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29413/A3/EP/KV/ac

15th March 2019

Dear Sir/Madam,

SOLIHULL METROPOLITAN BOROUGH COUNCIL - LOCAL PLAN REVIEW SUPPLEMENTARY CONSULTATION

We write on behalf of IM Land who are working with landowners in respect of the promotion of land at Jacobean Lane, Knowle (the 'Site'), in connection with the above public consultation on the supplementary Consultation for the Local Plan Review and the policy options presented. A Site Location Plan is attached at **Appendix 1**.

We accompany our letter with a Vision Document (**Appendix 2**) which contains information about the Site confirming its suitability, availability and deliverability to provide sustainable development which will serve to meet the housing need of the District, and also the wider region. The Vision Document also sets out the particular characteristics of the Site, its constraints, and how these can be mitigated. It also shows how the landscape and area can be enhanced through good urban design and a strong landscape-led approach.

Further to this, we attach two concept masterplans (**Appendix 3**) for the Site which show how it could come forward as a residential-led development or as a development with an element of extra care to address the need within the area and wider region.

Finally, we attach a Landscape Advice Note (**Appendix 4**) which concludes that the Site's overall contribution to the Green Belt is limited. These documents were submitted to the Council, along with a Call for Sites form (**Appendix 5**) in December 2018.

For the avoidance of doubt, the following information about the Site is included with this consultation submission:

- Site Location Plan
- Vision Document
- Concept Masterplan
- Concept Masterplan (Extra Care Variant)
- Landscape Advice Note
- Call for Sites Form (including Cover Letter)

We provide detailed responses in respect of the questions we feel are relevant in the consultation document below and also set out an assessment of the Site, which has been submitted to the Council,

to assist in its assessment against the site selection methodology. Paragraph 57 sets out that the Council expect submissions to still be made: as set out above, the Site was submitted to the Council in December 2018 and we would anticipate the Council is currently assessing the Site.

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?

Paragraph 16 of the Revised NPPF (2019) sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development. They should be positively prepared, in a way that is aspirational but deliverable. Paragraph 20 sets out that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. Strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

At Paragraph 60, it states that the minimum number of dwellings (our emphasis) planned for should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances warrant a different approach.

Paragraph 67 sets out that planning policies should identify a supply of specific, deliverable sites for years 1-5, 6-10 and, where possible, years 11 – 15. The definition of deliverable makes it clear that where a site has been allocated, or is identified on a Brownfield Land Register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The same is true for major sites with outline planning permission.

Paragraph 70 sets out that where an allowance is to be made for windfall sites, there should be compelling evidence that they will provide a reliable source of supply.

As set out above, the NPPF is clear that the standard methodology should be used to find the minimum number of dwellings to be planned for, unless exceptional circumstances warrant a different approach. We would agree with the Council that no exceptional circumstances exist but would stress that the standard methodology only shows the minimum that should be planned for. The Council's aspirations to provide for a mix of dwellings, affordable housing, and economic growth should be incorporated into this assessment. The Government's aspiration to significantly boost the supply of housing (Paragraph 59) should also be taken into account. The Council should also ensure there is sufficient flexibility and capacity within the LPR to respond to changes in the market and fully maximise the benefit that will be felt by the delivery of HS2 to the Borough.

As such, Barton Willmore have undertaken a Housing Need Technical Note (HNTN) (**Appendix 6**) to assess the supply of housing proposed in the LPR and whether this aligned with the Revised NPPF (2019), the Planning Practice Guidance, and the aims, and objectives, of the LPR.

From a review of the relevant policy and evidence, it is our view that the assessment of housing need should not be made against the final standard method figure given the lack of additional population growth (and economic growth) being captured. The HNTN sets out that the Council would need to provide between 825 and 926 dwellings per annum over the Plan Period just to meet the baseline job growth set out in the Council's Employment Land Review (January 2017). To support the job growth created by the UK Hub, this would increase to between 1,019 and 1,127 dwellings per annum. When the affordability uplift for Solihull is added to these figures (24% in March 2019), this would increase the lower end of the range to between 1,023 and 1,148 dwellings per annum, and the upper end of the range to between 1,264 and 1,397 dwellings per annum. To support the economic growth aspirations and expected job growth set out in the Council's own evidence base, the HNTN concludes that between 825 and 1,127 dwellings per annum would be required.

