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## **Solihull Draft Local Plan Supplementary Consultation**

### **Representations on Behalf of L&Q Estates and Barratt David Wilson Homes**

March 2019

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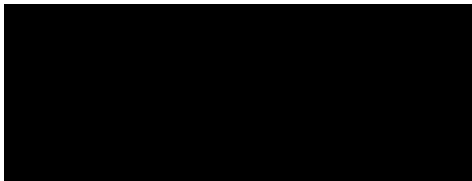
Appendix I      Grange Farm - Vision for a Sustainable Community

Appendix II      BDW and Gallagher Estates Ltd Representations (February 2017)



# 1. Introduction

- 1.1 Avison Young (formerly GVA), is instructed by L&Q Estates (formerly Gallagher Estates) and Barratt David Wilson Homes (BDW) to make representations in respect of to the Solihull Draft Local Plan Supplementary Consultation (January 2019).
- 1.2 L&Q Estates and BDW have an interest in some 50ha of land at Grange Farm, Balsall Common and are promoting the land for a development of approximately 700 dwellings in a manner consistent with the Vision detailed in our 2016 Vision Document attached at **Appendix I**. We have made representations on our clients' behalf at previous consultation stages and attach at **Appendix 2** submissions made in February 2017 which remain relevant, particularly in the context of the approach that the Council is taking to site selection.
- 1.3 As indicated above, a "Vision for a Sustainable Community" for Land at Grange Farm was submitted to the Council in the January 2016 in response to its 'Call for Sites'. It was also utilised at the Balsall Common Neighbourhood Plan Site Exhibition on 20 August 2017. Progress has been made in respect of the Balsall Parish Neighbourhood Development Plan since then and representations were made on behalf of L&Q Estates at the Regulation 14 stage in January 2019.
- 1.4 These representations are concerned with the soundness of the Draft Local Plan as presented in the Council's Supplementary Consultation Document. Our clients remain firmly of the view that the Draft Plan, as currently constituted, is unsound and that the land at Grange Farm should be allocated for development as part of a package of amendments required to satisfy national policy requirements.
- 1.5 Should any further information be required please contact:



## 2. Question 1: Exceptional Circumstances

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?

### Housing Need

The National Planning Policy Framework (NPPF, February 2019) requires strategic policies to determine the "minimum number of homes needed using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach". In addition to the local housing need figure, "any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (Para 60).

- 2.1 The Council has applied the Standard Method (SM) and has calculated its local need to be 767 dwellings per annum. In doing so, it has applied the Government's latest affordability ratios and its 2014 based household projections. This is the correct approach. The Council has then made an allowance for accommodating an element of the unmet need arising elsewhere in the HMA. This, for now, remains 2,000 homes, although the Council acknowledges that this requires further assessment and discussion pursuant to the Duty to Cooperate.
- 2.2 For the record, we remain of the view that an allowance of 2,000 homes is not sound. The evidence underpinning whatever allowance it is that the Council and its HMA partners settle on in due course, will need to be fully detailed and explained as part of the plan-making process and interested parties afforded the opportunity to interrogate and comment upon it.
- 2.3 If the Council's evidence base includes the Greater Birmingham HMA Strategic Growth Study, it will be necessary for the Council to fully explain and justify the assumptions made therein including those made in respect of urban capacity, increasing densities and windfalls. We suspect that when properly assessed, the scale of unmet need forecast across the HMA to 2036 will be significantly higher than specified in the SGS. This will inevitably have a bearing on Solihull and is likely to result in further changes being made to the proposed figure of 885 dwellings per annum. This in turn, will necessitate the identification and allocation of additional sites for housing development..
- 2.4 The Government also plans to review the SM over the next 18 months "with a view to establish(ing) a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government's aspirations for the housing market." It will be important to monitor this and its implications for housing need in Solihull and the wider HMA.

### Safeguarding Land beyond the Plan Period

The NPPF is clear that when defining Green Belt boundaries, plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period." (para 139c) and be able to "demonstrate that "Green Belt boundaries will not need to be altered at the end of the plan period." (para 139e).

- 2.5 In addition to considering its housing needs requirement for the plan period, the Council must also assess its likely needs over a longer term period (stretching well beyond the normal plan period) and safeguard land for development over such a period in accordance with the provisions of the NPPF. So far as we can tell, the Draft Plan makes no provision for safeguarded land and, as a consequence, the plan as currently drafted is unsound. We note that neither the NPPF or the NPPG define the term “stretching well beyond the plan period” but we consider that the Council should be providing for longer term needs over at least an additional 10 year period so as to ensure that the Borough’s Green Belt boundaries endure. Doing so will inevitably have an effect on how the plan is drafted and land for development is identified and allocated.
- 2.6 To make adequate provision for development over an additional 10 year period, the Plan will need to safeguard land sufficient for at least 7,670 new homes. Having a 10 year supply of safeguarded land is considered critical to ensure the Solihull Borough Local Plan can demonstrate a long and ensuring Green Belt. This matter alone requires an alternative approach to that currently taken by SMBC to ensure the plan can be deemed sound.

### 3. 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?

- 3.1 No, we do not agree with the methodology deployed by the Council. Importantly, the starting point is fundamentally flawed.

#### Plan Period

The NPPF requires strategic policies to 'look ahead' over "*a minimum 15 year period from adoption*" so it can anticipate and respond to long-term requirements and opportunities (paragraph 22).

- 3.2 We note that the Plan Period has changed from 2014 - 2033 to 2018 - 2035. Solihull Metropolitan Borough Council's (SMBC) Local Development Scheme, published October 2018, indicates anticipated adoption of the plan in Spring/ Summer 2020. There is a risk that the plan timescales will slip, meaning the Plan's strategic policies will only look ahead for a period of 14 years from adoption. This would be at odds with the NPPF and will render the Plan unsound. The Council should adjust the Plan period and extend it to at least 2036. This would bring it into line with the Strategic Growth Study and local plans being produced by other local authorities.

#### Housing Land Supply

- 3.3 The Council takes as its starting point (its context for site selection) the data contained within the Table on page 13 of the Supplementary Consultation Document. This reads as follows:

Source	Estimated Capacity
1. Sites with planning permission (started)	1,106
2. Sites with planning permission (not started)	2,199
3. Sites identified in land availability assessments	364
4. Sites identified in the brownfield land register (BLR)	200
5. Solihull Local Plan allocations without planning permission at 1 <sup>st</sup> April 2018	1,236
6. Less a 10% to sites with planning permission (not started), sites identified in land availability assessments and SLP sites	-400
7. Windfall housing land supply (2018-2033)	2,250
8. UK Central Hub Area	2,500
9. Allocated Sites	6,310
Total Estimated Capacity	15,765

- 3.4 We have sought from the Council the evidence or data that sits behind this Table but have been told this is not available. This is not acceptable and the evidence relied upon by the Council must be published so that it can be examined and tested. In advance of us being able to provide a comprehensive assessment of the Council's stated baseline position, we would make the following observations:

- Sites with planning permission (not started) (row 2) - The Council must publish detailed evidence of the sites relied upon. Sites that are expected to deliver major development but benefit from only outline planning permission will need to be supported by clear evidence that the proposed development is deliverable and housing completions, will begin inside 5 years;
- Sites identified in land availability assessments (row 3) – Either these are sites that should be allocated, in which case they should be identified and tested in the normal way, or they are windfalls (see below). Further information is thus required to justify inclusion of these sites in the Table;
- Sites identified in the brownfield land register (BLR) (row 4) – Either these are sites that should be allocated, in which case they should be identified and tested in the normal way, or they are windfalls (see below). In any case the Council must be absolutely certain that these sites are indeed ‘brownfield’. It would appear to us that a number of the sites in the Register are agricultural and therefore not previously developed.

#### **Solihull Local Plan Allocations (2013)**

3.5 In relation to Solihull Local Plan allocations without planning permission at 1<sup>st</sup> April 2018 (row 5) SMBC needs to demonstrate that these are deliverable and that the forecast delivery rates for each site are robust.

3.6 We note that there are certain sites that were anticipated to be delivered in the first 5 years of the plan period (i.e. by 2018):

- The ‘Simon Digby (Chelmsley Wood) site’ with a notional capacity of 200 homes. It is considered likely that the infrastructure requirements listed on page 80 of the 2013 SLP contributed to the failure of the site to be delivered, as anticipated i.e. providing ‘compensation for loss of green space with green infrastructure connectivity’. Evidence is required to demonstrate these and any other constraints can be overcome before the site can be regarded as deliverable;
- Homer Road and Monkspath Hall Road Car Park with an estimated capacity of 300 homes. This has also not been delivered as promised and should also be removed from the Council’s baseline supply unless it can provide compelling evidence which demonstrates that new homes will be delivered within 5 years. Any assertions in this regard will of course be carefully examined in the light of past performance.

3.7 On the basis of this information currently available we consider that these sites should be removed from the Council’s baseline supply. The Council must demonstrate why these sites, totalling 500 homes, have not come forward as anticipated and provide evidence that any barriers to delivery are capable of being overcome so that there is a reasonable prospect of these sites making a contribution to housing delivery in this plan period. If not, these sites cannot be considered deliverable in the plan period and should not be included within the sources of supply.

#### **Windfall Housing Land Supply (2018-2033)**

3.8 The Council is promoting Green Belt releases. It must therefore be satisfied that there are exceptional circumstances justifying such action. To demonstrate exceptional circumstances, the Council must have done all it can to extract capacity from the urban area. It must therefore have reduced significantly opportunities for windfalls. Its 2,250 windfall allowance is therefore wholly unrealistic. A robust approach would be to assume zero windfalls.

### UK Central Hub Area

- 3.9 We note the significant increase in housing numbers proposed on the UK Central Hub site from 1,000 to 2,500 dwellings. This comprises over 15% of Solihull's proposed housing land supply or c.28% of proposed allocated sites.
- 3.10 The UK Central Hub Framework Plan has identified potential timeframes by development phase (The Hub Framework Plan, Issue 2, 21 February 2018, p30). This assumes homes will be delivered in the period 2018 to 2027. Due to the significant lead in times for large scale sites and given the "*complicated land ownership and mix of uses*" (para 328 of the DLP, January 2019) it is most unlikely that this site will deliver housing in the timescales forecast. Having regard to evidence of large site lead in times gathered by Avison Young, and other consultancies, we consider it reasonable to assume that it will be another 7 years before Arden Cross delivers new homes. Accordingly the Council should assume that this site will deliver no more than 600 homes in the plan period. This would comprise c. 200 homes in the period 2028-2032 where commencement is more likely, and 400 homes in the final years of the plan period to 2035.

### Summary

- 3.11 In the light of the above, the Council's starting position should be as follows:

Housing Requirement	15,039
Less sites under construction	1,106
Less sites with planning permission	2,199
Less deliverable allocations (removing the 500 referenced above)	736
Less 10% of sites with planning permission and deliverable allocations	-c.294
Residual requirement to be provided for in the Local Plan	<b>11,292</b>

- 3.12 We note that the Council is assuming that its proposed allocations are capable of delivering 8,810 homes during the plan period. We have commented above on UK Central and made it clear that we do not consider the Council's delivery estimate to be robust and we will be interrogating its assertions in respect of its other proposed allocations when the Council publishes a detailed housing trajectory. However, even if its estimates are correct, the Plan is under-providing by at least 2,482 homes. If, as we believe, UK Central delivers only 600 units in the plan period the plan is under providing by 4,382 homes. Of course, the plan must also be "be sufficiently flexible to adapt to rapid change" (Para 11a) and, as included above, must make provision for development well beyond the plan period. The soundness of the plan is at risk if it is not able to respond to changing circumstances and it is considered prudent to allocate additional sites to enable effective delivery of homes over the proposed plan period.



### Site Selection Methodology

- 3.13 We have made representations previously on the approach that the Council has taken to the site selection process and reiterate some of these considerations later in our report. We now focus on some of the more detailed points:

#### Step 1 – Site Hierarchy

- 3.14 In broad terms we support the principles of using a site hierarchy as the first step to determine most suitable sites for allocation in the local plan. The NPPF (para 138) comments that, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which is previously-developed and is well served by public transport.
- 3.15 The approach in para 100 of the previous Draft Local Plan focusing on larger SUEs to provide the best opportunity for delivering significant infrastructure improvements is encouraged. Para 101 also notes that the release of Green Belt land should be guided through proximity to a highly accessible settlement. This approach is supported.
- 3.16 A key matter in the first stage is that the evidence base has informed whether a site is considered suitable. Having commented on the evidence at the previous Draft Local Plan Stage, we have raised concerns with the evidence and how it has informed whether a site should be considered suitable. These comments are reiterated throughout this submission, as it is contended that land at Grange Farm, Balsall Common should be included as an allocation, particularly given our previous representations in relation to Green Belt impacts which has informed the Step 1 assessment, which are reiterated in response to other questions posed by the consultation.

#### Step 2 – Site Refinement

- 3.17 It is noted that the second stage has been used to refine the site scoring and takes into account other considerations including site constraints and the spatial strategy, it is also understood that the results of the Sustainability Appraisal has informed this refinement with regard to the positive and negative effects of each site. Paragraph 73 of the DLP (Jan 2019) states that "*the analysis in step 2 will be used to principally confirm whether 'unlikely allocations' (blue) should be included as amber or red sites.*" It is however contended that step 2 and the evidence underpinning it should provide scope for sites previously determined blue or red to be included as green or amber sites if the evidence justifies this approach. It would also be more transparent for the schedule of assessed sites in Appendix E to outline the results of the Step 1 stage, so it is clear which sites were first considered 'yellow' or 'blue'.
- 3.18 Step 2 includes 'factors in favour' and 'factors against' below para 75, and it is noted that 'Green Belt Boundaries' are included as a key consideration. It is surprising that two of the 'factors in favour' (the third and fifth bullet points) and two of the "factors against" (the third and fourth bullet points) make reference to 'Green Belt Boundaries' whereas other factors, particularly in relation to the impact on the Green Belt are not included within the table at all. It is considered that the refinement criterion is unduly and inappropriately skewed to focus on creating 'strong and defensible boundaries' when it should be considering whether there are already strong and defensible boundaries that development would extend up to. In addition, the 'factors in favour' should firstly score positively sites that have no hard constraints whatsoever, before

considering whether a hard constraint only impacts a small part of the site or whether mitigation can be taken into account. Conversely the factors should also reference whether “the site has a hard constraint” and sites with more challenging hard constraints should be factored more strongly against sites in this refinement process. Grange Farm has no identified hard constraints within the Council’s Site Assessment (January 2019), and a strong defensible boundary would be created on the edge of a development in this location.

- 3.19 It is considered that the ‘refinement factors’ are not ‘balanced’ in their approach and potentially make certain issues of greater prominence, like Green Belt boundaries. This is a major weakness in the step 2 methodology.
- 3.20 In addition, another issue with site selection is that the sites that have been assessed in evidence base documents do not always correspond to the parcel being promoted by the landowners, which counts against certain smaller parcels, when different configurations may be more suitable. We also reserve the right to comment on the evidence base that has informed site selection in the context of the forthcoming Submission plan.
- 3.21 The results of the Council’s Site Assessment (January 2019) are considered in more detail by virtue of the responses on specific sites (Question 4-9) in relation to ‘Site Hierarchy’ and ‘Site Refinement’.

## 4. Question 3: Balsall Common Infrastructure Requirements

**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?**

- 4.1 The following comments are in relation to the list of supporting infrastructure, identified at paragraphs 87 to 96. The infrastructure proposed to support the allocations and expansion of Balsall Common should be contained in an Infrastructure Delivery Plan to supplement the Regulation 19 Submission Plan. This is necessary, to provide evidence to demonstrate the proposals are deliverable, particularly in relation to the proposed Balsall Common By-pass from Hall Meadow Road to the A452 at Meer End Road. It will be important to demonstrate that funding is available or the cost of the scheme required will not impact the viability of development proposals, particularly in relation to the proposed quantum of development at Barratts Farm. Related to this is the impact of construction of the road and the delivery in relation to the phasing of such development. This has potential to significantly delay the construction of homes on the site.
- 4.2 In addition to a potential new link road to the north of the settlement, there would be significant benefits in allocating land at Grange Farm. The Grange Farm development framework, provided at **Appendix 1**, demonstrates that Grange Farm could accommodate a primary school and community focus. The site would also provide a significant amount of Green Space at approximately half of the site including retained and newly created nature reserves, green corridors, woodland, parkland, play areas and formal sports pitches. These benefits would enhance the provision of schools, and provide a significant amount of Green Infrastructure that could be seen as an enhancement to the Green Belt, which would help to offset the impacts of removing land from the Green Belt in this location, as encouraged by NPPF para 138.

## 5. Question 4: Site 1 Barratt's Farm

**Do you believe that Site 1 Barratt's Farm should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?**

5.1 The site was assessed in the January 2017 Interim SA, and as such the analysis is still applicable. We therefore maintain our concerns with how the evidence base has been used to justify allocation of Site 1 and **Appendix 2** provides our observations on why Barratt's Farm should not be preferred as an allocation before Grange Farm.

### Step 1 – Site Hierarchy Criteria

5.2 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.

5.3 We have appended our representations made in February 2017 given that our response to Question 15 remains relevant in relation to the evidence base that has informed the Council's decision making and is applicable to our objection to Site 1 being included as an allocation in the SLP before Grange Farm.

5.4 To summarise our position, the land at Barratt's Farm performs a more important role in terms of Green Belt function than at Grange Farm. As such the following observations should have been taken into account when Barratt's Farm was categorised:

- We consider that the Green Belt Assessment must be assessed against how the site performs now and not how it may perform in a post-HS2 world.
- We contend that development on Site 1 would reduce the gap with Coventry and would introduce further development into the Meriden Gap. Development on Grange Farm would thus result in a significantly less material impact on settlements to the north, given the considerable separation that would be maintained.
- Additionally, the land at Grange Farm is flanked by existing development on its eastern and western edges. The development is also contained by landform which rises sharply to the north.
- It can be seen from **Appendix 2**, that in terms of Green Belt function, the land at Barratt's Farm performs a more important role than that at Grange Farm. Our conclusion was that Barratt's Farm should score 7 in terms of impact whereas Grange Farm should score 5 and thus should be preferred.

5.5 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above and detailed analysis provided at **Appendix 2**, that whilst Barratt's Farm has been categorised as a 'yellow' site it should more appropriately have been defined as a 'blue site 6' and that Grange Farm, in contrast should have been categorised as a 'yellow site 5'.

**Step 2 – Refinement Criteria**

- 5.6 Following this analysis, we now observe that the proposed allocation of the site has increased from 800 homes to 900 homes and note that in the site analysis (January 2019) with respect of the Masterplans considers that the anticipated delivery of the HS2 trainline will provide a strong and defensible Green Belt boundary. The proposed line of a new by-pass to Balsall Common was originally put forward as the proposed new defensible boundary to the Green Belt.
- 5.7 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary in effect provides a summary of the Sustainability Appraisal which in the case of Barratt's Farm still relates to the 2016 SA. In relation to this we concluded that our review of the Sustainability Appraisal report in January 2017 indicates that Grange Farm would have less significant effects than Barratt's Farm and would be a more suitable alternative for development. In addition, in relation to landscape matters the proposed allocation at Barratt's Farm would appear flawed and would not be based upon the reasoned assessment of alternatives.
- 5.8 We therefore disagree with the commentary that has led to the allocation of the site. The commentary for Barratt's Farm acknowledges that the site "*would result in an indefensible boundary to the east*" although note the proposed HS2 rail link "*could provide a clear and firm Green Belt boundary*". It is remarkable how the refinement criteria questions have not resulted in Barratt's Farm being concluded at the current time as not having a strong boundary. This is a key consideration to delivery of homes, which should not take place until the strong and defensible boundary is in place.
- 5.9 The construction of the HS2 line and the proposed relief road is likely to significantly impact the amenity of development and potential to deliver the site in the plan period. In addition para 101 references that the site has "*multiple and complex land assembly issues*". It is therefore critical that the Council demonstrate that the site is deliverable in the plan period. It is contended that land at Grange Farm can be delivered on the basis of the landownerships and the vision document represents a common position.
- 5.10 Robust evidence is therefore required to demonstrate that Site 1 is deliverable in the plan period and that the timeline for the HS2 proposals are fully taken into account in the preparation of the Submission Plan for Solihull Borough.
- 5.11 In summary, our assessment of the SA, provided at **Appendix 2**, indicates how there would be less significant impacts in allocating Grange Farm than Barratt's Farm.

## 6. Question 5: Site 2 Frog Lane

**Do you believe that Site 2 Frog Lane should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?**

6.1 The site was assessed in the January 2017 Interim SA report which is still applicable to the site. We therefore maintain our concerns with how the evidence base has been used to justify allocation of Site 2 and **Appendix 2** provides our observations on why Frog Lane should not be preferred as an allocation before Grange Farm.

### Step 1 – Site Hierarchy Criteria

6.2 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.

6.3 We have appended our representations made in February 2017 given that our response to Question 15 remains relevant in relation to the evidence base that has informed the Council's decision making and is applicable to our objection to Site 2 being included as an allocation in the SLP before Grange Farm.

6.4 To summarise our position, in our view the land at Frog Lane performs a more important role in terms of Green Belt function than at Grange Farm. As such the following observations should have been taken into account when Frog Lane was categorised:

- The release of land at Frog Lane will result in development extending southwards and would represent a clear physical extension of development into the countryside. This would significantly change the character of the environment in this location and would result in unrestricted urban sprawl.
- It can be seen from **Appendix 2**, that in terms of Green Belt function, the land at Frog Lane performs a more important role than that at Grange Farm. Our conclusion was that Frog Lane should score 7 in terms of impact whereas Grange Farm should score 5 and should thus be preferred.

6.5 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above and detailed analysis provided at **Appendix 2**, that whilst Frog Lane has been categorised as a 'yellow' site it should more appropriately have been defined as a 'blue site 6' and that Grange Farm, in contrast should have been categorised as a 'yellow site 5'.

### Step 2 – Refinement Criteria

6.6 Following this analysis, we now observe that the proposed allocation of the site has reduced from 150 homes to 110 homes.

6.7 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary provides a summary of the Sustainability Appraisal which in the case of Frog Lane still relates to the 2016 SA. In relation to this we noted that although Frog Lane scores slightly higher than Grange Farm, mainly due to its proximity to the local primary school, as part of the redevelopment of Grange Farm a new primary school would be

developed making access to such facilities more sustainable. This factor should be taken into account which would result in a more positive SA score and therefore the site at Grange Farm would deliver a sustainable development which can meet the needs of the wider community.

- 6.8 In summary, our assessment of the SA, provided at **Appendix 2**, indicates how there would be less significant impacts in allocating Grange Farm than Frog Lane.

## 7. Question 6: Site 3 Windmill Lane

**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?**

7.1 The site was assessed in the January 2017 Interim SA report which is still applicable to the site. We therefore maintain our concerns with how the evidence base has been used to justify allocation of Site 2 and **Appendix 2** provides our observations on why Windmill Lane should not be preferred as an allocation before Grange Farm.

### Step 1 – Site Hierarchy Criteria

7.2 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.

7.3 We have appended our representations made in February 2017 given that our response to Question 15 remains relevant in relation to the evidence base that has informed the Council's decision making and is applicable to our objection to Site 3 being included as an allocation in the SLP before Grange Farm.

7.4 To summarise our position, in our view the land at Windmill Lane performs a more important role in terms of Green Belt function than at Grange Farm. As such the following observations should have been taken into account when Windmill Lane was categorised:

- The release of land at Windmill Lane plays an important role in preventing development extending into the countryside and resulting in urban sprawl. The narrow shape of the land within Site 3 extends disproportionately from the southern edge of the settlement and would have a significant negative impact on the local environment in this location.
- It can be seen from **Appendix 2**, that in terms of Green Belt function, we consider that the land at Windmill Lane performs a more important role than that at Grange Farm. Our conclusion was that Windmill Lane should score 8 in terms of impact whereas Grange Farm should score 5 and should thus be preferred.

7.5 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above and detailed analysis provided at **Appendix 2**, that whilst Windmill Lane has been categorised as a 'yellow' site it should more appropriately have been defined as a 'blue site 6' and that Grange Farm, in contrast should have been categorised as a 'yellow site 5'.

### Step 2 – Refinement Criteria

7.6 Following this analysis, we now observe that the proposed allocation of the site has increased from 200 homes to 220 homes.

7.7 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary in effect provides a summary of the Sustainability Appraisal which in the case of Windmill Lane still relates to the 2016 SA. In



relation to this we noted that even before our reservation about the individual scoring of both sites the proposed allocation at Windmill Lane scores -3 (AECOM ID 99) and Grange Farm (AECOM ID 76) would score -1. Notwithstanding our additional comments this implies that the proposed allocation at Windmill Farm is less sustainable than land at Grange Farm. On that basis the proposed allocation of Windmill Lane is flawed and Grange Farm should be preferred by way of an allocation before Site 3.

## 8. Question 7: Site 21 Pheasant Oak Farm

**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?**

8.1 Pheasant Oak Farm is a new site and it includes the farm complex (most of which is included in the Brownfield Land Register), but also adjacent land. The Draft Plan indicates that the site has capacity for 100 homes.

8.2 We note that an updated Sustainability Appraisal has been carried out (AECOM, January 2019) and this includes an assessment of this site. This is considered below.

### Step 1 – Site Hierarchy Criteria

8.3 We consider there has been an inappropriate designation of the site as brownfield land. It is noted from the NPPF that previously developed land should “*exclude land that is or was last occupied by agricultural or forestry buildings*”. It is therefore considered that any agricultural buildings within this site should therefore not be classed as brownfield. In addition, there are greenfield elements to his wider site parcel, so the categorisation process is flawed when the entire site is included within this ‘brownfield’ category.

8.4 We note in relation to the Green Belt impacts that the site currently:

- Performs a more important role than Grange Farm overall, in relation to the impact on the Green Belt.
- It would result in unrestricted sprawl given the current lack of a strong and defensible boundary to the east of the site.
- It is unclear why the site is preferred to Grange Farm which is less important in Green Belt terms and often more compact (less sprawling) form of development.

8.5 It is considered that Step 1 of the site selection process has been incorrectly applied to the site given we object to greenfield land or agricultural buildings being classified as brownfield land. We consider, that this proposed allocation should not be categorised as ‘green’, indeed it is at best a 7 Greenfield in accessible higher performing Green Belt Location and land at Grange Farm, should be preferred before this site.

8.6 A key consideration with the proposed allocation of sites in the first step is how the subject land performs in Green Belt terms. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1. We note that the site has been incorrectly included within priority 3 “Brownfield in accessible Green Belt Location”, so the categorisation process is flawed. This clearly represents an incorrect approach where the site gets treated as a ‘green’ category 3 site.

8.7 The commentary which led to this site being allocated is as follows: “*the site is Part brownfield within high performing parcel in the Green Belt Assessment... lack of clear, firm green belt boundaries could only be considered as part of a larger site*”. The site is situated within a “Higher performing broad area (BA04)” of the Green Belt with an overall combined score of 12. This means the site is highly performing in terms of all purposes of the Green Belt. We have also challenged the basis of the brownfield designation and in this light, it is remarkable how the site has been allocated, given the evidence from the Green Belt assessment clearly

suggest this broad area is not acceptable for development. This contrasts with the much lower score within the Green Belt assessment for the Grange Farm area (RP51).

- 8.8 There are no strong and defensible Green Belt Boundaries to the east of the site currently, and yet the approach has been to justify the allocation on the back of creating a strong and defensible boundary in the form of the proposed Balsall Common Bypass. This is inconsistent with the approach taken in respect of other sites. It is contended that a strong and defensible boundary could also be created at Grange Farm an area where there would be less impact on the Green Belt.

### Step 2 – Refinement Criteria

- 8.9 Overall Grange Farm is more sustainable than land at Pheasant Oak Farm.
- 8.10 The January 2019 SA scoring for Land at Pheasant Oak Farm is reproduced below, with our proposed scoring of Grange Farm (as per **Appendix 2**). It is noted that the January 2019 SA includes a column on Housing Deliverability (SA16), which was not included in the January 2016 table. We have excluded this from the table below to enable a direct comparison of indicators. The Council will need to ensure that all sites are assessed on the same basis going forward.
- 8.11 The table below indicates that Grange Farm scores significantly better than Pheasant Oak Farm by 4 SA points, and should therefore be preferred (the SA provides no basis for preferring this site over Grange Farm).

