

1. Introduction

Berkswell Parish Council performed a “listening exercise” at a drop-in event on Saturday 2nd March 2019 to help inform its response to the Solihull Draft Plan and to inform residents so that they could respond directly if they so wished. It was a very busy session, where despite having two full displays of a display size significantly larger than that used at the SMBC consultation session, the exhibits were overwhelmed by residents. We estimate that 200-300 residents attended from both Berkswell and Balsall Parishes.



2. Question 1 : Local Housing Need

2.1. 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?

2.2. No comment

3. Question 2 : Site Selection Methodology

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

3.2. Berkswell Council considers the site selection methodology to be seriously flawed and fails to meet the requirements of the NPPF

3.3. The greenbelt analysis is not suitable and sufficient for the use to which has been put. The methodology employed looks at very small pieces of land and assesses them individually without considering the greenbelt contribution of the large tracts of land of which those small tracts form a part. The value of a large tract of land to the 5 purposes of the greenbelt can clearly be cumulatively greater than the sum of the parts from which it is formed. That is particularly the case within a narrow belt of greenbelt between neighbouring towns. There is no doubt that Balsall Common is already a town (bigger than many) and the gap between it and neighbouring towns (Coventry/Burton Green) is of major importance to greenbelt policy. Harm assessments should have been undertaken on possible greenbelt modification options before any commitment of resources on site allocations or concept plans.

3.4. The site selection methodology fails to take account of the relative loss of relative amenity when comparing areas of land within the greenbelt. Paragraph 141 of the NPPF states that for green Belts local planning authorities “*should plan to positively to enhance their beneficial*

use, such as looking for opportunities to provide access.....". Consequently, current levels of access should form part of site selection criteria. It reduces the value of the greenbelt if destroying public access to greenbelt for recreation and healthy exercise is reduced by development and cannot be easily replaced for the residents who use the current access. Hence this harm to the greenbelt and public should form part of the site selection methodology.

- 3.5. The site selection methodology takes no account of the impact of the pressures on the greenbelt which impact the 5 purposes. For example, the impact HS2 on the greenbelt both from its physical impact on the openness and also the land removed from the greenbelt which in the case of Berkswell Parish is (insert hectares please can Richard Lloyd calculate). This should be included in a cumulative harm analysis and compared with other areas of land available for development elsewhere. Similarly, the Coventry and North Warwickshire Local plans are reducing the Meriden Gap on the Coventry border and at Burton Green and that has not been factored in to the site selection methodology.
- 3.6. The methodology fails to take account of the potential housing productivity of a site. The assessment takes no account of the productivity of the land in terms of the housing that can be built upon it due to site constraints.
 - 3.6.1. To take the Windmill Lane site in Berkswell (site ref.138) as an example. The site is shown as 11 hectares. However, the ecology survey shows that it has high ecological value and a large amount of the site is not developable because it must be set aside for ecological/great crested newt reasons. This reduces the site capacity to 6 hectares including 1.4 hectares for public open space. Hence, the housing productivity of this site is very poor. Almost twice as much greenbelt needs to be lost to achieve the same level of housing that other sites without such constraints would need. I.e. it is a very poor use of land released from greenbelt.
 - 3.6.2. Similarly, the methodology does not take account of the impact of heritage assets on a site's housing productivity. Again, this is evident at the Windmill Lane site where the Windmill as an ancient monument of national significance given that it is a working windmill will have a very large impact. We note that no proper assessment of the impact of the Windmill was undertaken before the draft plan was developed (that assessment took place on 1st March). The zone of significance for this cultural asset as shown in the draft plan is clearly incorrect because it fails to show that the windmill can be seen from the Kenilworth Road, Hob Lane and importantly the footpath across site 138. Proper reflection of the importance of this monument should further reduce the capacity of the site for housing.
 - 3.6.3. However, we are arguing the principle here and wish these factors relating to site housing productivity must be included within all site assessments not just site 138.
- 3.7. The assessment methodology fails to take account of NPPF paragraph 68 requiring 10% of the housing requirement to be met on sites of no larger than 1 hectare. Such sites are available in Balsall Common and are proposed for removal from the greenbelt and have not been included. Whilst it is acceptable in NPPF terms to make an allowance within windfall allocation it is not good planning practice to ignore sites that can be included within the plan. Berkswell Council is reminded of SMBC's approach within the 2013 plan that rated Duggins Lane as a non-sustainable brownfield location and then within one year granted it planning permission whilst ignoring paragraph 89 of the 2012 NPPF. Similar mistakes were made with the Partco site in central Balsall Common.

