End Farm, Kenilworth Road, Knowle (ref A4)**

Petition against: 1,150 signatures

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**Support**

- The site immediately adjoins Knowle village and offers a highly sustainable option to bring forward an exemplar housing development.
- The sites scores highly in the SHELAA and has been correctly identified as part of the deliverable supply.
- The site is highly accessible, it was identified as one of the most accessible sites in the Borough in the Accessibility Mapping Report. It is close to employment in Solihull town centre/UK Central.
- Site is adjacent to an existing primary school, within walking distance of facilities in Knowle and will not affect Knowle Conservation Area.
- Should be included in preference to developing site 26 and Site 4.
- Site is reasonably level, there is a clearly defined boundary along Kixley Lane, Grand Union canal and Kenilworth Road.

**Object**

- Petition signed by 48 residents objecting:
  - to development of highly scoring Green Belt land (other sites have scored significantly lower and retained Green Belt status).
  - impact on already busy roads and junction with Warwick Road and Kenilworth Road.
  - infrastructure is unable to cope with the increased population from all the additional sites that are proposed in Knowle.
  - Dorridge is better equipped to cope with an increase in population however no sites are put forward.
- Should not be developed, site is located in a very important Green Belt area and would have a negative visual impact on the entrance/exit to the village.
- There are already three development sites in Knowle, including one between Knowle and Dorridge. This is unfair on Knowle and involves a 30% increase in growth.
- Other reasonable options have not been appropriately considered.

**Kixley Lane**

- Kixley Lane is an unspoilt narrow country lane of historical significance in the village which diminishes in width at the end.
- It is used daily by walkers, dog walkers and cyclists to access the countryside. The release of the site for housing would destroy the important historical approach to Knowle from the east when entering from open countryside for future generations.
- Kixley Lane has an entrance to the adjacent school so at dropping off times the lane is already congested.
- Development here would mean that developers would also look at the Wet Meadow (SSSI) and the widening of Kixley Lane as a possible next step.

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**Infrastructure**

- Concerns about the impact on local infrastructure and services with increased traffic and lack of parking.
- No evidence to explain how local services and infrastructure would cater for significantly increased demand from growth in population/traffic.
- Infrastructure requirements already outstrip CIL contributions.
- Local public services including, school places, doctor's surgery, dentists, parking spaces, sewage pumping, would be unable to support such a large scale development.
- Whilst it is close to the village centre which may result in less traffic generation, increased traffic flow from sites 8 and 9 means there will be further congestion along High Street.
- There is already serious road traffic congestion through Knowle with gridlock on Kenilworth Road and Hampton Road, especially with heavy goods vehicles. Further traffic will completely clog up the village as residents need to get to Birmingham or the M42.
- Large volumes of traffic through Knowle are already to the detriment of the Conservation Area and Listed buildings.
- Concern that if further problems arise the Council will respond. Better to have a proactive rather than reactive planning strategy to what is an inevitable problem.
- There is very limited local employment in Knowle.

**General**

- If anything this site should be considered for the replacement football ground rather than the prominent and visually intrusive area north of Site 8.
- A combination of other smaller sites around the KDBH community could achieve 250 dwellings in a less destructive way and be better integrated into the community.
- Inconceivable to have another large development if Arden triangle and Hampton Road are developed.
- Sites in Dorridge and Bentley Heath should be considered where access to Solihull/M42 is closer.
- Development would increase pollutants near to the school contrary to the Governments health agenda.
- This site should be changed to a red site.
- Is located on the wrong southern side of the village.
- Should be pursuing reuse of derelict and abandoned homes first.
- Loss of views across the fields would devalue neighbouring properties.
- Box Trees/Stratford Road corridor is ideal for 1000/1500 homes as a new village

**Environment**

- Would result in the village projecting into a highly scoring area of Green Belt (overall score 11) into open countryside to the east without any form of rounding off. There should be assurances that the openness of the Green Belt will be preserved.

- No exceptional circumstances to justify removal of the site from the Green Belt.
- Would be against government Green Belt policy.
- Site safeguards the open countryside from encroachment by further urbanisation of Knowle through preserving the historic open approach to Knowle village.
- Golden End Farm enhances and preserves the character and historic setting of Knowle through countryside views over fields and hedgerows to the ancient church tower and conservation area.
- It is widely used by the public as open space for walking and cycling.
- Would result in loss of wildlife and have an impact on the landscape.
- Area bordering the canal is currently like open countryside. Is overlooked by surrounding hills near Barston.
- Will completely destroy the character of the village.
- There are far less damaging sites available. This approach indicates a lack of consistency in the consideration of which sites should or should not go forward.
- Is prime quality arable farmland which should not be lost. There are many alternatives where the land is of less agricultural value.

#### Council Response (Draft Submission Version)

- Whilst the site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This Site is not therefore being taken forward as an allocation.

#### Land off Blue Lake Road, Dorridge (ref A5)

- Site should not be developed. In the region of 900 dwellings are already being added to Knowle and Dorridge, these villages were not designed to deal with this capacity. There are more suitable sites in the gap between Knowle and Solihull along the M42.
- Difficulties posed by allocated sites have not been adequately addressed by the Council, further sites such as this one will make the situation worse.
- Land off Blue Lake Road suffers from flooding. This may be exacerbated by further development.

#### Traffic

- Increased traffic flow would impact on the existing busy traffic network. There is no way in which improvements could be made without severe consequences to the environment. Grove Road, Blue Lake Road and Norton Green road are narrow without footpaths making them hazardous to pedestrians and traffic.

- Traffic in Dorridge has increased massively since the inappropriate and oversized Sainsbury's opened.
- There is already serious road traffic congestion through Knowle and these developments will completely clog up the village as residents need to get to Birmingham or the M42.
- Will have an impact on traffic at the junction with Warwick Road and Kenilworth Road.
- No traffic impact study has been undertaken or mitigation measures have been proposed.
- Additional traffic would create a serious health and safety risk and increase pollution levels.
- Dorridge is better equipped to cope with an increase in population yet no sites are put forward.
- The safety and infrastructure issues of this site will go against the Neighbourhood Plan.
- There is already considerable parking pressure in the village centre.

#### **Local character**

- Will completely destroy the character of the village. This is a desirable area, attracting wealth creators bringing prosperity to the area. Further development would destroy one of the last desirable village locations in the Borough.
- The immediate area has a distinctive character consisting of substantial family homes on large plots, in a semi-rural location. Development would undermine the qualities and defining characteristics of this area.
- Density of housing proposed out of keeping with existing character and development. Contravenes Policy D1.

#### **General**

- Development of this site would run counter to the National Planning Policy Framework, the Spatial Policy, Local Plan and Neighbourhood plan.
- There are large areas of land suitable to be included in future residential development plans in the 'gap' between Knowle and Solihull where the M42 already influences the open space should additional land be required.
- The Greater Birmingham and Black Country Housing Market Area Strategic Locations Study did not propose large scale housing development for Knowle and Dorridge.
- Site 207 has better road infrastructure and proximity to Solihull which would allow access to the town centre without using cars. Uncertain why this site has not been included. It performs better than Land at Golden End Farm. Both sites are adjacent to the existing settlement boundary and there are physical features bordering both sites that could create a new defensible GB boundary.
- Should be omitted to reduce urban sprawl, maintain open spaces to support the natural world.
- Site performs an important function in checking the unrestricted sprawl of large built up areas and safeguarding the countryside. Site should score 9 which would place it in the red category which recognises the potential for severe and widespread impacts from the development of the site.

- Dorridge has expanded significantly in recent years and like Knowle and Bentley Heath is in danger of becoming a mini town. Whilst there is a need for housing, it is important to balance the protection of a village community from 'over development'.
- Loss of amenity and open aspect for properties situated on the 4 roads in the immediate proximity. Property prices would be adversely affected.
- The Knowle, Dorridge and Bentley Heath Neighbourhood Plan should be taken into account particularly in relation to issues regarding village character and the natural environment. There has been no consultation with the neighbourhood forum over this site, it does not conform with the Plan.
- The vision document for this site has not been published or been the subject of public consultation.
- Site selection methodology is flawed as it scores down landscape character in areas that contain ribbon development.
- Object to conclusion in site assessment methodology for this site.

#### **Environment**

- Would constitute an inappropriate intrusion into an area of very high quality Green Belt. Site has as high landscape value as north of Grove Road.
- This area of the Green Belt provides a corridor for walkers, cyclists horse riders etc to access the countryside from the residential area.
- Agricultural land should be retained as it is vital for food production.
- Hedgerows would be destroyed as well as mature oak trees which would affect wildlife.
- Will have a significant impact on air quality due to additional traffic and congestion.
- Development of this site together with the Arden Triangle site would concentrate too much housing to that part of Knowle, leading to coalescence of Knowle and Dorridge contrary to Green Belt objectives and destroying the village character. At present the area has some housing but the general appearance and feel is rural or semi-rural and this should be retained.
- Green Belt assessment differs from that performed on substantially the same site in the last Local Plan.
- Disagree that visual impact would be low based on the Landscape Character assessment. Visual sensitivity is high in this area particularly from Blue Lake Road and other local houses on Knowle Wood Road.
- Whole development would be visible from all areas due to topography.

#### **Infrastructure**

- There will be an adverse impact on local infrastructure including health, education, emergency services as well as parking particularly at the rail station. Lack of provision for additional school places and medical services.
- Most infrastructure around Knowle and Dorridge is unchanged in 50 years and cannot cope with the additional pressures created by this level of housing.
- Would add to over development and infrastructure pressure on the southern side of the village.



- Poor access to local bus services.

### **Support**

- Object to omission of site, compares favourably against draft allocations in terms of Green Belt and accessibility including site 8 and has therefore been incorrectly scored in the site selection process.
- Should be included as there is concern surrounding the overall number of houses generated from the draft allocations in meeting unmet need in the Housing Market Area. Site 9 is in multiple ownership and there is evidence the capacity will not be achievable.
- Dorridge is one of the most sustainable settlements in the Borough in terms of public transport and local amenities. The east side of Dorridge has good accessibility to employment opportunities and public transport. Site should be allocated for housing.
- This is better in most respects to site 8 and should be considered as a substitute. It provides a sensible rounding off to the settlement.
- Lower performing Green Belt, close to Solihull town centre/UK Central. Should be included in preference to developing site 26 and site 4.
- Better option than sites in Blythe. There is capacity for more houses and the infrastructure more able to cope.
- Support exclusion of LWS, the abandoned garden/orchard between Barn End, Grove Road and No.88 from the developer's proposals. This land, provides habitat for owls, bats and badgers, and has several notable trees and hedges. Understand that the two fields behind Barn End, that border Norton Green Lane, have also been excluded from the proposals. This move has protected these existing habitats.