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
55	1018	BC3 Pheasant Oak Farm	-1	0	+1	+1	+1	0	-1	0	0	W	-1	0	0	0	0	-2	-2	-4
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

## 9. Question 8: Site 22 Trevallion Stud

**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?**

9.1 Trevallion Stud (Land at Wootton Green Lane) is a new site and has an indicative capacity of 300 homes. A large part of the site is included in the Council's Brownfield Land Register. The allocation has been considered suitable given it would use strong, defensible Green Belt boundaries and due to the presence of built development in this area this smaller parcel performs less well in Green Belt terms.

9.2 Although this is a new allocation, the site was assessed in the January 2017 Interim SA report.

### Step 1 – Site Hierarchy Criteria

9.3 We consider there has been an inappropriate designation of the site (totalling c.11ha) as brownfield land. The curtilage of the Stud should more suitably be drawn much more tightly around the Stud buildings which amount to c.2 hectares. The greenfield parts of the site around the stud at c.7.5ha (c.68%) should rightly be classed as greenfield, so the categorisation process is flawed when the greenfield element of the site is also included within the brownfield site category.

9.4 We note in relation to the Green Belt impacts that the site:

- Performs a more important role than Grange Farm overall, in relation to the extent the site protrudes from Balsall Common.
- It would result in unrestricted sprawl.
- It is unclear why the site is preferred to Grange Farm which is less important in Green Belt terms and often more compact (less sprawling) form of development.

9.5 In addition, whilst we are encouraged by the fact that the Council clearly considers that it is appropriate to release land to the west of Balsall Common, it is considered that Site 22 would result in development extending disproportionately from the northern edge of the settlement. This protrusion, in turn, would have a significant adverse effect on the character and expansion of the settlement and the local area. Indeed it would have a far greater impact than Grange Farm which, as per the Vision Document at Appendix 1, would have a developable area drawn much closer and tighter to the settlement edge.

9.6 As Grange Farm is within the same Green Belt parcel (RP51) it is considered that the Council should have considered Grange Farm favourably against Step 1, particularly given the site lies much closer to the centre of Balsall Common. The site selection process has also not been applied equally across the Trevallion Stud site given only c.32% could be considered previously developed. We consider, that a different conclusion could have been reached on Grange Farm given it too falls within the same Green Belt parcel (i.e. category 5).

9.7 A key consideration with the proposed allocation of sites in Step 1 is in relation to Green Belt impact. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1. The site has been considered as being completely within priority 3 "Brownfield in accessible Green Belt Location", however this

is incorrect for the whole of the site. Indeed, only a small area around the Stud buildings should be classified as brownfield.

9.8 In addition, this site falls within the same assessment area as Grange Farm, whilst part of the site is brownfield this clearly represents an inconsistent approach where the greenfield aspect of this site gets treated as a 'green' category 3 site and not in the same category as Grange Farm as per the Green Belt Assessment.

9.9 The commentary which led to this site being allocated is as follows: "*Brownfield site within moderately performing parcel in the Green Belt Assessment, and would result in an indefensible boundary. Site has a medium level of accessibility, is in an area of high visual sensitivity with very low capacity for change.*" It is unclear how such a site could be preferred to Grange Farm.

### Step 2 – Refinement Criteria

9.10 The 2016 SA scoring for Land at Wootton Green Lane (Trevallion Stud) is reproduced below, with our proposed scoring of Grange Farm (as per Appendix 2). Overall, both sites score '0'. There is really little difference between the two overall.

9.11 The differences in where the positive and negative effects arise, and in some cases the scale of effects, leave relatively little to choose between them in SA terms.

9.12 There is no reason why this site is preferred (the SA provides no basis for preferring this site over Grange Farm).

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
79	BC2	North of Balsall Common, Kenilworth Road and Wootton Green Lane	-1	-1	0	+1	+1	0	0	0	0	-1	-1	0	-1	+1	+1	-1	+2	0
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

## 10. Question 9: Site 23 Lavender Hall Farm

**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?**

10.1 Lavender Hall Farm is a new site and has an indicative capacity of 60 homes. A large part of the site is included in the Council's Brownfield Land Register. The allocation has been considered suitable given that the proposed HS2 line will provide a new feature separating the site from the wider Green Belt.

10.2 Although this is a new allocation, the site was assessed in the in January 2017 Interim SA report.

### Step 1 – Site Hierarchy Criteria

10.3 We query the designation of the entire site as brownfield land. It is noted from the NPPF that previously developed land should "*exclude land that is or was last occupied by agricultural or forestry buildings*". It is therefore considered that any buildings relating to agricultural use should therefore not be classed as brownfield, so the categorisation process is flawed when the site is included within this 'brownfield' category. In addition, the greenfield part of the site to the east should not be classified within the brownfield site selection category.

10.4 We note in relation to the Green Belt impacts that the site until HS2 is implemented:

- Performs a more important role than Grange Farm overall, in relation to the impact on the Green Belt.
- It would result in unrestricted sprawl given the current lack of a strong and defensible boundary to the north of the site.
- It is unclear why the site is preferred to Grange Farm which is less important in Green Belt terms.

10.5 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council should apply the Green Belt Assessment evidence to assess the sites in step 1. We note that the site has been considered as being completely within priority 3 "Brownfield in accessible Green Belt Location", however this is considered incorrect, given the brownfield designation is questionable. The categorisation process is therefore flawed. The site is situated within a "higher performing broad area (BA04)" of the Green Belt with an overall combined score of 12. This means the site is highly performing in terms of all purposes of the Green Belt.

10.6 The site is premised on the defensible boundary of the HS2 line. Whilst the evidence clearly suggests this broad area is not acceptable for development, a flexible approach has been adopted to take into account the proposed HS2 line. We would query whether the assessment should rely on HS2 as a defensible boundary at this point given the HS2 line has not been built.

10.7 In contrast the Green Belt site assessment for the Grange Farm area (RP51) is much lower and no merit is given to the proposed open space at Grange Farm in protecting the northern edge of development from further expansion (as shown in the Vision Document at Appendix 1), and ability to create a defensible boundary. It is contended that these factors should also be taken into account in the site selection process to ensure consistency of approach.

**Step 2 – Refinement Criteria**

- 10.8 Lavender Hall Farm scores -1 in sustainability terms in the Council's assessment, however Grange Farm has scored 0 in our assessment of sustainability.
- 10.9 Grange Farm is superior in sustainability terms, and makes a more limited contribution to the Green Belt and so should be preferred.
- 10.10 Robust evidence is therefore required to demonstrate that Lavender Hall Farm is deliverable in the plan period and the timeline for the HS2 proposals are fully taken into account in the preparation of the Submission Plan for Solihull Borough, particular given the impacts of construction and potential amenity issues, which suggest employment uses may be more preferable on the site.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
81	BE5	Land at Lavender Hall Farm	-1	0	0	+1	+1	0	-1	0	0	-1	-1	-1	0	+1	+2	-2	+1	-1
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

## 11. Question 10: Balsall Common Eastern Green Belt Boundary

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?

- 11.1 A key change to the Green Belt is being predicated on the proposed HS2 route. Whilst there is no doubt this will provide a boundary line, it is not currently built or in construction, so we query the soundness of relying on the strong and defensible boundary being relied upon to form an eastern boundary to Balsall Common.
- 11.2 This presents an issue of certainty and timing, which are key matters to consider in the eastern boundary of the Green Belt around Balsall Common. It is critical that the HS2 proposals are fully taken into account in the preparation of the Submission Plan for Solihull Borough, particularly given the impacts of construction and potential amenity issues. We also suggest that employment uses should be considered in location close to the HS2 line as they may be preferable to residential uses.



## 12. Question 38: Amber Sites

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

- 12.1 The following provides our observations as to why one of the larger amber sites should not have been preferred before land at Grange Farm.
- 12.2 Land at Golden End Farm, Knowle is categorised as Amber, yet it is within a higher performing parcel (RP37) overall with a combined score of 11 [it is highly performing in terms of purposes 1, 3 and 4].
- 12.3 The Grange Farm site is within a Green Belt parcel (RP51) which scored 7. Notwithstanding our objections to this scoring given we consider the smaller parcel of Grange Farm would have even less of an impact on the Green Belt. We query why this site that was categorised '7 Blue' in step 1 of the site hierarchy leap-frogs Grange Farm as an amber site following refinement.
- 12.4 We consider that the Grange Farm site should have been, or should be, categorised as a Green site. At the very least it outperforms the Golden End Farm site and so should rank higher than this in the Council's assessment.

## 13. Question 39: Red Sites Omitted

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

13.1 We are firmly of the view that the Grange Farm, Balsall Common site should be allocated for development and that the available technical evidence demonstrates that this is the case.

13.2 Firstly, we take no issue with the Council's over-arching strategy of seeking to focus growth, first and foremost, on land beyond the Green Belt.

13.3 We also take no issue with the Council's acknowledgement that of the Growth Options commented on previously, Option A (High Frequency Public Transport Corridors and Hubs) – including around Balsall Common), offers considerable potential to deliver sustainable growth.

13.4 We do though have concerns about:

(i) The subsequent lack of focus that has been attached to Balsall Common when the Council has looked at how it distributed development (it should be directing a greater percentage of the new homes needed to this settlement); and,

(ii) The way in which it has assessed and selected/ omitted sites, both around Balsall Common and elsewhere. The approach that has been taken, and elements of the assessment have been opaque, inconsistent and in some cases flawed.

13.5 It seems plain to us that on any reasonable analysis the Grange Farm site makes for a logical, suitable and, in particular, deliverable proposition. As explained previously:

- The site is considered more sustainable and would lead to less impact in Green Belt terms than other allocated sites around Balsall Common.
- The site would provide a high-quality, attractive and sustainable residential community integrated with, and complementary to, Balsall Common.
- Grange Farm will be a highly desirable place to live, celebrating existing landscape and wildlife assets to provide a community set within an "Arden" context and benefitting from convenient access to key facilities and transport opportunities.

### **Green Belt Impact**

13.6 A key consideration with the proposed allocation of sites in the first step is in relation to Green Belt impact. The Council has used the Green Belt Assessment evidence to assess the sites in step 1.

13.7 L&Q Estates and BDW remain concerned that land at Grange Farm (RP51) has been incorrectly assessed in relation to Purpose 1 and Purpose 3 of this Strategic Green Belt Assessment. We reiterate the following (from our February 2017 representations) with respect of Green Belt scoring, but also note our assessment of the site leads to a final Green Belt score of 5, and not 6 as previously advised in December 2016:

- Land at Grange Farm scores '2' when assessed against Purpose 1 (To check unrestricted sprawl of large built-up areas). We believe that if considered alone and in isolation to the larger RP51 parcel, a more appropriate score for the L&Q Estates and BDW site would be '1' (parcel is lower performing). This is because the land at Grange Farm includes development that is already present immediately to the south and to the east of the site. In addition, ribbon development is already evident along Kenilworth Road. The site is therefore contained on three sides and as illustrated in the Vision Document offer potential for rounding off the settlement edge.
- In respect to Purpose 3 (To assist in safeguarding the countryside from encroachment), we again believe that in isolation land at Grange Farm has been incorrectly scored against this Green Belt Purpose. As mentioned above, land at Grange Farm includes development that is already present immediately to the south and to the east of the site, with ribbon development along Kenilworth Road. As such, a more appropriate score would be '2' i.e. refined parcel is generally characterised by countryside and has limited development present.

13.8 In light of our comments above, we therefore consider a more appropriate score for land at Grange Farm is summarised below:

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Land at Grange Farm (SMBC Score)	RP 51	2	2	3	0	7	3
Land at Grange Farm (Avison Young Score)	RP 51	1	2	2	0	5	2

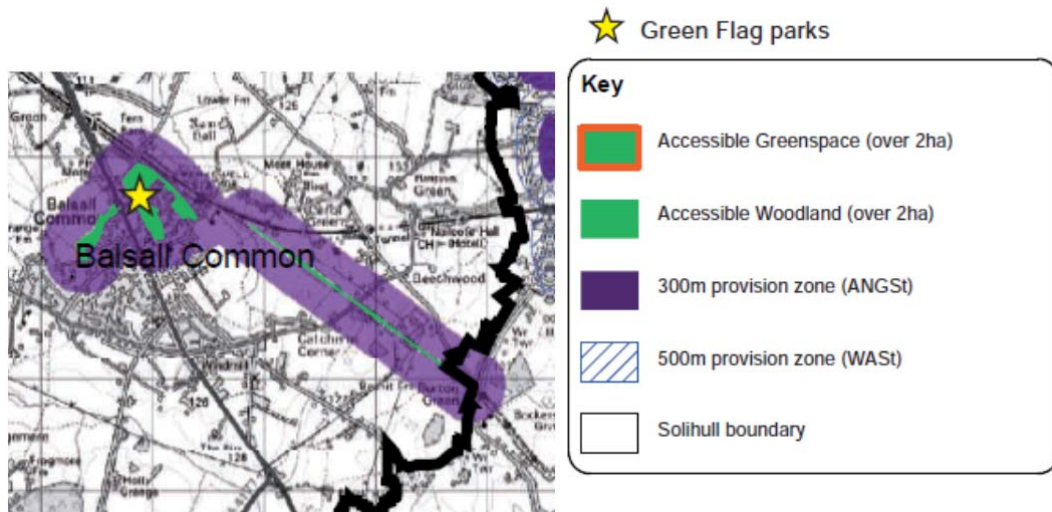
13.9 In light of this scoring, we consider that the land at Grange Farm is well placed to deliver additional growth to meet the needs for the release of land to meet housing growth based upon the housing need requirement in Solihull. In Green Belt terms, it is not necessary to keep it permanently open.

13.10 It is noted that Step 1 of the site selection process sifts sites into a hierarchy and the assessment of Green Belt impact is a critical consideration to inform how the sites are categorised. We consider, given our comments above and analysis provided within Appendix 2, that whilst Grange Farm has been categorised as a 'blue site 6' it should more appropriately have been defined as a 'yellow site 5'.

### Sustainability Credentials

13.11 Following this analysis, we consider that Grange Farm should have been allocated for 700 homes as a result of the refinement criteria. The fact that other sites have been able to consider proposed boundaries not currently in existence, suggests the same approach could have also been applied to Grange Farm.

- 13.12 It is understood that the Council has utilised the Sustainability Appraisal (SA) to provide a commentary for each of the sites and varying levels of detail have been applied. The commentary in effect provides a summary of the Sustainability Appraisal which in the case of Grange Farm still relates to the 2016 SA.
- 13.1 As referenced within **Appendix 2**, L&Q Estates and BDW question the Council’s assessment of Grange Farm against SA11 (To facilitate the delivery and enhance the quality of areas providing green infrastructure).
- 13.2 The Council’s own Green Infrastructure Study (January 2012) Figure 5.1 – Accessible Greenspace Provision identifies that land at Grange Farm is clearly within ‘400m from the public open space or natural greenspace of at least 2ha in size’. Therefore we believe that Grange Farm ‘Meets one standard’ of the criteria for SA11, and therefore a ‘Neutral Effect’ (Grey) should apply based upon the Council’s scoring criteria.



Source: Figure 5.1 Green Infrastructure Study (SMBC - January 2012)

- 13.3 On this basis and in light of our comments above, it is clear that the site should be given a more appropriate SA Assessment (SA11) for land at Grange Farm as follows:

	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
Grange Farm SMBC Assessment	-1	0	0	+1	+1	-2	0	0	+1	-1	-1	-1	-1	+1	+2	-2	+2	-1
GVA Assessment	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

- 13.4 As we have demonstrated within **Appendix 2**, and our responses in relation to individual sites, our assessment of Grange Farm proves that the site has strong sustainability credentials and is well placed to deliver housing growth.

13.5 The comparative scoring of the Grange Farm site against proposed Housing Allocations around Balsall Common is set out below. It can be seen that even before adjustment to scoring, that the site at Grange Farm performs significantly better than the land at Barratt's Farm, Windmill Lane and Lavender Hall Farm (2019 SA). If the delivery of a new Primary School is factored in, the Grange Farm site outperforms all of the proposed Housing Allocations. The comparative scoring is set out below.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	AY Total
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0
97	PO1	Barratt's Farm	-1	0	+1	+1	+1	-2	-1	0	-1	0	0	-2	0	+2	+2	-2	+1	-1
98	PO2	Frog Lane	-1	+2	+1	+1	+1	0	0	0	0	0	-1	-1	0	0	+2	-2	0	+2
99	PO3	Windmill Lane	-1	+1	+1	+1	0	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-3
55	1018	BC3 Pheasant Oak Farm	-1	0	+1	+1	+1	0	-1	0	0	W	-1	0	0	0	0	-2	-2	-4
79	BC2	North of Balsall Common, Kenilworth Road and Wootton Green Lane	-1	-1	0	+1	+1	0	0	0	0	-1	-1	0	-1	+1	+1	-1	+2	0
81	BE5	Land at Lavender Hall Farm	-1	0	0	+1	+1	0	-1	0	0	-1	-1	-1	0	+1	+2	-2	+1	-1

13.6 In relation to this, we conclude that the site refinement process should have included commentary to justify the inclusion of Grange Farm as a proposed 'Green' allocation, given it would have 6 positive effects; and that merit should be given to the proposed open space at Grange Farm in protecting the northern edge of development from further expansion (as shown in the Vision Document at **Appendix 1**), and ability to create a defensible boundary. It is contended that these factors would have led to a conclusion to allocate the site.

13.7 On this basis, L&Q Estates and BDW consider that the land at Grange Farm should be allocated for development and should be preferred ahead of other proposed Housing Allocations around Balsall Common.

13.8 In addition, in order to comply with national policy the NPPF requires 3,835 homes, as a minimum, to be allocated as 'safeguarded land'. It is contended that additional sites for safeguarded land should be identified within the Borough to ensure the Submission plan can be deemed sound.

13.9 Indeed, Grange Farm has the potential to provide longer term recreational value to the local community through the delivery of sustainable residential development on appropriate sites. This could provide a meaningful contribution towards the enhancement of local recreational facilities.

**Balsall Common Neighbourhood Development Plan**

- 13.10 It is also noted Balsall Parish Council are progressing a Neighbourhood Development Plan for Balsall Common. They have consulted on a Regulation 14 Draft Plan and representations have been made on behalf of L&Q Estates (Gallagher Estates at the time of submission) in response. The draft Neighbourhood Development Plan proposed to designate LGS5 'Grange Park' as Local Green Space could impact upon the bringing forward of Grange Farm for residential development.
- 13.11 We have expressed serious concern in our representations about the prejudicial effect of the neighbourhood plan on the future sustainable growth on Balsall Common and consider this to be premature.
- 13.12 We draw this to your attention as our firm view is that the strategic policies in the Solihull Local Plan should be drafted and adopted before policies in the Neighbourhood Plan are progressed further to adoption.

**Conclusion**

- 13.13 Our clients have a site immediately adjacent to Balsall Common, one of the most sustainable settlements in the Borough and which is unconstrained, has significant potential for growth. In terms of Green Belt function, Grange Farm, Balsall Common performs a less important role than other proposed allocated sites and therefore it is unclear to us on the basis of the Council's analysis why Grange Farm has not been preferred before other proposed allocated sites.

# Appendix I

## Grange Farm - Vision for a Sustainable Community

Grange Farm,  
Balsall Common

Vision for a  
Sustainable  
Community

October 2016



08449 02 03 04  
[gva.co.uk](http://gva.co.uk)

**GALLAGHER**  
ESTATES



**BARRATT**  
HOMES



**DAVID WILSON HOMES**  
WHERE QUALITY LIVES





# The Vision for Grange Farm

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*A high-quality, attractive and sustainable residential community integrated with, and complementary to, Balsall Common. Grange Farm will be a highly desirable place to live, celebrating existing landscape and wildlife assets to provide a community set within an “Arden” context and benefitting from convenient access to key facilities and transport opportunities.*

## Objectives

- **Consulting with the local community and key stakeholders** in planning the development and promoting it through the emerging Development Plan documents.
- **Delivering best practice** by responding to environmental and physical constraints and opportunities.
- **Quality of life**, providing a mixture of high-quality housing to meet local needs with good access to greenspace and social infrastructure and fostering a strong sense of community.
- **A positive identity** through a high-quality distinctive design which responds to local character and enhances the Arden landscape.
- **Connectivity and integration**, building upon the site’s accessibility to urban centres and public transport and delivering new and improved walking and cycleways to link with Balsall Common and the countryside.
- **Protecting and enhancing** landscape and wildlife assets including provision of an extensive network of community greenspace and a strong defensible Green Belt boundary.
- **Inspiring healthy lifestyles and well-being** through the creation of a walkable neighbourhood with provision of a range of community greenspace types.

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Appendix 1 Sustainability Appraisal

Appendix 2 Assessment against "Deliverability" Criteria



# 01 Introduction and Purpose

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*This document has been prepared on behalf of Barratt David Wilson Homes (BDW) and Gallagher Estates Ltd (Gallagher) to provide a vision for the development of a sustainable residential community at Grange Farm in Balsall Common, Solihull.*

*The Vision for Grange Farm is provided on the inside cover and this document explains the information which has been taken into account and collated to inform a “Development Framework” which realises this Vision.*

Grange Farm provides circa 50 hectares of land to the north-west of Balsall Common and is described in detail in Section 03. The land is being jointly promoted by BDW and Gallagher as a deliverable and sustainable residential site.

BDW and Gallagher have appointed a team of consultants to assess the site, engage with key stakeholders and identify a sustainable vision for a residential community. The consultant team comprises:

- **Bilfinger GVA** – Planning consultant
- **Townscape Solutions** – Urban Design and Masterplanning
- **CSA Environmental** – Ecology, Landscape and Archaeology/Heritage
- **JMP Consultants** – Transport, Drainage and Utilities
- **WSP Parsons Brinckerhoff** - Noise

This document presents the findings of the work completed to date to enable further consultation with stakeholders and to inform and support representations to the emerging Development Plan documents.

More specifically, it provides:

- An introduction to BDW and Gallagher (Section 02)
- A description of the site and surroundings (Section 03)
- An overview of the planning policy position and Solihull’s emerging housing need (Section 04)
- A summary of technical assessment work (Section 05)
- An overview of potential social infrastructure requirements (Section 06)
- A summary of discussions held with key stakeholders, including the local community (Section 07)
- A “Development Framework” for Grange Farm which delivers the vision and which demonstrates the potential scale and mix of uses which could be accommodated (Section 08)
- Conclusions and next steps (Section 09)

Contact details are provided on the back page.

## 02 BDW and Gallagher Estates

*As explained in Section 01, Grange Farm is being jointly promoted by Barratt David Wilson Homes (BDW) and Gallagher Estates Ltd. Further details on these companies is provided in this section.*

During 2015/16 BDW;

- \* delivered 17,319 dwellings including 3,102 affordable homes
- \* supported 53,000 jobs
- \* created 635ha of open space and gardens
- \* planted 555,000 trees
- \* secured a Gold award for sustainability performance
- \* secured planning permission for 95% of dwellings at the local level by working with local authorities and community
- \* contributed £392m to local community infrastructure (e.g. sports, health and community) and £39m in transport infrastructure and environmental improvements

### Barratt David Wilson Homes

BDW are part of Barratt Developments Plc – the UK’s largest housebuilder by volume. They are the only national housebuilder to have achieved a “5-star” HBF rating in seven consecutive years. They were awarded “Developer of the Year” in 2015 by the Urban Design Group and were awarded the highest score for any housebuilder in the UK Carbon Disclosure Project.

Putting customers at the heart of everything they do, BDW’s “Key Principles” include keeping people safe; being a trusted partner; building strong community relationships; and, safeguarding the environment.

BDW are committed to building strong community relationships. They arrange public exhibitions with local residents to secure the widest range of views, make promises on what can be delivered and are focused on listening. This document reflects their approach to community and stakeholder engagement.

BDW has two divisions operating in the West Midlands; Mercia and West Midlands. The Mercia division is based at Solihull Business Park.

#### New Century Park, Coventry



- 380 units
- Delivered on a vacant brown-field site in the Lower Stoke Ward of the City

#### LAWLEY VILLAGE, TELFORD



- 3,000 homes
- New footway/cycleway network
- Schools, sports and retail facilities

#### BLUEBELL, NUNEATON



- 813 homes on public land
- “Best Regeneration Project” at Housebuilder Awards

## Gallagher Estates Ltd



Gallagher Estates is one of the largest strategic land promotion and delivery companies in the UK, focused upon high-quality residential and mixed-use schemes and covering the breadth of the country.

Gallagher has a unique role as “master developer”, being responsible for land assembly, masterplanning, promotion, planning applications and infrastructure delivery.



With over 40 years of experience and a high calibre team of professionals engaged in key disciplines, Gallagher Estates has an established and enviable track record of working with landowners, housebuilders, communities and local authorities to deliver sites of differing scale and characteristics, including new settlements, regeneration projects and sustainable urban extensions. The aim is to leave behind a positive legacy of which the company can be proud.



Gallagher are based locally in Warwick and are active throughout Solihull and the wider West Midlands, including the sites listed opposite. More locally, they were responsible for delivering “The Grange” housing estate (230 dwellings) and its

adjoining area of open space, to the south-east of Grange Farm.

It is evident that Grange Farm is being jointly promoted by the country’s largest housebuilder and most reputable master developer. Clearly, the resources, capacity and commitment exist to deliver the vision for the site, and the promoters are fully committed to community and stakeholder engagement.

# 03 The Site and Surrounding Area

*This section provides a description of the site and surrounding area. The land lies north-west of Balsall Common in Solihull Metropolitan Borough Council's (SMBC) administrative area (in Balsall Parish which lies within the Meriden Ward).*

## Strategic Location

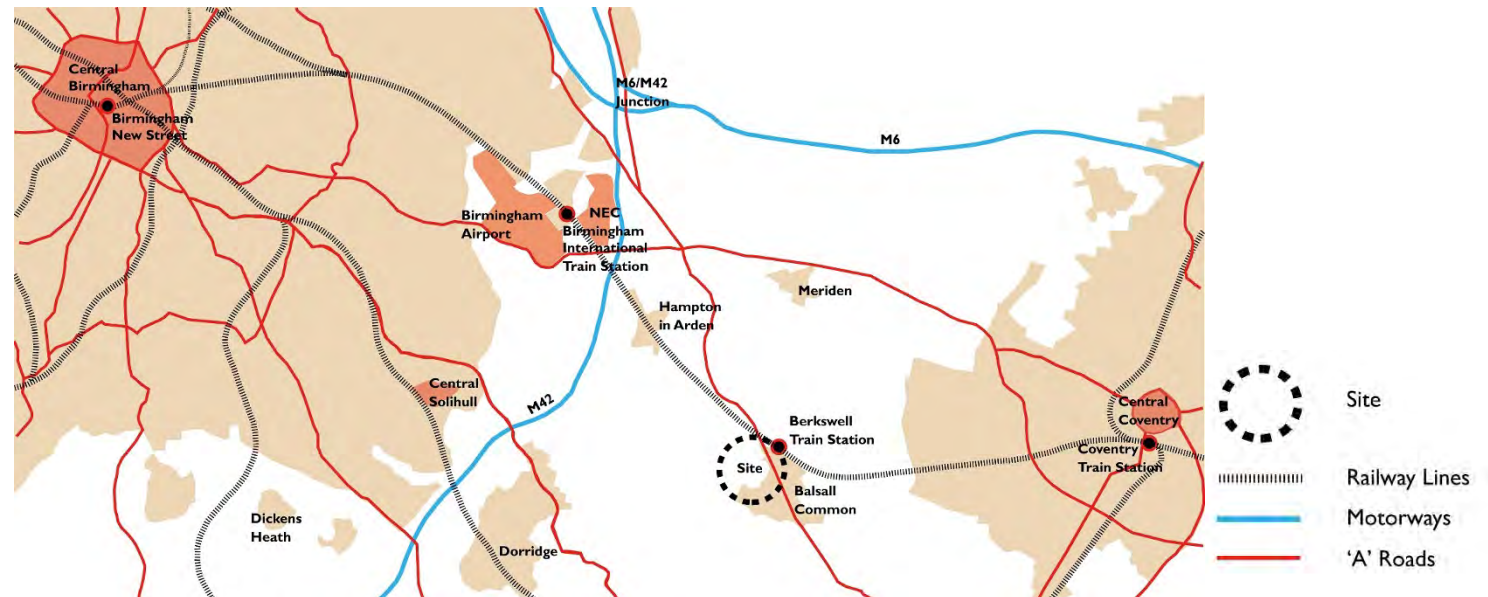
Balsall Common is one of the Borough's three largest rural settlements, located roughly equidistant (9km) between Solihull Town Centre and Coventry City Centre. Importantly, the village is served by Berkswell Railway Station which provides regular services to Birmingham, Coventry and London Euston.