- 3.8. The site selection methodology is also flawed because it takes greenfield sites, which clearly add to the openness of the greenbelt (eg, land at Waste Lane/Pheasant Oak Farm site ref 170), whilst rejecting those that are within the logical boundaries of Balsall Common and which are already not connected to open greenbelt and are heavily bounded by the west coast mainline and existing development in Balsall Common. I.e. site ref. 1 and 43.
- 3.9. The site selection method fails to give sufficient weight to sustainability in terms of effective public transport as demonstrated by both the frequency of train/bus services for commuters and the car usage of residents going about their daily activities as shown the Solihull study called "Solihull Connected". For Balsall Common it states "**Residents make approximately 70% of all their daily trips by car; with the average across the Borough being 50%**" and "**Public transport options in the area are limited**". The site selection methodology needs to reflect the Solihull Connected report which determines the true effectiveness of public transport and not invent something new and not based on real evidence. Balsall Common is not sustainable in terms of public transport as is evidenced by the Solihull Connected report.
- 3.10. The site selection method treats Dorridge, Bentley Heath and Knowle has far more effective public transport than Balsall Common, particularly the **Dorridge area. It has ??? trains per hour compared with Balsall Common**. However, the Knowle, Dorridge & Bentley Heath area is planned to take 900 homes compared with 1690 for Balsall Common despite having a combined 8000 households versus 3900 for the Balsall Common area. Dorridge with its high frequency rail service, modernised town centre & range of schools is planned to get no new housing despite having available sites which whilst in the greenbelt are not between conurbations. This is a counterintuitive outcome and indicates a failure in the site selection methodology.
- 3.11. The site selection process takes no account of property price despite this being a factor in the national assessment methodology. The Government states that property prices given an indication of unmet demand in that area. Dorridge has a high average property value (see table below). Clearly the unmet demand in Dorridge is higher than in Balsall Common based on HM Government logic. Land is available in Dorridge and in locations with lowish impact on the greenbelt but it has not been selected. House prices should feature as part of the site selection methodology given that HM Government think they are important.

	Dorridge	Balsall Common
Detached	£705,424	£543,383
Semi detached	£441,191	£368,257
Flats	£269,494	£167,326
Average	£582,852	£416,353

Source Zoopla analysis if Land Registry

Note: The average house price in Knowle is £505,325.

- 3.12. We are concerned that SMBC have given no consideration to the proposal from Berkswell parish to build a new settlement in the north of Berkswell parish. Land is available (site ref 76 & 212) and it could be coupled with the brownfield sites 216 and 31. The former sites were proposed by the Berkswell Estates for offices/industry and represent almost 170 hectares. That is enough area to build a small town. We note that the Hearn Report also proposed a new settlement north of Balsall Common. Contrary to comments made, it does not propose enlarging Balsall Common. It clearly shows in Figure 10, the placement of new settlement north of Balsall Common and says it will be around Balsall Common not at Balsall

Common. The report gives an indicative distance to the station of 2 km (paragraph 9.87) and this confirms that the report is suggesting a new settlement not an extension of Balsall Common. The Hearn proposal has also been ignored by SMBC. Given that land is available in an area that is not in the narrowest part of the Meriden gap, close to the major employment area of the Airport/NEC and within easy reach of the high capacity bus network as shown in Solihull Connect. it is surprising that SMBC have not given any consideration to this option.