### Council Response (Draft Submission Version)

- Whilst the site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This site is not therefore being taken forward as an allocation.

### **Rowood Drive (ref A6)**

#### **Support**

- Amber designation is unjustified, it should be allocated for residential development, as it is accessible and suitable.
- Lode Heath School wishes to realise income from the sale of the site to fund the development of an enhanced Community Sports facility on the main campus, bringing significant benefits for both the school and the wider community.

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- It is located within established residential area, surrounded on three sides by existing housing and to the north by the canal.
  - Very accessible position off Lode Lane, in close proximity to local businesses and services and on a major bus route.
- Loss of the disused pitch to be compensated by improvements to school gymnasium and youth football and rugby pitches.
  - Site should be sympathetically developed in a style of semi-detached houses with decent front and rear gardens like Damson wood and Lode Lane. There are too many cramped high density developments in Solihull with no front space or driveways; these homes just generate parking issues for residents because of poor design.
  - Urban site well suited to housing and not used for recreational purposes. Should be included in preference to developing site 26 and site 4.

### **Object**

- Would result in increased traffic, noise and air pollution in an already congested area. The exit from the Jaguar Land Rover site onto Rowood Drive was prohibited some years ago.
- The junction of Rowood Drive and Lode Lane is dangerous and needs redevelopment. The introduction of the bus lane on Lode Lane has made congestion more difficult.
- Would result in loss of Green Belt land which is used by the local community and should remain as a recreational area.
- This proposal and the loss of Green Belt land for JLR on Old Damson Lane will significantly reduce the open land at either end of Damson Wood.
- Lode Heath school have not managed the ground for a few years stating that it would be made into a nature reserve for the school and grass and hedges would be left to encourage wildlife.
- The playing field is currently used by local residents for recreation and dog walking as well as for children to play. There is a shortage of green spaces which are not privately owned which can be used for this purpose.
- Off-site compensation would be required to mitigate the loss of the playing field.
- Development would result in the loss of wildlife and habitats.
- Would place extra pressure on utilities including police, doctors surgeries and local schools are already oversubscribed.
- Additional load on sewerage and drainage services which already struggle with blocked drains. This could result in potential flooding.
- There would be disruption and noise to the local area during building.
- Development could disturb Japanese Knotweed present on this site and cause it to spread to neighbouring gardens.
- Would result in removal of an old oak tree.
- Would become a built up area in a confined space. Area would be a less attractive place to live and house prices of overlooked properties would be affected.

- The site should be used for community purposes and developed for locals, not further housing.

#### Council Response (Draft Submission Version)

- The site has been considered as a potential green in the Site Assessments Document, however a cautious approach has been taken to not include this Site within the SHELAA housing land supply at this time, until further work has been carried out on suitable alternative provision and on-site mitigation.

### Land r/o 114 to 118 Widney Manor Road, Solihull (ref A7)

#### Support

- Should be removed from the Green Belt and site should become green and allocated for housing.
- The analysis on which the current 'amber' status was achieved is based on some factual errors in SHELAA/Site Assessment, and errors of the analytical approach adopted in the Sustainability Appraisal. These relate to availability, and constraints on accessibility and proximity to railway. Omission of the land is unsound due to flawed justification and unlawfulness of the amalgamation approach in the Sustainability Appraisal.
- An already busy bus route through to Solihull with limited additional impact on highways.

#### Object

- Disappointed to see site reintroduced at this consultation when a planning application on the site was previously refused by the Council and on appeal by an Inspector. The reasons for rejection are still valid.

#### Traffic

- Would exacerbate congestion and highway safety issues. There are concerns over access and visibility on to Widney Lane particularly at the bend. Traffic along Widney Manor Road has dramatically increased.
- This is a very busy through road without further capacity. The roads near the site are extremely hazardous for motorists and pedestrians. There are significant parking issues close to the station.
- Accidents at the junction of Widney Lane and Widney Manor road are a regular occurrence and there is no room to add a traffic island.
- Would result in disruption to traffic flow on a road that is congested daily at rush hours.

#### Environment

- Will increase light, noise, environmental, traffic and air pollution.
- Would impact on local wildlife and tree preservation orders. Land is a wildlife corridor that supports badgers, bats, foxes, deer.
- Would block out light from existing homes at The Spinney.
- Destruction of mature gardens and a notable change in local character.
- This is important Green Belt which should be preserved.

- The nature of the suburbs with green areas and open space will be damaged.
- Development of this site would not create a logical extension into the Green Belt as land to the north and south on Widney Manor Road would remain. The inclusion of this land would be an example of garden grabbing which does not create good places.
- Area is identified as not having an open character which conflicts with the findings of the Solihull Green Belt Assessment 2016, the LDF Core Strategy Assessment of Green Belt 2011 and an appeal decision relating to this site. There are no exceptional circumstances to justify changes to the Green Belt boundary.

### **General**

- Will impact negatively on house prices within the over 55s estate.
- Does not meet the government's two main criteria for backyard developments; 1) that development must be in keeping with character and quality of its surrounding and that 2) development must be convenient and safe for both pedestrians and drivers. The proposed number of dwellings does not fit with the properties on Widney Manor Road. Access is a short stretch of straight road with blind corners at each end.
- Query whether there is evidence to demonstrate this site's deliverability. Instead, Land at Widney Manor Road (ref 407) is available, achievable and deliverable now to bring forward affordable housing within the first five years of the draft Plan.

### **General comments relating to Amber sites**

- Support further review of all the amber sites being included in principle.
- It will be necessary to use most of the amber sites as most are easier to develop in the short term, being smaller sites that require less infrastructure, are more sustainable and of a lower Green Belt rating. All amber sites except sites ref A4 and A5 should be developed. This will more than compensate for the loss of the 250 dwellings of part of Site 4 west of Dickens Heath.
- Sites to be taken forward, should be assessed against a PPG compliant assessment methodology, which has not been the case in the Council's site selection Framework.
- The Council are deferring the issue of ensuring that there are enough housing allocations.
- When the next LDP consultation takes place more land will be needed. This should be taken into account in developing this plan and current Amber and Red sites should be reconsidered in light of this rather than the current short term view.
- Concern that all Amber sites will eventually be released for unnecessary housing.
- No advantage in labelling sites, it creates an unnecessary stage in the methodology adding to confusion and unnecessary complexity. These sites should either be allocated or rejected and then could be commented on or not as omission sites in general.
- The inclusion of Amber omitted sites gives the promoters of these sites a 'way in' which is contrary to the Council's own assessment and conclusions reached.
- Do not agree with the methodology of the site selection process. The Council have identified sites to assess, assessed them against the site hierarchy and categorised the sites as an allocation, potential allocation, unlikely allocation and no allocation, it is not 'good planning' to then ignore this assessment and consult on the Amber omitted sites.

- There are several small sites in Balsall Common which it is hard to understand being omitted such as Land by the Railway Inn and the Antiques Barn.
- Solihull has 1,000 - 1,200 empty homes which should be used first.
- Amber sites should be protected and not built on. Solihull is in danger of becoming a sprawling extension of Birmingham, congestion in the Borough is unacceptable.
- Inconsistencies in the way that the amber sites have been assessed, sites 49 and 328 were assessed as amber within the Appendix D to the report to the January 2019 Cabinet meeting. However the Site Assessment document itself now concludes that these sites are 'green'. This should be clarified.
- Too much focus on the development of Shirley and surrounding with other areas of the Borough not being impacted upon.

#### Council Response (Draft Submission Version)

- Whilst the site was included as an amber site in the 2019 Supplementary Consultation, it was made clear that amber sites were not being proposed as allocations. They were sites identified as being 'less harmful' than red sites in order that residents and stakeholders were able to comment on their omission from the Plan.
- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives. This Site is not therefore being taken forward as an allocation.

### Q39 – Red Sites

*Are there any red sites omitted which you believe should be included; if so which one(s) and why?*

#### **Representations received:**

Number objecting: 105

Number supporting: 7

Number commenting: 76

#### **Key Issues raised by Representations:**

##### **General**

- The plan will need to be reviewed and more land identified in under 15 years. Current amber and red sites should be reconsidered in this context, rather than the current short term view.
- It is unrealistic ask for residents to contribute, except on sites they have already become aware of. Even then, the likelihood of them finding the exact site is low.
- Red sites 42, 49, 81, 97, 107, 128, 195, 197, 211 and 226 should be considered for inclusion to allow for reduction in proposed allocations in other areas.
- Sites around Meriden can be developed instead of Shirley. It would benefit from the more than adequate road network and draw road use and services use away from the already crowded areas elsewhere in the plan.

- Support for the decision to review Green Belt boundaries to accommodate the identified growth.
- Council should review its site assessments as there are inconsistencies regarding several sites.

37. The commentary given in the following paragraphs refer to sites using their 'Call for Sites' reference numbers are ordered by ward in the first instance, and then parish in each ward (if applicable).

### **Bickenhill**

#### ***Marston Green***

##### Site 131 – Birmingham Business Park, adjacent to Coleshill Heath Road

- Site should be re-assessed as green and allocated for housing as lower performing parcel in Green Belt Assessment, well-contained with defensible Green Belt boundaries, accessible, performs well against spatial strategy, , no significant constraints, would retain substantial green buffer and SHELAA/Sustainability Appraisal support inclusion.

##### Site 196 – Land at Bickenhill Road

- The site is suitable for consideration as a Green or Amber site.
- There has been an incorrect application of the Council's site methodology and no justification in the site assessment for its exclusion.
- Further evidence submitted to demonstrate the site is suitable for development.

##### Site 341 – Land between 70 and 84 Chelmsley Road

- Site should be re-assessed as green and allocated for housing.
- Evidence in Green Belt Assessment, SHELAA, Sustainability Appraisal and Site Assessment indicates the site performs very well and only rejected as would narrow Green Belt gap, which conflicts with Green Belt Assessment and Site Assessment.