The village is approximately 8km south-east of Birmingham Airport and Birmingham International Rail Station, as shown on the Strategic Location Plan below.

In terms of access to the strategic highway network, Balsall Common lies 7km south and east of Junctions 5 and 6 of the M42 respectively. Kenilworth Road (A452), running through the village in a north-south alignment, connects Balsall Common with the A45 to the north and Kenilworth to the south.

The village has been developed considerably post World War II, with the centre focused around Kenilworth Road (A452) and Station Road.

## Strategic Location Plan



## Site Characteristics

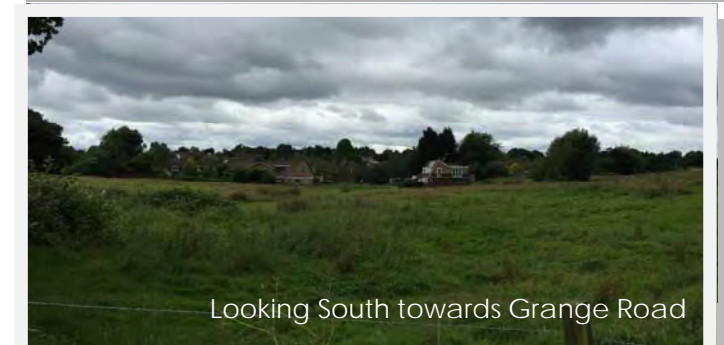
*Site-specific constraints and opportunities are described in greater detail in Section 05.*

The site comprises c.50ha of agricultural land designated within the Green Belt; predominantly arable but with some pasture/grassland to the south. It is situated to the north of Needlers End Lane and "The Grange" estate, west of Kenilworth Road and south of Wootton Green Lane. A Site Location Plan and Site Aerial Photograph are provided overleaf.

The site encompasses the farmhouse and associated outbuildings of Grange Farm, accessed from Needlers End Lane, as well as nine fields which are separated by hedgerows and woodland. The fields, hedgerows and wooded areas include mature trees, watercourses, ponds and scrub.

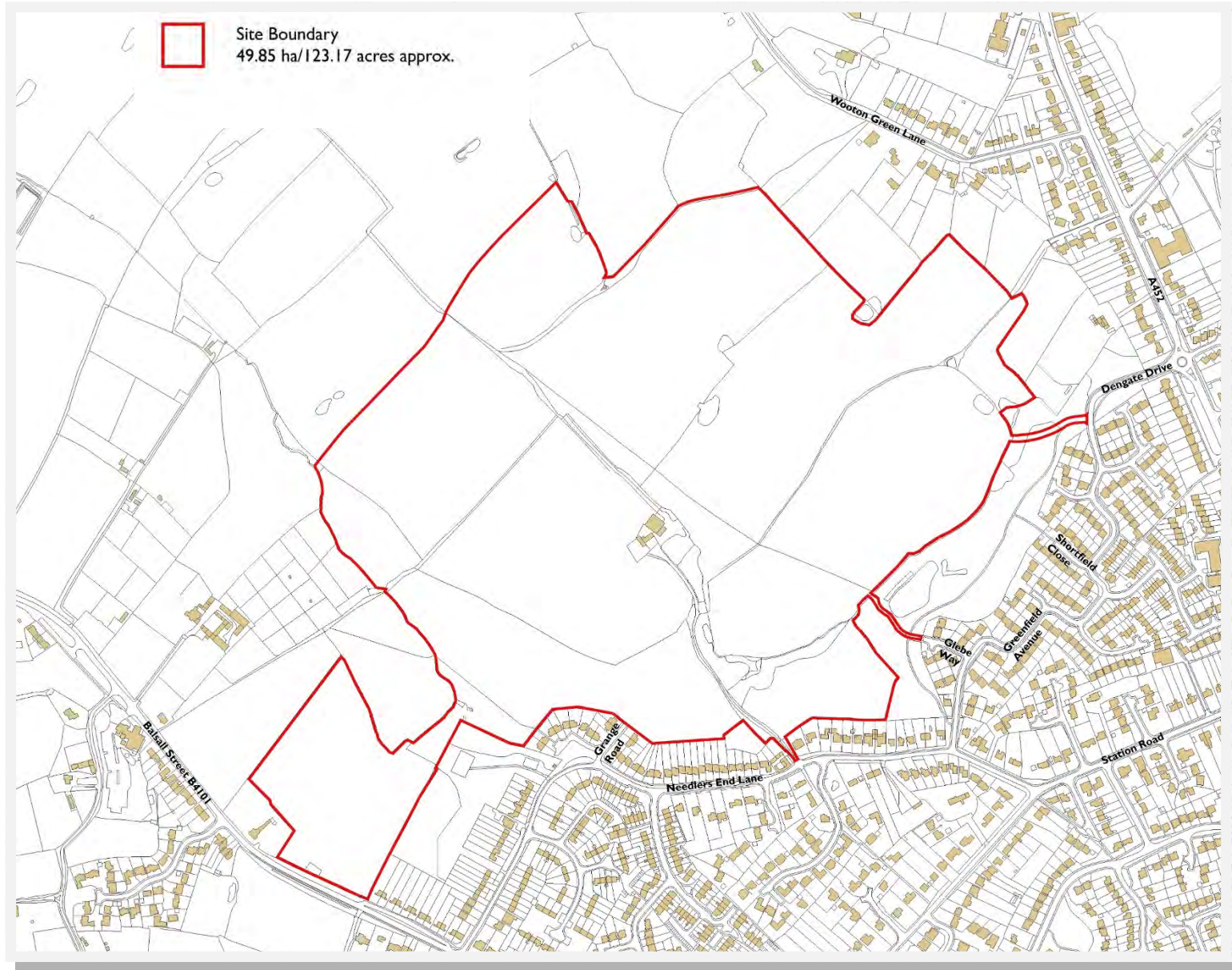
The main woodland areas are situated on the eastern and western boundaries and south of the farmhouse. The site is crossed by five public rights of way.

The local topography is undulating, and Grange Farm is bisected by two ridgelines.





# Site Location Plan



# Site Aerial Plan Photograph



## Surrounding Uses



The site is adjoined by residential/built development off Wootton Green Lane, Kenilworth Road, and Needlers End Lane on its north-eastern, eastern and southern sides, although an area of public open space (c.5ha) separates the site from "The Grange" housing estate to the east and Willow Park lies to the south-west. The former area is owned by Gallagher although is leased to SMBC who are responsible for maintenance (Gallagher have retained full rights of access). To the west and north-west is countryside in the form of agricultural fields.



Balsall Common is a thriving village including a range of shops, public houses and community facilities/ services. The village centre is within walking distance of the site (c.500m east of the site boundary) and there is a Sainsbury's "Local" store c.400m to the north on Kenilworth Road . The Heart of England Secondary School and Balsall Common Primary School lie on the southern side of the village off Balsall Street East and

Gipsy Lane (c.800m from the site's southern boundary). A modern health centre is provided off Hallmeadow Road on Ashley Drive (c.800m east of the site boundary), including a GP surgery, dentists, pharmacy and other health/community services.

In addition to the Railway Station, the village is served by a number of bus services which provide links to Solihull, Coventry, Knowle, Meriden and Kenilworth. The 87 and 88 are hourly services to Solihull. The nearest bus stops are positioned at the Needlers End Lane and Balsall Street junction and the Dengate Drive and Kenilworth Road junction.

The village has various recreational, community and sports facilities. Lavender Hall Park, approximately 400m to the east, boasts Green Flag status and includes woodland, sports pitches, equipped play and a Local Nature Reserve.



Grange Road



Kenilworth Road



Village Centre

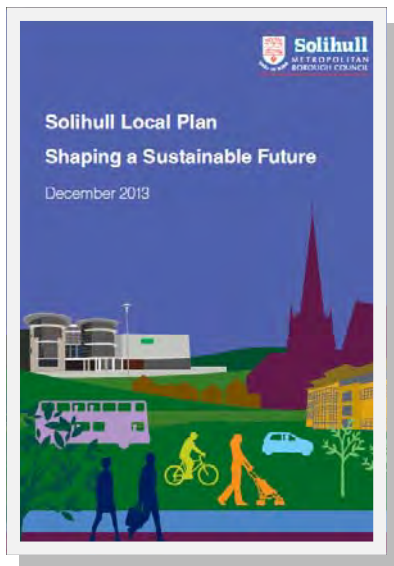


Hawthorne Drive (The Grange)



# 04 Planning Policy Context and Solihull's Housing Needs

*The Solihull Local Plan (SLP) comprises the adopted Development Plan. However, SMBC are in the process of preparing a new Local Plan and Balsall and Berkswell Parish Councils are jointly preparing a Neighbourhood Plan. Both of these documents will replace the adopted Local Plan when they have been examined and adopted.*



## Solihull Local Plan (SLP)

The SLP covers the period 2006-2028. Its key relevance is summarised below:

- The Proposals Map shows that the whole of the subject land lies within the West Midlands Green Belt (within the Meriden Gap) although there are no other designations;
- Policy P5 states that *“the Council will allocate sufficient land for 3,960 net additional homes to deliver 11,000 additional homes in the period 2006-2028”*, equating to 500 dwellings per annum. However, in 2014, the Court of Appeal remitted large parts of P5 to SMBC following a legal challenge which means that the adopted Local Plan does not include a housing need figure. This has been one of the main drivers behind SMBC’s decision to commence a review of the Local Plan (see overleaf).
- Para. 2.8.1 identifies Balsall Common as one of the three largest settlements in the *“Rural Area”*, and 2.84 states that the village has a *“thriving”* local centre.
- Section 5 sets out the Spatial Strategy for the Borough. There is no spatial strategy policy but para. 5.4.7 states that *“Provision will be made for development ... on suitable sites in the settlements of Balsall Common...”*. The Spatial Strategy Figure is shown overleaf.

There are numerous “development management”

policies throughout the SLP which will need to be taken into account in masterplanning Grange Farm (provided they are carried forward into the new Local Plan). We draw particular reference to the following:

### ***Meeting Housing Needs (Policy P4)***

Seeks new development to deliver 40% affordable housing provision.

### ***Improving Accessibility and Encouraging Sustainable Travel (Policies P7, P8)***

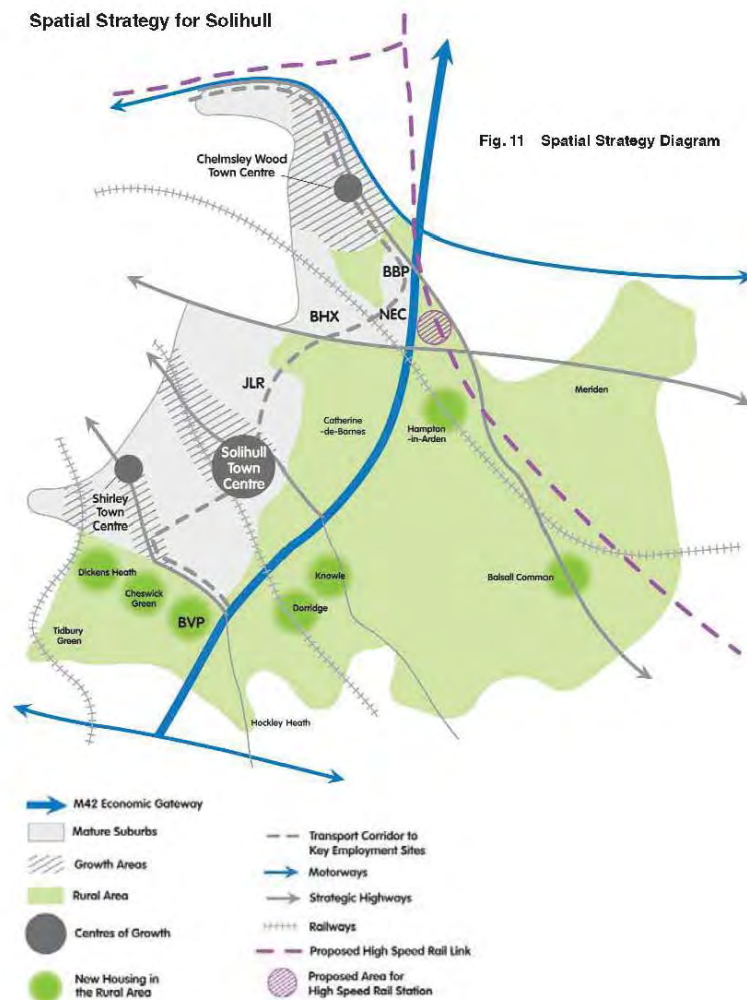
New development should be focussed in accessible locations and seek to enhance existing accessibility. P7 includes specific accessibility criteria for housing developments.

### ***Protecting and Enhancing our Environment (Policies P9, P10, P11, P14)***

Developers will be required to demonstrate the highest viable energy efficiency standards. Regard should be had to the need to minimise energy consumption. The Council will seek to protect, enhance and restore the diverse landscape features of the Borough. High standards of water efficiency will be expected.

## Spatial Strategy Figure from SLP

### 5.4 Spatial Strategy for Solihull



### Promoting Quality of Place (Policies P15, P16, P17)

Development proposals will be expected to achieve good quality, inclusive and sustainable design. Buildings should integrate with the surrounding area and public spaces, as well as increase public safety. Development proposals must demonstrate how local characteristics have been conserved. The 'best and most versatile' agricultural land will be developed only when there is an overriding need. The Green Belt will be protected from inappropriate development except in very special circumstances.

### Supporting Local Communities (P18, P19, P20)

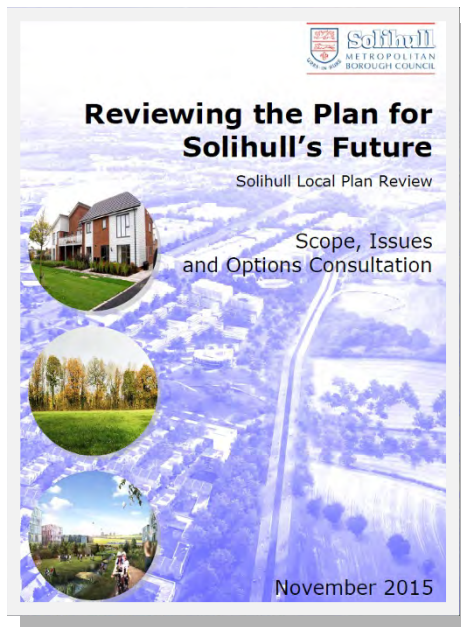
Development will be expected to contribute to healthy and sustainable places and communities. Policies will support the enhancement of existing facilities and open space.

### Delivering and Monitoring (P21)

Development will be expected to provide, or contribute towards, measures to directly mitigate its impact making the development acceptable in planning terms and to deliver the physical, social and green infrastructure required to support the needs associated with the development.

In addition to the above policies, there is the following guidance which supports the SLP:

- **Green Space Review (2014)** – Updates and replaces the Green Space Strategy (2006) identified in Policy P20. Para. 4.2.3 includes a standard of 2.86ha of greenspace per 1,000 population.
- **Meeting Housing Needs (July 2014)** – Supplements Policy P4.



## Emerging Solihull Local Plan Review (SLPR)

SMBC have commenced preparation of a Local Plan Review to identify its objectively assessed housing need (OAN) and to allow for a contribution towards the housing needs of the wider Housing Market Area (HMA) (37,500 dwellings to 2031). This process will require a Green Belt review. The new Plan is proposing to cover the period 2011 to 2033.

In November 2015 a "Scope, Issues and Options Consultation" document was published:

### Housing Need

SMBC will be required to deliver a step change in housing growth and the Council has acknowledged that this amounts to an *"exceptional circumstance"* which justifies the release of Green Belt land through the Local Plan Review (NPPF para. 83). The extent of Green Belt release will depend upon the level of housing which needs to be delivered through the emerging Local Plan.

The GBSLEP Strategic Housing Needs Study (SHNS) identified a minimum need for 12,154 dwellings in the Borough between 2011 and 2031 (608dpa), which SMBC translated into a minimum need of 13,500 dwellings over the emerging plan period, with a residual minimum need of c.4,000 dwellings when taking identified supply into account. SMBC have commissioned a Strategic Housing Market Assessment (SHMA) to determine the precise housing need, although the results are yet to be published.

We understand that the HMA authorities are making progress in agreeing the distribution of housing land to deliver the unmet need and that this will be delivered through a "memorandum of understanding."

In terms of next steps, we understand that:

- SMBC is considering representations to the Issues and Options consultation (including 230 site proposals) and proposes to publish the Draft Local Plan for consultation during autumn 2016 (targeting a Cabinet meeting in November), including a Green Belt Review, SHMA and Strategic Housing and Employment Land Assessment; and
- Thereafter, "Publication" of the SLPR is envisaged in spring 2017 with formal submission in summer 2017 and adoption in winter 2017.

SMBC's housing need figure, preferred distribution strategy – including the role of Balsall Common in meeting housing needs – and approach to Green Belt land release, will become clearer once the Draft Local Plan and its supporting evidence are published later in 2016. However, it would appear likely that Balsall Common will be required to accommodate a significant share of the housing need given the identified land supply and the village's status as one of the largest settlements in the rural area.

*“...unwise to dismiss the exploration of expansion of some of the rural settlements such as Knowle and Dorridge, Hampton-in-Arden and Balsall Common” (SMBC Sustainability Appraisal 2015)*

Indeed, the Council’s Sustainability Appraisal (November 2015) stated it would be *“...unwise to dismiss the exploration of expansion of some of the rural settlements such as Knowle and Dorridge, Hampton-in-Arden and Balsall Common”*.

### Balsall and Berkswell Neighbourhood Plan (NP)

In addition to the SLPR, Balsall and Berkswell Parish Councils are proposing to jointly prepare a Neighbourhood Plan (NP). The NP area was formally designated on 31 January 2016 and encompasses Balsall Common, Berkswell Village, Temple Balsall and the smaller settlements of Fen End, Meer End, Oakley and Carol Green.



A Project Timetable published by April 2016 indicates plan preparation from summer 2016, publication of a Pre-submission NP in December 2016 with consultation in January 2017, formal submission in autumn 2017, Examination in December 2017 and referendum/ adoption in May 2018.

The NP will have to accord with the SLPR given that the programmes are running in parallel.

A “Site Exhibition” was arranged by the Parish Councils in August 2016 to allow developers to present their sites and plans to the local community (refer to Section 07).

BDW and Gallagher intend to promote Grange Farm through the emerging SLPR and NP, using this document and the technical reports as an evidence base which demonstrates that the site is both sustainable and deliverable and, therefore, appropriate for release from the Green Belt as a residential-led allocation.



## Balsall Common Village Plan 2009

This document was produced by a Management Group and endorsed by the Parish councils in 2010. It summarised research on current and future needs and aspirations for Balsall Common, and provided a plan of actions.

The plan records that infrastructure enhancements are “critical” as part of any residential expansion, and that the village is “approaching a small town in size.” (p8).

It also recorded that:

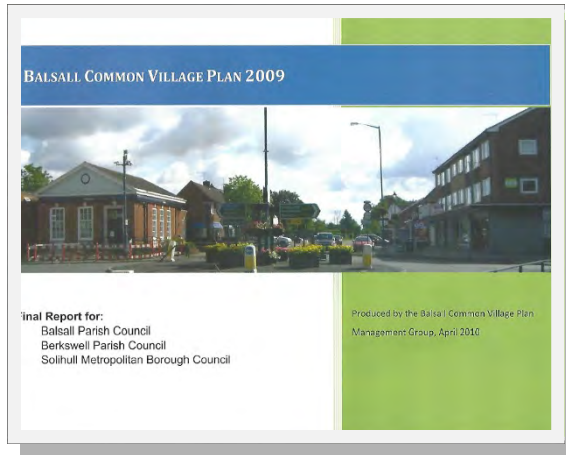
- The establishment of a new school was an option to avoid constant building programmes.
- Traffic congestion was an issue in the village centre and on the A452
- The Village is well served with excellent transport links via road, rail and air.

The Plan also includes a “village design statement” with eleven design principles. It is noted that the village enjoys a relatively open aspect and there would be strong resistance to high-density development.

The eleven design principles are:

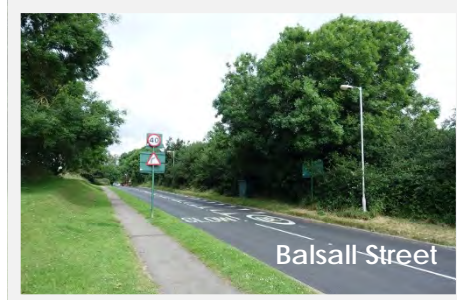
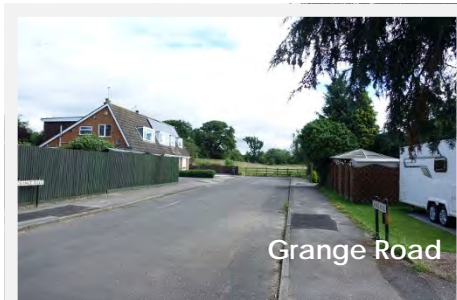
- A. Maintain rural gaps between neighbouring villages/towns.
- B. Preserve the Green Belt around the village.
- C. Preserve the character of rural approaches.
- D. Preserve the rural character of roads within the village.
- E. Manage traffic speeds by designing good highway and pavement layouts.
- F. Preserve and reuse existing quality buildings where possible.
- G. Ensure new housing development is integrated with the Village and not isolated.
- H. Ensure the density and character of new development are in character with surrounding properties.
- I. Maintain green space...and include open public spaces.
- J. Encourage public footpaths/walkways and cycles ways.
- K. Retain the village centre as main area for retail, business and community.

The above principles have been taken into account in formulating the vision and Development Framework for Grange Farm.



# 05 Constraints and Opportunities: Technical Assessments

*A consultant team has been appointed to provide a technical assessment of the site. This section summarises the full suite of technical assessments, alongside an assessment of urban design context. The opportunities and constraints are presented visually on the drawings overleaf.*



## Urban Design Context

Balsall Common is a large post-war suburban commuter village including a thriving local centre and railway station. It is characterised by low-density housing development with an open plan and cul-de-sac style layouts, which are found immediately to the south and east of the site on the estates developed off Balsall Street, Station Road and Kenilworth Road.

Development at Grange Farm could reflect established densities as well as the site's location adjoining the countryside to the north-west and the rural approach, particularly to the west. Adjoining homes would need to be respected by separating new development with appropriate landscape buffers, although appropriate linkages with the village for vehicles, pedestrians and cyclists should be introduced.

## Transport and Access

JMP have produced a Transport and Access Appraisal to identify the most appropriate access strategy, the site's relationship to existing local facilities and a high-level forecast of traffic distribution:

- Vehicular access is possible from Balsall Street, Dengate Drive, Glebe Way and/or Grange Road. There are other opportunities for pedestrian and cycle linkages.

- The majority of the site is readily accessible to local shops and facilities, schools and public transport by walking and cycling.
- There is an opportunity to enhance the existing (five) public rights of way which cross the site, and provide new pedestrian and cycle routes to enhance accessibility to the village and countryside.
- The primary destinations for the majority of vehicular trips from the new development are expected to be Birmingham and Coventry with the remaining trips heading for Warwick, Kenilworth, Leamington Spa and Solihull as well as some destinations within the village.
- The access strategy proposed for the site should be designed so that car trips generated by the development are distributed over a range of access points, have direct access to the strategic highway network and thereby minimise the impact on local roads. The majority of car trips will be heading for the M6, M40 and M42 and will therefore be using the A452 north and southbound as well as Balsall Street.
- Some local improvements may have to be carried out at existing junctions along the A452 in Balsall Common but no new major highway infrastructure works are envisaged.



## Drainage and Utilities

JMP have produced a Drainage and Utilities Appraisal providing a high-level flood assessment, an overview of the most appropriate drainage strategy and identification of existing utilities:

- The majority of the site lies within Flood Zone 1; the zone at lowest risk of flooding.
- Existing watercourses and ponds could be retained within new greenspace corridors – sufficient land is available to deliver a sustainable urban drainage strategy including attenuation basin(s).
- There are no recorded Ground Water Source Protection Zones.
- Electricity supplies can be taken from power lines crossing the site or the underground cable. Associated substations will need to be provided on-site.
- Gas can be extended into the site from existing services within adjoining roads.
- Aqueducts run south-west to north-east across the site and suitable easements will be required either side of these (diversion is not considered to be feasible).

- Telecommunication infrastructure is extendable from the surrounding area.
