3.13. We note that no Highway assessment has been included and information requests concerning the funding of the “so called Balsall Common bypass” have not been answered within the statutory timeframes.

3.14. SMBC at a meeting on 8th March 2016 asked the PC’s opinion of building a bypass that significant housing should be built within Berkswell on Barrett’s Farm. That was before any analysis was undertaken and it would appear that SMBC has stuck with this concept despite evidence to the contrary. The site selection criteria need to be modified to reflect the real evidence rather than “planners’ judgement” being used to justify a position reached before the evidence was available.

We strongly recommend that the site selection criteria are modified to give significant weight to the above factors.

4. Question 3 : 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?

Berkswell Parish Council welcomes the identified infrastructure needs but would point out the following additional issues

4.1. Infrastructure timing

Many key facilities within Balsall Common are already at capacity and the infrastructure needs to be put in place very early to meet the enhanced need caused by the housing proposed. In particular

4.1.1.Schools

4.1.2.Village centre improvements (particularly parking see below)

4.1.3.Improved parking at the station including parking restrictions on Station Road to deter parking for the station

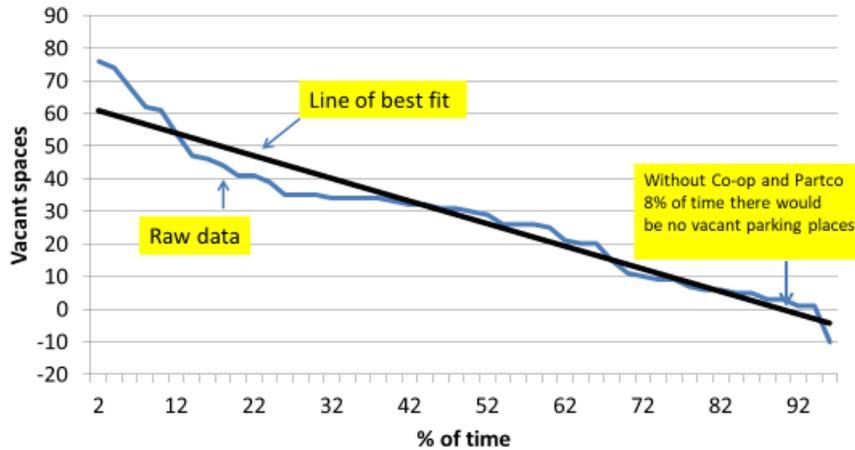
4.1.4.Anything else?

4.2. Balsall Common centre

The current centre of Balsall Common is at or close to its car parking capacity availability with the current homes. Survey’s conducted in 2017 show that it only copes because the Coop allows parking in its car park for non-customers

Vacant car parking spaces Balsall Common excluding Co-op

Excludes Co-op and assumes all Partco parking is distributed into Station Road/Library car park



The local plan must find additional car parking space within the centre of Balsall Common because the average distance of the proposed new homes exceeds the current average distance of homes from the centre. Hence, a greater proportion of new residents will seek to drive to the shops/centre than currently. With the number of houses increasing by 1755 plus windfall sites over the plan period from a total of around 3200 within Balsall Common currently. That is approximately a 60% increase in housing, more than that in cars wishing to get the Balsall Common centre.

Similar arguments apply to parking at the station. Already there are on average 70 to 80 cars parked on Hallmeadow and Station Roads in addition to the station park and ride capacity of 93 spaces (including 5 disabled spaces). There has been a marked increase in parking for the station since the developments on Kenilworth Road were built and it is noted that these homes are outside effective walking range of the station in the same way as much of the housing now proposed by SMBC. (Survey data on Hallmeadow and Station Road parking for the station can be provided). Currently there is under provision of 70 to 80 places and it would be fair to add an additional 70-80 places for the new housing. Hence additional parking at the station of around 150 places is required. Hence significant additional parking provision must be provided at the station funded by the CIL payments received by SMBC.