### ***Hampton in Arden***

#### Site 6 - Land off Old Station Road, Hampton in Arden

- Strongly objects to the omission of their site. Site selection methodology has been inconsistently applied and as a result this site has been unfairly discounted. Evidence within the site assessment document confirms the site to be highly achieving against a number of the matrices:
- Site performs better than proposed allocations of a similar size and location within settlements of the same Settlement Hierarchy class.
- Site continually performs highly when assessed against the key criteria; including in relation to the spatial vision, site constraints, deliverability, accessibility, impact on Green Belt performance, and sensitivity of landscape character.
- The site adheres to the DLP's spatial vision, reaching a 'Yellow' score of 5 overall in Step 1 of the Site Selection process. The site scores more favourably than Land South of School Road, Hockley Heath, which is proposed for allocation as DLP Site 25.
- 2016 SHELAA assessed site as a category 1 which could commence within 5 years.

- Site also performs to a similar standard or better than comparable sites that have been proposed for allocation within the Green Belt assessment.
- Site lies within landscape character parcel which only has medium sensitivity and is more favourable when compared to proposed allocations within Meriden and Hockley Heath. The Sustainability appraisal is also favourable to the site having fewer negative and more positive impacts than other sites proposed for allocation.
- The issues of 'indefensible boundaries' and 'visual intrusion' are given a considerable amount of weight in the site assessment process despite the site being assessed favourably in other areas. This is unfounded as this can be readily mitigated and is not permanent.

#### Site 16 – Land South of Hampton Lane

- Site should be removed from the Green Belt and allocated for housing, or safeguarded for future needs as site conforms with strategy, is accessible, located in a lower performing Green Belt parcel, supported by the Sustainability Appraisal.
- The site assessment reference to coalescence is misleading as Green Belt Assessment indicates little contribution to Purpose 2.

#### Site 17 – Land West of Ravenshaw Lane/South of Hampton Lane

- Site should be removed from the Green Belt and allocated for housing, or safeguarded for future needs as site conforms with strategy, is accessible, located in a lower performing Green Belt parcel, supported by the Sustainability Appraisal.
- The site assessment reference to coalescence is misleading as Green Belt Assessment indicates little contribution to Purpose 2.

#### Site 20 – South of Hampton Lane

- Site is a deliverable option to accommodate additional housing.
- Site comprises a comprehensive and developable site in an area of lower performing Green Belt that would provide a strong and defensible Green Belt boundary with established woodland to the east and south.
- Allocation would not harm purposes of remaining Green Belt land and any reduction in openness would be to a well contained area closely related to the settlement edge.

#### Site 21 – The Paddock

- Site should not be red as close to built-up area with bus route.
- Sites in close proximity assessed as green including proposed Site 24, lower performing Green Belt compared to Site 24 and would not lead to coalescence.

#### Site 24 – Oak Farm

- Allocation should include the full extent of the original submission.
- Boundary of the site would make a firmer and more defensible Green Belt Boundary than that currently identified. Roads have been identified as defensible boundaries on other sites; this is no different.
- The omitted land makes little contribution to landscape quality or the purposes of the Green Belt.

- From the traffic island on the eastern edge of the village, the site is clearly part of the settlement; Friday Lane being the visual boundary between the settlement and open countryside.

Site 83 – Land at Catherine-de-Barnes

- Site should be elevated to green or amber.
- Site assessment is incorrect. Land is clearly shown outside of Green Belt on previous proposal maps, but site assessment puts it into the Green Belt without justification.
- Site is bounded by Canal and common land to the north, both defensible boundaries.

Site 86 – Land at Old Station Road, Bickenhill

- Site should be amber if not green.
- Site is recognised as brownfield land on the Register and within a lower performing parcel in the Green Belt Assessment.
- Site is not isolated with existing development to the south and west which would result in a defensible boundary.
- Site has a medium level of accessibility, is within an area of medium landscape sensitivity with low capacity for change, and is suitable for development.

Site 96 Land on the North Side of Lugtrout Lane

- Site should not be red as close to built-up area with bus route.
- Sites in close proximity assessed as green including proposed Site 24, lower performing Green Belt compared to Site 24 and would not lead to coalescence.

Site 195 – Land at Damon Parkway

- Considers that the Green Belt assessment scoring is incorrect for this site.
- The site should have been be fully assessed at Step 2 of the site selection process and consideration given to the landscape led approach which has resulted in a smaller portion of the site being proposed for development.
- No mention of the sustainability appraisal which identifies more positive effects than negative, including 2 significant positives which are not identified in the commentary.
- Site should be included as an Amber site if not a Green site, particularly given the neighbouring sites to the south of the Grand Union Canal have been included as a proposed housing allocation.

Site 325 – Land adjacent to 157 Hampton Lane, Solihull

- Site provides a suitable and sustainable location for urban extension to Hampton Lane without encroaching on Catherine-de-Barnes and therefore would not contribute to coalescence.
- The site is located within a lower performing Green Belt parcel.

Site 418 – Diddington Lane

- Site should be allocated as is within a main settlement capable of accommodating new development.
- Site 6 has uncertain delivery, whereas this site is available and can contribute to early Plan period needs.



- Capacity has flexibility to meet wide range of needs depending on the Plan target, and could be phased over Plan periods.
- Will deliver market and affordable housing, accommodate public open space and well-located to village centre, shops, school, surgery, public house, and railway station.
- New pedestrian and cycle links will increase permeability.
- HS2 line will provide strong defensible Green Belt boundary.

## **Blythe**

### General

- No transparency why sites have been amalgamated when other sites such as Sites 44, 45, 48, 123, 168, 173 & 334 cumulatively would have same benefits. Sites have been assessed inconsistently and wrongly.

### **Cheswick Green**

#### Site 48 – Earlsmere House

- Site should be re-assessed either in isolation or together with others in the same location as accessibility assessment incorrect, Landscape Character Assessment is inconsistent and land has been removed from Green Belt in vicinity for Gypsy and Traveller sites.

#### Site 62 – Land adjacent to Shirley Golf Course, Stratford Road

- Should be allocated as a green site.
- Objects to assessment which does not support the step 2 refinement from potential allocation to site with significant harmful impacts.
- No significant impacts on the Green Belt as the gap between settlements would not be reduced and is much greater than maintained from other allocations.
- No significant impacts on landscape character.
- Site has a strong defensible boundary with the golf course to the south.
- Should be categorised as high accessibility rather than medium/high, as footway can be provided and Accessibility Mapping score of 40 is incorrect, should be 100.

#### Site 99 – Land at Tanworth Lane

- Site should be removed from Green Belt and allocated for housing or safeguarded for longer-term development needs.
- Site has no insurmountable constraints, would not be visually intrusive and would have a defensible Green Belt boundary. Site could provide 130-140 dwellings based on landscape-led approach.
- An up to date site assessment is provided to replace the site assessment prepared by the Council.

#### Site 173 – Winterton Farm/Land to the north of Blythe Valley Park

- Incorrectly assessed in site selection process and should be allocated in whole or part.
- Should be a priority 6 site as moderately performing Green Belt and it is adjacent to Cheswick Green.

- Site performs better than Site 26.

### ***Dickens Heath***

#### Site 340 – Land at Three Maypoles

- Part of this site lies within previous allocation site 13. These should still be included as allocations.
- The suggested advantages of site 26 over site 13 are not accepted. Site 13 has not been dismissed for technical reasons. Similar site issues e.g. coalescence, maintaining a Green Belt gap apply equally to other sites but are not referenced. These can be mitigated on Site 13.
- Masterplanning of sites 11, 12 and 13 together in terms of infrastructure, form and content made complete sense.
- Site 26 is within a highly performing Green Belt parcel; site 13 is not.

### ***Tidbury Green***

#### Site 69 – Norton Lane, Earlswood

- Relatively close to the Birmingham-Stratford rail line and stations and local services.
- Underused site which includes a vacant house and commercial buildings.
- Site is shielded from wider views by trees and by existing development in Norton Lane and Rumbush Lane and is capable of an immediate start.
- Site is well placed to provide a much needed boost to housing land supply with no significant detriment to strategic Green Belt functions, support public transport provision in the area and contribute appropriately to necessary funding for the development of the proposed Earlswood Living Landscape.

#### Site 84 – Land at Houndsfield Lane

- Site is unused wasteland and is an eyesore.
- Should be included for self-build housing as precedent set by development for 2 bungalows.
- Planning permission given for development at the eastern end of the site so it would make sense to include the entire site for housing.
- Site would then join a larger, more coherent area with the west of Dickens Heath and the (currently amber) site to the rear of 146 to 152 Tilehouse Lane.

#### Site 141 – Land around Earlswood Station

- Site should be further considered for allocation.
- Site can be included within the opportunity area 'South of Birmingham' a broad, non-specific area of land between Birmingham and Stratford upon Avon (location NS5) which was identified as having potential for a new settlement in the GL Hearn Strategic Growth Study 2018.
- Site Selection Methodology is flawed and the site should have been considered in step 2 due to proximity to Earlswood Station.

- Could provide up to 500 homes, provide Green Belt compensation, provide 11ha of open space, provide opportunity for supported uses such as schools, adjacent to underutilised station.

#### Site 192 – Jordan Farm

- Site should be green as performs better than proposed Site 4, is in area suitable for significant growth and has defensible boundaries.

#### Site 209 – Tidbury Green Golf Club

- Strongly object to way site has been assessed in the site selection process as a red site. Site was not taken forward in the step 1 assessment therefore was not subject to more refined step 2 analysis.
- Site is accessible and within a Green Belt area which scores 4 therefore should be given priority 5 status as a yellow site. Overall the site has medium to high accessibility, the same as other sites which have passed through the step 1 sieve and been taken forward to step 2.
- Land is allocated opposite the site which scores the same in terms of accessibility but is higher performing in terms of Green Belt. Accessibility study fails to cross boundary services in relation to this site.
- Site has no constraints which cannot be mitigated in the normal way, would not breach defensible boundaries to Green Belt. Site scored down in SHELAA due to part of the site being within flood zone however no development is proposed in this area.
- Object that landscape assessment based on a wide area has been used to discount sites.