## Landscape

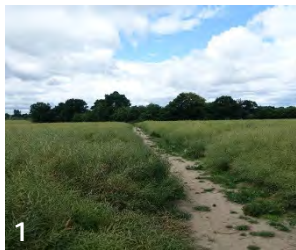
CSA Environmental have produced a Landscape and Visual Impact Assessment and Green Belt Review. This assesses the existing landscape character and quality, and considers the suitability of the site to accommodate residential-led development in relation to potential landscape and visual effects. It also considers the suitability of the site for release from the Green Belt:

- The site is not affected by any designations for landscape quality or value.
- The site exhibits some of the characteristics of the Arden landscape and, overall, is considered to be of medium landscape quality.
- The south-eastern and south-western areas are closely related to the existing areas of housing and lie on the south-west facing side of the ridge and are, therefore, contained (refer to topographical plan overleaf). This area is considered to have medium to low sensitivity to residential development.
- The central and northern parts of the site lie on higher ground and are considered to be of medium sensitivity. (*Continued overleaf...*)

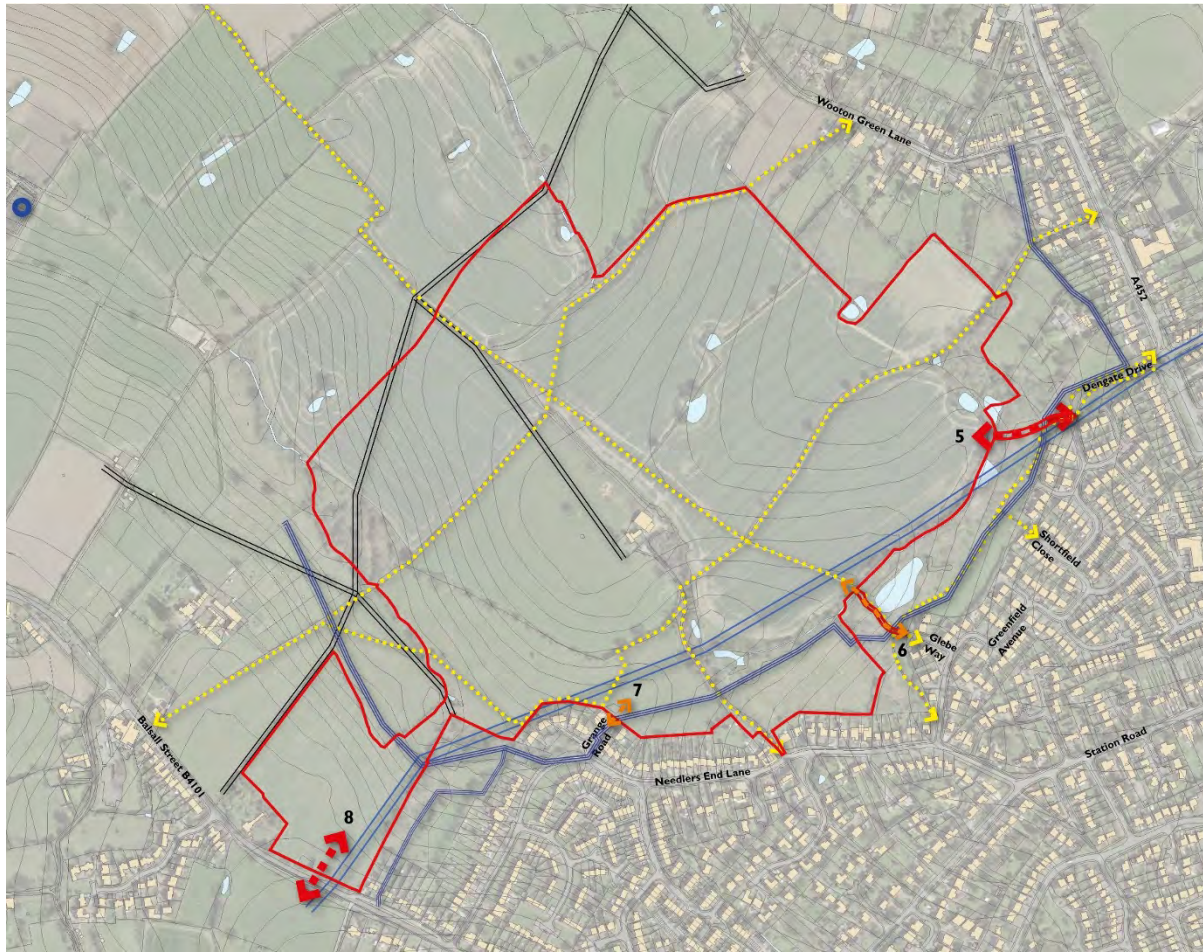
# Site Analysis: Environment and Townscape







-  Site Boundary  
49.85 ha / 123.17 acres approx.
-  Watercourses
-  Ponds
-  Contours/slope direction  
(arrows point uphill)
-  Highest point
-  Lowest point
-  Broadleaved semi-natural woodland
-  Hedgerows/tree lines
-  Line of historic field boundaries
-  Sensitive amenity boundary to existing housing
-  Area of archaeological potential
-  North of line: landscape more sensitive to change
-  Local Wildlife Site
-  Eco Site
-  Recreation ground/nature conservation status ungraded



# Site Analysis: Access and Infrastructure



-  Site Boundary  
49.85 ha/123.17 acres approx.
-  Water main (aqueduct)  
(showing 12m easement)
-  Foul sewers crossing site  
(showing 6m easement)
-  Waste water treatment plant
-  Overhead power cables
-  Pedestrian links
-  Potential primary access points
-  Potential secondary access points

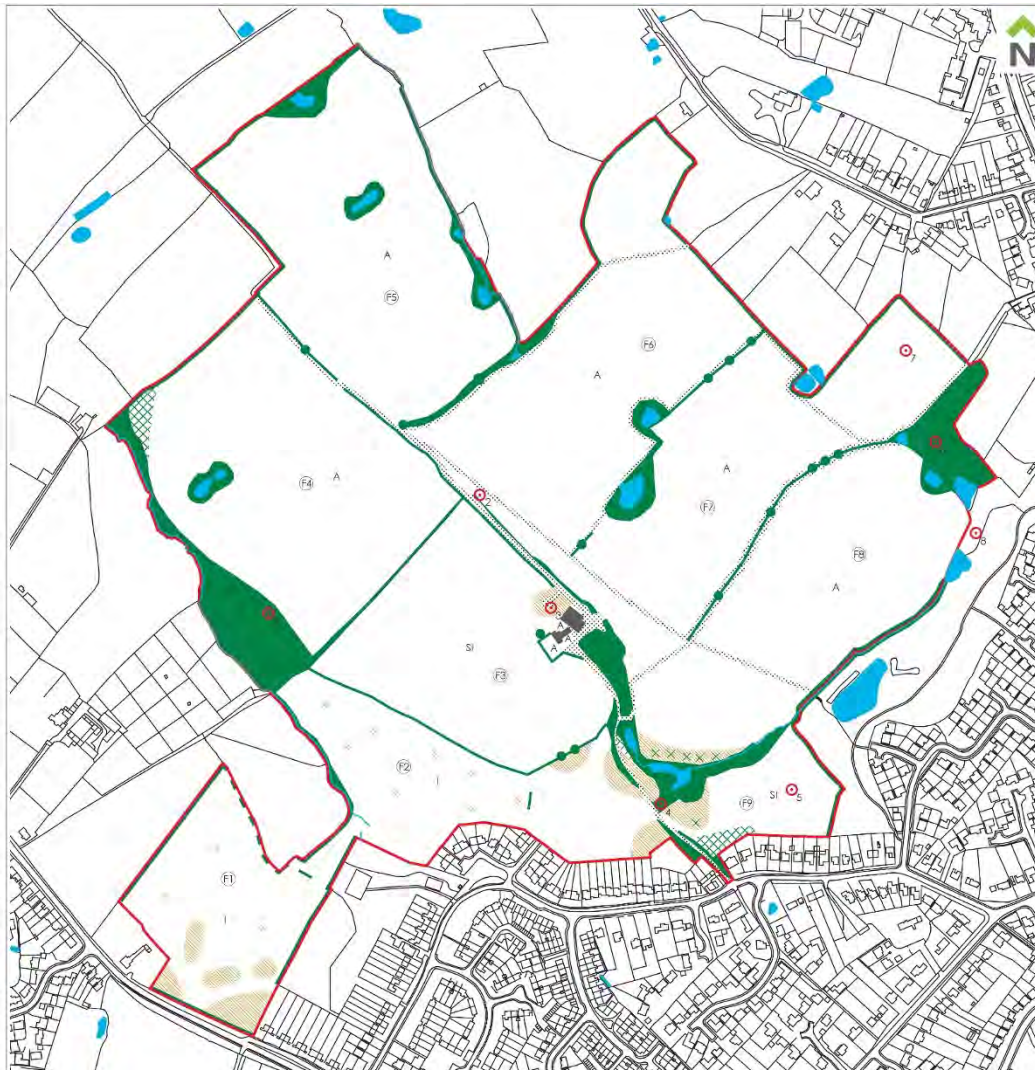


## Topographical Plan



- Middle and long distance views of the site are largely unavailable and key views of the site tend to be limited to local views from nearby roads, properties and public footpaths.
- The retention of existing hedgerows, trees and woodland within a framework of open space and green corridors would assist in assimilating the development within the wider landscape.
- Development would not have a material impact on the visual amenity of local properties nor on key views from the wider area.
- Development could deliver an extension to the village which is well connected and contained to the north-west by existing and proposed landscaping. It would not result in urban sprawl, would not encroach into the open countryside, would not impact on the setting of a historic town, or lead to coalescence with a neighbouring settlement. A new defensible boundary to the Green Belt could be formed. As such, the site could be released from the Green Belt without compromising Green Belt policy.
- Specific landscape principles are recommended which are reflected in the Development Framework (refer to Section 08).

## Habitats Plan



## Nature Conservation

CSA Environmental have completed a Preliminary Ecological Appraisal (PEA) to identify ecological constraints and enhancement, and to identify where further surveys are required:

- The site is not covered by any wildlife sites of national importance.
- Confirmed constraints comprise the River Blythe SSSI (to the north-west), non-statutory designated wildlife sites (two on-site in the form of a Local Wildlife Site and Ecosite), broadleaved woodland, boundary features and ponds, nesting birds and badgers.

### Legend

Site boundary	Dense scrub
Field numbers	Scattered scrub
Arable	Dense tall ruderal
Semi-improved grassland	Scattered tall ruderal
Improved grassland	Bare ground
Broadleaved semi-natural woodland	Pond
Intact hedgerow	Stream/wet ditch
Defunct hedgerow	Buildings
Individual tree	
Target note 1: Badger sett consisting of at least six entrances, showing signs of recent activity	
Target note 2: Oak <i>Quercus robur</i> tree with high bat roost potential	
Target note 3: Manure heap with potential for use by reptile species such as grass snake	
Target note 4: Ash <i>Fraxinus excelsior</i> tree with high bat roost potential	
Target note 5: Needlers End LWS, comprising of meadow grassland	
Target note 6: Balsall Woodland Ecosite, comprising of broadleaved woodland dominated by mature oak and elm <i>Ulmus</i> sp	
Target note 7: Arable cultivation with high proportion of arable weeds, including Chamomile <i>Chamaemelum nobile</i> , scented mayweed <i>Matricaria chamomilla</i> and scentless mayweed <i>Tripleurospermum inodorum</i>	
Target note 8: Part of the rejected LWS, dominated by immature aspen <i>Populus tremula</i>	

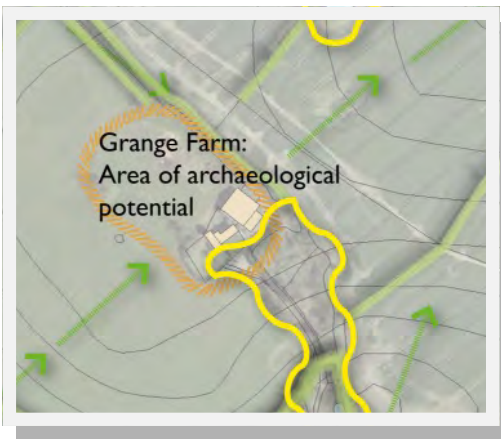
- Additional survey work is recommended in relation to badgers, bats, breeding birds, water voles, reptiles and great crested newts.
- Opportunities for enhancement of nature including new habitat creation to promote new “green corridors” and provide improved connectivity for wildlife.
- There are no overriding constraints to development and the site has good capacity to support development subject to appropriate mitigation measures and further surveys.

- Grange Farm is not listed or locally listed but is a building of potential historic significance. An historic building survey should be undertaken to confirm its importance/ significance and to determine whether or not it should be retained.
- The settings of listed buildings in the vicinity are unlikely to be affected by development within the site.

## Archaeological and Heritage

CSA Environmental have produced an Archaeology and Heritage Desk Based Assessment:

- No previous archaeological investigations have been carried out within or close to the site and the overall potential is therefore unknown.
- The remains of a medieval moat may exist at Grange Farm.
- A geophysical survey and trial trenching may be required to determine the site’s archaeological potential/significance.



## Noise

WSP Parsons Brinckerhoff have produced a Noise Survey and Exposure Assessment, involving a long-term noise survey in August 2016. This has found that, whilst subject to noise from road, rail and aircraft, the site is suitable for residential development provided that recommended design and mitigation measures are incorporated.



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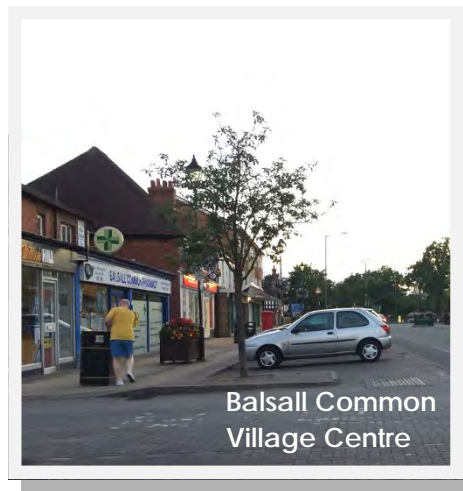
*The assessment results have guided the preparation of the Development Framework for the Grange Farm site, as explained in Section 08.*

### Summary of Opportunities and Constraints

- Site is accessible to shops, facilities and public transport and offers a natural extension to the village
- Several opportunities for vehicular access
- Opportunity to enhance accessibility by walking and cycling
- Access strategy should distribute vehicle trips over a range of access points, with direct access to the strategic highway network.
- Development should reflect its location adjoining countryside and rural approach to the west. Need to respect adjoining properties.
- Existing watercourses and ponds should be retained within greenspace corridors.
- Presence of aqueducts with easements.
- Focus development to the southern and central areas with northern areas left open to reflect landscape character and sensitivity
- Opportunity to create development well connected to village, with new defensible Green Belt boundary to the north.
- Opportunity to enhance "Arden" landscape.
- Presence of wildlife sites and features which should be retained and enhanced, and opportunity for new habitat creation.
- Potential remains of medieval moat at Grange Farm and farmhouse potentially of historic significance.

# 06 Retail and Community Infrastructure

*Bilfinger GVA has assessed social infrastructure to identify existing community facilities in proximity to Grange Farm and to understand what specific community facilities may be required as part of a residential-led development. The results are summarised here.*



## Village Profile

The Parishes of Balsall and Berkswell have a combined population of approximately 9,700, equivalent to 4.7% of the Borough’s population, living within 3,900 households. 92% of the population are “white – English/Welsh/Scottish/Northern Irish/British” (Source 2011 Census).

The Parishes have a higher economic activity rate compared to the Borough, West Midlands and national averages. 30% of workers travel between 10km and 20km to work which indicates that the village and adjoining parishes have high rates of commuting to Birmingham, Solihull, Coventry and Leamington/Warwick (Source: 2011 Census). The presence of Berkswell Railway Station is likely to be attractive to residents working in Birmingham, Solihull, Coventry and even further afield.

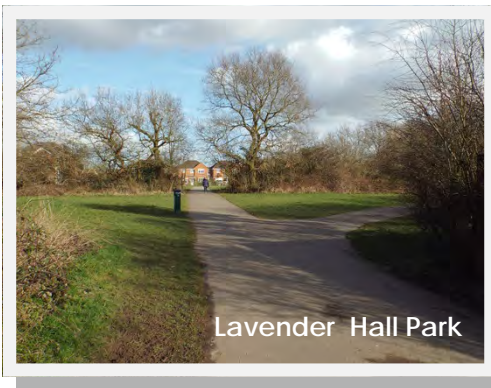
Local primary schools are over capacity although capacity exists within local secondary schools.

The village has a good range of retail and community facilities. These include shops within the village centre and to the north in the form of a Sainsbury’s “Local” store (both within walking distance of the site), public houses, doctors, dentists, places of worship and community halls.

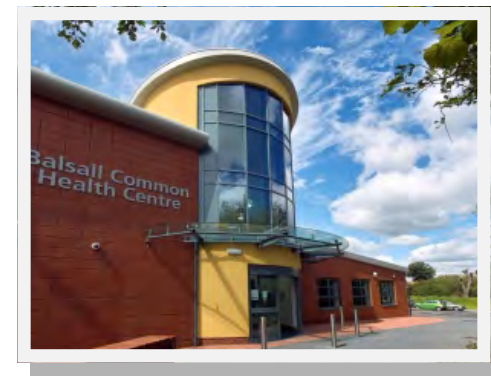
## Potential Requirements

**Education** – The site is located within two miles of three primary schools, all of which are operating at “over-capacity”. The scale of development at Grange Farm would determine the pupil yield but a development of 750-1,000 dwellings is likely to generate a need for a single form of entry primary school. A single form of entry primary school would require approximately 1ha of land.

In terms of secondary education, there is capacity within existing schools so any requirement for additional capacity from the Grange Farm development would be assessed through a future planning application although onsite provision is not appropriate for a development of 750-1,000 dwellings.



**Recreation and Open Space** – Balsall Common includes various areas of recreation, including playing pitches. Lavender Hall Park includes woodland, playing pitches, equipped play and a Local Nature Reserve. SMBC’s guidance would require up to 13ha and 18ha of greenspace for schemes of 750 and 1,000 dwellings respectively, although these figures take no account of the proximity of existing open space in the locality and some typologies could provide “dual” uses. Again, there is sufficient land available at Grange Farm to provide, and actually exceed, these standards.



**Health** – Within five miles of the site are 20 GP practices and all are accepting new patients. The closest facility is Balsall Common Health Centre. This is a modern purpose-built facility including a GP service, dentist, pharmacy and community services. The centre is c.800m from the site’s eastern boundary so is within walking distance although the central and western areas are beyond this so it may be necessary to provide a new health facility on-site – this will need to be explored in more detail with SMBC and health providers. Within five miles of the site are 13 dental practices with Balsall Common dental practice currently accepting new patients.

**Retail** – New residential development at Grange Farm will generate additional retail needs/expenditure and large parts of the site are within walking distance of the village centre and Sainsbury’s Local store. The development will further support these retail facilities but further detailed assessment will be required to assess whether any on-site local retail facilities are justified. The site is “out-of-centre” in planning policy terms so any new retail provision on-site will need to address national planning policy in relation to the sequential test and retail impact assessment criteria.

The potential social infrastructure requirements have been taken into account in preparing Development Framework for Grange Farm.

# 07 Engagement with Stakeholders

## Discussions with SMBC and Balsall Parish Council

*BDW, Gallagher and Bilfinger GVA have met with representatives of SMBC and Balsall Parish Council to discuss the emerging Development Plan documents and to present and discuss the Grange Farm opportunity. Grange Farm was also presented to the local community at the "Site Exhibition" on 20 August 2016.*

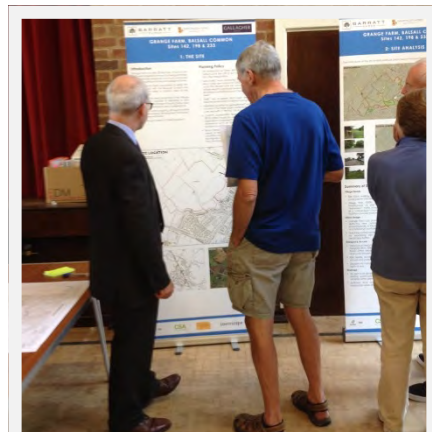
Representatives of BDW, Gallagher and the consultant team have met with representatives of SMBC and Balsall Parish Council to discuss progress with the emerging Development Plan documents and to discuss the Grange Farm site and proposals.

## Site Exhibition

Balsall and Berkswell Parish Councils organised a Site Exhibition on 20 August 2016 to allow developers and landowners to present their sites to the local community. Almost 700 local residents attended the Exhibition and their feedback was reported by the Parish Councils within a Report published on 12 September.

The most important site selection criteria were considered to be protecting the Green Belt; protecting the rural landscape; and protecting the character of the village and its rural setting.

Representatives of BDW, Gallagher and Bilfinger GVA attended the Exhibition to present the emerging proposals to the local community, using roller banners to display the site, the results of the site analysis and the emerging "Development Framework" plan (displayed overleaf).



GRANGE FARM, BALSALL COMMON  
Sites 142, 198 & 233

1: THE SITE

**Introduction**

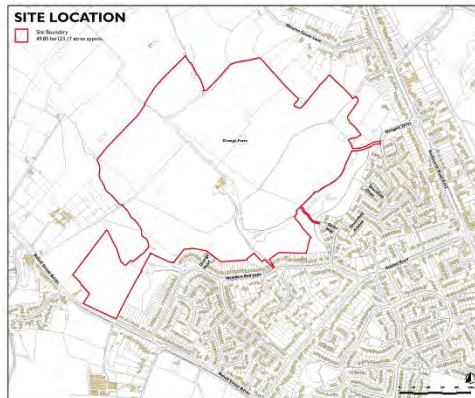
Grange Farm provides 50 hectares of land to the north-west of Balsall Common. It is being promoted as a sustainable residential community by Barratt Homes, David Wilson Homes and Gallagher Estates. Consultants have been appointed to assess the site and consult with the Borough Council and local people, in order to create a vision for this new community.

As the largest site being promoted in the Village Grange Farm is capable of delivering a new community with a range of housing types, local facilities and a substantial area of greenspace. Site assessment work is ongoing, although the initial findings and emerging 'Development Framework' plan are presented today.

We welcome your views on these proposals.

**Planning Policy**

- Site designated as Green Belt in the adopted Solihull Local Plan (2018) but not affected by any other designations.
- Solihull MBC have committed to delivering at least 13,500 new homes (to 2033) through the Local Plan Review and has acknowledged it will also need to contribute towards the housing shortfall across the Birmingham Housing Market Area.
- SMBC has accepted that Green Belt land releases are necessary to deliver housing needs.
- Adopted Local Plan recognises Balsall Common as one of the three largest settlements in the rural area with a "thriving" local centre.
- Council's Sustainability Appraisal (November 2015) states it would be "unwise to dismiss the exploration of expansion of some of the rural settlements such as Knowle and Darnidge, Hampton-in-Arden and Balsall Common."
- Role of Balsall Common in delivering housing needs to be determined through emerging Local Plan over the next 12-18 months. Preferred housing sites will be published in the Draft Local Plan (November 2016).



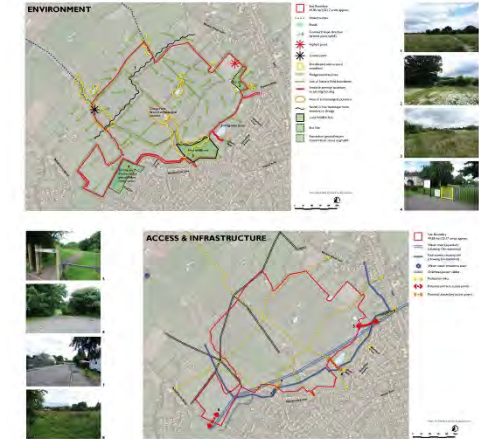
The key points discussed with local residents during the Exhibition specific to Grange Farm were as follows:

- **Highways and Access** – Many residents were concerned about the potential impact on local roads from traffic, especially on Kenilworth Road.
- **Public Rights of Way** – Some residents were concerned that retained PROW would no longer be as attractive as they would pass through areas of new housing.
- **Relationship with Village** – Some residents considered that the site could result in a completely separate community.
- **Greenspace** – Many people were generally positive about the level of proposed greenspace and the buffer between the new and existing housing, although some people argued that the site is already greenfield.
- **Scale and Type of Housing** – Some people expressed concern over the proposed scale of residential development (c.700 dwellings). Many people were interested in the specific type of housing that would be delivered and some residents considered that affordable housing should be reserved for local residents. *(Continued overleaf...)*

GRANGE FARM, BALSALL COMMON  
Sites 142, 198 & 233

2: SITE ANALYSIS

The initial results of the site analysis work are presented on the plans below.



**Summary of Site Analysis**

**Village Needs**

- Site within walking and cycle distance of Local Centre and Health Centre.
- Village Plan (2009) seeks new social infrastructure as part of any housing "expansion", traffic congestion perceived as a "critical issue". Youth and community facilities could be improved.

**Urban Design**

- Grange Farm can provide a high quality distinctive new community, responding sympathetically to the Village, site features and adjoining countryside.
- Adjoining homes/residents to be respected by separating new development with landscape buffers.

**Transport & Access**

- Vehicular access possible from Balsall Street, Dengale Drive, Glabe Way and/or Grange Road. Other opportunities for pedestrian and cycle linkages.
- Site readily accessible to local facilities, schools and public transport.
- Opportunity to protect and enhance public rights of way.

**Drainage**

- No part to be developed at risk of flooding. Existing watercourses and ponds to be retained within greenspace corridors.
- Sufficient land available to deliver a sustainable urban drainage strategy.

**Utilities**

- Appropriate networks available, potentially including High Speed Broadband.
- Development to safeguard existing easements for water main and sewers.

**Landscape & Green Belt**

- No landscape designations within or adjoining the site.
- Opportunity to protect existing landscape features and provide natural green buffer to north.
- Opportunity to concentrate development to south where landscape is less sensitive to change. Northern fields retained as farmland to respect countryside/Green Belt.
- Development would not result in unrestricted sprawl, would not result in towns/villages merging, and will not have a negative impact on any historic towns.

**Nature Conservation**

- No wildlife sites of national importance.
- Two local wildlife sites on site. Predominantly agricultural although woodland, hedgerows and pond habitats at field boundaries with potential to support protected species.
- Opportunities for enhancement of nature including habitat creation to promote new "green corridors" and provide improved connectivity for wildlife.

**Heritage and Archaeology**

- No listed buildings or conservation area within site.
- Potential for archaeological features in the vicinity/setting of Grange Farm.

GRANGE FARM, BALSALL COMMON  
Sites 142, 198 & 233

3: OUR EMERGING PROPOSALS

**The Vision**

Sustainable and attractive new community within Balsall Common, delivered through the emerging Development Plan and responding to community consultation and local needs. The new community will provide a full range of housing types and accessible community facilities (including a new primary school) together with substantial areas of greenspace making use of existing landscape and wildlife features to include nature reserves, green corridors, woodland, parkland, play areas and formal sports pitches.



**Development Framework**

Emerging development principles are shown on the above plan and are summarised below:

- 22 ha of land for **new housing** with capacity for approximately 700 new homes. New housing located where landscape impact less sensitive to change and to provide access to Village facilities.
- Provision of a **new primary** school in a central position.
- A **range of housing** to suit local needs with decreasing housing density as housing moves away from the primary estate road towards areas of countryside and greenspace.
- Approximately half of the site provided as **community greenspace**, in the form of nature reserves, green corridors, woodland, parkland, play areas and formal sports pitches.
- Primary **vehicular access** from Dengate Drive and Balsall Street with potential secondary accesses from Glebe Way and/or Grange Road.
- Protection and enhancement of existing **public rights of way** as part of green corridors alongside new cycleways and footpaths, providing linkages throughout the development and to the adjoining Village and countryside.

**Next Steps**

All feedback received today shall be taken into account in preparing a 'Spatial Vision' document. This document will be presented to the Borough Council and Balsall Parish Council during September 2016.

Thereafter, the development concept shall be promoted through emerging versions of the Solihull Local Plan and Balsall and Benwell Neighbourhood Plan, with a view to securing an allocation in both of these documents.

- **Impact on Local Centre** – Many residents highlighted the current lack of car parking in the village centre and there are regular conflicts with delivery vehicles during peak hour traffic. Some residents considered that there was a lack of suitable retail/ services and facilities in the local centre and requested that some form of retail provision be provided on-site.
- **Community Facilities and Services** – Many residents were positive about a proposed new school at Grange Farm. Some people enquired if this would be in addition to, or a replacement of, the existing school. Some residents considered that the existing health centre is over-subscribed and on-site provision should be made.
- **Noise impacts** – Some residents highlighted potential issues regarding noise impacts from Birmingham Airport traffic.
- **Green Belt Boundary** – Some residents considered that a stronger defensible boundary was required to the north.

BDW and Gallagher are committed to engaging fully with key stakeholders in progressing the development proposals for Grange Farm and further consultations will be undertaken as the proposals evolve.

## 08 The Development Framework

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*This Section presents a Development Framework to provide a visual illustration of how the vision and objectives (inside front cover) could be realised. It also reveals the potential scale and mix of uses which could be accommodated having regard to the constraints and opportunities identified through the technical analysis work.*

*The key principles and parameters underpinning the Development Framework are described in detail and we explain how the design principles from the Village Plan are fulfilled.*

The Development Framework is presented overleaf and provides a potential means of realising the vision for Grange Farm. Grange Farm provides a valuable opportunity to deliver a high-quality and distinctive development that accommodates a significant level of housing to meet Borough and village needs.

A fundamental aspect of the Development Framework has been to fully respect the rural landscape setting and the existing landscape features on-site such as woodland, trees, hedgerows, watercourse/ponds and nature reserves. This has been achieved by providing a substantial amount of community greenspace to adhere with Arden landscape guidelines and which integrates the site with the village on one side and the countryside on the other. A large area of greenspace will be provided on the north-western edge of the site to provide a new defensible Green Belt boundary.

The key principles and parameters, which respond to the opportunities and constraints identified in Section 05 are described overleaf.

It should be recognised that the Development Framework is purely illustrative at this point in time and provides a potential development layout to demonstrate site capacity. It will need to be subjected to further, and more detailed, technical analysis as well as consultation, and it is possible that this work may result in revised proposals.

# Development Framework



-  Site Boundary  
49.85 ha/123.17 acres approx.
-  Indicative primary route & access
-  Indicative secondary routes & access
-  Existing pedestrian links within 'Greenways'
-  Indicative new pedestrian links within 'Greenways'
-  Possible location for a new primary school and community focal point (4.08 ha/10.08 acres)
-  Higher density housing along the main spine route (6.12 ha)
-  Medium density away from the main spine and/or adjacent to existing medium density housing (10.82 ha)
-  Lower density towards the edge (5.38 ha)

Total housing land: 22.32 ha/55.15 acres with potential for approx. 700 dwellings (45% of the area)

Area of land for the potential new school: 4.08 ha/10.08 acres (8% of the area)

Total greenspace, inc. sports pitches, retained trees and hedgerows, new woodland and formal and informal open spaces: 23.45 ha/57.94 acres (47% of the area)





## Design Principles and Parameters

### Access

The principal points of vehicular access are proposed from Dengate Drive to the east and Balsall Street to the south-west, allowing convenient access into the development from the principal village roads and providing linkages to the wider village. At least two points of vehicular access would be required for a development of this scale.

Secondary vehicular accesses could also be provided from Glebe Way and/or Grange Road to serve discrete parts of the new development and to enhance permeability and linkages with the village and strategic road network. At the very least, these would provide cycle and pedestrian linkages into the site.

A central estate road could link the principal and secondary routes, and would be of sufficient width to permit its use as a bus route. The internal road network would provide for an integrated layout in accordance with the "Manual for Streets".

The existing public rights of way would be retained and enhanced as green corridors and would be supplemented with new cycleways and footpaths providing a fully permeable site which links the development to the adjoining village and countryside.

### Layout

The layout has been formulated taking into account the proposed access points and routes, and design constraints identified through the technical analysis work particularly the landscape/visual, ecological, access, drainage and utilities appraisals. In summary:

- New housing has been located in the southern and central areas where the landscape is less sensitive to change and to provide access to facilities within the village. Housing densities are shown as highest in the locations adjacent to the primary estate road and reduce as development moves away from the primary estate road towards areas of countryside and greenspace
- The new primary school / community focus is proposed in a central position adjoining the estate road and an area of greenspace to the north which could be used for playing fields / sports pitches.

## Landscape and Greenspace

The Development Framework illustrates how an appropriate residential-led scheme can be accommodated at Grange Farm which respects existing landscape quality, by focusing development to the southern and central areas with the northern areas left open.