Further to this, the HNTN also assessed the unmet need from the wider region. The adopted Birmingham Development Plan (2011-2031) quantified its housing shortfall as 37,900 dwellings. The Strategic Growth Study set out an updated housing need of 256,000 – 310,000 dwellings between 2011-2036 for the HMA. This included the potential need for 22,000 dwellings of unmet need from the Black Country Core Strategy Review (also set out in the Black Country Core Strategy Review Issues and Options document). The NNTN concludes that the unmet need ranges from a minimum of 28,000 up to 2031 (as reported by the Strategic Growth Study) and could be as high as 80,000 up to 2026 (including the Black Country Urban Capacity Review).

The 2,000 figure which the Council uses has no clear justification and opportunities may exist for SBC to make a greater contribution to meeting the wider regional need. The Council makes reference to their proposed housing requirement exceeding the highest number of net completions completed within the Borough since 2001. It is considered that, without the evidence to show that higher would not be possible, this fact is not sufficient justification for the LPR to avoid providing for more housing growth.

Further to this, we also feel that the Plan Period that the Council is proposing should be amended given the likelihood for delay and the need to provide for a minimum 15 year plan period. An extended plan period would also bring the LPR in line with the Strategic Growth Study, and the wider HMA; it is noted that other authorities (such as Lichfield District Council) are proposing 2020 – 2036 as a plan period.

Finally, within the Council's Land Supply section of their consultation document, in Paragraphs 53 – 57, how the supply of housing to meet the requirement is set out. The Council should be sure, and should be able to evidence, that the sites set out in this section are deliverable and accord with the Revised NPPF (2019). This is specifically true for the potential capacity held within the Brownfield Land Register (source 4) and windfall housing land supply (source 7). The definition of deliverable within the Revised NPPF (2019) is clear that there should be clear evidence. The Council should also evidence the increase in provision within the Plan Period from the UK Central Hub Area.

In summary, we would agree that there are no exceptional circumstances for the Council to use an alternative approach. However, given the specific spatial circumstances, the Council should ensure that sufficient capacity is provided to allow for economic growth that is planned for. A lack of housing provision should not stifle economic growth. The Council should therefore evidence that there is sufficient supply allocated to meet the needs. The Council should also ensure that, in line with the Duty to Co-operate, they have allocated sufficient supply to help meet the wider HMA's 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?

Given the Council have not yet assessed the Site against its Site Selection Process, we have undertaken this exercise. It is noted that the Council acknowledge Knowle's sustainability, transport links and facilities and that it is well placed to accommodate growth in excess of its own local needs within the consultation document (Paragraph 215) and within the Housing Topic Paper 4 (December 2016).

Site Assessment – Land at Jacobean Lane

Step 1 – Assess against site hierarchy

The first stage of the site selection process is an assessment against the Site hierarchy and a ranking of the Site against the priorities. These priorities support brownfield sites, accessible sites and sites which only impact on lower performing Green Belt and will determine the potential.

Sites can be rated from Priority 1 (brownfield in urban area or settlement) to Priority 10 (Greenfield in isolated highly performing Green Belt Location). Priorities 1-4 are ranked as green and sites within these are to be included within the Plan as an intended allocation. Priorities 5-7 are ranked as yellow

or blue and sites proceed to Step 2 for further assessment. Priorities 8-10 are ranked as red and are not taken forward.

The Site is a greenfield and Green Belt Site without committed development and therefore can score up to priority 5 (yellow) which would allow the Site to pass through to Step 2. We have reviewed the Site against the Step 1 hierarchy below.

