

Berkswell Parish Council

Response to the draft Solihull Housing plan consultation

1. Introduction and summary

1.1. Summary

- 1.1.1. The Council's general view is that there are significant errors and omissions in the site selection methodology. An overview is given in answer to question 2 and particular comments for the Barratt's Farm and Windmill Lane sites. These errors and omissions are such that the results are considered to be badly flawed.
- 1.1.2. The Council has been advised by residents of other significant errors within the SHELAA that materially impact the scoring results. The Council has not had the time and resources to study these but will have investigated by the time of the examination.
- 1.1.3. The Council supports the inclusion within this version of the plan of brownfield sites that were omitted from the first draft of the plan.
- 1.1.4. The Council considers that brownfield sites should be phased for development during the early phases of the plan to allow time for any development issues to be resolved within the 15-year plan period. If necessary greenfield sites can then be brought forward if the brownfield sites slip.
- 1.1.5. The Council is concerned that there is no reflection of the Berkswell Parish draft NDP within the draft plan.
- 1.1.6. The Council welcomes the infrastructure plan but makes significant suggestions for enhancement.

Berkswell Parish Council apologises for the length of this submission but considers that the issues are important and worthy of deep consideration with an honest attempt by SMBC to conduct a suitable and sufficient review of the draft plan proposals.

1.2. Berkswell Parish Council's engagement with residents

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.



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2. Question 2: 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?

Berkswell Council considers the site selection methodology to be seriously flawed and fails to meet the requirements of the NPPF for the following reasons

2.1. The Green belt analysis is not fit for purpose

2.1.1. The green belt 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 green belt 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 green belt 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 green belt 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 green belt policy. Harm assessments should have been undertaken on possible green belt modification options before any commitment of resources on site allocations or concept plans.

2.1.2. The site selection methodology fails to take account of the relative loss of amenity when comparing areas of land within the green belt. 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 green belt if destroying public access to green belt 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 green belt and public should form part of the site selection methodology.

2.2. The site selection methodology takes no account of the impact of the pressures on the green belt which impact the 5 purposes. For example, the impact HS2 on the green belt both from its physical impact on the openness and also the land removed from the green belt which in the case of Berkswell Parish is around 100 hectares. 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.

2.3. The site selection methodology is also flawed because it takes greenfield sites, which clearly add to the openness of the green belt (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 green belt and are heavily bounded by the west coast mainline and existing development in Balsall Common. I.e. site ref. 1 and 43.

2.4. Housing Issues

2.4.1. 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.

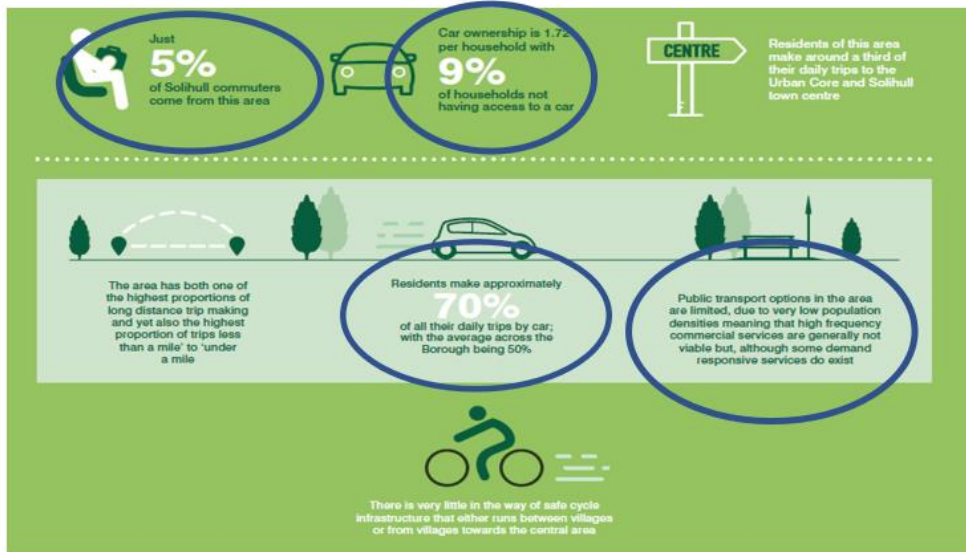
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- 2.4.1.1. To take the Windmill Lane site in Berkswell (site ref.138) as an example. The site is shown as 11 hectares. However, the ecology survey shows that it has high ecological value and a large amount of the site is not developable because it 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 green belt 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 green belt.
- 2.4.1.2. 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 Windmill is a focal point in the landscape and the zone of significance for this cultural asset as shown in the draft plan is incorrect. It fails to show that the windmill can be seen from the Kenilworth Road, Hob Lane and the footpath across site M181 and from the footpath running from Hob Lane to Evesons on the A452 (M184). Proper reflection of the importance of this monument should further reduce the capacity of the site for housing.
- 2.4.1.3. 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.
- 2.4.2. 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 green belt 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.