Greenspace would comprise almost half of the site (24ha) providing a valuable and publicly accessible resource for the whole village. The provision of greenspace would adhere to Forest of Arden landscape guidelines including softening the built edge of the village by introducing new tree and woodland planting and conserving and reintroducing historic hedgerows.

Green corridors would permeate the areas of housing including the PROW and incorporating retained hedgerows and woodland. Two large areas of community greenspace could also be provided to the south and north. The area to the south would provide a buffer between the new and existing housing and would provide a significant and continuous green corridor by providing publicly-accessible space which links the existing open space adjoining The Grange with Willow Park and the Balsall Common Woodland and Needlers End Ecosites. The area to the north would provide a new defensible Green Belt boundary in the form of playing fields, informal open space and new woodland to provide a transition with the Arden countryside to the north.



The Development Framework provides an indication of appropriate greenspace typologies but this will need to be further refined through discussions with SMBC and the local community.

## Drainage

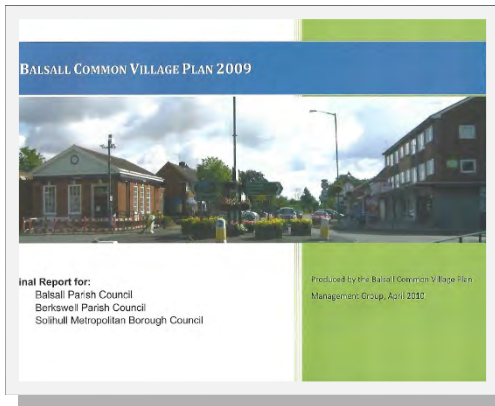
Storm water would discharge to the existing watercourses and the scheme would have a restricted discharge rate equivalent to or less than the calculated "Greenfield runoff rate". Flood water would be contained in designated areas such as attenuation ponds – a pond is indicatively shown on the north-western area where levels are lowest.

## Sustainability & Deliverability

In order to demonstrate that the site is sustainable, a site-specific sustainability appraisal (SA) has been completed (**Appendix 1**) which assesses the site against the Council's own sustainability objectives as contained within the SA Interim Report supporting the emerging Local Plan.

The SA shows an overall site score of +11 and it can therefore be concluded that the site is sustainable and is appropriate for allocation through the emerging Local Plan.

An assessment of the site's "deliverability" is provided in **Appendix 2** (in relation to para. 47 of NPPF). This demonstrates that the site is "available", "suitable" and "achievable" and, therefore, deliverable.



## Compliance with Village Plan Design Principles

We highlight below how the Development Framework complies with the design principles contained within the Village Plan:

- The site will not erode any gaps between neighbouring villages and will deliver a new and robust defensible boundary for the village and Green Belt in the form of Parkland.
- The development will deliver a significant area of community greenspace, particularly on its edges to preserve the rural character.
- The scheme will provide enhanced linkages to the village and countryside with new roads, footpaths and cycleways to enhance permeability.
- The site is readily accessible to the village centre (helping to support it as a viable centre) and existing bus stops.
- The development will reflect established residential densities and will be high quality and locally distinctive, including a landscape scheme which reinforces Arden principles.

## Land-Use Budget

*The Development Framework demonstrates that Grange Farm could accommodate the following scale and mix of development:*

Use	Approx. Land-Take	Approx. Quantum	Details
<b>Residential</b>	22ha	700 dwellings	<p>Residential dwellings would be developed on just under half of the total site area.</p> <p>This scale of development would enable a wide ranging mix of housing to be provided to meet the needs of the Borough and village (market and affordable)</p> <p>Different residential densities would be delivered in different areas but the overall density would be approximately 30 dwellings per hectare net to accord with the established density of the wider village</p>
<b>Primary School and potential community hub</b>	4ha	N/A	<p>Circa 4ha of land has been provided for the development of a new primary school and community focus.</p> <p>A development of this scale would require a primary school with one form of entry, which would require 1ha of land. Sufficient Land exists to provide a larger primary school if needs exceed those generated by the development.</p> <p>This area could accommodate other potential community uses such as local retail facilities, health centre and/or village hall as necessary (the area could easily be enlarged if necessary given the extensive area of greenspace).</p>
<b>Greenspace</b>	24ha	N/A	<p>Approximately half of the site would be provided as community greenspace including retained and newly created nature reserves, green corridors (including retained hedgerows and trees), woodland, parkland, play areas and formal sports pitches. This level of provision will greatly exceed SMBC's greenspace standards</p>
<b>Total</b>	50ha	N/A	

## 09 Conclusions and Next Steps

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*This document has presented a vision for a sustainable community at Grange Farm, Balsall Common.*

*It has been prepared on behalf of Barratt David Wilson Homes and Gallagher Estates Limited who are jointly promoting the site as a deliverable and sustainable residential site allocation, representing a natural extension to Balsall Common.*

### The Site

Grange Farm comprises circa 50ha of agricultural land to the north west of Balsall Common, within the Green Belt.

Balsall Common is one of the Borough's three largest and most sustainable rural settlements, including a railway station, a thriving village centre and a range of community facilities and services.

### Planning Policy Context

A new Development Plan framework is being prepared including the Solihull Local Plan Review and the Balsall and Berkswell Neighbourhood Plan. These documents will assess the need for new housing and will allocate specific sites to meet this need. Solihull MBC has acknowledged that Green Belt land will need to be released to deliver new housing and the view is taken that Balsall Common will be required to accommodate a share of the housing need mindful of its sustainability credentials.

### Technical Assessments and Stakeholder Engagement

A team of consultants have been appointed to assess the site, engage with key stakeholders and identify a sustainable vision for residential community. Technical assessments have been produced in relation to urban design, ecology, landscape, archaeology/heritage, transport, drainage and utilities, noise and social infrastructure.

Consultation has been undertaken by the promoters and their consultant team including meetings with SMBC and Balsall Parish Council and presentation of the emerging proposals at a site exhibition.

The assessments and engagement have helped to develop a vision and "Development Framework" for Grange Farm.

### ***The Vision for Grange Farm***

*A high-quality, attractive and sustainable residential community integrated with, and complementary to, Balsall Common. Grange Farm will be a highly desirable place to live, celebrating existing landscape and wildlife assets to provide a community set within an "Arden" context and benefitting from convenient access to key facilities and transport opportunities.*

## Development Framework

The Development Framework provides a visual illustration of how the vision for Grange Farm could be realised and reveals the potential scale and mix of uses which could be accommodated, having regard to the identified site opportunities and constraints:

The new community at Grange Farm site could include:

- Approximately 700 dwellings (market and affordable)
- A new primary school
- Community uses
- Community greenspace in the form of nature reserves, woodland, parkland, play areas and sports pitches
- Enhanced pedestrian and cycle connectivity to Balsall Common and the wider countryside

It can be concluded that Grange Farm is a sustainable and "deliverable" site which is appropriate for allocation through the emerging Development Plan documents as a natural extension to Balsall Common.

## Next Steps

BDW and Gallagher Estates will use this document, and the related technical assessment reports, in undertaking further engagement with key stakeholders and to inform and support appropriate representations to the emerging Development Plan documents.

Further technical assessments will be undertaken as necessary to further evolve the Development Framework into an Illustrative Masterplan.



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# Appendices

01 Sustainability Appraisal

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02 Assessment against "Deliverability" Criteria

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# 01 Sustainability Appraisal

Objective <sup>1</sup>	Commentary <sup>2</sup>	Score <sup>3</sup>
<b>Sustainable consumption &amp; production</b>		
1	The site is proposed for residential-led development so this objective is of limited relevance. However, the development will provide a high-quality housing scheme which will help to retain and attract well-educated members of the work force.	0
2	As a residential-led development the site will provide opportunities for employment during the construction phase, and will provide a new primary school so will enhance access to education for existing and future residents.	+
3	The site benefits from good access to physical infrastructure and utilities. The site is within walking and cycling distance of Balsall Common village centre, local schools, bus stops, and rail network providing routes to major cities (Birmingham, Manchester and London).	+
4	The site is greenfield but will be delivered to minimise the use of natural resources.	-
<b>Climate change &amp; energy</b>		
5	The site is greenfield but will be delivered to minimise greenhouse gas emissions and energy use. The site development will include a travel plan to reduce car based trips and encourage sustainable methods of transport. Residential travel produces significantly less CO2 in relation to travel than employment development.	0
6	Refer to response to 5.	0
7	A Drainage Appraisal has been undertaken – the majority of the site is Flood Zone 1 and the development will be designed to incorporate a sustainable urban drainage system with a restricted discharge rate equivalent to or less than the calculated greenfield runoff rate.	0
8	The development will be designed to mitigate any impacts relating to urban heating, the effects of high winds and promote behaviour change, particularly in terms of providing a significant amount of community greenspace to encourage health and well-being through exercise.	0
<b>Natural resource protection &amp; environmental enhancement</b>		
9	While the site does not include any nationally significant wildlife sites it does include two local wildlife sites, which will be retained and protected. Greenfield land will be lost but ecological connectivity will be maintained through habitat creation and the provision of green corridors. These areas will also provide opportunities for mitigation in relation to protected species. The use of SUDS will be employed to create new habitat conditions and attenuate storm water run off. Linking the existing ponds into the drainage system will enhance aquatic ecology.	+
10	: A Landscape and Visual Impact Assessment has been produced. Development will be focused on areas of medium and medium to low sensitivity. Development would be focused on areas of medium to low sensitivity and an appropriate residential-led scheme can be accommodated which respects the existing landscape features and would not materially impact on the character of the wider landscape. A robust and defensible boundary to the Green Belt would be provided.	-

<sup>1</sup>The 21 objectives are from the Solihull Metropolitan Borough Council Interim SA Report (November 2015) Table 2.2 Sustainability Appraisal Framework

<sup>2</sup>The Commentary provides detail of the assessment for Grange Farm against the relevant SA Framework objective.

<sup>3</sup>Scoring is based on the Solihull Metropolitan Borough Council Interim SA Report (November 2015) Table 2.4 outlining the seven categories of impact significance



11	The site enhances the provision of green infrastructure through the provision of a significant area of community green space across the site. The site provision will exceed SMBC's minimum green space standards.	+++
12	A geophysical survey and trial trenching will be required to determine the archaeological potential of the site, although the Development Framework plan allows for the potential retention of potential remains around the farmhouse. The site does not include any listed or locally listed buildings or conservation areas. The farmhouse is potentially of historic significance but a historic buildings survey will be required to confirm this. Again, the Development Framework allows for the potential retention of this building. The settings of listed buildings in the vicinity are unlikely to be affected.	0
13	The development will include the loss of greenfield land but will deliver improvements in townscape and enhance local distinctiveness by providing a high quality residential community within a significant area of green infrastructure.	0
14	There will obviously be some impacts from additional lighting and traffic but the construction and operational phases shall be delivered to minimise air, soil, water, light and noise pollution.	-
<b>Sustainable communities</b>		
15	The development will be integrated with the existing village including physical connections and the provision of new community infrastructure (including a new primary school and a significant area of community green space). The development will deliver a mix of housing types and tenures to create a truly mixed and balanced community.	++
16	The development will provide a significant level of market and affordable housing (in a mix of tenures) to meet Borough and local needs.	+++
17	The development will have no impact upon the Borough's regional assets.	0
18	The site is within walking and cycling distance of local services and facilities including public transport. It will provide a significant amount of community green space to encourage health and well-being through exercise and the land available for a primary school will provide a community asset within the site. The layout will encourage interaction between groups and integration with the existing Balsall Common community.	++
19	The site will be designed to follow best practice on designing our crime.	0
20	Refer to response to 19.	0
21	The development is residential-led but will provide appropriate community infrastructure/amenities.	+
<b>Total Score</b>		<b>11</b>

Score	Assessment
+++	Major positive outcome
++	Moderate positive outcome
+	Minor positive outcome

0	Neutral
-	Minor negative outcome
--	Moderate negative outcome
---	Major negative outcome

## 02 Assessment against “Deliverability” Criteria

*This Appendix demonstrates that Grange Farm is “deliverable” in terms of being “available now”, a “suitable location” and “achievable”, in accordance with the National Planning Policy Framework (NPPF).*

### Available Now

Footnote 11 to Para. 47 of the NPPF states that to be considered deliverable, sites should be “available now”. The NPPG (para. 020 Ref ID: 3-020-20140306) adds that a site is considered available “...when on the best information available...there is confidence that there are no legal or ownership problems...”.

The site is under the control of two national housebuilders – BDW and Gallagher – who have a strong interest in developing the site as soon as possible, subject to the land being allocated and following the grant of the necessary planning permissions. There are no legal/ownership problems which would prevent the land from being delivered for residential development (either in whole or in part).

It can, therefore, be concluded that the subject site is “available” now.

### Suitable Location

Footnote 11 to para. 47 of the NPPF states that to be considered deliverable sites should “...offer a suitable location for development now”. The NPPG (para. 019 Ref ID: 3-019-20140306) outlines the factors which should be considered when assessing “suitability”. These factors are considered in the table overleaf. Having regard to this, it is concluded that the subject site is a “suitable” location for development now.

### Achievable

Footnote 11 to para. 47 of the NPPF states that to be considered deliverable, sites should “...be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable”. The NPPG adds that “A site is considered achievable...where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete...the development over a certain period” (para. 021 Ref ID: 3-021-20140306).

In relation to a delivery programme and subject to the site being allocated in the emerging Local Plan, the view is taken that first completions could potentially occur as early as 2018/19 and that c.300 dwellings would be completed by 2020 (the scale of the site would permit two or even three housebuilders to be on-site delivering dwellings simultaneously). If the site were developed to its full capacity (c.700 dwellings) it would be completed in the mid 2020’s.

Clearly, BDW and Gallagher have the capacity to deliver, being national housebuilders. They are fully committed to bringing this site forward as soon as possible and could provide a full range of dwelling types.

## Suitable Location Factors

Factor	Relevance to Subject Site
<b>Green Belt Policy</b>	<p>Site is Green Belt, but it is acknowledged in SMBC's Issues and Options Consultation Paper (para. 44) that the housing requirement is an exceptional circumstance which justifies a Green Belt review. It is likely that significant areas of Green Belt will need to be released given the scale of housing need.</p> <p>It follows that the Green Belt designation should not be viewed as an overriding constraint to development and SMBC's Green Belt Assessment will need to appraise all potential sites against the five key purposes of Green Belt. We would highlight that the subject site provides the most logical area of extension to Balsall Common (rebalancing the built-up area from south to north) and rounding off the built-up area. It would not result in "unrestricted sprawl"; would not result in any towns/villages merging; will encroach into the countryside but this will occur with all greenfield Green Belt releases; will not have a negative impact on the special character of any historic towns; and, whilst it would not recycle derelict urban land this is largely immaterial given that large areas of greenfield sites in the Green Belt are required to satisfy the housing need.</p>
<b>Local Plan Spatial Strategy</b>	<p>Although the adopted Local Plan's Spatial Strategy will need to be reviewed in light of the scale of the housing requirement it is worth noting that Balsall Common is named as one of the three principal settlements in the Borough's rural area to accommodate housing need.</p>
<b>Physical Limitations, Landscape and Environmental/Amenity Impacts</b>	<p>As explained in detail in Section 4, technical assessments have identified site constraints and opportunities and the Development Framework has responded to these to demonstrate that there are no physical or environmental limitations or impacts to prevent a residential-led development of approximately 700 dwellings.</p>
<b>Market Attractiveness</b>	<p>Balsall Common has a strong housing market in relation to demand. The potential scale of development will allow a range of dwelling types and tenures to be delivered.</p>
<b>Regeneration Priority Areas</b>	N/A

In terms of viability, Balsall Common has a strong housing market being a highly desirable place to live. The site is greenfield and will not be subject to any major remediation or preparation costs. Moreover, there are no apparent technical/environmental constraints which will require significant costs to overcome. As such the site is viable.

In summary, the site will deliver a significant number of much-needed dwellings in the short and medium term in a sustainable location, leading national housebuilders are ready to swiftly deliver development and the proposed development is viable. As such, the site is "achievable".



London

Birmingham

Bristol

Cardiff

Dublin

Edinburgh

Glasgow

Leeds

Liverpool

Manchester

Newcastle

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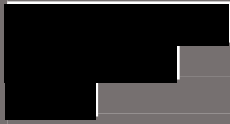
# Appendix II

BDW and Gallagher Estates Ltd  
Representations (February 2017)



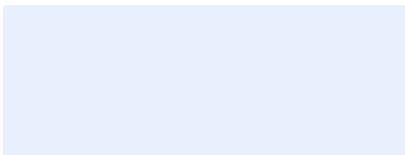
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Report



**Solihull Local Plan Review:  
“Draft Plan” Consultation  
Responses to Consultation Questions**  
Barratt Development Ltd and  
Gallagher Estates Ltd

February 2017



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## Appendices

Appendix I North Warwickshire Borough Council Committee Papers

Appendix II Vision Document

Appendix III NLP "Start to Finish" November 2016



**For and on behalf of GVA Grimley Limited**



# 1. Introduction

- 1.1 GVA (GVA) is instructed by Barratt Developments, (which in the West Midlands is represented by the Barratt West Midlands and Barratt David Wilson Mercia (BDW) and Gallagher Estates Ltd to formally respond to the Solihull Draft Local Plan consultation (November 2016).
- 1.2 BDW and Gallagher Estates have interest in land at Grange Farm, Balsall Common and wish to make representations to the Draft Local Plan. A separate Call for Sites Submission was made in January 2016 and a "Vision for a Sustainable Community" document was subsequently prepared and submitted to the Council. This document was also utilised to support input to the Neighbourhood Plan Site Exhibition, which was held on 20 August 2017 by the Balsall and Berkswell Neighbourhood Development Plan Committee, in order to enable local residents to express views in respect of sites being promoted by developers for proposed strategic allocation within both the emerging Local Plan and Neighbourhood Plans. This document is included as Appendix 2 for ease of reference.
- 1.3 This representation is made in response to the Draft Local Plan and in particular with regard to the "soundness" of the draft policies and allocations set out. The response is made on the basis that the land at Grange Farm, Balsall Common represents a more logical and justifiable opportunity for development, taking into account the known constraints when compared to alternative allocations for residential development considered through the Draft Local Plan.
- 1.4 This Statement is structured to provide a response to a number of the Questions raised within the Council's Consultation Document, but also specifically responds to policies and supporting text throughout the Draft Local Plan.
- 1.5 Separate Consultation Response Forms have also been completed and formally submitted for completeness.
- 1.6 Should any further information be required please contact:

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██████████████████	██████████████████
██████████████████████████████	██████████████████████████████

## 2. Question 1: Do you agree that we've identified the right challenges facing the Borough? If not why not? Are there any additional challenges that should be addressed?

2.1 The following responses are made in respect of Section 3: Challenges;

### Challenge B- Meeting housing needs across the Borough, including the Borough's own needs and where possible assisting with accommodation the Housing Market Area (HMA) wide shortfall

2.2 Challenge B identifies the need for the Council to meet the Full Objectively Assessed Housing Need (FOAN) and accommodating some of the needs of the HMA shortfall.

2.3 The Council sets its objective of ensuring that provision for an "appropriate proportion" of the HMA shortfall is made within the Borough, whilst maintaining the other objectives of the plan with regard to achieving sustainable development.

2.4 Fulfilling the Duty to Cooperate will require the Borough Council to reach agreement with the other authorities throughout the HMA on how it can assist, in accommodating an appropriate portion of the unmet housing needs from across the HMA (as identified in the SHNS).

2.5 It is understood that the Spatial Plan for Growth (SPG) will comprise the vehicle to deliver this agreement, but it is unclear how this will be achieved in practice, bearing in mind that the SPG is in the hands of the GBSLEP and that it will be the responsibility of the relevant authorities to reach formal agreement on distribution of the unmet needs.

2.6 Whilst the Council has proposed to accommodate a further 2000 dwellings of the HMA shortfall beyond its own FOAN, there is no agreement between the other HMA authorities to demonstrate cooperation or any agreement to a distribution of the shortfall. The lack of such agreement is highlighted by the emerging response of North Warwickshire Borough Council included at **Appendix II** and which expresses concern that the Borough should accommodate a greater proportion of wider HMA growth.

2.7 In the absence of such effective collaboration, the Draft Local Plan is unsound and would potentially fail to ensure that the wider HMA housing requirement is met. The Plan would not

satisfy the Duty to Co-operate under paragraph 178 of the NPPF and would therefore not be “positively prepared” in accordance with the requirements of paragraph 182 .

## Objectives

- 2.8 We are also concerned about the lack of clarity over the mechanism to agree how the unmet HMA housing needs are going to be distributed and delivered. Any such agreement should be open to public scrutiny and should be based upon a clear evidential basis.
- 2.9 Within the GBSLEP Strategic Housing Needs Study Stage 3 (SHNS) report it is concluded (para 2.45) that *“Of these ‘missing dwellings’, most should be within easy reach of Birmingham and to a lesser extent Solihull. This is where the largest imbalances between need and supply are found”*.
- 2.10 As such, the SHNS provides a clear steer towards Solihull accommodating a significant portion of the HMA Shortfall, bearing in mind that Birmingham itself is unable to meet its own needs (as tested through Examination).
- 2.11 There are a number of compelling reasons why Solihull is well placed to accommodate a significant part of the HMA shortfall:
- **Economic Growth** – the SHNS identifies the Borough as having the greatest rate of projected job growth of all the authorities within the HMA (25%) (Table 7.1 from Stage 3 Report). Furthermore, HS2 would provide a spur to economic growth which is recognised in the SHNS as “supergrowth” in respect of the UK Central initiative (see paras. 7.16 – 7.19 of Stage 3 Report).
  - **Public Transport Links** – Solihull has strong public transport linkages with Birmingham which accounts for the greatest part of the HMA deficit and is where the SHNS suggests most of the missing dwellings should be within easy reach. The SHNS indicates that 8,345ha of land is available within the Borough within 3.75km of railway stations which is not affected by “absolute” constraints, which indicates that significant sustainable land is available if the Green Belt is reviewed.
  - **Lack of “Absolute Constraints”** – Although the Borough is heavily constrained by Green Belt, this is a policy constraint which can be reviewed.
  - **An attractive and aspirational housing market** – the Borough is one of the most attractive and aspirational places to live in the HMA. This is reflected in average house prices (third highest authority in HMA), affordability ratios (third worst in HMA) and low vacancy rates (1%- lowest in HMA).

- 2.12 As set out throughout our responses, there are strong grounds to suggest that Solihull Borough is well placed to deliver a significant portion of the unmet needs and this should be provided for through the Local Plan Review. It is critically important to the social and economic interest of the GBSLEP area that the HMA authorities provide a clear strategy and programme for joint working to effectively agree ("resulting in a final position", para. 181 of the NPPF) the distribution of unmet housing needs across the HMA.
- 2.13 Unless this is achieved it is highly likely that the Draft Local Plan will be found unsound and the Duty to Cooperate will not be met. Procrastination on this issue will delay the preparation of other Local Plans resulting in housing needs being unmet which will have significant adverse impacts across the HMA and risks stifling economic growth.

Action required to ensure "soundness"

- 2.14 The Council should amend the text under Challenge B second bullet to give greater certainty of approach with regard to the need to satisfy the "duty to co-operate" test with the other HMA authorities to;

*"To satisfy the Duty to Cooperate test set out in the NPPF which will be achieved through accommodating an appropriate proportion of the HMA wide housing shortfall, in a manner which satisfies the principles of sustainable development."*

- 2.15 The second bullet point under Objectives should be amended to;

*"To ensure that provision is made for an appropriate provision of HMA shortfall in new housing land. This will be delivered based upon achieving formal agreement with the HMA authorities and based upon unique position of the Borough to assist in delivering new homes and economic growth as recommended in the GBSLEP SHNS."*

## Challenge D- Securing sustainable economic growth

- 2.16 Challenge D identifies under Key Economic Assets (fourth bullet) the potential impact of congestion arising from additional growth/housing upon Solihull's important regional and sub-regional role.
- 2.17 We are concerned that the Council's stated objectives do not reflect the important role that Solihull can deliver in terms of managing the threat of congestion on the road/ rail networks that would be caused through its failure to accommodate an appropriate level of housing growth upon the wider HMA as a result of unnecessary inward commuting to the Borough.
- 2.18 As a result, the text under challenge D would fail to result in a Draft Local Plan that is "*positively prepared*" or consistent with achieving sustainable development.

Action required to ensure "soundness"

- 2.19 The objectives under Challenge D should be amended with a new bullet to state;

*"Maximise the opportunity for reducing congestion on motorways, the strategic rail network and rail through delivery of an appropriate level of new housing to meet the shortfall across the HMA within the Borough, where this can be achieved to deliver sustainable development."*

## **Challenge E- Protecting key gaps between urban areas and settlement**

- 2.20 Challenge E seeks to ensure that in meeting housing needs for Solihull and the wider HMA, that the integrity of the Green Belt and rural setting of the Borough is maintained.
- 2.21 The objectives underpinning the challenge fail to reflect the nature of technical assessments undertaken to provide justification for site release to ensure that environmental protection is achieved.
- 2.22 As a result, Challenge E of the Draft Local Plan does not set out to ensure that it is "justified" in accordance with the NPPF and that it is therefore, based upon the most appropriate strategy and a proportionate evidence base.

Action required to ensure "soundness"

- 2.23 The objective should be amended to state;

*"Justification for the release of land from the Green Belt to meet the need to new development should be focused on those sites which perform least well against the functions of Green Belt and outcomes from the Borough's Green Belt Assessment."*

### 3. Question 2: Do you agree with the Borough Vision we have set out? If not why not and what alternative would you suggest?

- 3.1 The Borough's Vision sets out a policy position to acknowledge its role in meeting the needs of the wider housing market area which is welcomed.
- 3.2 The statement at paragraph 83 however, fails to define how justification will be made to determine which sites should be released from the Green Belt to deliver *"sustainable extensions to those settlements that are highly sustainable"*.
- 3.3 Paragraph 86 acknowledges the need for significant new development to be provided on the edge of Balsall Common, to contribute to meeting the Borough's housing need, however the statement does not provide a mechanism or criteria for guiding site selection, with reference to the stated vision set out at paragraph 83 to *"Borough will have continued to protect the best of the Green Belt"*.
- 3.4 The statement should provide a link back to the Draft Local Plan evidence base to ensure that the consideration of alternative sites is based upon an objective assessment.
- 3.5 As a result, the vision for the Draft Local Plan does not set out to ensure that it is *"justified"* in accordance with the NPPF and that it is therefore, based upon the most appropriate strategy and a proportionate evidence base.

#### Action required to ensure "soundness"

- 3.6 Paragraph 83 should be amended to state;
- "The Borough will have continued to protect the best of the Green Belt, whilst sustainable extensions to those settlements that are highly accessible or have a wide range of services, based upon the evidence set out through the Borough's Green Belt Assessment and Sustainability Appraisal will provide for the needs of the Borough and proportionate needs of the wider HMA, as agreed through the Duty to Cooperate. "*
- 3.7 Paragraph 84 should be amended to include;
- "A mix of market and affordable housing will have been provided in Balsall Common, with significant new development on the edge of the settlement, achieved through the careful selection of sites to ensure that the best of the Green Belt is retained, based upon evidence set out in the Borough's Green Belt Assessment."*

## 4. Question 3: Do you agree with the spatial strategy we have set out? If not why not and what alternative would you suggest?

- 4.1 Paragraph 100 of the Draft Local Plan sets out the Council's approach regarding where development should be located and identifies that focusing on larger sustainable urban extensions provides the best opportunity for delivering significant infrastructure improvements. Paragraph 101 goes on to set out that the release of Greenbelt land should be guided through proximity to a highly accessible settlement.
- 4.2 BDW and Gallagher Estates Ltd welcome the approach within the Draft Local Plan and agree that development should be focused where it is most accessible and to maximise the objective of ensuring that new development delivers the infrastructure needed to support new development.
- 4.3 The Draft Local Plan does not however, go further in defining how the Council proposes to assess alternative locations for development, in order to determine the most appropriate location adjacent to those settlements where development is proposed.
- 4.4 In this respect, BDW and Gallagher Estates Ltd are concerned that in the absence of the application of such criteria, that the Draft Local Plan risks being found unsound, on the basis that it is not likely to be based upon an objective assessment of alternative options for growth. In order to ensure that the plan is justified, paragraph 101 should be amended to ensure that sites are identified based upon consideration of the evidence contained within the Borough's Green Belt Assessment, SHELA and Landscape Character Assessment.

