

12 March 2019

Gary Palmer  
Policy and Spatial Planning  
Solihull Metropolitan Borough Council  
Council House  
Manor Square  
Solihull B91 3QB

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Michael Davies

**Sent by email – [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk)**

55 Colmore Row  
Birmingham B3 2AA  
T: +44 (0) 121 200 4500  
F: +44 (0) 121 633 3666  
[savills.com](http://savills.com)

Dear Gary

### **Solihull Local Plan Review – Draft Supplementary Consultation Winterton Farm, Cheswick Green**

On behalf of the landowner, we have prepared the following submission in response to the Solihull Local Plan Review – Draft Supplementary consultation document (DSLPR). We submitted our client's land (Winterton Farm) to the Issues and Options consultation (January 2016) and the Draft consultation (February 2017). Our client is the sole owner of land at Winterton Farm, Cheswick Green.

#### **Site Context and Previous Representations**

The site is located to the south of Cheswick Green and is bounded by Illshaw Heath Road, Creynolds Lane, Shirley Golf Course and Blythe Valley Business Park. A site location plan is set out below for your reference. The total site area is approximately 43.9 hectares (108.5 acres). The site has been assessed in the 'Draft Local Plan Supplementary Consultation: Site Assessment' (January 2019) document as site reference 173.

In the 'Site Selection' section of the Site Assessment document, it states that the scale of growth proposed for this site is too large for Cheswick Green. In both our Issues and Options (January 2016) and Draft representations (February 2017) we stated that the site had the capacity to accommodate up to 600 new homes and also had the potential to provide a community facility in the area of land north of the River Blythe. However, should a housing allocation smaller than 600 dwellings be considered appropriate then the landowner would also be willing to consider this. Therefore, we consider that the Council should reassess our client's land and identify whether a smaller parcel(s) (for say 400-500 dwellings) within the land submitted could be allocated for residential development.

We consider that a smaller development within the our client's land of between 400 - 500 dwellings adjacent to the Blythe Valley Park development offers an opportunity for its future expansion. We have attached a plan of showing our client's site boundary next to the Blythe Valley site which shows a shaded area within our client's landownership where the smaller parcels of 400 - 500 dwellings could be located (shaded in red). There is also the potential to create a footpath link through our client's land between Blythe Valley Park development and Cheswick Green to link both the settlements and improve their footpath / cyclepath accessibility to the employment provision, shops and services that each settlement provides.

The Site Assessment (January 2019) document identifies that there are three 'hard' constraints (River Blythe SSSI, adjacent Listed Buildings and RIGS) on site and various 'soft' constraints (access, adjacent to wildlife sites, Flood Zones 2 and 3 and a high pressure gas pipeline) however these constraints can be overcome and future development of the site can be designed to overcome these constraints and reduce its impact on the River Blythe SSSI and listed buildings. Although there are identified constraints, the site is located within a moderately performing Green Belt ('GB') parcel, is highly accessibility to schools, services and facilities and in the Sustainability Appraisal the site was assessed as having 9 positive (5 significant), 3 neutral and 5 negative

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effects (1 significant). We therefore do not support the Council's decision to withdraw the site from consideration for a residential allocation in the Local Plan Review.

We have responded to the following questions within the DSLP:

- Question 1
- Question 2
- Section 6 'Blythe' Comments
- Question 11
- Question 15
- Question 39

### **Local Plan Review Draft Supplementary Version Comments**

*Question 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?*

We do not consider there are exceptional circumstances to deviate from standard methodology as that is a requirement in the National Planning Policy Framework ('NPPF') (February 2019) however we have general comments on the 'Housing Requirement & Current Land Supply' section of the DSLP.

The DSLP states that the Strategic Housing Market Assessment ('SHMA') established that the Objectively Assessed Need ('OAN') for the Borough was 13,091 new dwellings over the period 2014 to 2033 which equates to 689 dwellings per year. However, to provide a contribution to the Greater Birmingham housing shortfall, the SHMA set the housing requirement at 15,029 new dwellings (791 dwellings per annum); providing a contribution of 1938 new dwellings to GBHMA.

The Council should be using the standard methodology to determine the minimum number of homes needed and the 2014 based household projections should be used for standard methodology calculations in order to establish the Local Housing Need ('LHN') figure.

Using 2018 as the base year, the annual requirement for LHN for Solihull is 621 dwellings per year. In addition, the latest affordability ratios were published in April 2018 with the next ratios projected to be published in March/April 2019. Using the formula in the standard methodology Solihull's percentage increase is 23.6%. When this percentage increase is applied, this results in a LHN figure of 767 dwellings per annum. As this is Solihull's Local Housing Need figure, this results in a contribution of 24 dwellings to the GBHMA. We consider that this contribution will not be a sufficient contribution to the HMA shortfall. SMBC makes reference to the application of a cap to its housing requirement however, further consideration is required on how this relates to a local authorities housing need and how they account is being taken off the housing shortfall arising from the Greater Birmingham housing market area. We consider this requirement to be in addition to Solihull's identified need.