2.5. Public Transport in Balsall Common is poor and has massive costs to improve it.

- 2.5.1. 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". This shows a very high dependence on cars in Balsall Common.

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2.5.2. 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”***.

2.5.3. West Midlands & Chilterns Route Study, Network Rail, Aug 2017, figure 3.3: Commuter high-peak arrivals seat utilisation into Birmingham in 2023 shows:

2.5.3.1. Tile Hill, **Berkswell**, into Birmingham - RED ***“Standing: 100% - 140% seat utilisation”***

2.5.3.2. **Dorridge** - GREEN ***“Seats available - up to 70% seats taken”***

2.5.4. In considering options for improving the rail service at Berkswell Station the report states on page 68 with respect to the Coventry Corridor choices

2.5.4.1. To increase the local rail services from 2 to 4 per hour, without impacting the long-distance services, requires infrastructure improvements shown in Tables 9 and 10. Improvements at New Street and between there and Stechford have "indicative" costs between £5.2 Bn and £10.4 Bn.

2.5.5. Dorridge has a far more effective public transport than Balsall Common. It has 5 peak trains per hour in each direction compared with 2 for Balsall Common. Dorridge trains are 70% utilised and those at Balsall Common are over capacity.

2.5.6. Balsall Common has only one fast bus service every 2 hours to Solihull albeit there is a slow bus via outlying villages every 30 minutes but that is unsuitable for commuting. Similarly, Widney Manor has 5 trains per hour.

2.5.7. 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.

2.5.8. 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 green belt are not between conurbations. This is a counterintuitive outcome and indicates a failure in the site selection methodology.

2.5.9. Transport conclusions.

2.5.9.1. Balsall Common is not sustainable in terms of public transport as is evidenced by the Solihull Connected report.

2.5.9.2. The costs to improve the rail service at Berkswell are very high

2.5.9.3. Dorridge has far better rail and bus service and spare rail seat capacity.

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2.5.9.4. The draft plan assumptions need to reflect the independently produced Solihull Connected report and the West Midlands & Chilterns Route Study.

2.6. Highways Issues

- 2.6.1. 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.
- 2.6.2. No analysis of bypass options has been undertaken. In particular no analysis of other options including those to the west of Balsall Common have been considered to take account of the changed requirements of the area following the building of the JLR facility just south of Balsall Parish. A route using Fen End road past the JLR facility would require a “new” section of the same length as the proposed eastern bypass. Such a bypass would create a defensible green belt boundary. Developers have not been asked whether they would be willing to fund this western option in the same way as for the eastern bypass. Hence the site selection process has created an unfair playing field contrary to law.
- 2.6.3. The Council is concerned that providing 700 affordable homes to rent in Balsall Common as a way of helping reduce the Solihull Housing waiting list will be ineffective. There are very few residents of Balsall Common who qualify for/need “affordable housing to rent” to the government definition. It is likely that the demand for affordable housing within the borough will come from Solihull (the town), Shirley, the area to the north of the NEC and possibly Knowle/Dorridge/Bentley Heath. Given the very poor bus service and no train service linking Balsall Common with those places it is hard to see that affordable homes to rent in Balsall Common would be attractive to those in need whose employment location is likely to be linked to their current location. Hence, the site selection methodology must take into account where the best place is for affordable homes to meet the Borough shortage of that type of housing. A proper needs analysis of this needs to be undertaken and fed into the site selection methodology.

2.7. Other issues

2.7.1. 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 green belt 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	% difference
Detached	£705,424	£543,383	30 %
Semi detached	£441,191	£368,257	20 %
Flats	£269,494	£167,326	61 %
Average	£582,852	£416,353	40 %

Source: Zoopla analysis of Land Registry data

The average house price in Knowle is £505,325 which is 21% higher than in Balsall Common. This relative unmet housing need in Knowle and Dorridge will not be met by the current draft which shows a flaw in methodology.