### Spatial Distribution

- 4.5 At paragraph 107, the Draft Local Plan sets out the process that the Council have followed in assessing broad Options for Growth and Development. This builds on the broad options considered through the Scope, Issues and Options consultation undertaken in 2015.
- 4.6 It is explained that that the Plan has distinguished between sites to be released under Growth Options A-D and E-G. In effect, a higher order test has been applied to the sites under E-G than for other areas in the Borough. Whilst this may have a certain logic in respect of land within the existing urban area and brownfield land, it is considered that where this relates to the release of greenfield and Green Belt land, that the approach that has been followed is inconsistent, in that it has not justified based upon consideration or alternatives given available evidence.

- 
- 4.7 This is particularly the case when considering Option A in relation to High Frequency Public Transport Corridors, which offer opportunity for the release of land to achieve sustainable development.
- 4.8 Paragraph 107 should be re-worded to ensure equal consideration of alternative development options given the available evidence. This is important given the acknowledgement that larger sites will take longer to come forward, which may consequently mean that additional land or reserve sites are needed in the event of a failure in the delivery trajectory.
- 4.9 Additionally, paragraph 107 refers to the "Reviewing the Options for Growth and Site Selection Topic Paper" which explains that through consideration of the evidence base, including the Green Belt Assessment, that it has been identified where development should/ should not be located.
- 4.10 At paragraph 108, based upon the Council's analysis of evidence, the Draft Local Plan identifies locations for growth and these are broadly shown on the spatial strategy diagram under paragraph 109.
- 4.11 These broad locations are subsequently included as defined site allocations under Policy P5 and at Appendix C.
- 4.12 BDW and Gallagher Estates Ltd strongly object to the inclusion of the locations for growth based upon available evidence within the Green Belt Review, SHELA, Landscape Character Assessment and subsequent "Reviewing the Options" paper.
- 4.13 It is considered that the identified locations for growth are not justified when considered against the reasonable alternatives or supporting evidence.
- 4.14 Additionally, the Draft Local Plan and supporting evidence base do not include any form of collective comparative analysis, where competing sites are assessed against the evidence base. Rather the Topic Paper includes a very limited broad explanation of the Council's thoughts.
- 4.15 The site selection process should be based upon detailed analysis of each of the competing sites to ensure that the process of site selection is transparent and to ensure that the Draft Local Plan is based upon a reasonable consideration of the alternative competing sites and is therefore justified.
- 4.16 Rather than repeating detailed evidence, the full reasons and concerns relating to each location for growth/ proposed allocation are set out fully in our response to Policy P5.



- 4.17 Notwithstanding the above points, it is also clear based upon the demographic analysis undertaken by Pegasus (see separate representations on behalf of BDW), that the plan has made insufficient provision for the delivery of new homes to meet the actual Full Objectively Assessed Need (FOAN) or an appropriate proportion of housing to accommodate needs of the wider HMA.

### Delivery Trajectory

- 4.18 Whilst we are in general agreement with the "Guiding Principles Generally in Support" at paragraph 104 of the Spatial Strategy, which identifies that the document should aim to *"boost significantly the supply of housing"* in accordance with paragraph 47 of the NPPF. This should be achieved through the identification of a supply of specific deliverable sites, to provide for housing for the first five years of the plan period, and for years 6-10 and 10-15.
- 4.19 It is acknowledged by the Council in the third bullet of paragraph 104, that larger sites often have a longer time frame for delivery; however there is no provision within the guiding principles to ensure that this does not act as a brake to development, such that delivery may be assured throughout the plan period.
- 4.20 The recent report by NLP *"Start to Finish: How Quickly do Large Scale Housing Sites Deliver"* November 2016 (**Appendix 4**) has assessed 70 sites nationally in order to understand timelines and risks associated with housing delivery from large sites.
- 4.21 Whilst there is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. It is important to understand however, that given the complexity of large sites and need for delivery of infrastructure, coupled with the need to progress often complex planning applications; large sites often take longer to deliver.
- 4.22 The report sets out that on average delivery from large sites takes around 3.9 years from identification to submission of an initial planning application, which clearly suggests that large sites will only make a limited contribution to delivery within the first five years of a plan period, from allocation within the Draft Local Plan.
- 4.23 The need to achieve a deliverable trajectory across the early years of the plan period therefore, will be a critical element of determining the soundness of the Draft Local Plan.
- 4.24 To this end, it is important to ensure that sufficient land is released, to ensure that the slow delivery of larger sites is compensated for or to install a review mechanism to require a future interim Local Plan Review in the event that the future failure of delivery.

- 4.25 This is likely to need the release of a greater number of sites to ensure that the potential for delay can be factored in and to ensure that delivery can be assured throughout the plan period, including the early years.
- 4.26 At the very least, given the acknowledged risks, it would seem appropriate for the Council to identify reserve sites/ safeguarded land that is removed from the Green Belt, through the current Local Plan review, which could be brought forward in such circumstances or to meet future identified need for the release of land for housing.
- 4.27 Failure to manage these identified risks questions the soundness of the Plan in terms of its effectiveness and ability to ensure that the plan is able to achieve delivery across the plan period.
- 4.28 The importance of ensuring housing delivery is also acknowledged in the Housing White Paper '*Building homes faster*', which includes a proposal that will see a new housing delivery test to ensure that local authorities and wider interests are held accountable for their role in ensuring that new homes are delivered in their area.
- 4.29 The test will highlight whether the number of homes being built is below target and provide a mechanism for establishing the reasons why. Where necessary, the test will "trigger" policy responses that aim to ensure that further land comes forward.
- 4.30 Where under-delivery is identified, the Government proposes a tiered approach to addressing the situation that would be set out in national policy and guidance, starting with an analysis of the causes so that appropriate action can be taken.
- 4.31 Ultimately, dependent upon the scale of under delivery against the Local Plan, the Government's proposals would require measures to be put in place to identify additional land and ultimately to allow "*the presumption in favour of sustainable development*" to apply to proposals from 2020, where the plan is unable to deliver at least 65% of its annual target.
- 4.32 There is a very real risk to the Local Plan therefore, if it places too heavy reliance upon large scale sites, which are subsequently delayed or take longer to deliver.
- 4.33 The absence of a Delivery Trajectory is particularly concerning and further highlights risk that the Draft Local Plan may be unable to ensure that housing is delivered throughout the plan period, in a manner which ensures a rolling five year supply of land for housing.
- 4.34 It may therefore, be to the Council's advantage to identify additional sites for development or to identify reserve/ safeguarded sites to enable it to take a realistic view with regard to delivery.

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## Neighbourhood Planning Process

- 4.35 Additionally, it is noted that several Parish Councils are in the process of preparing Neighbourhood Plans, which will express local views regarding the right location to deliver the strategic needs of the Borough identified through the Draft Local Plan.
- 4.36 Given that this process is advanced in the context of Balsall Common, it is somewhat surprising that the Council have sought to impose a preferred location for development in conflict with the Neighbourhood Planning process.
- 4.37 In this respect, the NPPF is quite clear at paragraph 184, that whilst Neighbourhood Plans should not promote less development than set out in the Local Plan and must be in general conformity with the strategic policies, that the Neighbourhood Plan, once in place will take precedence over the not strategic policies of the Local Plan.
- 4.38 Whilst it is therefore, reasonable for the Draft Local Plan to define appropriate strategic levels of growth for each settlement, it would seem premature where the Neighbourhood Plan process is well advanced for the Local Plan to impose specific sites upon a locality.
- 4.39 On this basis therefore, it is suggested that the Draft Local Plan would be out of line with the thrust of national policy contained within the NPPF.
- 4.40 Paragraph 108 should be amended to enable the Neighbourhood Planning process to identify the specific location of development in each of the settlements where a Neighbourhood Plan is in the process of preparation, albeit acknowledging that this will need to be guided by the Local Plan evidence base (Green Belt Review/ Landscape Character Assessment/ SHELAA) and specific quantum of development.

## Actions required to achieve soundness

- 4.41 In order to ensure that it is sound the "Guiding Principles should be amended to include an additional bullets as follows:
- Identify sufficient land to ensure continuous delivery of housing throughout the plan period, taking into account the risk associated with slower delivery from larger sites and
  - Provision of reserve sites/ white land removed from the Green Belt now to ensure that in the event of disrupted delivery for a consistent period of at least two years that a partial review of the Plan can be undertaken to include release of all/some of the reserve sites to remedy the plan deficiency.

- 
- 4.42 The Draft Local Plan should also be supported by a **Delivery Trajectory** to demonstrate how land is anticipated to be delivered, based upon realistic and evidenced assumptions with regard to the delivery potential for each allocated and committed site.
- 4.43 Paragraph 107 should be re-worded to ensure equal consideration of alternative development options given the available evidence.
- 4.44 Paragraph 108 should be amended to enable the Neighbourhood Planning process to identify the specific location of development as follows;
- 4.45 The locations where growth should be focused and land released from the Green Belt are as follows;
- **Growth Option F** – Limited expansion of rural villages/settlement
    - Land south and south east of Balsall Common
  - **Growth Option G** – Significant expansion of rural villages/settlement
    - Land at Dickens Heath
    - Land at Knowle/Dorridge
    - Land at Balsall Common
- 4.46 In each of these settlements, the Council anticipate that the Neighbourhood Plan will identify specific sites for release to meet the strategic targets identified in the Local Plan, based upon assessment of the evidential base supporting the Draft Local Plan or other information that may become available.”

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## 5. Question 11/12: Do you agree with Policy 4? If not why not and what alternative would you suggest? Do you agree with the level of affordable housing being sought in Policy 4? If not why not and what alternative would you suggest?

- 5.1 Policy P4 seeks the provision of 50% affordable housing on sites of 11 dwellings or more/ 1000sq m. Affordable housing is defined as social rented, affordable rented, intermediate tenure and starter homes all of which should be available at costs that are affordable to households whose needs are not met in the open market.
- 5.2 The level of affordable housing is justified on the basis that the Council has a high level of unmet housing need, as set out in the Strategic Housing Market Assessment (SHMA) Strategic Housing Market Assessment) Objectively Assessed Need for Affordable Housing.
- 5.3 The supporting text explains that the policy target is set at 50% on the basis that this will include 20% Starter Homes, with the remaining 30% split between rent(22%) and shared ownership (8%). The supporting text at paragraph 193 explains that the Council anticipate that the greater values derived from delivery of starter homes will be able to support this approach, *"but further evidence will be pursued to justify this."*
- 5.4 In this respect, the level of affordable housing sought through Policy P4 assumes that Starter Homes should be over and above provision of other tenures of affordable housing. BDW and Gallagher Estates Ltd are unable to support this position in principle for the following reasons.
- 5.5 The Strategic Housing Market Assessment (SHMA) Strategic Housing Market Assessment) Objectively Assessed Need for Affordable Housing advises at 7.1-7.3 that;

*"On completion of the calculation of the need for affordable housing, the PPG says, at Reference ID: 2a-029-20140306:*

*The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes. It is clear*

*that a Planning Authority should consider whether or not the housing target in the Local Plan should be increased to assist with meeting the need for affordable housing.*

*The total annual affordable housing need in Solihull of 210 households per year (as calculated in Chapter 5, Table 5.10) represents 28.7% of the annual projected household growth in the Borough between 2014 and 2033 (732 households per year as identified within the full OAN calculations<sup>14</sup>). This proportion of new housing as affordable appears achievable to deliver in Solihull.*

*It is clear that the Council can be confident that the affordable housing requirement can be met by the OAN identified and no adjustment is required to this figure. The figure of 28.7% is similar to the proportion of new affordable housing required within the LTBHM model, 26.9% as indicated in Table 4.3, providing further evidence that the assumptions reflect the realities of the current housing market locally."*

5.6 The actual need for affordable housing to meet needs arising in the Borough over the plan period is therefore, around 28.7% and not the 50% included under Policy P4.

5.7 Additionally, the Housing and Planning Act 2016 amends the definition of "affordable housing" with regards to planning obligations under the Town and Country Planning Act 1990 (as amended) to include starter homes (as defined in Part 1 of the Act).

*"159. Planning obligations and affordable housing.*

*(1)After section 106ZA of the Town and Country Planning Act 1990 (inserted by section 158 above) insert—*

*106ZB Enforceability of planning obligations regarding affordable housing*

*(4) In this section "affordable housing" means new dwellings in England that—*

*(a) are to be made available for people whose needs are not adequately served by the commercial housing market, or*

*(b) are starter homes within the meaning of Chapter 1 of Part 1 of the Housing and Planning Act 2016 (see section 2 of that Act)."*

5.8 To date Government guidance has not been updated in the NPPF and the existing definition of affordable housing continues to apply. Notwithstanding, it is clearly the Governments' intention to do so and therefore, the provision of Starter Homes will be included in the national policy definition of affordable housing in due course.

- 5.9 The Draft Local Plan is seeking to apply the provision of Starter Homes as additional to identified need for affordable housing. In effect this is double counting, given that some of the need identified through the SHMA will be met by the delivery of Starter Homes.
- 5.10 On this basis, Policy P4 as drafted would not be sound and would not be either “positively prepared” to meet the identified need for affordable housing or justified, based upon evidence from the SHMA. Additionally, the policy would not be consistent with national policy.
- 5.11 The Policy text should be amended to accord with the national policy definition and that set out in Section 159 of the Act

## Viability

- 5.12 Whilst it is noted that Policy P4 includes provision for an off-site financial contribution where on site delivery is not viable or feasible, this ignores the fact that it may not be viable to secure delivery of affordable housing in particular circumstances or a financial contribution.
- 5.13 In fact, it remains that there is no evidence to test delivery of affordable housing across a range of site/development scenarios.
- 5.14 Paragraph 173 of the NPPF is clear that, *“Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened”*
- 5.15 The need for effective assessment of the impact of such obligation is set out at paragraph 174, which advises that;
- “They should assess the likely cumulative impact on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk”*
- 5.16 In the absence of any such assessment of viability and deliverability, BDW and Gallagher Estates Ltd are concerned that Policy P4 is unduly onerous and would place an undue burden on new development, that would threaten the ability for developers to be able to bring sites forward.
- 5.17 As such Policy P4 would also fail the test of soundness on the basis of non-compliance with national policy.

- 5.18 The impact of such a significant requirement for the delivery of affordable housing, coupled with need for new education and community facilities, open space and physical drainage and utility infrastructure, as well as investment in highways and accessibility will threaten deliverability.
- 5.19 This is almost certainly likely to be the case in respect of larger greenfield schemes which will need to deliver significant levels of new infrastructure early through the development process.
- 5.20 The real issue is how to deliver more housing, including affordable across the market. This can only be achieved by significantly increasing the supply of new homes, which in turn will require a very substantial increase in the amount of land coming through the planning system for residential development.

### **Actions required to achieve soundness**

- 5.21 Policy P4 should be amended to set the requirement for affordable housing to be 29% to meet the identified needs set out in the SHMA. The policy text should be amended to;

*“Contributions will be expected to be made in the form of 29% affordable dwelling units on each development site, but will take account: (policy text continues)”.*

- 5.22 The policy should also specifically define affordable housing to include Starter Homes or defer to the national definition given the evolving position in this respect. The policy text should be amended to;

*“Affordable housing includes social rented, affordable rented, intermediate tenure or starter homes”*

- 5.23 Additionally the policy text should be amended from;

*“Where on site provision is not feasible or viable there will be a financial contribution towards the provision of affordable housing that would not otherwise be provided within the Borough”*

*to*

*“The requirement for the provision of affordable housing is subject to viability. Where it is not viable to secure delivery of affordable housing through development, planning applications should be supported by a Viability Assessment to demonstrate as such.”*



## 6. Question 15: Do you believe we are planning to build new homes in the right locations? If not why not and which locations do you believe shouldn't be included? Are there any other locations that you think should be included?

6.1 Barratt David Wilson Ltd and Gallagher Estates Ltd welcome the Council's acknowledgement that land must be released from the Green Belt, in order to accommodate the required level of new homes to meet housing need across the Borough and to accommodate a proportionate level of growth to meet the wider HMA shortfall.

6.2 Concern exists however that;

- The current allocations proposed in Balsall Common identified in the Local Plan Review are not the most sustainable options, when assessed against the Council's evidence base;
- Insufficient land is proposed for new housing development to meet the actual FOAN based on the analysis undertaken by Pegasus (see separate representations on behalf of BDW in response to question 14).

6.3 BDW and Gallagher Estates Ltd therefore, strongly object to the Summary Table of Allocated Sites at paragraph 223 of the Draft Local Plan and in particular, inclusion of several of the proposed site allocations ahead of land under their control at Grange Farm, Balsall Common including:

- Barratt's Farm (Proposed Housing Allocation 1);
- Frog Lane (Proposed Housing Allocation 2);
- Windmill Lane/Kenilworth Road (Proposed Housing Allocation 3);

6.4 Concern is centred on the outcomes from the Council's evidence base and the findings of the Housing Topic Paper, upon which the proposed site allocations are based. The findings are based upon three principal assessments including;

- Solihull Strategic Green Belt Assessment, July 2016;
- Solihull Local Plan Review Interim Sustainability Appraisal Report, January 2017 and
- Solihull Borough Landscape Character Assessment, December 2016.

- 
- 6.5 Notwithstanding, given the likely need for a significant increase in the level of housing to be provided based upon the full objectively assessed need for the Borough, the land at Grange Farm represents an appropriate location, based upon the outcome of evidence to accommodate additional growth.
- 6.6 BDW and Gallagher Estates are also concerned that the land at Arden Cross/ HS2 Hub will not deliver the level of houses proposed within the plan period, given the likely date of commencement and taking into account the high levels of physical infrastructure that will be needed to facilitate development and associated lead in times for delivery.
- 6.7 On the basis of the Council's assessment of its evidence base, concern exists that the plan will fail to be based upon a credible assessment of alternatives and would therefore be unsound.
- 6.8 BDW and Gallagher estates are concerned that the scoring of identified sites through the Council's evidence base documents is flawed in several areas and that this has resulted in an inaccurate position against which site selection has taken place.
- 6.9 It is considered that the land at Grange Farm, Balsall Common and proposals set out in the Vision Document at Appendix 3, represents a viable and deliverable alternative, which would be better placed to deliver growth and achieve sustainable green belt release, without resulting in significant harm to the principals underpinning the Green Belt, which BDW/Gallagher Estates consider would be the case with several of the proposed allocation set out through the Draft Local Plan.
- 6.10 The findings in respect of each site are reviewed against the land at Grange Farm, Balsall Common across each of the three main evidence base documents below;

### **Solihull Strategic Green Belt Assessment, July 2016**

- 6.11 The core purpose of the Strategic Green Belt Assessment is to assess the extent to which the land currently designated as Green Belt within Solihull Metropolitan Borough Council (SMBC), fulfils the essential characteristics and purposes of Green Belt land as set out in Paragraphs 79 and 80 of the National Planning Policy Framework (NPPF).
- 6.12 A methodology has been adopted for the Strategic Green Belt Assessment whereby two distinct categories of land have been defined and analysed, namely Refined Parcels and Broad Areas. Refined Parcels either adjoin or are positioned adjacent to built up areas, whilst Broad Areas comprise the wider rural area which is not located on the edge of built up areas.
- 6.13 Each Refined Parcel and Broad Area has been subject to a test against four of the five purposes of the Green Belt and assigned a score demonstrating the extent to which it performs against each purpose:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging in to one another;
3. To assist in safeguarding the countryside from encroachment; and
4. To preserve the setting and special character of historic towns.

6.14 The following scores have been given to each site:

Score	Assessment
0	Refined Parcel/Broad Area does not perform against the purpose
1	Refined Parcel/Broad Area is lower performing against the purpose
2	Refined Parcel/Broad Area is more moderately performing against the purpose
3	Refined Parcel/Broad Area is higher performing against the purpose

6.15 The basis of the assessment has been carried out using an entirely 'policy off' approach. Therefore consideration of other constraints, policies, strategies or the development potential of any of the Green Belt land to which the assessment relates, has not been included in the scope of the assessment.

## Grange Farm, Balsall Common

6.16 BDW and Gallagher Estates are concerned that land at Grange Farm (RP51) has been incorrectly assessed in relation to Purpose 1 and Purpose 3 of this Strategic Green Belt Assessment.

6.17 Firstly the site at Grange Farm (illustrated in the Vision Document at Appendix 3) consists of only approximately half of Refined Parcel 51 and involves only the land adjacent to the existing built-up area of Balsall Common. Refined Parcel 51 includes land much further from the settlement edge and therefore, direct comparison with other Refined Parcel areas around the settlement site creates a flawed position.

6.18 We note smaller refined parcels surrounding Balsall Common are assessed as part of this Green Belt Assessment and that RP51 is the largest parcel. It is logical that the larger the refined parcel and the more removed parts of the refined parcel are from the existing built up area, the more likely the site will be higher performing against these Green Belt Purposes.

6.19 A more balanced assessment would be to assess the smaller area of Grange Farm, i.e. of a similar size area to the other refined parcels surrounding Balsall Common (i.e. RP52 to RP61) to allow for a more comparative assessment to be undertaken.

- 6.20 It is particularly frustrating that the larger parcel has been assessed, when the Grange Farm proposals have been widely discussed with officers and given that the Vision Document (included as Appendix 3), has previously been submitted to the Council. On the basis that the Council were aware of the proposals and extent of land available, BDW and Gallagher Estates consider that the refined parcel assessment should have been considered against a much tighter area based upon the land being promoted at Grange Farm.
- 6.21 In this respect, the land at Grange Farm scores '2' when assessed against Purpose 1 (To check unrestricted sprawl of large built-up areas). We believe that if considered alone and in isolation to the larger RP51 parcel, a more appropriate score for the BDW and Gallagher site would be '1' (parcel is lower performing). This is because the land at Grange Farm includes development that is already present immediately to the south and to the east of the site. In addition, ribbon development is already evident along Kenilworth Road. The site is therefore contained on three sides and as illustrated in the Vision Document offer potential for rounding off the settlement edge.
- 6.22 In respect to Purpose 3 (To assist in safeguarding the countryside from encroachment), we again believe that in isolation land at Grange Farm has been incorrectly scored against this Green Belt Purpose. As mentioned above, land at Grange Farm includes development that is already present immediately to the south and to the east of the site, with ribbon development along Kenilworth Road. As such, a more appropriate score would be '2' i.e. refined parcel is generally characterised by countryside and has limited development present.
- 6.23 In light of our comments above, we therefore consider a more appropriate score for land at Grange Farm is summarised below:

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Land at Grange Farm (SMBC Score)	RP 51	2	2	3	0	7	3
Land at Grange Farm (GVA Score)	RP 51	1	2	3	0	6	3

- 6.24 In light of this scoring, we consider that the land at Grange Farm is well placed to deliver additional growth to meet the needs for the release of land to meet housing growth based upon the FOAN/ response to question 14.

6.25 We have subsequently assessed each of the proposed allocations identified above against the outcomes of the GVA revised Green Belt Assessment scoring for the Grange Farm site, but have also criticised the scoring of individual sites where it is considered that this is clearly flawed.

6.26 The outcome is that BDW and Gallagher Estates consider it is clear, that the land at Grange Farm is better placed than the proposed Housing Allocations to meet housing needs and should be included with the Summary Table of Allocated Sites. Notwithstanding this position, in the event that additional sites are required to meet the actual FOAN, the land at Grange Farm would also be well placed to deliver such housing growth.

6.27 We have subsequently assessed each of the following sites as follows;

### Barratt's Farm (Housing Allocation 1)

6.28 The proposed allocation at Barratt's Farm is split across two refined parcels in the Strategic Green Belt Assessment: Refined Parcel 53 (RP 53) and Refined Parcel 54 (RP 54).

6.29 Both refined parcels in which Housing Allocation 1 is split across have consistent scoring. The analysis demonstrates that refined parcels 53 and 54 score equally in terms of their role in preventing neighbouring towns from merging into one another (purpose 2 of the Green Belt).

6.30 This position is clearly flawed. Development within Refined Parcels 53/54 will result in coalescence with Coventry and development within the Meriden Gap. Development at Grange Farm would result in a significantly less material impact on settlements to the north, given the considerable separation that would remain.

6.31 As such, it is BDW and Gallagher Estates view that in respect of Purpose 2, the land at Barratt's Farm should score 3 compared to that at Grange Farm which scored 2.

6.32 Additionally, the conclusions of the Strategic Green Belt Assessment are that the refined parcels 53 and 54 have less of a role in checking the unrestricted sprawl of large build up areas and assisting in safeguarding the countryside from encroachment (purpose 1 and purpose 3 of the Green Belt respectively).

6.33 BDW and Gallagher Estates do not agree with this analysis given that development in parcels 53/54 will result in a significant development on the more rural eastern edge of the settlement, albeit within the line of the railway. Whilst the site will potentially be contained by HS2, the Green Belt Assessment must be assessed against how the site performs now. Otherwise, the potential impact of open space at Grange Farm in protecting the northern edge of

development from further expansion (as shown in the Vision Document at Appendix 3), should also be taken into account in the assessment of that site.

6.34 Additionally, the land at Grange Farm is flanked by existing development on its eastern and western edges. The development is also contained by landform which rises sharply to the north.

6.35 Consequently, we consider that the role of the land forming Housing Allocation 1 at Barratt's Farm (RP53/54) has been incorrectly assessed in relation to Purpose 1 and Purpose 3 of this Strategic Green Belt Assessment and should score in parallel with the Grange Farm site. As such we believe the following scoring should apply:

	Refined Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest Score
Barratt's Farm	RP 54	1	3	3	0	7	3
Barratt's Farm	RP 53	1	3	3	0	7	3
Land at Grange Farm	RP 51	1	2	3	0	6	3

6.36 It can be seen that in terms of Green Belt function, the land at Barratt's Farm performs a more important role than that at Grange Farm.

### Frog Lane (Housing Allocation 2)

6.37 The proposed allocation at Frog Lane is located in Refined Parcel 59 (RP 59).

6.38 The Green Belt Assessment identifies a score of 1 for Purpose 1 in respect of parcel 59. BDW and Gallagher Estates do not agree with this position. The release of the land at Frog Lane will result in development extending southwards and would represent a clear physical extension of development into the countryside. This will significantly change the character of the environment in this location and would result in urban sprawl. On this basis, it is concluded that the land at Refined Parcel 59 performs a highly important role in Green Belt terms.

6.39 Taking into account the scoring set out above in respect of the Housing Allocation 2, the following comparison exists;

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Frog Lane	RP 59	3	1	3	0	7	3
Land at Grange Farm	RP 51	1	2	3	0	6	3

6.40 The analysis demonstrates that refined parcels 59 comprising Housing Allocation 2 scores worse in terms of Green Belt purposes and should not be removed from the Green Belt ahead of the Grange Farm site.

### Windmill Lane/Kenilworth Road (Housing Allocation 3)

6.41 The proposed allocation at Windmill Lane/Kenilworth Road under Housing Allocation 2 is situated in Refined Parcel 57 (RP 57). BDW and Gallagher Estates do not agree with the Green Belt Assessment score of 1 for Purpose 1 and 3.

6.42 The land at Windmill Lane clearly plays an important role in preventing development extending into the countryside and resulting in urban sprawl. The land acts as a barrier to development containing the urban form along the A410 Balsall Street East.

6.43 The removal of the land from the Green Belt and release for development will result in a harmful urbanising impact, allowing an extension of the urban form to protrude southwards into the countryside. The narrow shape of the land within Housing Allocation 3 extends disproportionately from the southern edge of the settlement and would have a significant negative impact upon the local environment in this location.

6.44 As such, we believe the following scoring should apply to the land within RP57 and Housing Allocation 3 when compared to the site at Grange Farm:

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Windmill Lane/Kenilworth Road	RP 57	3	2	3	0	8	3
Land at Grange Farm	RP 51	1	2	3	0	6	3

6.45 Our analysis demonstrates that refined parcels 57 scores worse than the land at Grange Farm. We acknowledge that housing development has recently taken place adjacent to this refined parcel. We believe, however, that land at Grange Farm offers the potential to secure much needed social and community infrastructure and a more comprehensive form of development that would not be the case in respect of development of a smaller development.

### Strategic Green Belt Summary

6.46 As we have demonstrated above, our assessment of Grange Farm proves that the site has been incorrectly assessed by SMBC in terms of its Green Belt purposes. Critically, the site has been assessed as part of a much larger parcel that is proposed (Vision Document at Appendix 3) or needed. This is a flawed position which has distorted the outcome of the Green Belt Assessment in favour of competing sites.

6.47 Importantly, when assessed against the other proposed locations at Balsall Common. The Grange Farm site performs better against Green Belt purposes and should therefore, be brought forward for development as a site allocation in place of Housing Allocation 1,2 and 3.