Green Belt

In the Green Belt Assessment (2016), the Site parcel forms part of Refined Parcel 36:7 – the parcel encompasses land to the south which is not part of the Site being promoted. The overall score for this parcel is '7'. This score is made up of:

Refined Parcel	Description	Purpose Scores					Highest Score
		1	2	3	4	Total	
RP35	Land to the north of Jacobean Lane	1	3	1	0	5	3 (Purpose 2)
RP36	Land between	3	2	2	0	7	3

Figure 1 Parcel 36 Assessment (Solihull Green Belt Strategic Assessment 2016)

The site hierarchy criteria states that sites performing moderate Green Belt functions will generally have a combined score of 6 or 7 in the Green Belt Assessment. As such, the Site would fall into Priority 6.

It is noted that this parcel covers a wider area than the Site and would point the Council to the assessment made by Barton Willmore within its Landscape Advice Note (**Appendix 4**) which sets out that contribution to purposes 1-4 are limited and there is no contribution to purpose 5. This would therefore, using the Council's methodology, give the Site a score of 4 and would move the Site into Priority 5.

Accessibility

The second part of the criteria relates to accessibility and to achieve a Priority 5 or 6, the Site is required to be an accessible location. This is defined (within footnote 35) as either (our emphasis):

- (a) On the edge of an urban area
- (b) On the edge of a settlement that has a wide range of services including primary school and a range of retail facilities.

It is then confirmed within footnote 35 of the consultation document that a broad approach to accessibility is used based on a site's location and a finer grain of accessibility is used at Step 2. As such, it is considered the assessment at Step 1 should focus on the location of the development in accordance with footnote 35.

Geographically, the Site immediately adjoins the northern edge of Knowle and Copt Heath. The Vision Document (**Appendix 2**) shows the indicative vehicular access point as well as the multiple points of access onto Jacobean Lane, the Public Right of Way that runs along the southern boundary of the Site and the foot bridge that accesses the canal towpath. This Public Right of Way accesses Queen Eleanor's Drive and through onto Broadfern Road and Warwick Road.

The surrounding Sites that have been assessed as part of the Site Hierarchy have mainly been scored a Priority 6 within Step 1 and, as such, have passed through to Step 2. There do, however, appear to be inconsistencies with how the Council have assessed Sites within Step 1. The Council should ensure

that an objective and uniform analysis is undertaken, taking into account the Solihull Accessibility Study (2016) completed by Atkins and site selection methodology.

As such, and in accordance with footnote 35, we would consider that the Site is within an accessible location. Given the anomalies raised with the adjacent sites, and the unclear assessment against the Step 1 assessment, we would urge the Council to reassess all sites against the methodology to ensure accuracy.

Given the above, we consider that the Site falls in to Priority 6 or, if Barton Willmore's specific Green Belt assessment is used, Priority 5. As such, the Site would move on to Step 2 (Refined Criteria) for a more detailed review. On this basis, we review the Site against Step 2 below. We note that Step 2 has no scoring or weighting attributed and is a qualitative process.