#### Site 313 – Fulford Hall Farm

- Significant errors in site assessment. Step 1 should be priority 6 as accessibility is high and it is in a moderately performing Green Belt area. Step 2 important judgements on Green Belt/landscape not based on robust evidence.
- Evidence provided demonstrates site has limited impact on Purpose 3 and would not undermine remaining Green Belt.
- Methodology to establish visual sensitivity in Landscape Character Assessment is poorly justified with no explanation how classification criteria assessed/judged. High classification based on ancient woodland not evident within site, whilst sub-urban influences in/around settlement ignored.
- Detailed robust evidence is provided to show site well-contained, capable of accommodating development with limited visual impacts.

#### Site 404 – Land at Fulford Hall Road

- Site should be re-assessed as green and allocated for housing as it performs better than assessed, is in a sustainable location and there are inconsistencies in the assessment compared to those for proposed Sites 4 and 26.

### **Chelmsley Wood**

#### ***Chelmsley Wood***

#### Site 53 – Bluebell Recreation Ground

- Objection to the site being brought forward for development.

- Agree that Bluebell Recreation Ground is unsuitable for development. It is a popular local park and other land is already being lost to HS2 nearby.

### ***Fordbridge***

#### Site 52 – Chester Road/Moorend Avenue Roundabout

- Site should be released from Green Belt as in sustainable location, in lower performing Green Belt and would meet Plan objectives.

#### Site 54 – Clopton Crescent Depot and British Legion Club

- Strongly agree that this green space is well used recreational space of significant value. It was donated philanthropically to the predecessor local authority to be used for recreational activity. There is concern that there could be some development at the bottom part of the site, behind the Family Tree Club on Clopton Crescent. A Council depot was placed on this land in the past despite there being a Covenant on all of the playing field. Returning this land to green space would return the land to its original use.
- Support for exclusion and object to any development of grass cutting compound. Site should be returned to original state and green space protected.

#### Site 56 – Lambeth Close and Centurion PH

- Agree this site is unviable and not sensible to develop. It is already well developed with popular, socially-rented bungalows and a Public House that has received recent investment.
- Support assessment of this site as a red site.

#### Site 221 – Onward Club and Chelmsley wood Town Council Offices

- Agree that the Onward Club green space is unsuitable for development, as it is a recreational area used for sport.

### **Knowle and Dorridge and Hockley Heath**

#### General

- There are a large number of smaller sites around the fringe of the built-up area of Knowle, Dorridge, and Bentley Heath, which seem to have good accessibility and relatively low impact on the Green Belt.
- There are many proposed sites to the south west of Dorridge (29, 127, 199, 210 & 247) and northwest of Bentley Heath (3, 72, 88, 108, 207 & 419). Development of these sites would take traffic pressure off Knowle and give new residents a shorter and easier route to city rail links via Dorridge Station.
- Alternative sites 34, 103, 199, 13, 14, 57 and 121 are suggested as they have far better existing infrastructure than could ever be achieved in Knowle.
- Hockley Heath should be identified for significant rather than limited expansion as sustainable location with facilities and regular bus services to Dorridge and Solihull.
- Support exclusion of Sites 13, 14, 38, 57, 120, 121, 145, 180, 208, 416 & 417 as less suitable than proposed Site 25.
- Sites 13, 38, 121, 145, 180, 208, 219, 416 & 417 should be released west of village, to make essential infrastructure affordable, form defensible Green Belt boundary based on Stratford Road, Kineton Lane and School Road, and provide connection to Blythe Valley Park.

- A mix of sites and a more dispersed pattern of development would be far less damaging to the Green Belt, have far less impact upon the infrastructure and be much more acceptable to residents. Sites 72, 107, 135, 207, 210, 244, and 344 seem to perform reasonably well but have been categorised as red, although it is not clear why.
- In the Knowle, Dorridge and Bentley Heath area there are a number of alternative locations for development which appear to have been excluded on marginal/subjective grounds which could take some of the pressure brought about by the other Knowle sites (support for sites 72, 88, 108, 207, 419).
- The Council should review its assessment of sites as there are inconsistencies in the assessment of several sites. Examples in KDBH include 244, 323, 324 and 413, but also small sites such as 207, 210, 344 and 135. Some of these perform well on a number of criteria and may be able to overcome concerns such as defensible Green Belt boundaries.
- A mix of large and smaller sites in a more dispersed pattern would have less impact on the Green Belt, be more consistent with government guidance and potentially be less damaging to village character and infrastructure.
- Alternative sites between Knowle, Dorridge & Bentley Heath, and Solihull preferable to proposed Sites 8 and 9 as access and transport links better/less damaging/disruptive, least impact on nearby settlements and can still maintain Green Belt gap.
- Alternative sites further away from Knowle village with access to Widney Manor station, Solihull, Stratford Road and M42 preferable to proposed Site 9 and Amber Site A5, such as Sites 29, 59, 199, 207 and 210.
- There are no red sites in Knowle, Dorridge and Bentley Heath that should be included as housing allocations.

### ***Knowle***

#### Site 5 – Land at Grove House, Jacobean Lane

- Site should be included as an allocation.
- Site performs well in the SHELAA and Green Belt Assessment and the Sustainability Appraisal is too broad and fails to recognise site specifics of this land.

#### Site 32 – Land at Netherwood Lane, Chadwick End

- Inclusion of this site would address the lack of varied housing types in the village. It would allow for a significant contribution of social housing/custom/self-build, and could include a shop/community centre/village green.

#### Sites 68 and 324 – Land off and rear of Jacobean Lane

- Sites should be included as a housing allocation as access onto Jacobean Lane can be created to improve accessibility.
- Difficulty in establishing a Green Belt boundary contested as tree/hedgerows provide defensible boundary.
- Site performs as well as or better in Green Belt terms than some proposed allocations and is clearly part of urban area.

#### Site 98 – Land to the rear of 1761 Warwick Road

- Support exclusion of the site due to impact on landscape, medieval ridge and furrow, character and wildlife, and would create unacceptable congestion.

Site 107 – Land at Gentleshaw Lane, Knowle

- Should be upgraded to amber site.
- Should be changed from Red to Green. Site 107 has never before been assessed as part of a wider area, which already contains in the region of 200 dwellings, to be removed from the Green Belt.

Site 110 – Land to rear of 114 Kenilworth Road

- Site should be green.
- Since assessment the site has been reduced in area with a link to Site 98.
- Scores very highly for accessibility, reduction in encroachment/impact on Green Belt, and defensible Green Belt boundary can be created.
- Support for exclusion of Site 110 due to impact on landscape, ancient fields, character and wildlife, and would create unacceptable congestion.

Site 127 – Woodford, Grange Road

- Grange Road should be green as incorrectly assessed.
- Part brownfield, medium/high accessibility, SHELAA Category 1, majority of sites breach Green Belt boundaries, this site has defensible Green Belt boundary in lower performing parcel.
- Sustainability Appraisal score inaccurate and not reflected by amalgamated site area.

Site 135 – Land at Dorridge Road

- Should be upgraded to amber site. Council's main constraint is the lack of a strong Green Belt boundary.

Site 244 - Land at Tilehouse Green - Copt Heath Golf Course

- Site should be elevated to amber if not green.
- Located immediately adjacent to the built up area of Knowle and straddles the Green Belt boundary around the settlement.
- Southern half of the site is located within the settlement outside the Green Belt and the northern half is situated in the Green Belt, in a lower performing parcel. Whilst there are no permanent physical features that would easily define a new boundary, the site is well-contained and there appears to be strong field boundaries.
- Site has few constraints and represents a logical 'rounding off' to this part of the settlement. The golf course to the north and west would prevent further expansion into the countryside.
- Site has a medium level of accessibility and is in an area with medium landscape character sensitivity.

Site east of Warwick Road/north of Wyndley Garden Centre, Knowle

- The site has been submitted but does not appear in the Site Assessment document.
- Site would be similar priority to Site 9 to the east, hedgerows and ditches could be retained and will be significantly more accessible with the allocation of Site 9.

***Dorridge and Hockley Heath*****Site 14 – Land at 2440 Stratford Road**

- Site fully satisfies site selection criteria and should be green and allocated for housing.
- Sustainable location, part of built-up area requiring minor adjustment only of Green Belt boundary, lower performing parcel in Green Belt Assessment, medium/high accessibility, site assessment erroneous and defensible boundary provided by trees/hedgerows.

**Site 38 – Ashford Manor Farm, Stratford Road**

- Site should be allocated for housing as medium/high accessibility, lower performing Green Belt.
- Disagree that it would be difficult to establish defensible Green Belt boundaries as self-contained with permanent physical features.

**Site 57 – Land adjoining 2102 Stratford Road**

- Site should be re-assessed as it has the same accessibility as allocated Site 25.
- There are defensible Green Belt boundaries and the site is self-contained.
- Disagree with Landscape Character Assessment as it is too high level.
- Site would not erode gap between settlements.

**Site 72 – Land at Widney Road and Browns Lane**

- Site should be included as it is accessible to Solihull, the railway station and Stratford Road and capable of providing good housing numbers on a large featureless site with a strong defensible boundary.
- The 'gap' between Solihull and Knowle Dorridge and Bentley Heath would not be harmed because of the existing River Blythe/M42 corridor.

**Site 88 – Land at Widney Manor Road**

- Existing built up area is only 50 yards away.
- Site would have clear, well defined and permanent boundaries.
- Would not erode Green Belt gap, as merely infilling in established settlement of existing properties built many years ago.
- Has very high accessibility with bus services/rail station, no redeeming or worthwhile landscape features.
- Sustainability Assessment of the site is flawed as site contains 8/10 of most important elements.
- Comparable with allocated Sites 8 and 9, and amber site 134.
- Supported by SHELAA as achievable.
- Site should be included as it is accessible to Solihull, the railway station and Stratford Road and capable of providing good housing numbers on a large featureless site with a strong defensible boundary.
- The 'gap' between Solihull and Knowle Dorridge and Bentley Heath would not be harmed because of the existing River Blythe/M42 corridor.

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Site 108 – Blythe House

- Site should be included as it is accessible to Solihull, the railway station and Stratford Road and capable of providing good housing numbers on a large featureless site with a strong defensible boundary.
- The 'gap' between Solihull and Knowle Dorridge and Bentley Heath would not be harmed because of the existing River Blythe/M42 corridor.