6.48 The comparative scoring is set out below;

	Refined parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Total	Highest score
Land at Grange Farm (SMBC Score)	RP 51	2	2	3	0	7	3
Land at Grange Farm (GVA Score)	<b>RP 51</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>2</b>
Barratt's Farm	RP 54	1	3	3	0	7	3
Barratt's Farm	RP 53	1	3	3	0	7	3
Frog Lane	RP 59	3	1	3	0	7	3
Windmill Lane/Kenilworth Road	RP 57	3	2	3	0	8	3



- 6.49 Notwithstanding this position, in the event that additional sites are required to meet the actual FOAN (as set out in the separate representation by BDW and highlighted in the report by Pegasus), the land at Grange Farm would also be well placed to deliver such housing growth.
- 6.50 Overall, Grange Farm is a sustainable site, that performs well against the Green Belt criteria and represents a suitable location to meet the housing needs of the Borough.

### **Solihull Local Plan Review Interim Sustainability Appraisal Report, January 2017**

- 6.51 SMBC's Interim Sustainability Appraisal Report was undertaken by AECOM and published in January 2017. The Interim Sustainability Appraisal framework provides a means to ascertain whether and how sustainability issues are being addressed and to understand the social, economic and environmental implications of options, policies and proposals.
- 6.52 In order to appropriately propose sites for allocation in the Local Plan Review, a Call for Sites exercise was undertaken by SMBC in January 2016, inviting submissions to indicate where land may be available for development. Following this a Strategic Housing Land and Employment Availability Assessment (SHELAA) was undertaken on the Council's behalf by Peter Brett Associates in November 2016, to further inform the Local Plan Review site selection process.
- 6.53 The process of identifying reasonable site alternatives is detailed within Topic Paper 4 (November 2016), which explains how the site options were identified (through the Call for Sites and SHELAA) and what 'filtering' was undertaken to remove unsuitable site options. Ultimately, isolated site options were discarded and a number of site options were amalgamated into larger site areas to reflect the broad areas for sustainable urban extensions or settlement expansion.
- 6.54 The remaining sites were appraised in the Interim Sustainability Appraisal (January 2017) through its detailed framework.
- 6.55 A series of sustainability credentials were appraised for each site and given scores in accordance with the following coding:

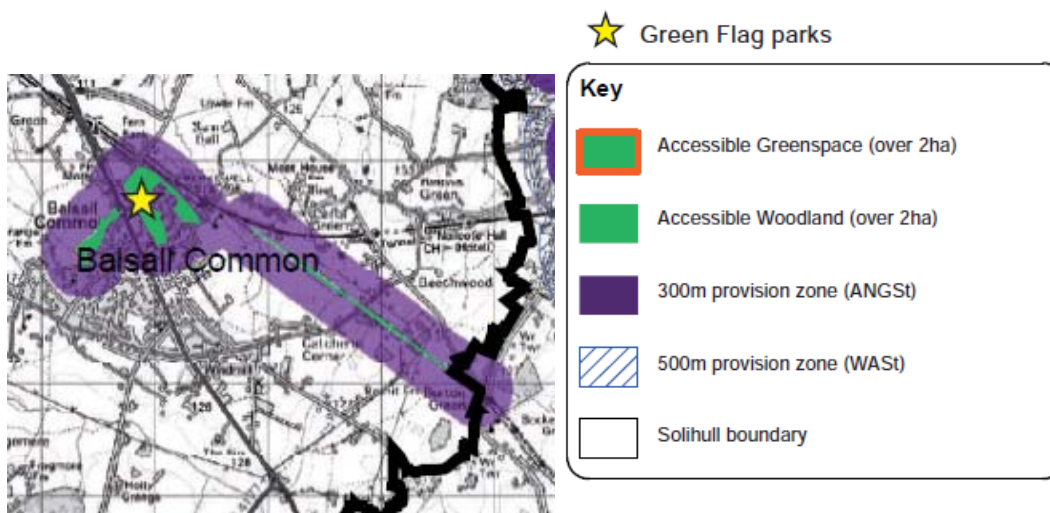
Colour code	Significance of effects	GVA Scoring
Dark green	Significant positive effects more likely	+2
Green	Positive effects likely	+1
Grey	Neutral effects	0
Amber	Negative effects likely/mitigation necessary	-1
Red	Significant negative effects likely/mitigation essential	-2

6.56 We have reviewed the assessment of the site at Grange Farm in light of the proposed development illustrated in the Vision Document included as Appendix 3, along with the other proposed allocations at Balsall Common/ Berkswell as follows.

### Grange Farm

6.57 BDW and Gallagher Estates question the Council’s assessment of Grange Farm against SA11 (To facilitate the delivery and enhance the quality of areas providing green infrastructure).

6.58 The Council’s own Green Infrastructure Study (January 2012) Figure 5.1 – Accessible Greenspace Provision identifies that land at Grange Farm is clearly within ‘400m from the public open space or natural greenspace of at least 2ha in size’. Therefore we believe that Grange Farm ‘Meets one standard’ of the criteria for SA11, and therefore a ‘Neutral Effect’ (Grey) should apply based upon the Council’s scoring criteria.



Source: Figure 5.1 Green Infrastructure Study (SMBC - January 2012)

6.59 On this basis and in light of our comments above, it is clear that the site should be given a more appropriate SA Assessment (SA11) for land at Grange Farm as follows:

	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	GVA Total
Grange Farm SMBC Assessment	-1	0	0	+1	+1	-2	0	0	+1	-1	-1	-1	-1	+1	+2	-2	+2	-1

GVA Assessment	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0
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### Barratt’s Farm (Housing Allocation 1)

- 6.60 A similar exercise has been undertaken for the land at Barratt’s Farm. It is noted that the proposed allocation at Barratt’s Farm (AECOM ID 97) scores **-1** and the land at Grange Farm (AECOM ID 76) also scores **-1** within the Interim Sustainability Assessment.
- 6.61 The implication is that based upon the Council’s own assessment that the proposed allocation at Barratt’s Farm and the land at Grange Farm are equal in terms of their sustainability.
- 6.62 It is further noted that land at Barratt’s Farm has 3 SA Objectives with a *‘Significant negative effects likely/mitigation essential’* i.e. a -2 score, compared to only t at Grange Farm.
- 6.63 As set out above, BDW and Gallagher Estates question the Council’s assessment of Grange Farm against SA11. This would result in Grange Farm scoring a **‘0’**, and thus outperforming Barratt’s Farm in terms of sustainability.
- 6.64 Taking into account the Council’s own assessment above therefore, Grange Farm would have less significant effects than Barratt’s Farm and would be a more suitable alternative for development.
- 6.65 The table below compares the scoring of the proposed allocation at Barratt’s Farm and the land at Grange Farm (GVA Assessment).

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	GVA Total
97	PO1	Barratt’s Farm	-1	0	+1	+1	+1	-2	-1	0	-1	0	0	-2	0	+2	+2	-2	+1	-1
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

### Frog Lane (Housing Allocation 2)

- 6.66 Although the Frog Lane site scores slightly higher than Grange Farm, mainly due to its proximity to the local primary school, it is important to note however, that as part of the development Framework for Grange Farm, a new primary school would be developed, making access to Primary school facilities more sustainable. This is clearly illustrated on the illustrative masterplan set within the Vision Document at Appendix 3 and should be taken into account in assessing

the suitability of the site for development. Additionally, it is noted that Grange Farm has more positive effects, 5 for Frog Lane and 6 for Grange Farm.

6.67 The table below compares the scoring of the proposed allocation of the Frog Lane site (Housing Allocation 2)

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	GVA Total
98	PO2	Frog Lane	-1	+2	+1	+1	+1	0	0	0	0	0	-1	-1	0	0	+2	-2	0	+2
76	BC1	Grange Farm	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

6.68 BDW and Gallagher Estates however would argue that the benefits of delivery of a new Primary School alongside the proposed allocation of Grange Farm should be taken into account which would result in the SA score for the site being raised to **+2**.

6.69 As such, based upon the outcome of the Interim Sustainability Appraisal we would argue that subject to delivery of a new Primary School as part of the development, that the site at Grange Farm would be well placed to deliver a comprehensive sustainable development which can meet the needs of the wider community.

### Windmill Lane (Housing Allocation 3)

6.70 Even before we raise our reservations over the individual scoring of both sites, through the application of GVA's scoring approach, the proposed allocation at Windmill Lane/Kenilworth Road (AECOM ID 99) scores **-3** and the land at Grange Farm (AECOM ID 76) would score **-1**.

6.71 Taking into account the suggested revised scoring for the Grange Farm site to SA11 would suggest that Grange Farm would score **'0'**. In addition, we note that the Windmill Lane / Kenilworth Road site only has four positive effects and six negative effects, as opposed to Grange Road which has six positive effects and five negative effects. This therefore adds further evidence that from a sustainability point Grange farm is more sustainable than Windmill Lane / Kenilworth Road.

6.72 If delivery of a new Primary School were taken into account the Grange Farm site would score even higher achieving **+2**.

6.73 The table below compares the scoring of the proposed allocation at Windmill Lane/Kenilworth Road and the land at Grange Farm.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	GVA Total
99	PO3	Windmill Lane	-1	+1	+1	+1	0	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-3
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0

6.74 This implies that on average the proposed allocation at Windmill Lane/Kenilworth Road is less sustainable than the land at Grange Farm. On this basis, the Council's proposed inclusion of the Windmill Lane site is flawed and the site should be removed from the Draft Local Plan.

### Interim Sustainability Appraisal Summary

6.75 As we have demonstrated above, our assessment of Grange Farm proves that the site has strong sustainability credentials and is well placed to deliver housing growth.

6.76 The comparative scoring of the Grange Farm site against proposed Housing Allocations 1,2 and 3 is set out below. It can be seen that even before adjustment to scoring, that the site at Grange Farm performs significantly better than the land at Barratt's Farm and Windmill Lane. If the delivery of a new Primary School is factored in, the Grange Farm site out performs all three proposed Housing Allocations. The comparative scoring is set out below.

AECOM ID	Site ID	Site name	SA1	SA2a	SA2b	SA3a	SA3b	SA4a	SA4b	SA7	SA9	SA10	SA11	SA12	SA14	SA17a	SA17b	SA19a	SA19b	GVA Total
76	BC1	Grange Farm,	-1	0	0	+1	+1	-2	0	0	+1	-1	0	-1	-1	+1	+2	-2	+2	0
97	PO1	Barratt's Farm	-1	0	+1	+1	+1	-2	-1	0	-1	0	0	-2	0	+2	+2	-2	+1	-1
98	PO2	Frog Lane	-1	+2	+1	+1	+1	0	0	0	0	0	-1	-1	0	0	+2	-2	0	+2
99	PO3	Windmill Lane	-1	+1	+1	+1	0	-1	0	0	0	0	-1	-1	-1	0	+1	-2	0	-3

6.77 On this basis, BDW and Gallagher Estates consider that the land at Grange Farm should be allocated for development ahead of land at any of the proposed Housing Allocations.

6.78 Additionally, the site should be included as a proposed allocation to meet the increased housing needs that will arise through delivery of the FOAN, as set out in our separate response to Question 14 on behalf of BDW.

Solihull Borough Landscape Character Assessment, December 2016

6.79 The Landscape Character Assessment has identified ten broad landscape character areas (with three having defined sub-areas). For each of the areas a judgement about landscape character sensitivity, visual sensitivity and the overall general capacity to accept development and change is made. These conclusions are based on standardised scoring matrices, shown below, together with a qualitative analysis of any key opportunities/constraints of the area.

**Overall landscape sensitivity**

		Landscape character sensitivity			
		High	Medium	Low	Very low
Visual sensitivity	High	High	High	Medium	Low
	Medium	High	Medium	Medium	Low
	Low	Medium	Medium	Low	Low
	Very low	Low	Low	Low	Very low / negligible

**Landscape capacity**

		Overall landscape sensitivity			
		High	Medium	Low	Very low
Landscape value	High	Very low/none	Very low	Low	Medium
	Medium	Very low	Low	Low	Medium
	Low	Low	Low	Medium	High
	Very low	Medium	Medium	Medium	High

6.80 It is made clear within the assessment of landscape capacity that it is not possible to establish a definitive baseline sensitivity to change without having details of a given development proposal, and thus a general assessment has been made.

- 6.81 In order to demonstrate the suitability of the site at Grange Farm (as proposed within the Vision Document at Appendix 3), we have assessed the land parcels against the outcome of the Landscape Character Assessment.
- 6.82 We have also reviewed other sites at Balsall Common/ Berkswell and have compared the findings of the above documents for selected proposed allocations with the land at Grange Farm,
- Grange Farm
- 6.83 Land at Grange Farm is situated in LCA 4 'Rural Centre' (and within this, positioned in sub-area 4C).
- 6.84 In terms of LCA 4C, the overall landscape character sensitivity is considered to be **high**, the visual sensitivity to be **medium** and the landscape value to be **medium**. This results in the view that the LCA sub-area would typically have an overall **very low** capacity to accommodate change.
- 6.85 BDW and Gallagher Estates consider that the approach taken is flawed and inconsistent with the manner in which other sites at Balsall Common have been assessed in terms of the Sub Area assessment. The proposed site should be considered against the extent of development set out in the Vision Document included at Appendix 3.
- 6.86 The Grange Farm site only forms a small part of a larger area of LCA 4C. Importantly, the landscape character adjacent to Balsall Common is different to that within the remainder of this Sub-Area.
- 6.87 Considered in isolation, we believe Grange Farm is considered to be of **medium** landscape character sensitivity, as opposed to high, for the following reasons:
- The site is not affected by any designations for landscape quality or value.
  - The site exhibits some of the characteristics of the Arden landscape and, overall, is considered to be of medium landscape quality.
  - The south-eastern and south-western areas are closely related to the existing areas of housing and lie on the south-west facing side of the ridge and are, therefore, contained. This area is considered to have medium to low sensitivity to residential development.
  - The central and northern parts of the site lie on higher ground and are considered to be of medium sensitivity.
  - Middle and long distance views of the site are largely unavailable and key views of the site tend to be limited to local views from nearby roads, properties and public footpaths.

- The retention of existing hedgerows, trees and woodland within a framework of open space and green corridors would assist in assimilating the development within the wider landscape.
- Development would not have a material impact on the visual amenity of local properties nor on key views from the wider area.
- Development could deliver an extension to the village which is well connected and contained to the northwest by existing and proposed landscaping.
- It would not result in urban sprawl, would not encroach into the open countryside, would not impact on the setting of a historic town, or lead to coalescence with a neighbouring settlement. A new defensible boundary to the Green Belt could be formed. As such, the site could be released from the Green Belt without compromising Green Belt policy.
- Specific landscape principles are recommended which are reflected in the Development Framework.

#### Barratt's Farm

- 6.88 The proposed allocation at Barratt's Farm is situated in **LCA 5 'Balsall Common Eastern Fringe'**. Whilst the land at Grange Farm is situated in **LCA 4 'Rural Centre'** (and within this, positioned in **sub-area 4C**).
- 6.89 The overall landscape character sensitivity of LCA 5 is considered to be **medium**. The visual sensitivity is considered to be **medium** and the value of the character area is considered to be **medium**. This results in the conclusion that the LCA would typically have a **low** landscape capacity to accommodate new development.
- 6.90 In the analysis relating to LCA 5 the following is outlined under 'Sensitivities and Pressures':
- Increased pressure from housing and other urbanising features from the edge of Balsall Common';
  - The landscape around contains many scattered buildings and has **limited** capacity to accept additional built development without detriment to landscape character through coalescence';
  - 'Almost the entire LCA bar the south-western area is a mineral safeguard area for coal, which could have considerable impact on the landscape character'; and
  - 'Pressure from the proposed HS2 route'.
- 6.91 In terms of visual sensitivity, it is outlined that 'prevention of coalescence is important particularly where the urban edge has a strong relationship with existing built form'.



6.92 In terms of landscape value it is outlined that;

*'the historic field pattern is irreplaceable and considered fundamental to the distinctiveness of the character area'.*

*'Overall, the area would be able to accommodate only small areas of new development...'*

6.93 As such, this results in the view that the LCA sub-area would typically have an overall '**low**' capacity to accommodate change. i.e. the area would be able to accommodate new development which would need to be of appropriate type, scale and form.

6.94 Compared to the land at Grange Farm therefore, the proposed allocation at Barratt's Farm would appear flawed and would not be based upon the reasoned assessment of alternatives.

Frog Lane (Housing Allocation 2) and Windmill Lane/Kenilworth Road (Housing Allocation 3)

6.95 Both allocations are situated in **LCA 5 'Balsall Common Eastern Fringe'**. The overall landscape character sensitivity of LCA 5 is considered to be **medium**. The visual sensitivity is considered to be **medium** and the value of the character area is considered to be **medium**.

6.96 This results in the conclusion that the LCA would typically have a **low** landscape capacity to accommodate new development.

6.97 In the analysis relating to LCA 5 the following is outlined under 'Sensitivities and Pressures':

- Increased pressure from housing and other urbanising features from the edge of Balsall Common';
- The landscape around contains many scattered buildings and has limited capacity to accept additional built development without detriment to landscape character through coalescence';
- 'Almost the entire LCA bar the south-western area is a mineral safeguard area for coal, which could have considerable impact on the landscape character'; and

6.98 In terms of visual sensitivity, it is outlined that 'prevention of coalescence is important particularly where the urban edge has a strong relationship with existing built form'.

6.99 In terms of landscape value it is outlined that 'the historic field pattern is irreplaceable and considered fundamental to the distinctiveness of the character area'.

*'Overall, the area would be able to accommodate only small areas of new development...'*

6.100 As such it is concluded that the Council's decision to include both Housing Allocations 2 and 3 are flawed and not based upon the outcome of the evidence base for each site.

## HS2 and UK Central Hub

6.101 These inter-related proposals have been identified as a potential form of economic "supergrowth" in the SHNS Stage 3 Report, which is unique to the HMA. They are exciting proposals and support the case for the Borough to accommodate a significant portion of the unmet HMA dwelling needs.

6.102 However, the Local Plan Review must acknowledge that these proposals are unlikely to occur until the "back end" of the proposed plan period, given that the HS2 Interchange Station – upon which the "HS2/ UK Central" is focussed – is unlikely to be operational until c.2030 and given that there are significant infrastructure works required to deliver the Hub. This is reflected in the Midlands HS2 Growth Strategy (July 2015) which states the following:

*"Delivering the Hub and Interchange will require a sequenced programme of enabling and major infrastructure works that align the construction of the railway line and Interchange Station with that of a new junction from the M42, the People Mover...three new bridges across the M42, the extraction of the minerals within the site and the creation of a linear park" (p21)*

6.103 The SHNS went further at paragraph 7.11 advising that;

*"Thus, on present plans the scheme will start providing space for new jobs four years before the end of our plan period in 2031. If that space is completed and occupied at a uniform rate from 2027 to 2045"*

6.104 The Growth Strategy values the Interchange Station Investment Package at £672 million (p27). The Investment Programme (p28) indicates that Phase One of the investment package would be completed in 2028 with Phase Three not being concluded until 2046.

6.105 We are not aware of any published trajectory for the residential development proposed at HS2/ UK Central, however paragraph 122 of the Draft Local Plan, supporting Policy 1 identifies that it is anticipated that 1000 dwellings would be delivered in the plan period.

6.106 In this respect, it should be borne in mind that large scale developments typically take time to deliver and particularly in the context of Arden Cross, which will be reliant upon significant front loaded infrastructure provision.

6.107 BDW and Gallagher Estates Ltd are concerned that in the absence of an identified Delivery Trajectory that the Draft Local Plan cannot rely upon the suggested delivery of 1000 dwellings, without a significant level of additional supporting information.

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### **Actions required to achieve soundness**

- 6.108 Paragraph 122 of the supporting text to Policy P1 should be amended to reduce the anticipated level of growth for Arden Cross within the plan period.
- 6.109 The table at paragraph 217 identifying the Solihull Housing Land Supply should be amended to reduce the level of housing to be delivered within the UK Central Housing Area to reflect the lack of available information regarding Delivery Trajectory.
- 6.110 The Summary Table of Allocated Sites at paragraph 223 should be amended to include the land at Grange Farm as a Housing Allocation for the delivery of 700 dwellings and remove the land from the Green Belt.
- 6.111 The site should be included in place of some or all of Housing Allocations 1,2 and 3 which should be omitted based upon the evidence set out above.
- 6.112 Alternatively, the land at Grange Farm should be included as an allocation to meet the Full Objectively Assessed Need (as set out in the separate response to Question 14 on behalf of BDW and established through the Pegasus assessment of housing need included as Appendix 1).

## **7. Do you agree with the policies for the quality of place? If not why not and what alternatives would you suggest?**

- 7.1 Policy 15 seeks to ensure that new development achieves delivery of high quality places which achieve inclusive and sustainable principles of design.
- 7.2 The policy seeks to ensure that new development responds to climate change and meets the requirements of Part M of the Building Regulations.
- 7.3 The government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes. The government set out its policy on the application of these standards in decision taking and plan making in a written ministerial statement, which also withdraws the Code for Sustainable Homes.

- 7.4 Given that all new residential development will need to meet the requirements of Building Regulations, BDW and Gallagher Estates Ltd are concerned that the reference to such through Policy 15 is unnecessary and simply repeats national planning policy.
- 7.5 Additionally, Policy 15 requires adherence of new residential development to the principles of Secured by Design.
- 7.6 Whilst BDW and Gallagher Estates Ltd are supportive of measures to improve the design quality of new development, mandatory Building Regulations covering the physical security of new dwellings came into force on 1 October 2015 and planning authorities should no longer seek to impose any additional requirements for security of individual dwellings through plan policies.
- 7.7 As drafted, Policy 15 would be unsound as it would not comply with national policy.

### **Actions required to achieve soundness**

- 7.8 Policy 15 should be amended by omitting reference to the need to achieve compliance with Building Regulations as this is a requirement of other legislation.
- 7.9 Reference to Secured by Design should be omitted as this is now addressed through Building Regulations.

## 8. Do you agree with Policy P21. If not why not and what alternative would you suggest?

8.1 Policy P21 sets out the Council's intention to seek either on site delivery of financial contributions through planning obligation delivery of physical, social, green and digital infrastructure. The Infrastructure Delivery Plan (IDP) 2012 provides a baseline of the infrastructure needs of the Borough,

8.2 Whilst BDW and Gallagher Estates Ltd are supportive of the need for new development to deliver appropriate infrastructure and facilities to meet the needs of new residents, the implementation of Policy P21 must also take into account development viability.

8.3 In this respect, paragraph 173 of the NPPF is clear that;

*"Plans should be deliverable. Therefore the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened"*

8.4 The needs for effective assessment of the impact of such obligation is set out at paragraph 174, which advises that;

*"They should assess the likely cumulative impact on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk"*

8.5 There would appear to be no specific evidence base document to test the impact of infrastructure provision or the requirements of the IDP upon the viability of residential development in the Borough.

8.6 Whilst the Council's CIL Charging Schedule has been through EiP and has been subject to viability modelling, it is not clear that this is the case with regard to potential obligations in relation to site specific proposals.

8.7 In the absence of viability modelling, policy 21 is unsound as it is not justified or based upon an appropriate evidence base and is not in compliance with national policy.

## Actions required to achieve soundness

8.8 Policy 21 should be amended to state;

“Where it is viable to do so, new development will be expected to provide or contribute towards provision of;”



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Appendix I  
North  
Warwickshire  
Borough  
Council  
Committee  
Papers

**Agenda Item No 6**

**Planning and Development Board**

**16 January 2017**

**Report of the Assistant Chief Executive  
and Solicitor to the Council**

**Solihull Draft Local Plan – Reg 18  
Consultation**

**1 Summary.**

1.1 This report informs Members of the consultation on the Solihull Draft Local Plan.

**Recommendation to the Board**

**a That Members take note of the consultation of the Solihull Draft Local Plan which runs from 5 December 2016 to 30 January 2017; and**

**b To forward any comments Members may raise following consideration of the issues at this Board.**

**2 Consultation**

2.1 A copy of the report has been forwarded to Councillors Waters, Reilly, Sweet and Simpson.

2.2 The Solihull Draft Local Plan, Regulation 18 consultation commenced on Monday 5 December 2016 and runs to 30 January 2017.

**3 The Local Plan Review consultation (Dec 2016)**

3.1 Solihull Council has published the Solihull Draft Local Plan, Regulation 18 document for consultation. The consultation documents are available on [www.solihull.gov.uk/lpr](http://www.solihull.gov.uk/lpr). The Council is seeking views on the revised policies and proposed site allocations for housing and employment land, in addition to those in the existing Plan. The Council is also publishing the updated evidence base.

3.2 Members may recall the Borough Council previously commented on the Solihull Local Plan Review Scope, Issues and Options following consideration at the Local Development Framework Sub-Committee on Monday 29 February 2016. I have attached the Borough's previous comments as Appendix A to this report.

...



- 3.3 Responses to the Plan consultation should be received by midnight on Monday 30 January 2017. However, in view of the impending release of a number of evidence base documents, yet to be published, and in order to enable Members and Officers and North Warwickshire to respond within a reasonable time to any issues those documents raise, North Warwickshire Forward Planning team have requested an extension of time to respond to the Plan and associated documents from Solihull's Policy and Spatial Planning team.
- 3.4 The extension requested is until the week ending 12 February 2017 to enable a further Report to be taken to members for consideration at the 6th February Planning and Development Board, if necessary. A response is awaited and any confirmation will be provided to Members at the Board on the 16th. The extension would also allow a more detailed response, particularly to the series of questions specifically asked in the document in relation to the Plan's approach, policies, proposals and site allocations.

#### **4 Plan Proposals**

- 4.1 Following earlier consideration of a number of options the Plan indicates the locations where growth should be focused and land released from the Green Belt which are as follows:

Growth Option E (The UK Central Hub Area & HS2):

- Land to the east of the NEC

Growth Option F – Limited Expansion of Rural Villages/Settlements:

- Land to the east of Hampton-in-Arden
- Land to the west of Meriden
- Land south and south east of Balsall Common

Growth Option G – Large Scale Urban Extensions:

- Land to the north east of Damson Parkway
- Land south of Shirley (either side of Tanworth Lane)
- Land east of Solihull (between Lugtrout Lane and Hampton Lane)

Growth Option G – Significant Expansion of Rural Villages/Settlements:

- Land west of Dickens Heath
- Land south of Knowle
- Land north east of Knowle
- Land north east of Balsall Common

These growth locations are shown in the following diagram:



4.2 A number of Site allocations have been proposed, with an indicative average density of 36dph, to address the Metropolitan Borough Council's housing requirement. However, the Plan does note that the boundaries of these sites has not been fixed (Para 224) and further work will be undertaken on the options to be taken forward and included in the submission version of the plan.

- 4.3 The Borough Council congratulate Solihull in delivering a Local Plan that addresses their current housing needs, as identified in the November 2016 SHMA. However there are serious concerns over the lack of adequate response to the shortfall of 37900 arising from the Birmingham City Development Plan, and identified in the modifications to the Plan MM2 and MM3, which indicate that the focus of the search for capacity to address this shortfall will be within the authorities including The Black Country, Bromsgrove, Redditch, Solihull, North Warwickshire, Tamworth, Lichfield, Cannock Chase, South Staffordshire and parts of Stratford-on-Avon.
- 4.4 Through the Duty to Co-operate and in conjunction with adjoining authorities North Warwickshire have pro-actively addressed this issue in their own recent Local Plan process through examining levels of inward and outward commuting within the appropriate Travel to Work areas (using recent work by Metro Dynamics for the City of Wolverhampton) and determining an appropriate level of housing to accommodate from this shortfall. This approach or similar does not appear to have been seriously considered or undertaken for the purposes of the Solihull Local Plan Review and there is no clear rationale or evidence to help determine or indicate what the relevant level of additional housing Solihull should be accommodating to address this shortfall.
- 4.5 The work noted above examined the relationships and similarity between authorities in the Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull LEAs. This document's findings showed the largest travel to work commuting flows in or out of the authority were between Birmingham and Solihull, and also that some of the largest Migration inflows and outflows were between Birmingham and Solihull.
- 4.6 The ONS in 2011 indicated that of people/residents travelling to work in Solihull, 36% of the total of all trips were between Birmingham and Solihull.

<b>Local Authority</b>	<b>Number of Residents</b>	<b>% of Total</b>
Solihull	32,114	39%
Birmingham	29,458	36%
All Solihull Residents Travelling to Work	81,316	100%

Source: ONS Census 2011

The number of Solihull residents travelling outside of the borough for work (49,202) is exceeded by the number of people living outside of the borough and travelling in to Solihull for work. (51,403). This work and other similar assessments would appear to indicate that the level of housing proposed to address the shortfall of housing in the Greater Birmingham Housing Market Area (GB HMA) is insufficient at 2000 to truly reflect the links and relationships between Solihull and Birmingham.

