

## **Solihull Local Plan Review – Supplementary Consultation (January 2019)**

### **Response on behalf of Golden End Farms, Knowle**

#### **Executive Summary**

- This Statement responds to the Solihull Local Plan Review Supplementary Consultation in respect of a site at Golden End, north of Kenilworth Road in Knowle, Solihull (SHELAA Site Ref. 59). The site has been identified as one of a number of ‘Amber Sites’ in the Supplementary Consultation whereby the Council has specifically identified the site as having ‘less harm’ than other omission sites and wishes to receive comments on their omission from the Draft Local Plan and whether this is justified.
- The site was submitted through the ‘Call for Sites’ in 2016. The site was also promoted at the KDBH Developer Showcase day in July 2016 as a result of which it was listed in the KDBH Showcase Event Outcome Document as one of the ‘most supported sites’. The site was submitted as an Omission Site to the Draft Local Plan Review in November 2016.
- It is our submission that the Draft Local Plan Review does not provide for sufficient sites to meet the needs of the Borough and the wider HMA. The housing requirement should be increased to include a more realistic housing contribution to meet Birmingham’s needs, and more sites should be included in the plan to ensure housing requirements are met.
- The Local Plan should include the site at Golden End as a housing allocation. The site is highly accessible and provides the opportunity for a sustainable extension to the village for approximately 250 homes. It also offers substantial community benefits in terms of public open space, community/school playing fields, canalside access and additional parking for Knowle Primary Academy and the village.
- Unlike many of the draft site allocations in the local plan, the site is immediately deliverable as it is in single ownership and has no technical constraints to delivery. It has received overwhelming levels of developer interest and could therefore provide an immediate source of housing supply in the early years of the local plan period.
- In relation to the evidence base, the site scores very highly in the SHELAA in terms of its suitability, availability and achievability for housing development and has therefore correctly been identified as part of the potential ‘deliverable’ supply. There are however factual errors in the assessment which when corrected result in an overall score of 53 out of 56. This is one of the highest in the Borough.
- In the Accessibility Report the site is identified as one of the most accessible sites in the Borough. There are however factual errors in the assessment which when corrected result in the site securing a maximum score. Very few other sites in the Borough achieve this.

- With regard to the Interim Sustainability Appraisal, the site again scores well but the Appraisal contains some fundamental flaws in its approach through the 'bundling' of sites. If the site was assessed on its own it would show there are no significant negative effects to development on this site.
- With regard to the Green Belt Assessment for the site, this contains some fundamental flaws which ignore the existing ribbon development that exists along Kixley Lane and Kenilworth Road and also the ability for the canal and Kixley Lane to provide clear long term defensible Green Belt boundaries.
- In conclusion, we submit that the omission of the site from the Local Plan Review is not justified and that the site should be included within the Submission Draft Plan for approximately 250 homes.

## **1. Introduction**

On behalf of our client, Golden End Farms, this statement sets out our response to the questions raised by the Council in respect of the Draft Local Plan Supplementary Consultation published January 2019. Our client's interest relates to land at Golden End, north of Kenilworth Road in Knowle, Solihull (SHELAA Site Ref. 59).

## **2. Previous Representations**

The site at Golden End was promoted during the preparation of the existing Solihull Local Plan (adopted 2013). At that stage it was rejected because significant Green Belt release was not required in order to satisfy the identified housing requirement. This situation has now changed and the Council has accepted that some Green Belt release is inevitable in order to meet the identified housing requirements.

In late 2015/early 2016, Solihull Metropolitan Borough Council (SMBC) undertook consultation on the 'Scope, Issues and Options' to be covered in the Local Plan Review and also carried out a 'Call for Sites' process. Representations to this consultation were duly made and were supported by a site proposal statement highlighting why the land at Golden End would provide a suitable location to expand Knowle to help meet housing requirements. This demonstrated that the site offers a highly sustainable location for a high quality housing development.