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- 2.7.2. The Council also considers that where large allocations are to be made, the capacity of the existing town/village centres to cope should form part of the site selection methodology.
- 2.7.3. 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 and 212) and it could be coupled with the brownfield sites 216 and 31. Sites 212 & 76 were proposed by the Berkswell Estates for offices/industry and represent almost 170 hectares of which a substantial proportion (after allowing for HS2) could be available for housing. That is sufficient to support a new settlement on the Dickins Heath model and is in line with current government support for garden villages as shown in paragraph 72 of the 2019 NPPF. 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, within easy reach of the Sprint bus network as shown in Solihull Connect and within 2 to 3 Km of Hampton Station. Such a new village could also have a purpose designed centre as is so successful in Dickins Heath. It is very disappointing and amazing that SMBC have not given any consideration to this option.

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

3. 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

3.1. 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

- 3.1.1. Schools (for rationale and details see paragraph 3.4 below)
- 3.1.2. Village centre improvements (particularly parking see below)
- 3.1.3. Improved parking at the station including parking restrictions on Station Road to deter parking for the station
- 3.1.4. Enhanced provision for young people, particularly those in the age range 12 to 18 whose needs are poorly served within Balsall Common at present.

3.2. Public Transport

- 3.2.1. Enhanced public transport needs to be available early on, to encourage new residents not to use cars. If the objective is to attract new residents who want to travel using public transport then it needs to be in place early.
 - 3.2.1.1. Increased rail capacity through longer trains
 - 3.2.1.2. Increased capacity and convenience through more trains of the Dorridge style frequency which implies an increase from 2 to 4 or 5 per hour.
 - 3.2.1.3. Enhanced bus timetable to allow commuting to Solihull, with express services focused on commuting.

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3.2.1.4. We note that the costs of providing enhanced rail transport will be in the £billions according to the West Midlands & Chilterns Route Study, Network Rail, Aug 2017.

3.3. Balsall Common centre

3.3.1. Overall Concept

3.3.2. The Council welcomes the proposal that SMBC will lead a project to improve Balsall Common centre and will work with Berkswell and Balsall Parish Councils. We would also ask that the Balsall Common Residents Association and the Berkswell Society are included. Both have active residents and large databases of residents contact details that would be of great assistance.

3.3.3. The village centre needs to be radically changed to make it a “go to location” rather than a place that one has to go to. It needs to be the heart of the community as happens in other successful towns e.g. (Knowle, Dorridge, Dickins Heath, Solihull). That will require a radical approach and significant investment in the public realm and a commitment to better ongoing maintenance. The failure to positively maintain the public realm makes the centre a poor cousin to Dickins Heath, Knowle or Dorridge. Two photo examples are shown below. At two recent litter picks, residents brought shovels to clear the road gutters on the central roundabout of years of accumulated earth/muck. This is not centre that will attract top class establishments in its current state.



This tree was cut down well over a year ago. Would that happen in Solihull Town?

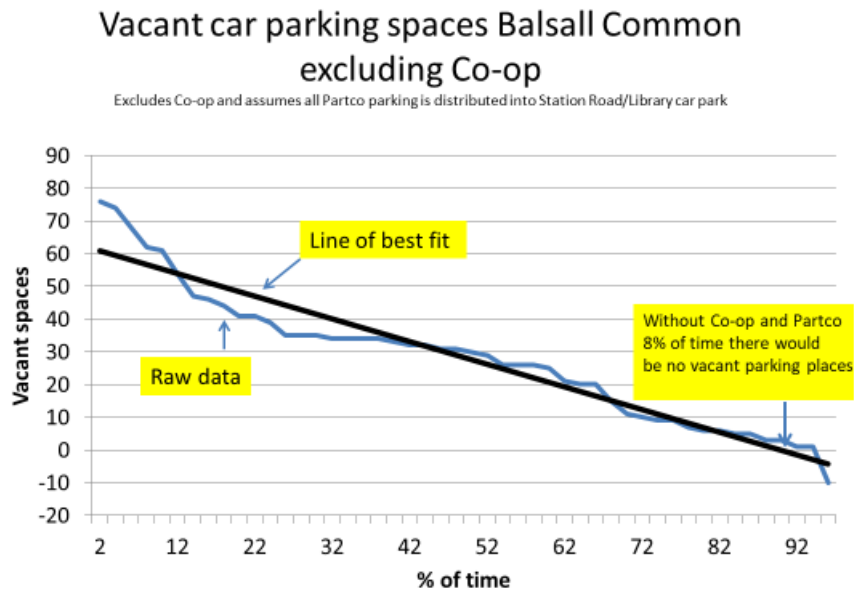


This pavement has been like this for a long time and is next to the tree with wheelchairs forced to go over it

3.3.4. Parking in Balsall Common

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

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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.