Step 2 – Assess against refining criteria

<p>FACTORS IN FAVOUR</p>
<p>In accordance with the spatial strategy (Including only proportional additions to lower order settlements (i.e. those without secondary school or not located close to urban edge.)</p> <p>The current consultation does not include any Spatial Strategy but does reference the Draft Local Plan realised for consultation in December 2016. Within this document, Paragraph 84 sets out that a mix of market and affordable housing will have been provided in Knowle, Dorridge and Bentley Heath, with significant new development on the edge of Knowle, Dorridge and Bentley Heath. This fits with Growth Option G – a preferred option – which includes significant expansion of rural settlements; specifically, to the north east of Knowle. This is repeated within the Draft Local Plan: Topic Papers (December 2016) in Paragraph 397.</p> <p>We also note that the Site, when assessed against the SHELAA assessment, would be classed as a Category 1 Site (see below for assessment), in the same way the assessed sites adjacent are. As such, it can therefore be concluded that the Site would be in accordance with the spatial strategy.</p>
<p>Any hard constraints only affect a small proportion of the site and/or can be mitigated.</p> <p>As set out in the Vision Document held in Appendix 2, the Site does not contain any hard constraints (as set out in the SHELAA Assessment) that cannot be mitigated. The Vision Document, and concept masterplans (Appendix 3) show how the Site could come forward through a high-quality landscape-led approach.</p>
<p>Site would not breach a strong defensible boundary to the Green Belt.</p> <p>The Site enjoys strong defensible boundaries to the north in the form of the M42, to the east in the form of the existing canal and to the west in the form of Jacobean Lane and the sport pitch provision beyond. These physical, engineered, features would prevent sprawl extending north or east. More information on this is held within the Landscape Advice Note held in Appendix 4.</p>
<p>Any identified wider planning gain over and above what would normally be expected.</p> <p>The Site would deliver much needed market and affordable housing as well as play areas/public open space and an enhancement to the landscape and character of the canal through enhanced planting. As evidenced within the concept masterplans (Appendix 3) there is also the potential to provide extra care to provide more flexibility and options for the residents of the Borough. It is also noted that development adjacent to canals is welcomed given the increase in natural surveillance that would be created.</p>

Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.

As set out above, the Site would utilise the M42 and canal, as permanent and defensible structures to define the extent of land to be removed from the Green Belt. There is a hedgerow, and Public Right of Way, that defines the southern edge of the Site which can be enhanced as required.

If finer grain accessibility analysis shows the site (or the part to be included) is accessible.

The Step 2 assessment refers directly to the Accessibility Study. This focuses on the various facilities/services and their proximity to the Site:

Primary School: Knowle C of E Primary School – 1.9km

Food Store: Tesco Metro – 1.8km

GP Surgery: Knowle Surgery – 1.8km

Public Transport: Very High (Bus) – Nos 88, S3, 233, FW5 serving Solihull, Balsall Common, Dorridge and Coventry

The Site is within walking distance of Knowle C of E Primary school and also Arden Academy. Further, there is a bus service which serves these schools in very close proximity to the Site; the bus stop is .05km walking distance from the Site.

It is also noted that access to the primary school would be available either along the canal or utilising the existing Public Right of Way, which could be upgraded, to the south of the Site. These routes would allow use of a footpath at all time for walking or cycling. Arden Academy is accessible by bike on a flat route and we consider this is accessible for secondary age children. In addition, the extensive bus provision provides access to education facilities in Solihull, Dorridge and Coventry.

This bus provision provides sustainable transport options for future residents to access the major employment areas of the Region in a sustainable manner. The bus route also links to the nearest rail stations (Dorridge and Solihull) which offer access to Birmingham, London and beyond.

With regards to the accessibility to the other facilities referenced within the Accessibility Study, the centre of Knowle has an extensive array of services and facilities (including doctors' surgery, Tesco Metro and dentist). These would be available to any future residents by the existing bus provision or by foot/bicycle along the canal, or along the A4141 which has wide footpaths separated by verges. This road is also lit at night. Access to the centre of Knowle along the canal towpath would provide an extremely high-quality and pleasant route into Knowle for any future residents.

Notwithstanding the above, we would also consider that the Accessibility Study is flawed given no consideration is given to travel by bike. The document references 'shared cycle' routes but then makes no actual consideration of people actually using them for cycling. Clearing were cycling factored in then the proximity to the above facilities and services would be much improved. It is noted that the A4141 contains streetlights, pathways and cycle lanes which would encourage cycling. The route to this road could be upgraded to integrate the Site in with this highly sustainable travel network. The distances, terrain, topography, and facilities means that the Site should be considered accessible and the Accessibility Study upgraded to reflect this.

Further to this, it should also be noted that there are numerous services directly adjacent to the Site including Old Silhillians Hockey Club and Copt Heath Golf Club. This shows that there are sustainable facilities surrounding which could be utilised by any future residents beyond the facilities that will be provided within the Site. The proximity to the proposed re-provided Knowle Football and Cricket Club is noted with access along the canal.