Site 207 – Land bounded by Browns Lane, Smiths Lane and Widney Manor Road

- Site should be considered for development.
- Site should be re-assessed and allocated for housing as would not compromise Green Belt purposes, has defensible Green Belt boundaries, supports growth proposals and has limited suitability constraints.
- Site preferable to Sites 8 and 9 and Amber Site A5 as access and transport links better/less damaging, more in keeping with density and character of surroundings, M42/surrounding fields provide separation, avoids unnecessary intrusion into Green Belt, and conforms with KDBH Neighbourhood Plan.
- Would be preferable to build on land near to the M42 than take large quantities of Green Belt Land adjacent to Knowle and Dorridge.
- Support for inclusion of this site in preference to Amber site A5 (site 413) as it is more in keeping with existing housing density and better served by road and public transport infrastructure.
- Site is accessible to Solihull, the railway and Stratford Road and capable of providing good housing numbers on a large featureless site with a strong defensible boundary.
- The 'gap' between Solihull and KDBH would not be harmed because of the existing River Blythe/M42 corridor and there would be a much needed new primary school.
- Bentley Heath School not consulted on a potential relocation and the school does not support the promotion of the site.

Site 121 – Land West of Stratford Road, Hockley Heath

- Little difference between this site and Site 25.
- The landscape features on the site are substantial and will create a firm and defensible Green Belt boundary.
- The site does not extend as far out into the countryside as the existing development to the north and south of the site and it cannot be described as an incursion into open countryside.
- The site is more centrally located and has a stronger relationship to the village. It also offers the opportunity for providing a doctors surgery.
- Site should replace site allocation 25 or be allocated in addition.

Site 180 – Site rear 122 School Road, Hockley Heath

- Site should be allocated for housing as nearby development allowed and similar to sites 49, 139, 176 and 328 that are assessed as green.

Site 199 – Land at Four Ashes Road – Box Trees

- The site is suitable for consideration as a green or amber site.



- The Green Belt score has been overrated and therefore out of alignment with similar surrounding sites.
- Sustainability Appraisal identifies more positive than negative effects, including 1 significant positive which is not identified in the commentary.
- A suitable hedgerow boundary could be established.
- The overall development envelope is defined by the visual and physical containment provided by the urban edge of Dorridge and the road network that transects the surrounding countryside.

#### Site 210 – Earlswood Road

- Site should be included in the Plan for a care home development as site is infill development opposite built-up area of Dorridge. There are no physical constraints and site is largely contained by mature trees/hedgerow.

#### Site 344 – Land off Grange Road

- Site should be re-assessed as green and allocated for housing, with the village hall relocated to land south of Arden Road, Dorridge to facilitate development.

#### Site 416 – Land North of School Road

- Site should be re-assessed as green and allocated for housing as adjacent site assessed as green, sustainable location, site enclosed by defensible Green Belt boundaries to north, west and south, and no constraints that cannot be mitigated.

#### Site 417 – Land West of Stratford Road

- Site should be re-assessed as green and allocated for housing as adjacent site assessed as green, it is in a sustainable location, the Green Belt gap is not too narrow, a landscape buffer can be provided and the site has capacity for community infrastructure such as school, sports pitches and a GP surgery.

#### Site 419 – 60 Four Ashes Road

- Site should be included as it is accessible to Solihull, the railway station and Stratford Road and capable of providing good housing numbers on a large featureless site with a strong defensible boundary.
- The 'gap' between Solihull and Knowle Dorridge and Bentley Heath would not be harmed because of the existing River Blythe/M42 corridor.

#### Site 503 - Stratford Road

- Site should be removed from Green Belt and allocated for housing, in conjunction with land within Warwick District.

### **Meriden**

#### ***Balsall***

##### General

- Some red sites to the west of Balsall Common are worthy of consideration in conjunction with a west bypass that would remove virtually all of the through north south traffic and provide a defensible boundary for such a development.

#### Site 82 - Land north of Dengate Drive, Balsall Common

- Site should be elevated to amber if not green and considered for release in conjunction with Grange Farm or at a later date.
- There is an error in the commentary on the Sustainability Appraisal.
- Settlement identified as suitable for significant expansion, and site would have defensible Green Belt boundaries to the south at Dengate Drive, a woodland to the west and track to the north.
- Site is deliverable, subject to some constraints.
- The only significant negative is the distance to jobs.

#### Sites 142, 198 and 233 – Grange Farm, Balsall Common

- Better to develop on the west side of Balsall Common than the east side with adequate space to develop a new centre.
- A defensible Green Belt boundary to the north and west could be established if a link road were proposed to take traffic across to the A452 from Balsall Street.
- The site is deliverable and is in a settlement identified as suitable for significant expansion.
- Sites are not in the Meriden Gap and therefore should not be considered as performing as highly as Barrett's Farm.
- These sites are on average no further from the station than the extreme parts of Barrett's Farm.
- Along with Trevallion Stud (site 240), these could provide support for a western bypass which would be preferable to the one proposed.
- Could provide an alternative to Barratt's Farm and facilitate a bypass to the west of Balsall Common.
- The site assessment has very similar attributes to Site 1. It would provide a better site for a new primary school and could be developed ahead of the completion of HS2.
- Development of these sites would enable provision of relocated housing from Sites 2 and 22, together with new/relocated Primary School away from B4101 traffic and not affected by HS2 or phasing restrictions.

#### Site 304 – Land at Oakes Farm

- Should be allocated for development.
- Too much emphasis on Barratt's Farm and no good reason for rejecting this site.
- Could enhance access to farm shop.
- Site performs better than Barratt's Farm in methodology Step 1 and is bounded by hedgerow providing defensible boundaries.

#### Site 421 – Silver Tree Farm

- Site should be allocated as it could be part of larger site with Sites 198 and 233 and has well-established field boundary to northwest.

#### Site 422 – Rose Bank, Balsall Street

- Site should be amber if not green.

- It is within moderately performing parcel in the Green Belt Assessment, although it is small but would result boundaries to the south and west which are as defensible as many other sites identified for release.
- Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change and is deliverable.
- Balsall Common is identified as suitable for significant expansion and the site is noted as being suitable for consideration as a windfall site.

#### Site 338 – Land at Kenilworth Road

- Site should be allocated for housing as site is no further from centre than sites allocated in SLP 2013.
- Proposed Site 3 stretches much further south and would have greater impact on Green Belt.
- Does not rely on HS2 or bypass unlike most other sites in settlement.
- Green Belt Assessment conclusions and alleged lack of defensible Green Belt boundary are disputed, and site assessment incorrect as there is footpath alongside site.

#### Site 305 - Land at Park Lane

- New submission for land at Park Lane for use as site for employment purposes given the need for employment land, the lack of non-Green Belt land to address need and the amount of housing proposed.

#### ***Berkswell***

#### Sites 31 Solihull Blooms Garden Centre, Kenilworth Road and Site 216 Land at Lincoln Truck Stop

- Sites, in conjunction with sites 76 and 212 (see below) should be considered for potential new development.
- After allowing for HS2, a substantial proportion would be potentially available for housing, sufficient for new settlement in line with Government's garden villages and Dickens Heath.
- The land is available, not in narrowest part of the Green Belt, close to employment area around Airport/NEC and within easy reach of Sprint network/Hampton rail station.
- Concern that no consideration given to this option to date.

#### Sites 76 and 212 – Land at Berkswell Quarry

- Rejection of this site for a new settlement, as identified in the Strategic Growth Study is the largest missed opportunity.
- The area is well sited for access to UK Central and the major road network.
- Good quality, high frequency bus services operate in the area.
- The area does not have high Green Belt value and the proposal is supported by the Parish Council.
- Question why these sites are assessed for employment only.

- The sites are previously developed land near railway stations and close to the motorway network.
- The sites could provide a purpose built new settlement and the Council should look seriously at this as an alternative to imposing any significant level of new housing on Balsall Common.
- Should be considered for potential new development. After allowing for HS2 a substantial proportion would be potentially available for housing, sufficient for new settlement in line with Government's garden villages and Dickens Heath.
- This is land available that is not in narrowest part of Green Belt, close to employment area around Airport/NEC and within easy reach of Sprint network/Hampton rail station.
- Concerned that no consideration given to this option to date.

#### Site 91 – Home Farm, Berkswell (promoted for employment use)

- Site should be elevated to green or amber.
- Would result in defensible boundaries and is a natural extension to the existing business park providing local employment in the local rural community.
- Site has good level of accessibility, and Balsall Common is identified as suitable for significant expansion.
- In the absence of the Council providing no new employment sites this site expands on an existing provision.

#### Site 305 – North of Balsall Common

- Site used by HS2 as a works compound for 6 years. Consider this site should be included.

#### Site 426 – Land south of Broad Lane, Meriden

- Strongly object to way site has been accessed in the site selection process as a 'red site'. Site was not taken forward in the step 1 assessment therefore was not subject to more refined step 2 analysis.
- Site is accessible adjoining the urban edge of Coventry and located in a Green Belt area with a score of 5 therefore should be allocated priority 5 status (yellow).
- As confirmed in the SHELAA the site would be viewed as an urban extension to Coventry and is in accordance with the spatial strategy which seeks to locate development to the most accessible locations
- Site does not have any hard constraints.
- Would not breach any strong defensible boundary to the Green Belt.
- Accessibility study is flawed in terms of the assessment of sites on the Solihull/Coventry boundary which do not receive any score despite bordering a major city with major services and a comprehensive transport network.
- Site has the same landscape character as other 'green sites'.
- No account is given of this sites geographical proximity to Bannerbrook Park the large urban extension within Coventry, with local services, community facilities and medical facilities.

#### ***Meriden***

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Site 81 – Land at Fillongly Road

- Site should be allocated for housing as it is a sustainable location and could be part of a larger expansion if required.

Site 128 Area G Meriden

- Further land within Meriden should be allocated for housing as village and facilities could accommodate additional numbers.
- Area currently being could assist in additional housing and should be considered in part or full as logical extension to Site 10.
- Site would enable a gateway development into Meriden from Birmingham Road/Maxstoke Lane roundabout and high quality reclamation of benefit to village.
- Would form logical and defensible boundary to western end of village.