3.4. 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 operating for 2 of its year groups. Whilst the draft local plan says it is a 3-form entry school that is misleading. The school is over capacity.

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

Berkswell Parish Council

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.

3.5. Bypass case not proven and other options not considered

3.5.1. The Council notes the proposal for a bypass which will cause damage to the green belt. 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/Department of Transport because it could not be justified on the basis of the traffic figures.

3.5.2. Solihull Local Plan, December 2013, Sections 9.3.15 - 9.3.19, headed "Bypass Improvement Lines" states

"Transport policy is now focused more towards the management of travel demands, encouraging a shift away from car use and towards public transport, walking and cycling."

And

"the implementation of such bypass lines could be detrimental to the vitality and viability of the centres. In the light of the national commitment to sustainable economic growth, measures to increase footfall in centres and to manage the various different needs of a centre in a cohesive way that encourages its sense of place, would be more appropriate."

3.5.3. The draft plan gives no justification for its volte face on this reasoning for Balsall

Common particularly given the no change for bypasses for Knowle and Hockley Heath

3.5.4. The road demand in Balsall Common on the A452 is demonstrably caused by commuting and has reached its natural limit because the traffic lights at Kelsey Lane constrain throughput at peak times. This clearly features in the highway statistics held by SMBC (2015, 2017 and 2018) which show two distinct peaks with relatively low traffic at other times.

3.5.5. The Environment Statement for HS2 states that there will be no significant impact on local roads from the operation of the train on the roads in Balsall Common. Paragraph

Berkswell Parish Council

12.5 of CFA23 states that there will be 145 additional vehicles in the morning and 120 in the evening associated with the operation of HS2 at Balsall Common. It concludes no further mitigation is needed. That is a reasonable conclusion given daily traffic flows of 6-7000 vehicles.

3.5.6. The latest 2017 & 2018 traffic surveys conducted by/for SMBC for Balsall Common shows no increase in through traffic on the Kenilworth Road, with a reduction if anything from 2015 which confirm the parish council's analysis.

Location	April 2015 Vehicles per day	April 2017 Vehicles per day	Nov/Dec 2018 (Axiom 7 th March 2019)
A452 north of Windmill Lane (going north)	42,454	41,064	41,316
A452 north of Windmill Lane going south	43,286	39,152	43,178
A452 close to Wootton Green Lane going North	60,991	48,434	N/A
A452 close to Wootton Green Lane going south	Not available	50,114	N/A

Vehicle count data from April 2013 has not been included because it was collected over the bank holiday Easter weekend of that year and is therefore not comparable.

3.5.7. 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

3.5.7.1. A desire by those on or near Kenilworth Road to move the traffic elsewhere despite having bought their properties on a main road

3.5.7.2. 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.

3.5.8. 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.

3.5.9. 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 3 miles.

- Hob Lane
- Waste lane
- Accesses to serve the new housing estate
- Station Road
- Ashley Drive
- Riddings Hill
- Grovefield Crescent
- Lavender Hall Lane

3.5.10. Given the number of formal intersections and junctions it is not easy to see that such a route would be chosen by commuters. The feeder roads into Balsall Common (the

Berkswell Parish Council

A452 and A4177) are more than capable of taking more traffic if it could get through the traffic lights at Kelsey Lane. Those traffic lights currently regulate the volume of traffic.

3.5.11. Whilst a bypass might work in the short term there is a high risk that a new bypass would simply encourage more traffic and not significantly reduce traffic through Balsall Common in the longer term.

3.5.12. It is therefore hard to understand why SMBC removed the bypass proposal in December 2013 based on Highways England/Department of Transport advice is reintroduced 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.

3.6. Provision for youth

Balsall Common has poor public provision for young people. For those in primary school there is considerable volunteer supplied provision, for example through scouts/brownies/hornets. However, for older groups in the age 11 to 18 surveys indicate that the provision is not adequate. As children develop into young adults' tastes change and those tastes are not currently sufficiently met. A survey of 6th formers for the Berkswell NDP showed that the most appreciated recreational provision for that group was Costa Coffee which has opened in the last few years. Casual observation shows that it is a significant social meeting place for young people particularly after school.