<p>It is therefore clear that the Site can only be defined as being within an 'accessible location'. Given Step 2 is a qualitative exercise, we would suggest the specific location is assessed and the sustainable transport options, and proximity to the centre of Knowle, is taken into account for the Site, and its surrounding sites.</p>
<p>FACTORS AGAINST</p>
<p>Not in accordance with the spatial strategy.</p> <p>As set out above, the Site is in accordance with the spatial strategy, specifically the diagram at Paragraph 109 of the December 2016 Draft Local Plan Consultation document.</p>
<p>Overriding hard constraints that cannot be mitigated.</p> <p>There are no hard constraints identified.</p>
<p>SHELLAA category 3 sites unless demonstrated that concerns can be overcome.</p> <p>We have undertaken our own SHELLAA assessment (below) and the Site would not be identified as a Category 3 Site. It is noted the surrounding Sites are classed as Category 1 where there are not achievability issues which the Site at Jacobean Lane does not have.</p>
<p>Site would breach a strong defensible boundary to the Green Belt.</p> <p>As already confirmed, and as set out in the Landscape Advice Note (Appendix 4), the Site would utilise existing defensible boundaries and proposed to strengthen where required.</p>
<p>Sites that would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.</p> <p>The Site would create a strong defensible boundary.</p>
<p>If finer grain accessibility analysis shows the site (or the part to be included) is not accessible.</p> <p>As set out above, the Site is accessible by a number of sustainable transport options, including a high-quality cycle route, which provide for all services and facilities required.</p>
<p>If the site is in a landscape character area that has a very low landscape capacity rating.</p> <p>The Site is situated within Landscape Character Area (LCA) 1: Solihull Fringe and in sub area 1B. This landscape is described as being influence by the direct proximity of the urban edge to the open countryside and sits wholly within the Birmingham Green Belt. The landscape of LCA 1 is described as having a medium character sensitivity and medium landscape value.</p> <p>Sub character area 1B is described as comprising a variety of land uses and vegetation cover including farmland (pastoral and arable), transport corridors - M42, secondary roads and the Chiltern Railway line, residential ribbon development, parkland, woodland (some of which is ancient) and golf courses. The sensitivity of the landscape character is assessed as medium and the landscape value medium.</p> <p>The Site also adjoins the northern edge of LCA 3: Knowle and Dorridge Fringe, which is described as being largely rural with scattered blocks of woodland across the area with signs of urban influence towards the northern extent of the LCA. The landscape management guidance follows that of LCA 1.</p>

The landscape capacity for this area is Low and, as such, the Site passes this test. It is also noted that the Landscape Advice Note (**Appendix 4**) summarises that the Site has a contained Zone of Visual Influence.

If the SA appraisal identifies significant harmful impacts.

The SA does not identify any significant harmful impacts when the Site is assessed against the Site Appraisal Framework (Section 2.3 Sustainability Appraisal Report January 2017). This is confirmed by the SA appraisals of the surrounding sites which also, notwithstanding site-specific constraints, have no significant harmful impacts.

In summary, the Site passes the Step 1 assessment given it falls within Priorities 5-6. As such, it passes to the Step 2 assessment which utilises a professional judgement of the Site against a list of factors. Having assessed each of those factors, it can be seen that the Site is considered appropriate for inclusion in the Plan as a green site and should be taken forward by the Council given its location and specific circumstances.

Given the Site has not been assessed by the SHELAA, we have completed our own assessment of the Site using the same assessment and scoring criteria. The Site does not contain any Absolute Constraints.