4.3. Education

Whilst welcoming the commitment to an additional primary school the council is concerned that the draft plan underestimates the challenge that will be presented with the expansion envisaged. All current schools in Balsall and Berkswell parishes are basically at capacity. Balsall Common Primary school is officially a 3-form entry school but is currently operating with 4 forms for the youngest classes. (this needs checking).

The Council formally plans 1755 new homes in Balsall Common addition to those currently being completed on Kenilworth Road. In addition, there will be windfall development over the 15 years of the plan. Berkswell parish has averaged about 7 -8 windfall homes since the last plan. It is not unreasonable to assume that Berkswell and Balsall Parishes would generate 10 windfall homes over

the plan period taking total new homes to 1900. That represents 1520 school age children using the standard ratio used for planning. That is roughly 760 primary and 760 secondary school children. That implies 4 forms are required for the primary school. I.e. two new primary schools.

We note that the plan for the Heart of England, a school with 1200 pupils according to the draft plan, is to reduce its catchment area. Obviously, that is not within SMBC ability to plan because the Heart of England is an academy. It would appear unlikely that the Heart of England could/would find places for 760 additional pupils by adjusting its catchment area particularly given its attractiveness to pupils from outside of Berkswell and Balsall Parishes including places such as Meriden and those from Coventry who live close by.

We suggest that further work needs doing on school provision or the number of houses needs to be reduced to the level in the previous draft plan.

4.4. Bypass

The Council notes the proposal for a bypass which will cause damage to the greenbelt. The Council is concerned that the factual justification for a bypass has not been made. This is important given that part of the reason for the bypass is to open up land for housing at the narrowest part of the Meriden Gap. The bypass line was withdrawn by SMBC in its December 2013 Local Plan at the request of Highways England because it could not be justified on the basis of the traffic figures.

We note that the Environment Statement for HS2 states that there will be no appreciable impact on local roads from the operation of the train on the roads in Balsall Common. (Richard Lloyd to provide exact wording and page reference please).

We note that the latest 2017 traffic survey conducted by SMBC for Balsall Common shows no increase in through traffic on the Kenilworth Road, with a reduction if anything from 2015.

Location	20??	April 2015 Vehicles per day	April 2017 Vehicles per day
A452 north of Windmill Lane (going north)	FOI request made	42,454	41,064
A452 north of Windmill Lane going south		43,286	39,152
A452 close to Wooton Green Lane going orth		60,991	48,434
A452 close to Wooton Green Lane going south		Not available	50,114

4.5. Berkswell Parish residents are on balance against a bypass. Only 44% supported it at the drop-in consultation session. When it becomes apparent that there will be other significant

- downsides from the additional housing used to justify the bypass the Council would expect a loss of support. The Council believes that support for the bypass is based on two factors
- 4.5.1.A desire by those on or near Kenilworth Road to move the traffic elsewhere despite having bought their properties on a main road
 - 4.5.2.A lack of knowledge of the consequences of additional housing in terms of disruption, congestion in Balsall Common centre (and the likely imposition of car parking charges that will follow is established SMBC practice e.g. Knowle and Shirley) and the virtual doubling of size of Balsall Common.
- 4.6. The Council is also concerned that a bypass will create more traffic and encourage traffic from Burton Green and Tile Hill through the lanes of Berkswell to use it.
- 4.7. It is also hard to see that a road that runs through a housing estate can be called a bypass. There will be a high number of junctions on it in just 2 miles (needs checking).
- 4.7.1.Hob Lane
 - 4.7.2.Waste lane
 - 4.7.3.Accesses to serve the new housing estate
 - 4.7.4.Station Road
 - 4.7.5.Health Centre/new estate on the Council owned property
 - 4.7.6.Riddings Hill
 - 4.7.7.Grovefield Crescent
 - 4.7.8.Lavender Hall Lane
- 4.8. It is therefore hard to understand why SMBC removed the bypass proposal in December 2013 based on Highways England/Department of Transport advice only to reintroduce it again in 2019 when there is no significant difference in traffic flows. The building of a bypass will cause significant hardship to some Berkswell residents and others will be significantly inconvenienced (e.g. those whose properties will be next to/close to the line). We understand that it will benefit those living on the Kenilworth Road but all of those bought their properties knowing that the A452 was a trunk road and impacted by traffic. There is very little impact on the shopping centre in Balsall Common because the vast majority of it is on Station Road and not on the A452.