The top request from the sixth form survey was for a multi-purpose sports centre including a gym, all weather football/hockey pitches and tennis. Provision, particularly for the land, should be made for this within the Solihull Plan.

4. **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?**

4.1. Site Selection

4.1.1. Berkswell Parish council does not agree that Barratt'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 as defined in the answers given to Question 2.

4.1.2. In addition, the Council notes that the site falls within two categories of green belt classification from the Atkins Green Belt Strategic Assessment 2016. The portion to the south west falls within parcels of land having green belt scores ranging from 5 (RP54) & 6 (RP55 & RP52). A larger part falls within broad area 4 which scores the highest possible green belt score of 12. As such that part in particular cannot pass step 1 of the site selection process. Hence the statement in paragraph 106 in the draft local plan "*This parcel of land doesn't perform highly in the Green Belt Assessment*" is not supported by the Atkins Green Belt assessment. Hence, the site selection criteria (flawed as they are) have not been applied correctly.

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- 4.1.3. Development of this site will reduce the gap between Balsall Common and the Coventry/Burton Green conurbation from 2km to just over 1km. That remaining gap is badly eroded by a major industrial site (National Grid) which fills almost half of the gap. The ribbon of houses on Waste Lane east of the line of HS2, whilst still nominally within green belt, bridge a significant proportion of the green gap not occupied by the National Grid site. The new HS2 line will totally bridge the gap.
- 4.1.4. The inclusion of part/all of Barratt's Farm will directly contravene the purpose of the green belt laid down in the NPPF.
- 4.1.5. It is likely that Barratt's Farm, on average, performs better than site RP51. This is a large tract of land having a Green Belt score of 7.

4.2. Concept Plan

There are some good things within the concept plan.

- 4.2.1. Medium rather than high density housing closer to existing homes.
- 4.2.2. The inclusion of public green space
- 4.2.3. The identification of areas of ecological importance which should not be developed.
- 4.3. 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".
- 4.4. In particular, the concept plan is contrary to the NDP
 - 4.4.1. It fails to place public green space between existing and new homes
 - 4.4.2. 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.
- 4.5. 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.
- 4.6. We also note that the whilst the site acreage has increased by about 40-50% since the draft plan the number of planned homes has increased by 12.5%.
- 4.7. 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 Barratt's farm "*the final version of the plan will need to reflect this (sic HS2) by phasing much of the Barratt's Farm development until later in the plan period*". As most of the Barratt'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 sites capacity is given as only 900 and other areas elsewhere have been removed from green belt without good cause.
- 4.8. 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.
- 4.9. The brown area should be allocated to medium and high-density housing

5. 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?

Berkswell Parish Council

- 5.1. 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.
- 5.2. In particular we note that the area taken out of green belt 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 green belt than would be the case elsewhere.
- 5.3. 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 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”.
- 5.4. Shown below are photographic views of the Windmill from the Kenilworth Road, Hob Lane and the footpath to the south-east of the windmill (M184)



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



The setting of the Mill from the south east from footpath grid reference 254756 (path M184)



The Windmill from the Kenilworth Road grid ref 246 756

- 5.5. 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

Berkswell Parish Council

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, including the potential impact on wind flow, before any further work is undertaken on the site suitability for inclusion in the Local Plan let alone work on a concept plan.

- 5.6. 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.
- 5.7. 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.
- 5.8. 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.
 - 5.8.1. Land adjacent to the proposed public open space on Windmill Lane.
 - 5.8.2. Land to the south of number 763 Kenilworth Road

5.9. Concept Plan comments

- 5.9.1. 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.
- 5.9.2. 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.
- 5.9.3. 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.
- 5.9.4. We note from the Axiom speed report on Kenilworth Road that the traffic calming measures introduced as part of the Meer Stones development were not effective. This gives the parish council concerns about traffic speeds on Windmill Lane if this site is further developed

Berkswell Parish Council

6. 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?

- 6.1. 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.
- 6.2. However, the planned allocation includes a significant area of that which is currently greenfield/green belt. That is not supported by the evidence base versus other sites that will be removed from the green belt and whose development will not impact the openness of the countryside in the manner of building on greenfield/green belt 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 green belt of little value to the 5 purposes of the green belt, are close to village amenities (transport, shops and schools (in one case Berkswell School)).
- 6.3. 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.
- 6.4. 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 green belt 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 green belt and sits as a small island of development inset within the green belt in accordance with planning regulations. That same approach can be adopted for Pheasant Oak Farms brownfield element.
- 6.5. 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.