Suitability Criteria	Score	Comment
Suitability of Location for Development	3	Adjacent to Knowle
Site Access Score	3/5	Existing road access is adequate but may require upgrade to meet full sustainability aims
Bad Neighbour Constraints	5	No bad neighbours
Ground Conditions Constraints	5	Site is agricultural with no obvious indication of previous contaminating uses.
Contaminated Land/Historic Landfill Site	5	Site is agricultural with no obvious indication of previous contaminating uses
Flood Risk Constraints	5	Flood Zone 1
High Pressure Gas Pipeline	5	No pipeline identified
Biodiversity	5	Site does not within, or adjacent to, Local Wildlife Site (noting the potential Site)
Heritage	4	Adjacent to listed building
BMV Agricultural Land	3	Site is Grade 3 Agricultural Land
Suitability Score	43 / 50	Results in a 'suitability' score of 3 i.e. the site is suitable and could contribute to the five-year supply
Availability Criteria		
Availability Details	3	Site is under option to a promoter
Achievability Criteria		

Achievability Details	3	Good marketability and / or viability. Site faces few achievability constraints and is likely to be achievable within 5 years.
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On the basis of the above scoring, the Site is rated as a Category 1 – Deliverable Site. Such sites are deemed to be available now, offer a suitable location for housing now and there is a reasonable prospect that housing will be delivered on site within 5 years from the date of adoption of the plan.

Conclusions

Given the above assessment, we raise certain concerns with the methodology of the site selection processes. Mainly, the reliance on the Accessibility Study, and lack of consideration of other sustainable modes of transport, is a failing which needs to be remedied. Further, there would appear to be anomalies within the assessment process and the Council should ensure this is standardised.

As set out above, the Site at Jacobean Lane (submitted to the Council in December 2018), should be included as a preferred option given its positive assessment against the SHELAA and site assessment methodology.

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?

It is noted that a new Balsall Common By-pass is required to sustain to the proposed growth within this area. The Council should evidence that this infrastructure will come forward with the development surrounding to ensure that it is in place at the correct time, with the funding required for this in place to allow the correct phasing.

Finally, the Council should be sure that HS2 will be forthcoming, and will provide a defensible boundary, as it continues through the Local Plan Review process.

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?

It is noted that there are 'multiple and complex land assembly' issues as Barratt's Farm. The Council should evidence that the Site is deliverable, available and achievable, and the timeframe for this delivery. This will ensure that any proposed housing trajectory will be accurate and achievable.

Question 12

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

This Site proposes the redevelopment of the existing sports pitches associated with Highgate Football Club and the Old Yardleians Rugby Club. The current land use also contains a Local Wildlife Site and designated Ancient Woodland as well as historic hedgerows.

As such, the Council should ensure their assessments are fair, robust and objective and the site is sequentially acceptable when weighed against others. It is also noted that 'future work is required in connect with replacement of all of the displaced pitches [sic]'. The Council should ensure that Paragraph 97 of the Revised NPPF (2019) is adhered to and replacement pitches of equivalent or better quality in a suitable location are shown. This should be shown to be feasible before the Site is allocated for development.

Finally, the Site is adjacent to an employment use and the Council should evidence that this use will not be disrupted in line with the Agent of Change principles.

Question 22

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

Paragraph 220 states that a mix of market and affordable housing, as well as smaller market homes for young people wishing to remain in the area and specialist housing to meet the needs of older people will be provided in the settlement. As can be seen within **Appendix 3** there is the potential to provide extra care housing within the Site, as required, to benefit the area.

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?

As with Land West of Dickens Heath, this Site contains sports pitch provision which must be mitigated in line with the Revised NPPF (2019). It is also noted that this Site is in a similar location to the Site at Jacobean Lane and enjoys similar defensible boundaries. It is also within the same Green Belt parcel within the Council's Green Belt Assessment. The Council should utilise the same assessment for both sites. The allocation of Site 8 will also reinforce the canal as the edge of the settlement, which would be in line with the Site at Jacobean Lane.

Question 25

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

Within Paragraph 257, the Council states it is encouraging people to use more public transport as well as cycle and walk. While this is a sensible approach, the Council must be pragmatic and ensure that sufficient capacity is created within sites for parking that is required. Just because parking isn't provided does not mean future residents will not own cars and the Council should be mindful of this when attributing numbers to allocated sites.