5. Question 4 : 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?

- 5.1. Berkswell Parish council does not agree that Barrett's farm should be included as an allocated site because Solihull Council has failed to study alternatives and there are errors in the site selection methodology.
- 5.2. There are some good things within the concept plan.
 - 5.2.1.Medium rather than high density housing closer to existing homes.
 - 5.2.2.The inclusion of public green space
 - 5.2.3.The identification of areas of ecological importance which should not be developed.
- 5.3. However, and most significantly, the concept plan ignores the Berkswell NDP which is currently undergoing external examination. We note that the views expressed within the NDPs of other areas are taken account of within the draft plan text. We note that the Meriden

plan is not close to external examination but there is a paragraph within the draft Solihull Local plan (para. 290) solely dedicated to “local aspirations”.

- 5.4. In particular, the concept plan is contrary to the NDP
 - 5.4.1. It fails to place public green space between existing and new homes
 - 5.4.2. It seeks to provide vehicular access to new housing from existing residential lanes/roads e.g. Meeting House Lane. Such access is not required because all access can be achieved from the dedicated access road, so called a bypass.
- 5.5. We note that zone 3 flood plain is included as public green space. A significant portion of that flood plain is not accessible for most/all of the year due to flooding and cannot be regarded as public open space.
- 5.6. We also note that whilst the site acreage has increased by about 50% since the draft plan the number of planned homes has increased by 12.5%.
- 5.7. We do not understand why the area shaded brown between the so-called bypass and the greenway is scheduled for development post HS2 construction. However, paragraph 103 states for Barrett’s farm *“the final version of the plan will need to reflect this (sic HS2) by phasing much of the Barrett’s Farm development until later in the plan period”*. As most of the Barrett’s Farm site will be phased beyond the completion of HS2 construction the exclusion of this area (shaded purple) from the concept plan design looks inappropriate. It might be that its exclusion is the reason why the site’s capacity is given as only 900 and other areas elsewhere have been removed from greenbelt without good cause.
- 5.8. Whilst the brown area is close to HS2, building to BS8233 (Guidance on sound insulation and noise reduction for buildings) will bring internal noise levels well within WHO guidelines.
- 5.9. The brown area should be allocated to medium and high density housing

6. Question 6 : 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?

- 6.1. Berkswell Parish council does not agree that the Windmill Lane site should be included as an allocated site because Solihull Council has failed to study alternatives and there are errors in the site selection methodology.
- 6.2. In particular we note that the area taken out of greenbelt is disproportionate to the number of houses that can be built due to restrictions caused by great crested newts. It is not credible that twice the area of that required for housing is removed from the greenbelt than would be the case elsewhere.
- 6.3. We also note that the concept plan significantly underestimates the impact of the windmill and its setting. It seeks to limit the impact of this Grade2* monument of national importance given its status as a working windmill which has been restored at great public expense. The site analysis, within the concept plans, shows that its “setting” and visual impact is restricted to Windmill Lane. That is clearly not the case. We note that a higher visual impact is awarded to Barratt’s Farm House and Pool Orchard. Despite being significantly lower buildings and not as rare as working windmills, these two buildings are shown as having a far greater “setting”.
- 6.4. Shown below are photographic views of the Windmill from the Kenilworth Road, Hob Lane and the footpath to the south-east of the windmill (please can Richard L insert the footpath number it connects Evesons with Hob Lane. The photo from Kenilworth Road is true but it is not really that visible)