Site 144 – North of Fillongly Road, Meriden

- Deliverable option to accommodate housing.
- The proposed larger site allows for a more comprehensive and developable site whilst delivering a strong and defensible Green Belt boundary to the east and west.
- Land is lower performing Green Belt and release would not harm purposes of the remaining Green Belt.
- Reduction in openness restricted to well-contained area close to settlement edge.
- Site could be considered as part of larger allocation.
- Part of site could provide additional educational development/improvements.
- Existing green infrastructure within and surrounding the site could be enhanced.

Site 197 – Land at Berkswell Road, Meriden

- Criticism that the site is identified in an incorrect Green Belt parcel. If the site were scored as a lower performing parcel then it would become a site with potential for inclusion and therefore has potential for consideration as a Green or Amber site.
- It is located immediately adjacent to a lower performing parcel of Green Belt land and adjacent to the edge of Meriden within the same landscape character area.
- Due to its scale (much smaller than identified in the site assessment document) it would be a small scale development, linked to the built up area of the settlement with only a minimal role in maintaining the purposes of Green Belt.
- Utilising this site would enable a less intensive scheme on site allocation 10 which would be more in keeping with a semi-rural settlement, and spread development on smaller scale sites.

Site 420 – Land at Meriden

- Site should be allocated for up to 100 houses. Site Selection topic paper demonstrates Meriden has good level of services and is highly accessible, suitable for limited expansion and could take more than 100 dwellings.
- Scores well in site assessment other than defensible boundaries, which is capable of remedy using existing hedgerows/watercourse.
- Assessment incorrectly states 170 rather than 100 dwellings.

- Accessibility mapping finds very high level of accessibility. Maximum SHELAA score, moderate impact on Green Belt and visually well-contained.
- Can provide significant green infrastructure.
- Site performs well against Step 2 factors, other than very low landscape capacity, which applies to Site 10 and elsewhere. Site more positive in Sustainability Assessment than other Meriden sites.

### **St Alphege**

#### Site 111 – Land at Widney Manor Road

- If being near to a railway station is required, fields to the east of Widney Manor Station should be considered.
- Do not agree with categorisation as a red site. This is a consequence of a flawed site selection methodology and flawed judgements that have been applied in the assessment of Site 111.
- Disagree that site is isolated, as reflected in PBA SHELAA.
- Site has medium accessibility as referred to in evidence.
- SA and Accessibility Study differ in assessment of proximity to primary school.
- Disagree with Green Belt Assessment, should be lower performing parcel.
- SHELAA Assessment is incorrect, is not in a Flood Zone.
- Site promoter working with Cadent Gas on gas pipeline.
- Disagree with Landscape Assessment's relevance to site.
- Disagree with elements of Sustainability Appraisal.
- Site has achievable capacity of 79 dwellings.

#### Site 407 – Land at Widney Manor Road

- Site should be re-assessed as green as no severe impacts and allocated for housing, as it is in one of the most sustainable locations in Borough, with strong Green Belt boundaries, no constraints that cannot be mitigated and would achieve 100% affordable housing.

#### Site 423 – Lovelace Hill, 123 Widney Manor Road

- Support for exclusion of site as Green Belt with severe negative impacts.

### Council Response (Draft Submission Version)

- Having regard to the spatial strategy, the evidence base, sustainability appraisal and site selection process, the Council consider that the most appropriate and suitable sites have been allocated, taking into account the reasonable alternatives.
- Further information is included within the Site Assessments Document, which was updated with additional Call for Sites in 2020.

## 17. Affordable Housing Policy and Open Market Housing Mix

### Q40 – Affordable Housing Approach (using area not no. of units)

*Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floor space incentivise developers to build more smaller market housing?*

#### Representations received:

Number objecting: 28

Number supporting: 8

Number commenting: 25

#### Key Issues raised by Representations:

##### Support comments

- Parish and Neighbourhood Plan surveys indicate a view there is a shortage of mid-size dwellings suitable for young couples. These should be provided in adequate numbers on all sites.
- Needs to be a rebalance as new developments provide too many 4, 5 & 6 bed housing to compensate for the 40% affordable contribution.
- Will incentivise developers to build more, smaller homes, increase the numbers of open market houses, increase housing density, reducing the amount of Green Belt land that needs to be used for development.

##### Objection comments

- The justification proportion of smaller properties being delivered is not supported by any analysis of its assumptions.
- Policy confuses matters relating to housing mix; housing size and matters relating to affordable housing provision, these are separate.
- No evidence that such an amendment will have effect of providing smaller market housing.
- The type and size of housing provided for both private sale and affordable housing should instead reflect market demand and local need.
- Calculation by floor space not fully justified or consistent with national policy and confuses requirement with housing mix/type of housing.
- Alternative approach will not provide clear indication of requirement, and is not justified through viability assessment.
- Seeking affordable housing contributions based on the total square meterage or habitable rooms/floor space would not comply with the affordable housing site thresholds set out by the Government in the Written Ministerial Statement dated 28th November 2014 and NPPF 2019 (para. 64).
- Parish resident's interests are primarily smaller homes to buy and affordable housing definition does not help this group and that is disappointing. Support higher proportion of shared ownership/Starter/discounted homes.

- 
- Plan should make specific reference to providing land on large developments for almshouses.
  - It is unreasonable to expect that affordable housing should be of the same size or standard as market housing.
  - The current method of measuring the requirement as a straight percentage of unit numbers is simple and effective.
  - The approach to increasing densities is set out at paras. 122 and 123 of the National Planning Policy Framework.
  - Past density has been too low, given the shortage of land and the need created for motorised transport.
  - Consequently, the Planning Authority should control the housing density to appropriate levels through all the sites.
  - Using affordable housing policy to deal with identified issues associated with market housing mix, increasing densities and minimising Green Belt release and does not comply with affordable housing site thresholds set out by Government in the Written Ministerial Statement dated 28th November 2014 or para. 64 of the NPPF 2019.
  - We consider this approach to be unconventional and could lead to a greater than 50% of housing units being provided for affordable housing.
  - Schemes would be designed around numbers, not good place making or meeting identified needs (and demand).
  - Approach limits the policy's flexibility and the flexibility with which a site can be designed to meet housing needs and still be viable.
  - Schemes could be badly skewed towards an arbitrary numerical target instead of housing needs as required by NPPF.
  - Policy will lead to increased affordable housing numbers, affordable housing requirement when evidence provided within the Part 2 SHMA would appear to indicate that affordable housing needs are much lower at 210 dwellings per annum (roughly 25% of future housing need).
  - No data provided as part of the consultation to illustrate the mix of housing delivered within the Borough in recent years.
  - The Part 2 SHMA sets out that the largest proportion of future market housing need is for 4 bedroom dwellings or more.
  - Concern over how the Council would monitor the implementation of the proposed approach for affordable housing.
  - A block of small apartments can have a higher net residential floor area than the equivalent land-take for family homes therefore would require a greater amount of affordable housing but with less revenue with implications for economic viability.
  - The policy objective is to meet in full the identified housing requirements in terms of numbers, sizes, tenures and types. Para. 60 of the NPPF states there should be an evidence based approach to determine this.
  - An affordable policy requirement based on a proportion of net residential could also make it difficult for the LPA to assess the effectiveness of the plan.



- 40% affordable housing is too high and must be reduced to 20%

#### Council Response (Draft Submission Version)

- The alternative policy obligation was set out as a question in the 2019 Supplementary Consultation, as the Council is keen to enable more opportunities for first time buyer homes and diversify the housing stock with smaller homes, and proposed to incentivise this through the affordable housing policy.
- Following consideration of the 2016 and 2019 consultation responses, the Council has proposed that the affordable housing contribution will remain at 40% of dwellings (as units) on qualifying sites in Policy P4A in the Draft Submission Plan.
- The housing size mix for affordable (P4A) and market (P4C) housing have been incorporated within the policy text to afford more weight to the policy direction, and indicate the housing mix to be achieved on site.
- The NPPF sets out separate requirements for affordable housing and density. It is clear that Local Plans should have policies for density, and developments should make efficient use of land, whilst optimising densities that are appropriate to the location.
- The draft Submission Plan has strengthened the density policy in Policy P5, and density ranges for site allocations are set out in the concept masterplans, which has informed indicative capacities for the sites.

#### Q41 – Affordable Housing calculation

*If so, what is the most effective approach? Is it to calculate affordable housing as: (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?*

#### **Representations received:**

Number objecting: 20

Number supporting: 6

Number commenting: 13

#### **Key Issues raised by Representations:**

##### **Support comments - 40% of bedroom numbers**

- No comments of support

##### **Support comments - 40% of habitable rooms**

- No comments of support

##### **Support comments - 40% of habitable square meterage**

- 5 comments of support

#### **Objection comments**

- All calculations will not provide certainty to developers and landowners at point of site acquisition as what is required.
- All approaches will bring viability matters into play more frequently.

- 
- All three approaches would run counter national policy on affordable housing which does not seek contributions on sites of 10 dwellings or fewer (i.e. based on dwelling numbers and not floor space calculations).
  - All three approaches are considered likely to create uncertainty as to the number of affordable units required, resulting in prolonged negotiations and a slowing of the planning application process.
  - Standard practice for affordable housing contributions to be calculated on the basis of the numbers of units proposed in conjunction with development.
  - Oppose change to the unit basis of calculation and consider the existing unit basis at 40% for the affordable element is already exceptionally high.
  - Support the retention of the unit housing measurement as a clearly understood basis given the system is already required to meet housing size, mix and accommodation standards set down by the local authority.
  - No evidence that such an approach already in use achieving an improvement in provision of affordable housing.
  - No evidence to support offered to support any of the approaches.
  - Supported the retention of the existing unit system as well established and easily understood. The present 40% affordable policy is at the very top end of the scale with concern expressed at the level of cross subsidy from market housing falling especially heavily on younger and first time buyers.
  - To provide a 40% true representation of the total number of dwellings proposed for a site, then there should be provided 40% of each house type as affordable, thus by definition achieving a 40% representation of the whole.
  - Calculation by floor space not fully justified or consistent with national policy and confuses requirement with housing mix/type of housing.
  - Alternative approaches will not provide clear indication of requirement, and are not justified through viability assessment.
  - Approaches based on the square meterage or habitable rooms/floor space are not generally supported due to the inherent difficulties in designing for the policy, which causes developers to calculate the appropriate level of delivery by reference to optimal market floor space instead of baseline numbers.
  - Will cause difficulties in decision making and monitoring of delivery, and therefore in setting appropriate responses to under delivery of affordable housing.
  - Requiring the balance of market and affordable housing to be calculated by reference to such detailed calculations as floor space will inevitably result in a reduction in the quality of place making.
  - A system based on unit numbers, in line with national guidance is more appropriate.
  - No evidence that the proposed method will not render schemes unviable given the amount of affordable housing may be higher than 40% of the total unit numbers.
  - Approach is unconventional and could lead to a greater than 50% of housing units being provided for affordable housing.
  - No evidence or justification for a bedroom/habitable room/floor space requirement.