Question 26

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

This Site contains similar constraints to Site 1 in that it has multiple land owners and assembly issues as well as sports pitch provision. The Council should evidence that this Site is deliverable as well as showing that the sports pitches will be mitigated in line with the Revised NPPF (2019).

Question 27

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

This Site is an existing industrial estate and the Council should ensure that any loss of employment provision is acceptable. This should be evidenced. Further to this, the Council should ensure that any retained employment provision is not adversely impacted by the creation of a noise-sensitive use close by.

Further to this, given the Site has an industrial use currently, the Council should evidence that the Site is deliverable within the required timeframes and that there are not issues (such as contaminated land) which will prohibit the delivery of the Site or its viability.

Question 28

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

It is noted that there are playing pitches within this Site which should be mitigated.

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.

The concept masterplans (**Appendix 3**) for the Site show compensatory planting to enhance the canal as well as area large areas of Public Open Space.

Question 39

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

Please see answer to Question 2.

Question 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?

We would not support a percentage-based approach to affordable housing and consider that the Council is attempting to address issues relating to housing mix, and the provision of smaller dwellings, with the need for affordable housing provision. These matters are separate and should not be joined together through planning policy.

The Council has presented no evidence that a percentage-based approach would be feasible, viable, and would not inhibit development. Certainty is required within the planning process and developers will need to be able to understand the requirements of a scheme at a very early stage; a percentage-based approach will not allow this given it will only be settled upon agreement of the finalised detailed designs. This is one of the reasons why Stratford District Council abandoned this approach. The Council has also not provided any evidence that this approach will achieve its aim of incentivising the delivery of smaller housing or, indeed, that this approach will not delay the delivery of all housing given the added layer of complexity.

Further to this, the wording of the proposals is confused and vague and does not provide the certainty required. It is a needlessly complicated process and what is a 'habitable room' is open to debate. As such, any benefit of this approach is outweighed by the issues surrounding it.

Finally, it is noted that the proposal is contrary to the WMS on affordable housing which does not seek affordable housing on schemes proposing ten dwellings or fewer; this is set out within Paragraph 64 of the Revised NPPF (2019).

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?

We do not support this approach and suggest that a system based on unit numbers, in line with national guidance, is appropriate. If the Council continues with this approach it should demonstrate that the proposed method will not render schemes unviable given the amount of affordable housing may be higher than 40% of the total unit numbers.

Question 42

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

See answer to Questions 41 and 42.

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

As set out above, the Council is seeking to utilise affordable housing provision to address a different issue. Sufficient land for housing should be allocated to meet the needs of the Borough, and the wider region. This should include scope for different types of housing to come forward to meet specific needs.

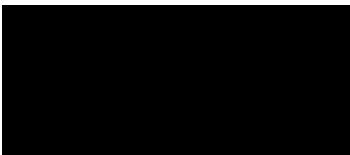
The Council should also ensure that balanced and mixed developments come forward to avoid scheme which fail to create communities and enhance social cohesion. The overprovision of smaller housing in specific areas may lead to transient populations and development which does not meet the definition of sustainable development.

Conclusions

We welcome the Council's decision to hold a further consultation for the Local Plan Review and the opportunity to comment on the site selection process. The Site at Jacobean Lane has previously been submitted to the Council and will be included within subsequent Local Plan Review documents. However, as can be seen above, we have assessed the Site against the Council's criteria and feel the Site should be included as an allocation given its highly sustainable location and lack of constraints. There is the opportunity to provide high quality development to meet the Borough, and wider regions, housing needs.

We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



KATHRYN VENTHAM

Partner

Encs.

- Appendix 1 - Site Location Plan
- Appendix 2 - Vision Document
- Appendix 3 - Concept Masterplan(s)
- Appendix 4 - Landscape Advice Note
- Appendix 5 - Call for Sites Letter/Form
- Appendix 6 - Housing Need Technical Note