The setting of the Mill from Hob Lane - grid reference 250 761



The setting of the Mill from the south east from footpath (insert) grid reference 254 756



The Windmill from the Kenilworth Road grid ref 246 756

- 6.5. The Council is also concerned that SMBC have failed to engage properly with the keeper of the windmill on the issues of setting relating to the free flow of wind necessary to maintain the safe operation of this historic monument. We are advised that the planning specialist sent to look at the windmill on 1st March (after the publication of the draft plan) to assess the windmill had no expertise in windmills and asserted initially that the windmill was driven by a diesel motor. There is no such motor in the windmill. Berkswell Parish Council has no expertise on the operation of Windmills but we understand that the windmill keeper had organised for experts to be available for the planning consultant's visit but they were unable to engage in a meaningful technical discussion because of the lack of expertise in the contract consultant. We urge that a suitable and sufficient examination of this important heritage asset is undertaken before any further work is undertaken on the site suitability for inclusion in the Local Plan let alone work on a concept plan.
- 6.6. This site is a beyond acceptable distances from the village centre (food shops), doctors and the station. It is also outside of the desirable distance to the nearest local schools. It will be highly car dependent and as such is not sustainable.
- 6.7. We note the areas that will not be developed due to great crested newts. We do not understand how estate roads can be actually built without severely disrupting the ecology for the newts. We understand how a tunnel under a road provides connectivity but we cannot understand how such tunnels can be constructed for the number of estate roads required without causing damage to the ecology.

6.8. We note from the ecology report for Windmill Lane shows two areas of ecological importance upon which it is proposed to build. Off-setting is not an appropriate approach when it is simpler not to build upon these two areas in the first place because that causes less disruption to the ecology of the area and there is not significant case that these two areas must be built upon to justify their destruction and offsetting.

6.8.1. Land adjacent to the proposed public open space on Windmill Lane.

6.8.2. Land to the south of number 763 Kenilworth Road and

6.9. Concept Plan comments

6.9.1. We note that the Berkswell NDP has apparently again been ignored in the creation of the concept plan for this site in that public open space has not been provided between the existing homes on Wellfield Close and the new homes.

6.9.2. The Council is concerned that the provision of a site access onto Windmill Lane will increase traffic flows. There are no pavements on Windmill Lane and SMBC (rightly) wants to keep the rural feel of the Lane. The Council considers that all vehicular entrances to this site should be from the Kenilworth Road which will be "quiet" after the building of a bypass.

6.9.3. The Council is also concerned about the safety of more vehicles exiting south onto the A452 at the southern end of Windmill Lane where sightlines are difficult.

7. Question 7 : 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?

7.1. Berkswell Parish Council has always been supportive of building on brownfield sites and it was very regrettable that SMBC ignored brownfield sites in the 1st draft Local Plan. We are glad to see the change of heart on brownfield sites. The Council is supportive of Pheasant Oak farm being included within the brownfield register and for that portion that is brownfield to be included within the planned allocations.

7.2. However, the planned allocation includes a significant area of that which is currently greenfield/greenbelt. That is not supported by the evidence base versus other sites that will be removed from the greenbelt and whose development will not impact the openness of the countryside in the manner of building on greenfield/greenbelt land near Pheasant Oak Farm. For example, site 1 (Spring Hill) and site 43 (Kenilworth Road) are strongly bounded by roads and the west coast mainline. They are remnants of greenbelt of little value to the 5 purposes of the greenbelt, are close to village amenities (transport, shops and schools (in one case Berkswell School)).

7.3. The inclusion of greenfield land makes this site a major site. This site is a beyond acceptable distances from the village centre (food shops), doctors and the station. It is also outside of the desirable distance to the nearest local schools. It will be highly car dependent and as such is not sustainable. Hence, it should not be such a large site.