*Question 2 - Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?*

We strongly object to the assessment of our client's land in the Site Assessment (January 2019) document. The document states that our client's land falls within Priority 9 of the Site Hierarchy Criteria on page 18 of the DSLP document which is the "greenfield in isolated lower/moderately performing Green Belt Location". Our client's land is not isolated. There is no definition for 'isolated' within the NPPF however oxford dictionary definition of 'isolated' is "far away from other places, buildings or people; remote". Our client's land is immediately adjacent to Cheswick Green and is also bordered by the significant permitted development at Blythe Valley Park to the south. We therefore consider that the Council's assessment of our client's site is incorrect and it should have been assessed as a Priority 6 site ("greenfield in accessible moderately performing GB location"). Paragraph 70 states that "sites that fall within priorities 5 to 7 are considered to have potential to be included". We request that our client's site is reassessed so that it is correctly identified as a Priority 6 site.

As a priority 6 site, our client's land should fall within the 'unlikely inclusions' (blue sites) category. The blue sites are then assessed against the 'refining criteria' (Step 2) and identified as being either green (allocation within the plan), amber (not included in the plan but the Council are seeking comments on them) or red (not to be included in the plan). We also do not support the Step 2 'refining criteria' which are listed in the table on page 19 of the DSLP and the lack of clarity on how sites have been assessed against the factors listed in the table. In relation to our client's land, it does fall under some of the factors listed in the 'factors against' column of the table however not all of them. It is unclear how the Council has rated the sites in relation to Step 2 and clarity is sought on this matter.

### Section 6 Blythe – General Comments

Cheswick Green has been included as part of the Blythe Area within the DSLP.

Paragraph 128 of the DSLP states that “*significant new development at Dickens Heath, Cheswick Green, and Blythe Valley Park will add to the vibrancy and vitality of the settlement, whilst retaining the intrinsic character of distinctive villages separated by open countryside*”. Paragraph 144 goes on to state that there are limited brownfield redevelopment opportunities within the Blythe area therefore GB release will be required. When seeking to define GB boundaries, paragraph 138 of the National Planning Policy Framework ('NPPF') (February 2019) lists a range of criteria that plans should include. One of the criteria is that redefined GB boundaries should be clear “*using physical features that are readily recognisable and likely to be permanent*”. Illshaw heath Road to the west, Blythe Valley Park to the south and Shirley Golf Club to the east are physical features that could act as a revised permanent GB boundary.

Paragraph 144 also states that “sites that are close to the existing settlement or are / can be well-served by public transport will be preferable, subject to their performance against the purposes of including land GB as supported in the Green Belt assessment and any other evidence base and constraints”. Our client's land is located immediately adjacent to the existing settlement of Cheswick Green and the proposed housing development at Blythe Valley, is well served by a bus service on Creynolds Lane and the site is within a moderately performing GB parcel. We therefore consider that it is a suitable residential development option.

There is a requirement in paragraph 145 that a mix of market and affordable housing, as well as smaller market homes for young people be provided. Our client's site could assist the District in meeting this requirement in the Blythe area.

### Question 11 - Do you agree with the infrastructure requirements identified for Blythe, if not why not; or do you believe there are any other matters that should be included?

Paragraphs 132 to 143 list a range of potential infrastructure requirements for the Blythe area which includes; improved public transport, pedestrian and cycle connectivity, highway improvements, parking improvements, health provision, sports and recreation and open space. We support the proposed infrastructure requirements and consider that, if allocated, our client's land would be able to support the provision of the infrastructure requirements.

### Question 15 - Do you believe that Site 26 Whitlock's End Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

Site 26 is located within a higher performing GB parcel. Under the Council's site assessment methodology, the site should be a Priority 7 site which means the site falls within the 'unlikely inclusions' section. It is unclear how the site has now included as a draft allocation when it also should score poorly against the Step 2 'Refinement Criteria' as it is also scored high against landscape character sensitivity and visual sensitivity and has a very low landscape capacity to accommodate change. We do not consider that there are any substantially beneficial factors (other than it being in an accessible location) that warrant its allocation within the DSLP. All of the Council's evidence demonstrates that it is not the most suitable site for residential development.

Question 39 - Are there any red sites omitted which you believe should be included; if so which one(s) and why?

As stated in our comments to the questions above, it is considered that our client's land has been incorrectly assessed and should have been identified as a Priority 6 site under Step 1 of the site selection process. Our client's land is within a moderately performing GB parcel and is adjacent to the sustainable settlement of Cheswick Green. We consider that our client's land also performs more highly than Site 26 in the Site Assessment (January 2019) document. We request that our client's land is correctly reassessed and either the whole site or parts of the site are allocated for residential development.

We trust you find the above helpful, please contact either myself or my colleague Jessica Graham [REDACTED] should you have any queries.

Yours sincerely

[REDACTED]  
Michael Davies  
**Director**