The landowners at Golden End have also fully engaged with the Knowle, Dorridge and Bentley Heath Neighbourhood Forum (KDBH) and took part in the Developer Showcase Open Event held in July 2016. The outcome of that event was that it was listed as one of the 'most supported sites'.

In 2016 SMBC consulted on a draft Local Plan Review together with various 'evidence base' documents. The site was not included as a draft allocation, although the evidence base clearly showed it as being one of the most suitable sites. Representations to this consultation and evidence base documents were again duly made and were supported by an updated site proposal statement.

## **3. Draft Local Plan Supplementary Consultation - Questions and Evidence Base**

The Local Plan Review document invites comments on a series of 44 questions listed at Section 17 of the Supplementary Consultation. This statement seeks to respond to the questions of most relevance to our client.

### **Question 1 - Local Housing Need**

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

We agree with the adoption of the Governments Standard Methodology for assessing the Borough's housing need and the use of the 2014 based household projections.

Where we disagree is the contribution that the Plan is currently seeking to make towards the wider Housing Market Area which is clearly insufficient. We note that this issue is not part of the current supplementary consultation but consider this is a missed opportunity and the Council should be more realistic in the contribution it needs to make. At present the plan is offering to provide for 2,000 additional homes towards addressing the HMA shortfall (approximately 5% of the market area deficit). This is simply not enough. There are very close links between Solihull and Birmingham given the Borough's proximity to the city and extensive shared boundary, established travel-to-work patterns and complementary nature of housing and employment provision. It is widely accepted that the edge of the conurbation offers the most obvious and sustainable option to meet Birmingham's shortfall. By only proposing to accommodate 2,000 homes, SMBC is falling way short of its responsibilities in addressing housing requirements across the HMA.

## **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?***

We welcome the fact that some of the omission sites have been recognised as having less harm than others and are being reconsidered as 'Amber sites'.

We do however maintain a fundamental concern over the Site Selection Methodology because Step 1 of the process is reliant on a flawed Green Belt Assessment report which has errors in relation to our client's site at Golden End which need to be rectified. See later response to Question 38 for our representation on this matter.

## **Questions 22-24 Knowle Dorridge and Bentley Heath**

***Question 22 - Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not; or do you believe there are any other matters that should be included?***

We are broadly in agreement with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath. It is of note that our clients land at Golden End is well placed to help contribute towards many of these infrastructure requirements including the following:

- Provision of affordable housing, including starter homes;
- Provision of housing for the elderly;
- Provision of additional parking for Knowle Primary School (thus relieving existing congestion on Kixley Lane and provide additional village parking);
- Potential improvements to highway junction capacity at Kenilworth Road/High Street;
- Provision of additional playing fields and public open space (some 6 hectares are proposed as part of our clients proposals); and
- Provision of pedestrian links to the canal network.

***Question 23 - Do you believe that Site 8 Hampton Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?***

Before allocating this site the Council needs to satisfy itself that the site is deliverable. The scheme (including the Cricket Club) is controlled by 4 different landowners and will require re-provision of the sports facilities before any housing can take place on the current football/cricket club site. There has to be a concern that delivery of this site will take time. At best much of the housing will be delivered in the later stages of the local plan period.

The site is also not the most accessible to public transport with no bus services using Hampton Road at present nor likely to in the future.

The site also needs to be carefully assessed for its impacts on the Grade 1 listed Grimshaw Hall. This is one of the highest grade listed buildings in Knowle and a question has to be raised as to whether its setting can be adequately protected with new housing developed in such close proximity on two sides. We acknowledge that this issue appears to be recognised in the emerging Masterplan document.

***Question 24 - Do you believe that Site 9 land south of Knowle should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?***

Before allocating this site the Council again needs to satisfy itself that the site is deliverable. The scheme is controlled by numerous different landowners and requires complex infrastructure delivery. There has to be a concern about delivery of this site, and particularly over how long that could take. At best much of the housing will be delivered in the later stages of the local plan period.