7.4. Berkswell Council strongly recommends that the greenfield element of this site is excluded from development because the evidence base does not support its inclusion versus other sites in the Borough. However, Berkswell PC is not averse to a little straightening of boundaries of the brownfield site to include a little Greenland close to Hob Lane if that will help with delivery of the site. For example, required public open space provided for the development could remain within greenbelt with only the housing on the brownfield site.

The Council is aware that site 22 in the December 2013 local plan was brownfield and removed from the greenbelt and sits as a small island of development inset within the greenbelt in accordance with planning regulations. That same approach can be adopted for Pheasant Oak Farms brownfield element.

7.5. We note that paragraph 113 of the draft plan states

This is a new site to be included in the plan and is focussed on the farm complex (most of which has been included on the BLR), but also including adjacent land so that a strong and logical new Green Belt boundary is formed. This would mean that the allocation would stretch from the edge of the settlement up to the line of the by-pass and include all of the land between Waste Lane and Hob Lane that would sit west of the by-pass.

7.6. The site analysis which shows the red line bounding the site. There is no conceivable way that the route of a bypass as shown on the site allocation 1 concept plan will come within 200 metres of the proposed site boundary for Pheasant Oak Farm. Consequently, paragraph 113 in the draft local plan is not true and the justification for the inclusion of the greenfield land is not supported by the facts on the ground.

8. Question 8 : 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?

Berkswell PC would not normally comment on sites within Balsall Parish. However, the Council notes that this site is classed as brownfield and Berkswell PC supports the development of brownfield sites before greenfield sites.

9. Question 9 : 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?

9.1. Berkswell PC are pleased that SMBC have responded to consultation responses and included brownfield sites within the local plan. Therefore, the Council supports the inclusion of this site within the housing plan. We note that the text proposes medium and high-density housing on this site. The Council supports this but notes that the graphic only shows medium and low-density housing.

9.2. Three points of detail are worth stating at this stage regarding planning for access

9.2.1. Footpath access is possible to the station and to Hallmeadow Road but these will need to be improved

9.2.2. If Hallmeadow Road is to become a bypass, consideration will have to be given to suitable and sufficient access across it for the new residents to access the park.

9.2.3. The Highway entrance on Lavender Hall Lane will need to be carefully planned in conjunction with the new HS2 bridge because the current entrance is "problematical".

10. Question 10 : 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?

- 10.1. There is no justification given in the plan documents for such a step. There is a presumption in favour of sustainable development within the NPPF for land not within the greenbelt. The removal of greenbelt 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 normal planning system.
- 10.2. The Council is also not aware that there is funding available for the proposed bypass. No explanation is given and FOI request to Solihull and the West Midlands Mayor's office have gone unanswered with respect to funding.
- 10.3. The land south of Old Waste/Waste lanes has a high value in greenbelt terms separating Balsall Common from Burton Green. It also has a high significance in the setting of the iconic Berkswell Windmill which sits within splendid views across this land from Hob Lane, Windmill Lane and public footpaths.



View across land proposed for removing from greenbelt south of Waste lane

- 10.4. The Council notes that on page 34 of the concept plans SMBC state "The rural character of Hob Lane and Windmill Lane should be safeguarded. The Council supports that statement and the best way of doing that is to leave the greenbelt designation unchanged.
- 10.5. Whilst the Council can understand (but not fully agree with) the release of land in the Balsall Common area to provide housing the Council and residents simply do not understand land will be taken out of greenbelt without it being needed for planned housing development. Furthermore, the Council does not understand why SMBC is not proposing to implement paragraph 139 c of the NPPF with respect to all land removed from the greenbelt but not proposed for development within the plan period. No explanation is given for either proposal and no "Harm Analysis" to the greenbelt has been undertaken.
- 10.6. If the greenbelt boundary is to be changed to facilitate new housing then it should tightly surround housing allocations and not stray beyond. The Council would suggest that a combination of Waste Lane and Old Waste lane form the southern boundary. These are roads and will form a boundary that is permanent. If Pheasant Oak Farm is to be developed then

either the greenbelt can be washed over it or a boundary set around it as was undertaken for the 2013 plan for site 22 on the Kenilworth Road