- 6.6. 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.
- 6.7. We note that whilst part of this land is within an area scored as having low green belt value the greater part is within broad area 4 with scores the maximum score for contribution to the green belt

Berkswell Parish Council

7. 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.

8. 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?

8.1. 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.

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

8.2.1. Footpath access is possible to the station/medical centre and to Hallmeadow Road for the park and shops but these will need to be improved to properly link the site to village facilities.

8.2.2. 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.

8.2.3. 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".

9. 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?

9.1. 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 green belt. The 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 normal planning system.

9.2. The overwhelming majority of the land in this parcel is within broad area 4 and is scored at 12 in the Atkins Strategic Green Belt Assessment 2016. Only a very small area RP56 is found to make a limited contribution to the green belt. Consequently, removing green belt status from this land flies in the face of the Atkins Green Belt report states that broad area 4 which states "The area covers a large part of the strategic Meriden Gap between the major urban areas of Birmingham and Solihull to the west and Coventry to the east..... The area performs highly against all 4 purposes and makes an equal contribution to the preservation of the Meriden strategic gap and the setting and character of the Berkswell Conservation area". That is to say this is strategic green belt and its removal from the green belt will cause a strategic diminution of the green belt and Meriden Gap.

9.3. The Council is also not aware than 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

Berkswell Parish Council

gone unanswered with respect to funding. Given the above paragraph do we want this paragraph in?

- 9.4. The land south of Old Waste/Waste lanes has a high value in green belt 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 green belt south of Waste lane

- 9.5. 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 green belt designation unchanged.
- 9.6. 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 green belt 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 green belt but not proposed for development within the plan period. No explanation is given for either proposal and no “Harm Analysis” to the green belt has been undertaken.
- 9.7. If the green belt 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 green belt 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

Berkswell Parish Council

10. 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.

- 10.1. Berkswell PC is most concerned about the loss of easy access to the countryside currently provided by the network of footpaths on Barratt'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.
- 10.2. 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.)
- 10.3. Whilst full mitigation for the loss of what are probably unique countryside access arrangements on Barratt's farm is not possible, the following actions would help
- 10.3.1. The creation and signposting of circular walks from Truggist Lane (footpath number M192) 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
- 10.3.2. 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
- 10.3.3. 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.
- 10.4. Whilst not an improvement strictly in the remaining green belt, the following change within the existing green belt will encourage use of the countryside a low cost. The greenway will be extended to Station Road. Thereafter there is a footpath (M196) that runs behind the Railway Inn northwards. This footpath does not extend for the full length of the woods but comes out early onto Hallmeadow Road. This footpath could be extended to exit the woods close to the roundabout at the junction of Lavender Hall and Hallmeadow Roads. From there it will connect via Lavender Hall Park to the footpath running through the Hornets Football ground to exit by the George In the Tree roundabout on the A452.
- 10.5. Plant a wood on SMBC owned land behind the Sainsbury petrol station on the A452. Grid reference 237 779. This is currently leased to the Hornets but not used and is "waste ground". The Hornets would be willing for SMBC to take this initiative subject to the wood remaining in the "waste" area and not the mown football ground.

Berkswell Parish Council

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

Q.40. 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?

Q.41. 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?

11.1. Residents' interest is primarily smaller homes to buy so that the children of Balsall Common residents can buy a property in Balsall Common. The affordable housing definition does not help this group and that is disappointing.

11.2. The Council very much supports SMBCs desire to build more smaller homes.

11.3. The Council would very much support a high proportion of shared ownership, starter and discounted homes (as per annex 2 of the 2019 NPPF) given that this property type would meet both local needs and those from elsewhere.

11.4. The Council is concerned of the housing shortage within Solihull that leaves some very vulnerable people sleeping on the streets or "sofa" Surfing. The Council notes that the Berkswell Charities has expressed an interest in building alms houses. As experienced providers of alms houses, they are in a good place to provide a niche solution of small homes to meet that need. Alms houses do not charge a "rent", merely a "contribution" based on costs and ability to pay. Alms houses can provide an important halfway step for some needs. The Solihull plan should make specific reference to seeking to provide land on big developments for the role that alms houses can play in the affordable housing solution.

15th March 2019