Notwithstanding the above, the whole rationale and concept behind the site to date is that it would secure delivery of a replacement secondary school. Option 1 however excludes this and objection is raised to this option. Without the secondary school, the site justification falls away and it should be removed entirely from the plan and replaced by other more suitable sites. We therefore object to Option 1.

**Question 38 - Omitted Sites**

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

We submit that Amber Site ref A4, Golden End Farm, Kenilworth Road, Knowle, should not be omitted and should be included in the Submission Draft Local Plan.

This site immediately adjoins Knowle village to the east and offers a highly sustainable option to bring forward an exemplar housing development as outlined in the Proposal Site Supporting Statement submitted with this response.

As set out in the Site Supporting Statement, the site offers a highly sustainable growth opportunity. This is recognised in much of the evidence base documents which score it extremely well in terms of accessibility, suitability, availability and deliverability.

The site scores highly in the SHELAA in terms of its suitability, availability and achievability for housing development and has therefore correctly been identified as part of the 'deliverable' supply. There were a few errors in the original SHELAA which once corrected gives the site an overall score of 56. This re-assessment was detailed in our full response to the Draft Local Plan review. This is one of the highest scores in the Borough and is commensurate with many of the sites selected for allocation.

Furthermore, in the Accessibility Mapping Report the Golden End site is identified as one of the most accessible sites in the Borough. Again, once errors are corrected in the original report, the site scores the maximum score of 400. This reassessment is detailed in full in our response to the Draft Local Plan Review.. This is the highest score in the Knowle/Dorridge area and one of the highest in the Borough. This high accessibility is noted in the Supplementary Consultation summary relating to the site. It is important to note that by far the biggest issue of concern to local residents expressed at meetings of the KDBH Neighbourhood Forum is about traffic congestion arising from the proposed housing allocations. The fact that the Golden End site scores higher than any other site in Knowle and Dorridge in terms of accessibility should therefore be given significant weight in the site selection process.

In terms of landscape assessment, it is noted that the same assessment and identified pressures apply equally to all sites around Knowle and Dorridge and therefore the Golden End site does not perform any differently than the selected sites.

In Green Belt terms, we have responded in detail to the Atkins Assessment in our full Submission to the Draft Local plan Review. Suffice it to say we totally disagree with the site assessment which is flawed and inconsistent with regard to other Green Belt parcels. It ignores the fact that both Kixley Lane and Kenilworth Road already have ribbon development along them. Further, it ignores the fact that the Grand Union Canal borders the site to the east and Kixley Lane (with its Local Wildlife Reserve to the north) borders the site to the north. Given the existing ribbon development and the strong defensible boundary formed by existing roads and the Grand Union Canal, we disagree that the development of this site would result in the village encroaching via a projection into the open countryside any more so than other sites and provides a similar 'rounding off' achieved by development elsewhere. The Green belt harm of releasing the site is not therefore as high as is suggested by the Atkins report or the Summary in the Supplementary Consultation.

Overall, it is clear that too much weight has been placed on the flawed green belt assessment and insufficient weight has been given to the wider evidence base considerations in making a final judgement on site selection in Knowle. The site at Golden End scores higher than virtually any other site in the KDBH area across the evidence base, particularly once the factual errors are taken into account in the various studies. The land at Golden End Farm has clear locational advantages being the most accessible site to existing facilities and services in Knowle and therefore reducing the potential traffic implications of new housing. The site can be sensitively developed to minimise any impacts on nearby heritage assets and would establish a new and

defensible long term boundary to the Green Belt limiting any risk to further expansion of the village in this location.