- Approach will not overcome the Council's concerns with low provision of smaller market homes.
- Should the habitable rooms in the open market element of a scheme be quite large but few in numbers, this will not necessarily equate to an increase in delivery of affordable homes.
- Approach may have the unintended consequence of larger affordable homes being provided which do not meet local housing needs, are not affordable and may be difficult to re-let or sell on shared ownership terms.
- All approaches will impact on scheme densities to the detriment of good design in cases where viability is marginal and the number of units must increase to achieve a policy-compliant level of affordable floor space, bedroom or habitable rooms.
- 40% affordable housing is too high and should be reduced to 20%.

#### Council Response (Draft Submission Version)

- The affordable housing policy is set out to meet the identified needs for affordable housing. The affordable housing contribution will remain at 40% of dwellings on qualifying sites, as shown in Policy P4A in the Draft Submission Local Plan.
- See also the response to Q40.

### Q42 – Measuring Developable Space

*What is the best way of measuring developable space for this purpose: bedroom numbers, habitable rooms or habitable floor space?*

#### **Representations received:**

Number objecting: 21

Number supporting: 3

Number commenting: 13

#### **Key Issues raised by Representations:**

##### **Support comments - bedroom numbers**

- 1 comment of support

##### **Support comments - habitable rooms**

- No comments of support

##### **Support comments - habitable square meterage**

- 9 comments of support

##### **Comments objecting**

- Should keep to a unit based policy.
- Inappropriate approach irrespective of the way used to measure developable space.
- None of these alternatives.

- The gross floor space of any house allows for non-habitable space included such as utility rooms, kitchens and bathrooms, all of which are an important factor taken into account by prospective purchasers/shared equity owners/tenants.
- The overall floor areas should be the same for each house type being provided.
- All approaches will cause inherent difficulties in designing in policy into scheme.
- All approaches will cause difficulties in decision making and monitoring of delivery.
- Requiring the balance of market and affordable housing to be calculated by reference to such detailed calculations as floor space will inevitably result in a reduction in the quality of place making.
- Only a system based on unit numbers is in line with national guidance.
- No evidence provided that the approaches will not render schemes unviable given the amount of affordable housing may be higher than 40% of the total unit numbers.
- Further analysis is required to understand what the impact of any of the proposed measures needs to be provided.
- Need to test policy to schemes already subject to planning applications.
- Viability testing should be completed to ensure that any proposed approach would act to maximise affordable housing delivery.
- All approaches of affordable housing contributions is unconventional and could generate a greater than 50% of housing units being provided for affordable housing.
- All approaches will negatively affect the overall site mix, development viability and prohibit development.
- No evidence provided to justify a habitable room/floor space requirement.
- The Council's existing approach on affordable housing is more appropriate.

#### Council Response (Draft Submission Version)

- The affordable housing policy is set out to meet the identified needs for affordable housing. The affordable housing contribution will remain at 40% of dwellings on qualifying sites, as shown in Policy P4A in the Draft Submission Local Plan.
- See also the response to Q40.

### Q43 – Incentivising More Smaller Market Dwellings?

*What other measures would incentivise developers to build more smaller market housing?*

#### **Representations received:**

Number objecting: 7

Number supporting: 2

Number commenting: 29

#### **Key Issues raised by Representations:**

#### **Objection comments**

- 
- Provision of only small dwellings on sites will not develop long term sustainable communities.
  - Will result in a transient community where people will not be able to form long term neighbourhoods as they will need to move on as their circumstances change.
  - Focus should be on building strong healthy communities which can cater for all rather than simply planning for short term ownership.
  - All households should have access to different types of dwellings to meet their housing needs and that market signals are an important factor in determining the size and type of homes needed.
  - Focus should be on ensuring that there are appropriate sites (providing a wide range of types across a wide range of locations) allocated to meet the needs of specifically identified groups of households, such as families, older people and/or self-build, rather than setting a specific housing mix on individual sites.
  - Building more small market homes, developers will build fewer but larger affordable dwellings, in order to preserve the profitability.
  - Larger affordable dwellings will result in occupiers will have no incentive to move out and acquire market housing of their own, even when they become financially able to buy.
  - Need to control land pricing and land banking so affordable housing is delivered by more realistic house prices.
  - Minimum standards should be set of accommodation intended for families of a certain number of people.
  - More attention to quality of housing, quality of materials and development and overall improvement of peoples lifestyles rather than focusing on smaller houses.
  - Policy should include the full range of affordable housing tenures to maximise the number of affordable homes that can be delivered across Solihull over the Plan period.
  - Developers want their developments to be desirable and do not want to squeeze in as many small properties as possible to reach council affordable housing targets.
  - Should be about providing an appropriate mix of housing for all and responding to need across the board i.e. families, elderly, self-build as well as smaller units.
  - No evidence in up to date SHMA/HNA to show need for more smaller market housing.
  - The Council is seeking to utilise affordable housing provision to address a different issue which is inconsistent to NPPF.
  - The overprovision of smaller housing in specific areas may lead to transient populations and development which does not meet the definition of sustainable development.
  - The focus should be on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as families, older people and/or self-build rather than setting a specific housing mix on individual sites.

- Consider a combination of policies on expected housing type, size and tenure mix together with an appropriate threshold measure.
- National Space Standards across all tenures.
- Starter homes now form part of the definition of affordable with the restrictions placed on starter homes in terms of price paid, size and type this will increase the supply of smaller stock within the Borough.
- Density requirements may also be effective in securing a higher proportion of smaller dwellings.
- Where there is a strong demand for smaller market houses then house builders will build them.
- To rigidly require house builders to build more smaller houses may reduce the ability to meet the market requirements for larger 3 and 4 bed houses.
- If the supply of larger houses is artificially restricted then there is a risk that asking prices would increase which could in turn affect the asking price of smaller properties.
- A policy influence on the market housing mix is unnecessary.

#### Council Response (Draft Submission Version)

- The market housing size mix has been incorporated into Policy P4C in the Draft Submission Local Plan, thus affording more weight to the market mix that ought to be achieved on a site. This has been informed by the 2020 Housing and Economic Development Needs Assessment.

## 18. Responding to this Consultation & Schedule of Questions

### Q44 – Any Other Comments

*Are there any other comments you wish to make on the Draft Local Plan Supplementary Consultation?*

#### Representations received:

Number objecting: 86

Number supporting: 6

Number commenting: 108

#### Key Issues raised by Representations:

##### General

- Given rejection of SMBC contribution to wider Housing Market Area shortfall, prudent to allocate sufficient additional sites to provide additional capacity.
- Solihull well placed to deliver a significant proportion of wider Housing Market Area shortfall, which will be required to fulfil Duty to Cooperate, and should seek views on potential of sites currently discounted.
- More holistic approach to consideration of overall housing requirement including local needs and contribution to wider Housing Market Area shortfall alongside employment needs, implications of HS2 and future role of Solihull Town Centre required.
- No justification for housing supply or figure for contribution to wider Housing Market Area shortfall. Concern that revision at Submission stage of such a fundamental issue will provide limited scope to genuinely reconsider and test Strategic Growth Study findings.
- Close relationship between Birmingham and Solihull justifies considerably high contribution to wider Housing Market Area shortfall than 2000.
- Expect on going engagement with neighbouring authorities on cross-border matters, including transport and education infrastructure, to culminate in inclusion in Infrastructure Delivery Plan, supported by Statement of Common Ground/Duty to Cooperate agreement.
- Full potential capacity of Borough for housing not considered as no testing/feasibility/masterplanning of Strategic Growth Study growth location recommendations.
- Spatial Strategy/alternative sites should be revisited as additional growth to meet wider Housing Market Area shortfall and Strategic Growth Study recommendations may require changes to ensure sound Plan. This fundamental issue should not be left to Submission stage.
- Clear need to identify additional land to support the delivery of large-scale sites, and/or to include a review mechanism that will secure additional sites in the event of a failure to deliver housing.
- Council should challenge WMCA to do more to develop derelict/brownfield sites and reduce pressure on Green Belt.

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- SMBC should ensure that Birmingham makes greater provision/use of brownfield sites for its housing need rather than seeking to export housing to surrounding areas.
  - Shocking/disappointing to see how much Green Belt being lost.
  - Should review spatial strategy and identify ways to meet housing target without losing Green Belt.
  - Most housing on edge of Borough in areas that could become part of other authorities.
  - A holistic perspective has not been taken to site allocations across the Borough, with disproportionate increase for Balsall Common, reduction in numbers for Dickens Heath/Shirley and none proposed for Dorridge, one of the most sustainable settlements in terms of public transport and local amenities.
  - Shirley/Blythe Valley is targeted with too high a number of new homes without the infrastructure to sustain this, whereas other parts of the Borough are not taking a fair share of the housing.
  - Housing to support UK Central Hub Area/HS2 growth should be located nearer Hub Area rather than in Shirley, as this offers best solution to additional housing where infrastructure is being significantly improved..
  - New areas of development similar to Dickens Heath are far more acceptable than ruining the areas of current Solihull residents.
  - Should not overdevelop urban neighbourhoods that lack capacity, but spread future housing across wider geographical area.
  - Spatial Strategy/Plan heavily reliant on large-scale sites including 2 sites with significant uncertainties, UK Central Hub area and Barratt's Farm, with multiple ownerships resulting in significant uncertainties over delivery. Should reassess/allocate more smaller sites with less constraints.
  - Explanation/definition required for how rural settlements split between significant and limited expansion. Dickens Heath and Cheswick Green included for significant expansion whereas Meriden limited expansion despite being highly accessible and having wide range of services.
  - Further Green Belt land likely to be required for development in next review so land should be removed from Green Belt and safeguarded for future needs to avoid future Green Belt changes and comply with NPPF.
  - Plan sacrifices Green Belt without adequate compensation.
  - Should focus on brownfield, derelict sites rather than green field development.
  - Utilise the empty homes in the Borough before new homes are built.
  - Too greater emphasis on land owned by property companies.
  - More affordable housing required in more areas supported by additional infrastructure and need to ensure accessed by local people not private landlords.
  - Crisis in social housing provision needs to be urgently addressed, with areas in south of Borough and the urban west as well as North Solihull, by Solihull Community Housing and supporting community schemes.
  - Conflict between provision for social housing across Borough and concentration of support infrastructure for families/young people in North Solihull.