11. Question 37 : 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.

11.1. Berkswell PC is most concerned about the loss of easy access to the countryside currently provided by the network of footpaths on Barrett's Farm. These are probably the most used footpaths in the Borough forming circular walks of between 2 and 4 miles in length ideal for dog walking, running and enjoying the countryside. The area is easily accessed from all of Balsall Common east of the A452 with many hundreds of residents required to walk 100 to 200m metres to access the network using residential roads with little traffic.

11.2. The Council is concerned that access to the countryside after development will be very much more complicated involving walking on main (commuter) roads without pavements (e.g. Truggist Lane, Waste Lane and Lavender Hall Lane.)

11.3. Whilst full mitigation for the loss of what are probably unique countryside access arrangements on Barrett's farm is not possible, the following actions would help

11.3.1. The creation and signposting of circular walks from Truggist Lane (footpath number **insert number please Richard**) using existing footpaths but with improvement of difficult sections e.g. board walks, replacement of stiles with kissing gates and a pavement linking the footpath to Station Road for safety purposes

11.3.2. The designation of new footpaths accessible from the east of Balsall Common that can create circular walks perhaps involving the greenway again with footpath improvements involving kissing gates, board walks etc

11.3.3. The provision of a combined cycleway/footpath on Lavender Hall Lane linking Balsall Common with Berkswell village. That will enable residents' easy access to the rural delight that is the conservation area of Berkswell village. This will use the new HS2 bridge. It will incidentally encourage walking to Berkswell school for the proposed development at Lavender Hall Farm. Responses to the Berkswell NDP Issues and Option survey indicated very high levels of support for this. 76% of Berkswell Parish residents and 68% of Balsall Parish Residents agreed with spending CIL money on this connection. These are credible numbers in a survey which achieved over 400 responses. Access to the countryside for leisure using such a link was a repeated qualitative reason given.

11.4. **Any other ideas?**

12. Questions 40 and 41 - Affordable Housing Policy and Open Market Housing Mix

Q40. Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floorspace incentivise developers to build more smaller market housing?

Q41. 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?

12.1. Berkswell Council notes that the required % of affordable homes historically do not get built.

- 12.2. The Council notes that SMBC accepts compensatory payments when developers request release from their affordable home obligation but has never seen that money reinvested in social housing in Balsall Common.
- 12.3. Berkswell Council considers that the cause is the failure by SMBC to require developers to meet their obligations. This is due to developers alleging financial constraints. However, given that the price paid for land by developers is many times its previous use value, the developers have only themselves to blame for paying too much for land.
- 12.4. The Local plan must make it clear that developers will be held to the affordable home requirement and must adjust the price they pay for land accordingly.
- 12.5. In terms of the options listed
- 12.5.1. 40% of habitable rooms will merely encourage an already popular trend towards open plan living – one large room.
 - 12.5.2. 40% of bedrooms will encourage the development of studies and other rooms to avoid the “bedroom tax” such a policy would represent
 - 12.5.3. 40% of habitable square meterage is likely to create more than 40% of affordable homes which sounds beneficial but will result in large tracts of affordable homes to rent with fewer larger homes to buy. Hence an inappropriate social mix not representative of Solihull’s needs.
 - 12.5.4. A simpler approach might be to say that all development must devote 25% of their land to affordable housing
- 12.6. Berkswell PC is supportive of the provision of affordable homes. It is however, concerned that the lack of effective public transport which results in the highest car usage in the borough for Balsall Common is not that compatible with meeting the Borough’s needs for affordable housing. The plan does not justify the need for affordable housing to be built within Balsall Common as meeting a need generated by Balsall Common, so presumably that need comes from elsewhere. Put simply, how are people without cars supposed to get to Solihull for work and social contact.

Draft 2