One of the points that seeks to justify the selection of Site 8 (Hampton Road) in the Supplementary Consultation (para 237) is that the site lies: *“immediately adjacent to the built up area of the settlement and would represent a continuation of the existing development along Hampton Road. Whilst it is recognised that the site lies within a parcel of highly performing Green Belt, it is acknowledged that it comprises a small part of a wider parcel and that built development and/or urbanising influences are present either within the site or in the immediate vicinity adjacent to and opposite the site. The site is relatively well-contained and a defensible Green Belt boundary could be provided”*. It is submitted that the above justification applies even more so to the site at Golden End. In terms of accessibility, it is notable for example that the Golden End site scores higher than Hampton Road since the latter has no bus accessibility, whereas Kenilworth Road is situated on the Solihull-Coventry bus route with bus stops in close proximity to the site access. The Golden End site is also close to the Primary School and the High Street.

In terms of deliverability, unlike many of the draft site allocations in the local plan, including those in Knowle and Dorridge, the site is immediately deliverable. It is in single ownership and has no technical constraints. It has received overwhelming levels of developer interest and could therefore provide an immediate source of housing supply in the early years of the local plan period.

Finally, in terms of what the Golden End site can deliver, the Site Supporting Statement outlines the following:

- The opportunity for at least 250 dwellings to cater for the full range of housing needs, from starter homes and live-work units through to housing for the elderly;
- The inclusion of 6 hectares (15 acres) of new public open space and parkland, including playing fields, a new canal side walk and ecological habitats;
- Vehicular access off Kenilworth Road via a new junction;
- Additional parking facilities and coach access adjacent to Knowle Primary Academy, helping to relieve parking issues on Kixley Lane and provide additional village parking;
- Opportunity to provide a walkers car park close to the canal bridge to relieve parking pressures by Knowle Locks;
- Significant levels of pedestrian connectivity between the site, the village and the surrounding countryside;
- Protection of existing boundary trees and hedges;
- Protection of views from the countryside into the Conservation Area and to the Church; and
- Protection of the area of nature conservation north of Kixley Lane.

It is worthy of note that the site masterplan proposal was generally very well received at the KDBH Developer Showcase event in July 2016, and was listed in the event summary document produced by KDBH Forum as one of the 'most supported sites'. Unlike many of the sites listed in the 'most supported sites', it did also not appear on the 'most opposed sites' list.

Accordingly, it is requested that the Local Plan Review should include the Golden End site as an additional allocation.

#### **Questions 40-43 Affordable Housing and Housing Mix**

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

No. Such an approach is highly complex and open to abuse.

We disagree that the existing approach of a percentage calculated on unit numbers leads to an incentive on developers to increase the size of units and reduce numbers. Developers ultimately seek to build houses and will bring forward schemes that reflect market demand and what they can sell in terms of size and mix of new homes. Oversizing of units is not in a developer's interest. The existing Meeting Housing Needs SPD for affordable housing requires the private and affordable to be similar in size and this is a more straightforward way of securing more smaller units and higher densities.

An affordable housing target calculated based on floorspace has been tried by Stratford-upon-Avon Council for example, but was dropped in favour of the more straightforward and equally effective approach based on unit numbers and separate policy on unit type and mix.

It is also important to bear in mind that a high density development will not be the best option for every housing development in every location across the District. Other considerations need to be taken into account such as the need to respect local character, a key priority expressed for example in the Knowle, Dorridge and Bentley Heath Neighbourhood Plan. This specifically states that emphasis within the Neighbourhood Plan is on respecting the existing character and appearance of the Area (and the generally lower than average housing density), while recognising that higher density housing has its place. There clearly needs to be a balanced approach to ensure that the right size and mix of both affordable and market housing is provided across the district without overriding other policy priorities.

***Question 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?***

Do not agree with the approach.

***Question 42 - What is the best way of measuring developable space for this purpose: bedroom numbers, habitable rooms or habitable floorspace?***

Do not agree with the approach.

***Question 43 - What other measures would incentivise developers to build more smaller market housing?***

A strong policy on housing type and mix which is enforced at planning application stage.