- Need for improved outdoor and indoor leisure facilities.
- Plan not meeting challenges and objectives identified in Sustainable Economic Growth chapter.
- Severn Trent Water will provide appropriate levels of treatment at each of its sewage treatment works, expects surface water on new development to be managed in line with the Government's Water Strategy, Future Water and greater emphasis to be paid to consequences of extreme rainfall, expects development to take account of EA Source Protection Zone (SPZ) and Safe Guarding Zone policy, EA RBMPs, and Water Framework Directive, will provide site specific assessments once details of location and numbers are known, does not anticipate capacity problems whilst recognising that significant development in rural areas is likely to have greater impact, and recommends adoption of optional water use target in Building Regulations and the installation of water efficient fittings.
- Environment Agency welcomes inclusion of flood risk as hard constraint in Site Selection Methodology and recommends water quality with particular reference to River Blythe Site of Special Scientific Interest is added to footnote 39, seeks addition of enhancement of water quality to requirements for Blythe, and recommends sequential testing and level 2 Strategic Flood Risk Assessment for Sites 12, 19 and 20 and in Dickens Heath and Cheswick Green areas.
- Concern about implications for Cannock Chase Special Area for Conservation.
- Natural England green infrastructure comments on Balsall Common apply to all sites. Allocations should enhance biodiversity delivering net gains where possible. If adverse impacts on Sites of Special Scientific Interest/Local Wildlife Sites cannot be overcome, alternatives should be considered. Appropriate mitigation of protected species.
- Welcome review as response to High Court challenge to SLP 2013.

### **Evidence**

- Plan has many significant flaws and will require extensive research and modification before next iteration or will be extensively challenged.
- Strategic Environmental Assessment process fails to comply with guidance/regulations.
- Formal Sustainability Appraisal Report should have been prepared/consulted on at this stage. Deficiencies relating to; lack of consideration of alternatives to Local Housing Need, reasonable site options not assessed, deficiencies at DLP stage not addressed, fails to evaluate significance of impacts against appropriate evidence, cumulative effects/mitigation not considered, Green Belt land not considered, no flood risk sequential test of proposed allocations, no explanation for selection/rejection of options or overall conclusions of sustainability of different alternatives, no explanation how SA informed SDLP in integrated way, fails to show how representations from statutory consultees/neighbouring authorities taken into account, fails to assess 75 sites of which 15 identified as green and 9 as amber sites, fails to appraise all reasonable alternatives, or demonstrate that strategy is appropriate or take into account alternatives.
- Sustainability Appraisal not updated to take account of changes in Supplementary Consultation and without Housing Market Area agreement, will not have properly considered suitable alternatives and established the most sustainable strategy.
- Transport evidence base is required for cumulative impact of development/infrastructure including assessment of M42 Junctions, growth and

infrastructure improvements at UK Central/Airport/NEC, impact of development at Balsall Common on the M42/Strategic Road Network, and cross boundary implications including on A46 within Warwickshire.

- Evidence is flawed as no detailed landscape/ecological assessment of preferred/amber sites.
- Green Belt Assessment should be revisited to assess additional/smaller parcels to reflect additional green/amber sites.
- Assigning Broad Areas in Green Belt Assessment a score of 3 is flawed and unsound.
- Playing Pitch Strategy identifies current and future shortfall in provision and Plan should seek to accommodate identified need, though not apparent in proposed allocations.
- No revision of Infrastructure Delivery Plan. Local infrastructure will be overwhelmed and current problems of congestion, GP waiting times, class sizes, police/fire shortages and parking will worsen.
- Cannot conclude that housing supply proposed is deliverable in absence of site-specific information regarding timescales or trajectory.
- No viability assessment.
- Mineral Safeguarding Area for Coal should be removed as no longer relevant, following closure of Daw Mill and as re-opening not viable.
- No specific comments from Coal Authority.

#### **Consultation and Document**

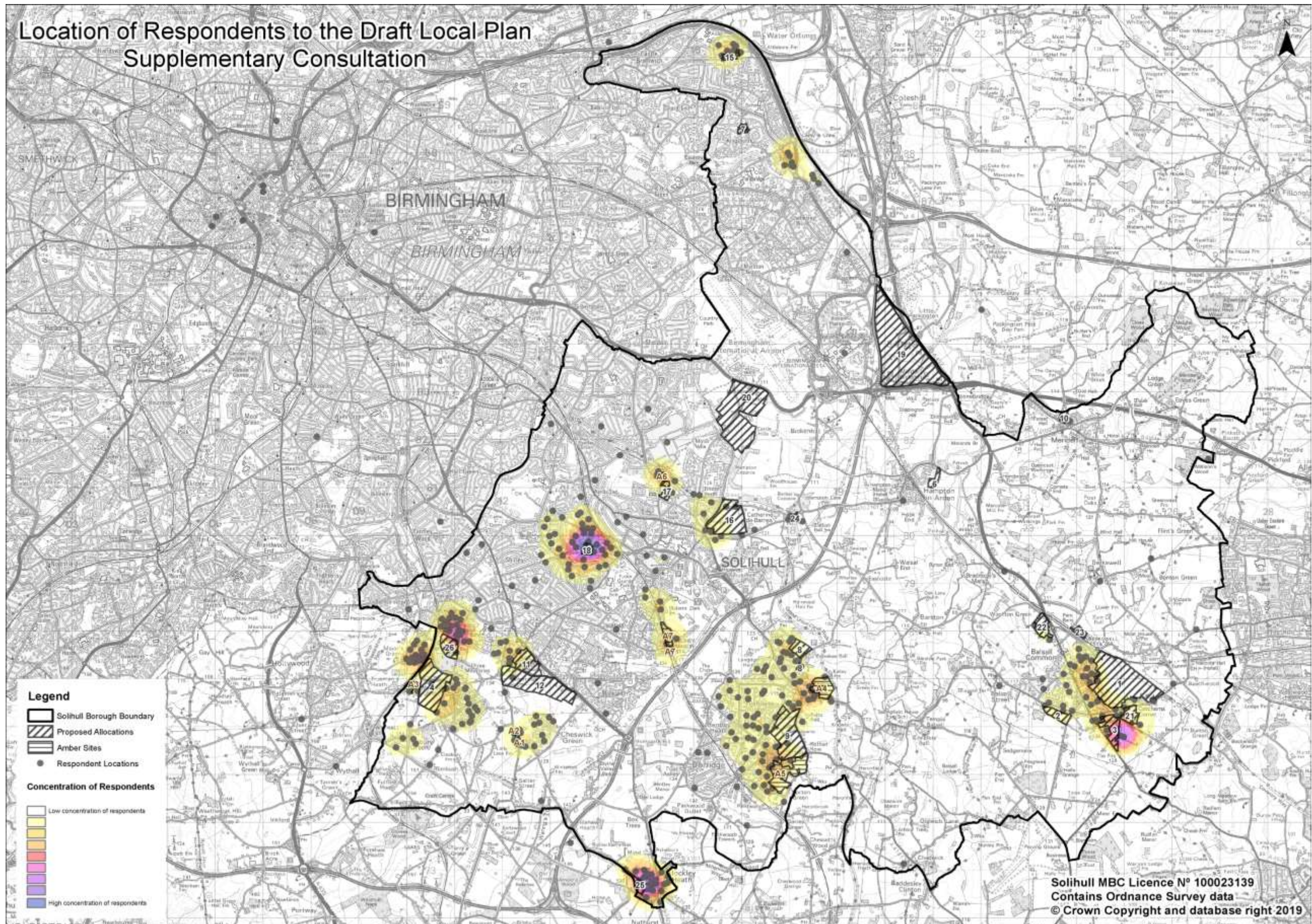
- Plan period end date should be 2036 to be consistent with Strategic Growth Study.
- No new discussion on traffic/transport/Medical Centre impacts.
- Need reassurances that concept masterplans have some strength and long term validity and that SMBC will insist they are observed by developers.
- WM Police seek engagement with concept masterplans, policy implementation and delivery.
- Inconsistent reporting in the Plan on issues related to different sites; some offer clear and concise reasons, others skip over infrastructure issues and seem 'thrown in'.
- Non statutory consultation under Regulation 18 contradictory. Statement of Community Involvement indicates Review should be subject to formal Regulation 18 consultation, which should be next stage.
- On-line responses require full consideration of full responses, not simply based upon (100 word limited) summary responses.
- Some questions in consultation document too complicated, unclear or unrealistic, and limited in scope and number excessive.
- Drop in events not supported with senior officials and should be held near each proposed allocation.
- Time frame for responses insufficient.

- A range of consultation events were held to support the consultation (see Introduction).
- See responses to Q1 on housing need and Duty to Cooperate.
- A large number of questions were included in the consultation document to aid stakeholders in their responses.
- The Supplementary Consultation was a more focused consultation at the Regulation 18 stage to invite comments on the updated work carried out on proposed allocations and to reflect the forthcoming changes to assess Local Housing Need.
- Informal consultation has been carried out with infrastructure and service providers to inform the 2020 draft Infrastructure Delivery Plan.
- Plan period extended to 2036 in the Regulation 19 consultation.
- Habitat Regulations Appropriate Assessment Screening report was updated for the Regulation 19 consultation and potential impact on Cannock Chase SAC taken into account.
- A number of further studies were finalised and/or updated, and published for the Regulation 19 consultation of the Draft Submission Plan including:
  - Sustainability Appraisal
  - Viability Assessment
  - Transport evidence studies
  - SHELAA
  - Site Assessments Document
- Council has separate Empty Homes strategy.

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19. Location of Respondents Relative to Allocated Sites





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