- 4.7 This is of particular concern for North Warwickshire given the clear economic, housing and transport links and relationships Solihull has with Birmingham, which are far greater than those between North Warwickshire and Birmingham. This gives rise to concerns that if Solihull does not adequately

address this issue the knock on effect on North Warwickshire will be further development pressure, both within and outside North Warwickshire's Green Belt and on settlements in an authority that (in comparison to Solihull) significantly lacks the infrastructure and service capacity to accommodate the levels of development likely to arise.

- 4.8 Similarly the Plans emphasis on regeneration, economic and employment growth and opportunities to 'deliver Solihull's future economic success' and 'enhance Solihull's competitive advantage' should be matched and balanced with housing growth that reflects the above relationship with Birmingham and wider sub-region, a "balance" sought and supported by the National Planning Policy Framework guidance (para 37).

## 5 Observations

- 5.1 In summary the following comments are considered relevant to the Solihull Local Plan Review consultation;

- The SHMA supporting the Plan for Solihull appears to deal only with their local need and not adequately address the wider GB HMA needs and shortfall. (Note Para 7.32 of SHMA; "*The OAN above does not consider any additional homes SMBC might provide to address unmet need from elsewhere in the HMA*").
- It is to be supported and encouraging that the Plan deals with the whole of their local need.
- It is to be supported and encouraging that the Plan agrees that it is the appropriate time for dealing with the Birmingham City Council shortfall, and that the shortfall will have to be met elsewhere within the Housing Market Area (HMA) (or other nearby areas) such as Solihull. (Para 4 of Plan)
- However, there is no clear rationale of how Solihull have got to 2000 dwellings figure (para 211) for dealing with the GB HMA shortfall, particularly in view of the clear, historic, transport routes and links, commuting and travel to work links the Plan notes/highlights elsewhere. This is considered a potentially serious failing in the Plan in terms of adequately addressing the "Duty to Co-operate", given the clear shortfall in need identified in the Birmingham City Local Plan, noted in the proposed Modifications to the Plan, and the comments from the earlier Solihull Local Plan Inspector. The Solihull Plan indicates the additional 2000 houses are specifically to address the strategic housing needs study (SHNS) 37,500 dwellings shortfall for the whole HMA, which was undertaken in 2015 over the period 2011-2031, but does not address the larger shortfall indicated in the Birmingham Development Plan Modifications of 37,900 homes, including about 14,400 affordable dwellings, within the Development Plan's period.
- The Plan notes that as the Birmingham airport expansion proposals aren't firm they have not reflected them in the Plan. Although the Plan seeks to "*maximise the capacity and benefits of the recently extended*

*runway at Birmingham airport*", Solihull are happy to look at putting any expansion proposals or considerations in the next version of the Plan.

- Nevertheless, the Plan needs to maximise development opportunities at a transport hub, which could be a combination of the HS2 International Interchange with any proposals for Airport expansion, and maximising links into the Birmingham Metropolitan area and opportunities of future links into North Warwickshire and Coventry as part of the wider Midlands Connect work and 'Movement for Growth' strategy.
- Topic papers are being prepared and will be put on their website. The Borough Council may need to respond to these documents and their findings once published.
- The Sustainability Appraisal is not yet available and should be on the website by the New Year.

5.2 Due to the stage of the Local Plan and the outstanding additional evidence base documents still awaited, there are still outstanding issues which will only be able to be answered as the Local Plan progresses. Further comments may need to be made to Solihull Metropolitan Borough Council once these documents have been examined to address any issues or concerns they may raise. This is the reason for the request for extension to the period for comments and representations to the Solihull Local Plan Review.

5.3 This Report should form the basis of the initial response to the Solihull Local Plan Review along with re-iteration of the Borough's previous comments attached as Appendix A to this report (which are considered still to be relevant to the current Plan), with the caveat that further comments are likely to be forwarded to Solihull once the additional evidence base documents are published. Any additional comments from Members will be added following consideration of this Report and the Plan consultation.

## **6 Report Implications**

### **6.1 Human Resources Implications**

6.1.1 Greater staff and member involvement may be required in the development of the Solihull Local Plan than previously due to the cross border issues and in particular the provision of housing, the need to address the shortfall in the GB SHMA, HS2 and UK Central implications and possibly employment land and housing balance.

### **6.2 Links to Council's Priorities**

6.2.1 The Local Plan has links to all of the Council's priorities.

The Contact Officer for this report is Dorothy Barratt (719250).



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Borough Council

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This matter is being dealt with by

: |

Direct Dial : (01827) 719250

Your ref : |

Our ref : |

Date : 01<sup>st</sup> March 2016

Dear Mr Palmer

**Solihull Local Plan Review – Additional comments following LDF Sub-Committee meeting on 29<sup>th</sup> February 2016**

Further to my earlier letter of the 22<sup>nd</sup> January 2016 regarding a response from the Borough Council to the Solihull Local Plan review I can confirm a Report on the consultation was considered at the Local Development Framework Sub-Committee on Monday the 29<sup>th</sup> February.

I have attached a copy of the Report and its Appendices to this letter for your attention and information as part of the Borough Council's response to the Solihull Local Plan Review. Following consideration at the Sub-Committee, Members from the Borough Council would wish the following additional comments to be highlighted and noted as part of the Council's consultation response.

Members highlighted the potential huge implications on North Warwickshire of the development and growth at Solihull, particularly with reference to the "UK Central" proposals. There are significant local concerns over the impact this proposal will have on the local, rural highway network and rural settlements from increased traffic flows and levels. Measures need to be considered and included in the Local Plan review to address any potential adverse impacts, in parallel with maximising connectivity to the HS2 Interchange station.

Access to the rural road network should be restricted and focussed on local services and local settlement access only, with Interchange Station Traffic concentrated, directed and routed onto the Strategic Transport Network only. Where necessary, to avoid traffic conflict with local traffic and adverse impacts on rural settlements (particularly from heavy construction traffic and "rat running" by commuter and interchange traffic avoiding congestion points/routes), some route and road closures should be considered as an option.

This is also highlighted by the potential implications arising from the shortfall from Birmingham, which re-inforces the need for this to be reflected in the review of the plan. The implications of the Green Belt Review for Solihull, and indeed the Borough's own Green Belt Review also highlight the pressure on this location. The Solihull Local Plan Review should note concerns that any development growth must take account of, and address the highway infrastructure capacity, the need to address and minimise the traffic levels and impacts on the

rural settlements and rural road network and seek to separate local traffic and networks from the strategic traffic, that is both generated by and servicing the growth in Solihull, the shortfall from Birmingham and the construction and eventual commuting traffic to the HS2 Interchange Station.

I trust that you will find the above useful and look forward to on-going discussions on how Solihull will deal with the expected growth and consider any implications on this Borough.

Yours sincerely

*D M Barratt*

Dorothy Barratt  
Forward Planning & Economic Strategy Manager



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Appendix II  
Vision  
Document

Please refer to main report Appendix 1



# GVA

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Appendix III  
NLP "Start to  
Finish"  
November  
2016

TRIP  
Targeted Research  
& Intelligence Programme



Nathaniel Lichfield  
& Partners  
Planning. Design. Economics.

# Start to Finish

## How Quickly do Large-Scale Housing Sites Deliver?

November 2016

# Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.



## The Research in Figures

**70** number of large sites assessed

**3.9** years the average lead in time for large sites prior to the submission of the first planning application

**6.1** years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

**161** the average annual build rate for a scheme of 2,000+ dwellings

**321** the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

**40%** approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

**50%** more homes per annum are delivered on average on large greenfield sites than large brownfield sites



Image Credit: Nick Turner / Alamy Stock Photo

# Introduction

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When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year<sup>1</sup>.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

*“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”*

**DCLG consultation on proposed changes to national planning policy (December 2015)**

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”<sup>2</sup>. It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”<sup>3</sup>

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

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<sup>1</sup> House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

<sup>2</sup> PPG ID: 3-023-20140306

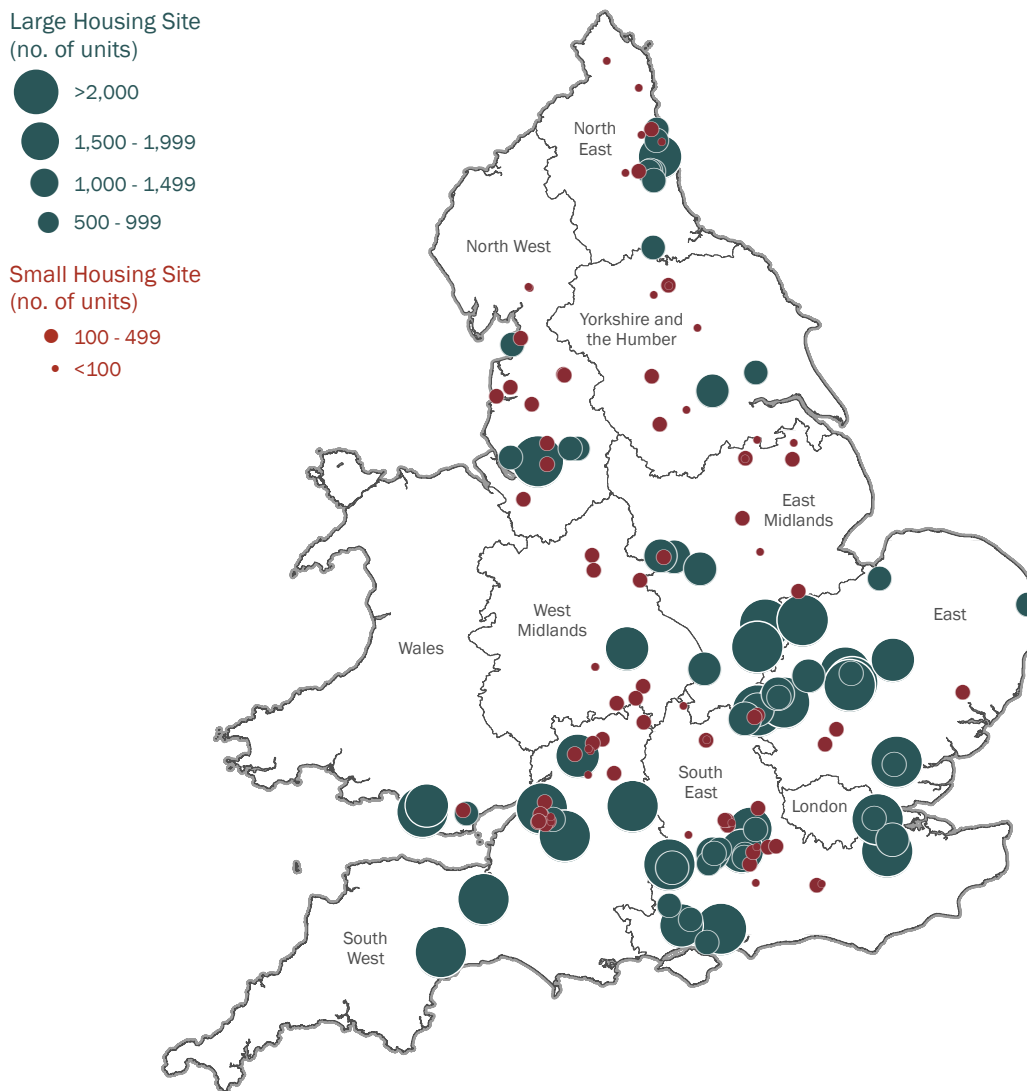
<sup>3</sup> PPG ID: 3-028-20140306

# Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



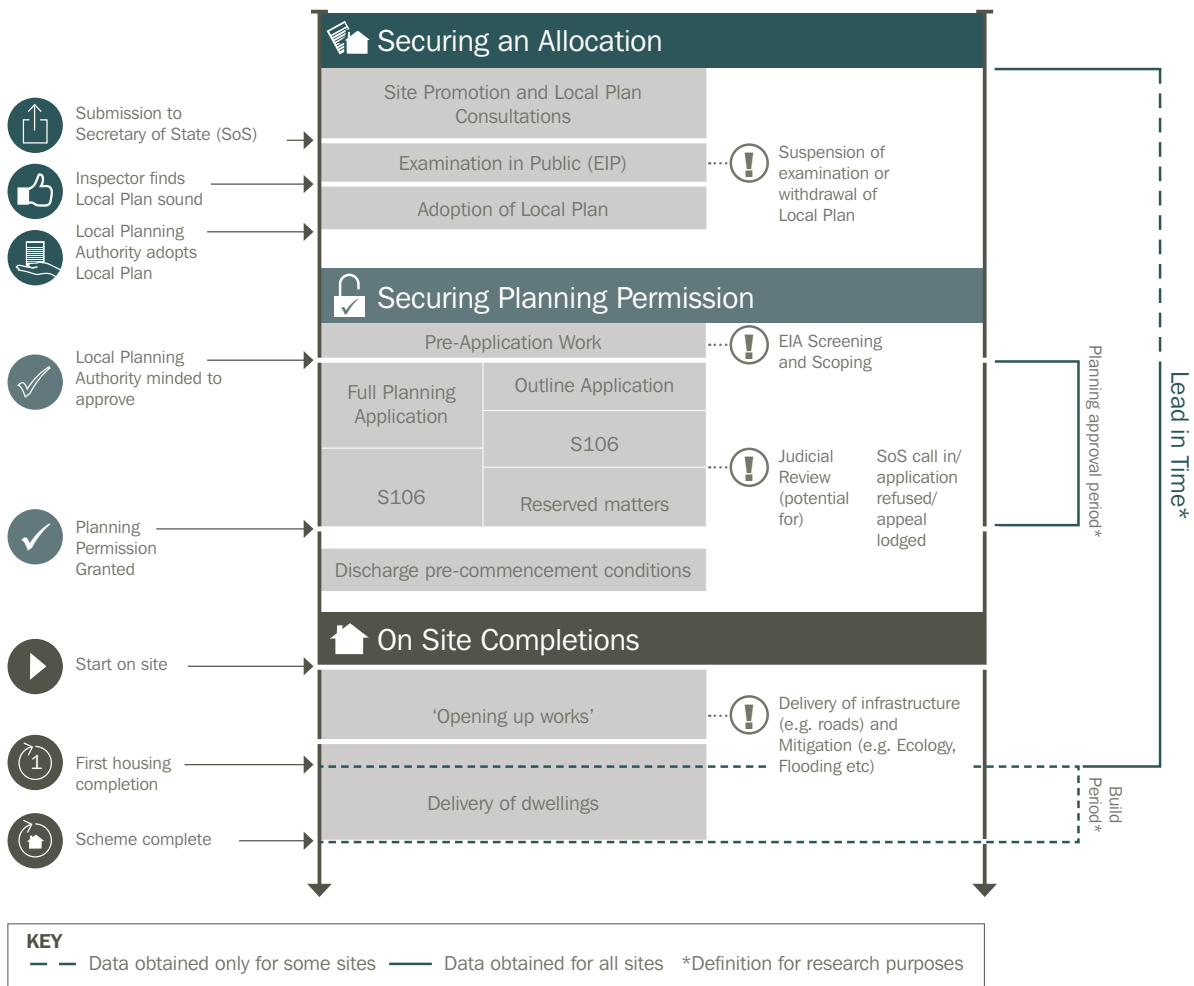
Source: NLP analysis

## Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site




Source: NLP

Start to Finish



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The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.



# Getting Started: What are Realistic Lead-in Times?

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How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

## Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF<sup>4</sup> is a cause for concern.

If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

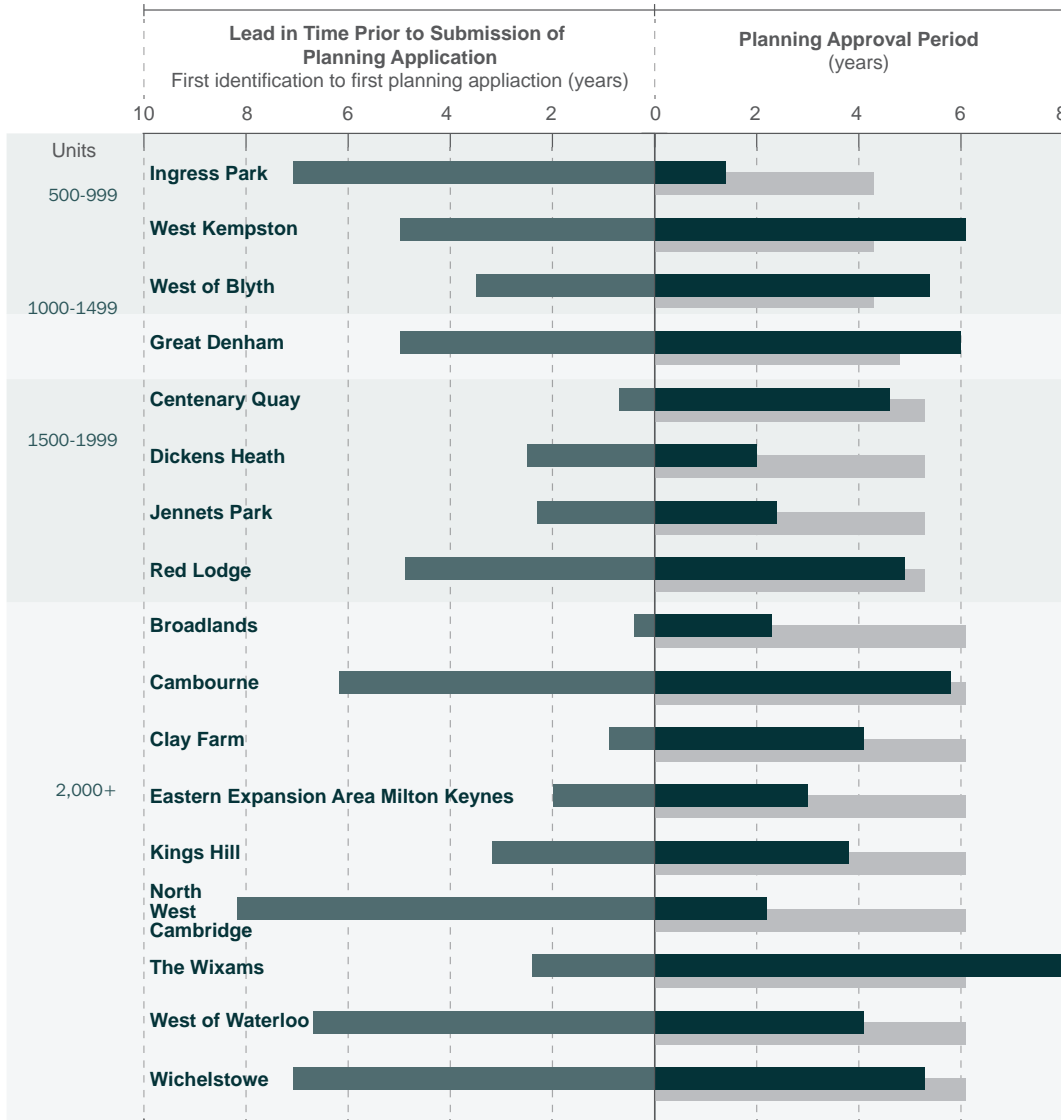
Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years<sup>5</sup>.

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<sup>4</sup> As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

<sup>5</sup> The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



**KEY**  
 Lead in time prior to submission of planning application  
 Planning approval period  
 Average planning application period for site of that size

Source: NLP analysis



## The Planning Approval Period: Size Matters

The term 'planning approval period' in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government's Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

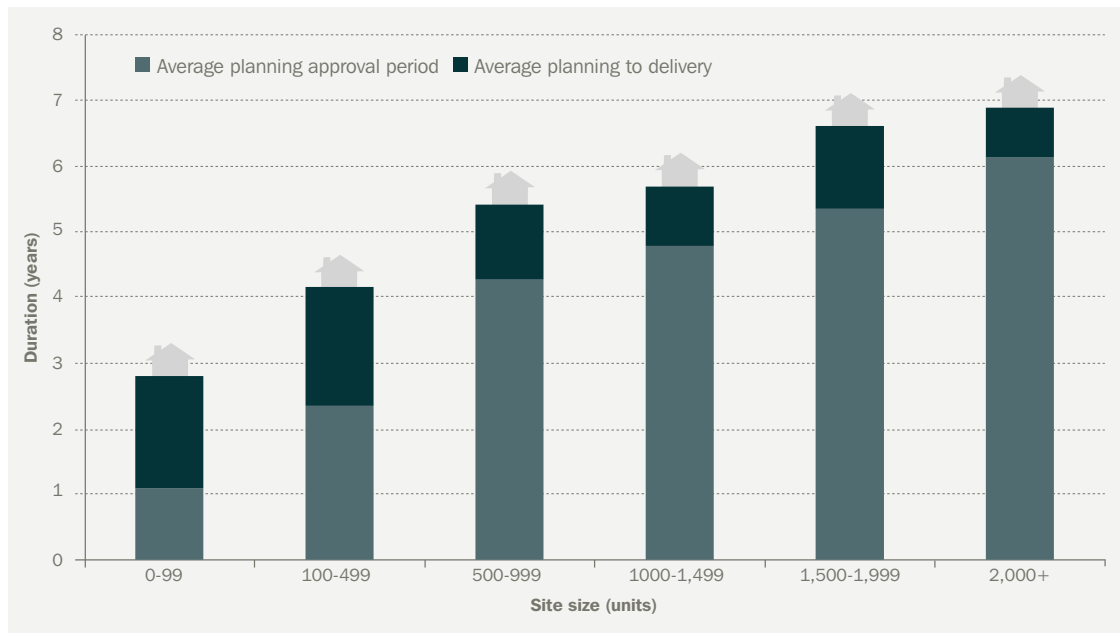
## Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

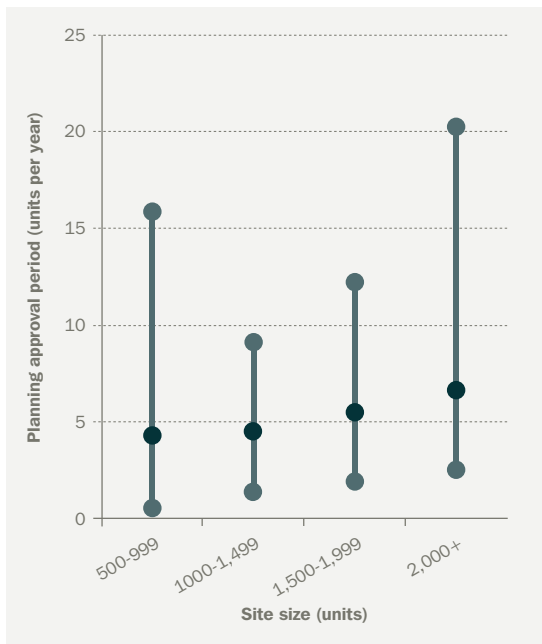
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

## Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

### Gateshead – St James Village (518 dwellings):

Planning approval period 0.3 years<sup>6</sup>

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

<sup>6</sup> St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area



## **Dartford – Ingress Park (950 dwellings):**

### **Planning approval period 1.4 years**

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

## **Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces):**

### **Planning approval period 2.2 years**

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

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## Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).



# Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site<sup>7</sup>. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years<sup>8</sup> and indeed for UK greenfield and urban land, is still below levels last seen at least 2003<sup>9</sup>. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions<sup>10</sup>, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed<sup>11</sup>. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

<sup>7</sup> DCLG Presentations to the HBF Planning Conference (September 2015)

<sup>8</sup> Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

<sup>9</sup> Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

<sup>10</sup> Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) [http://www.local.gov.uk/web/guest/media-releases/-/journal\\_content/56/10180/7632945/NEWS](http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS)

<sup>11</sup> This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'

# Build Rates: How Fast Can Sites Deliver?

The rate at which sites deliver new homes is a frequently contested matter at Local Plan examinations and during planning inquiries considering five year housing land supply. Assumptions can vary quite markedly and expectations have changed over time: in 2007, Northstowe – the new settlement to the north west of Cambridge – was expected by the Council to deliver 750-850 dwellings per annum<sup>12</sup>; it is now projected to deliver at an annual rate of just 250<sup>13</sup>.

There is a growing recognition that the rate of annual delivery on a site is shaped by ‘absorption rates’: a judgement on how quickly the local market can absorb the new properties. However, there are a number of factors driving this for any given site:

- the strength of the local housing market;
- the number of sales outlets expected to operate on the site (ie the number of different house builders or brands/products being delivered); or
- the tenure of housing being built. Are market homes for sale being supplemented by homes for rent, including affordable housing?

The analysis in this section explores these factors with reference to the surveyed sites.

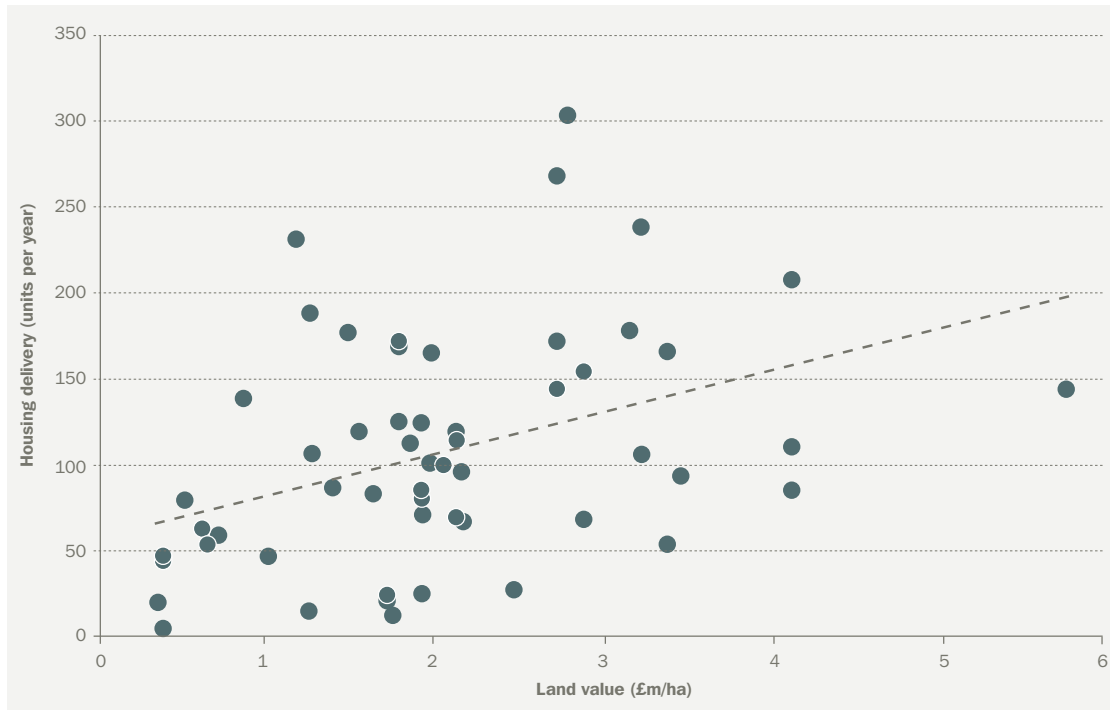
## Market Strength

It might seem a truism that stronger market demand for housing will support higher sales and build rates – but how far is that the case and how to measure it?

Figure 6 below compares CLG data on post-permission residential land value estimates (£/ha) by Local Authorities in 2014<sup>14</sup> to the average build out rate of each of the assessed strategic sites. Unfortunately the residential land value estimates are only available for England and as such the Welsh sites assessed are excluded, leaving 57 sites in total.

The analysis shows that markets matter. Relatively weaker areas may not be able to sustain the high build-out rates that can be delivered in stronger markets with greater demand for housing. There are significant variations, reflecting localised conditions, but the analysis shows a clear relationship between the strength of the market in a Local Authority area and the average annual build rates achieved on those sites. Plan makers should therefore recognise that stronger local markets can influence how quickly sites will deliver.

Figure 6: Average Annual Build-out Rates of sites compared to Land Values as at 2014



Source: NLP analysis and CLG Post-permission residential land value estimates (£/ha) by Local Authorities (February 2015)

<sup>12</sup> South Cambridgeshire Annual Monitoring Report 2006/07

<sup>13</sup> South Cambridgeshire Annual Monitoring Report 2014/15

<sup>14</sup> Post-permission residential land value estimates were released in December 2015, however the end date of the build rate data obtained is 2014/15; as such land value estimates at February 2015 are better aligned to the build periods assessed in this report and have been used for consistency.

## Size Matters

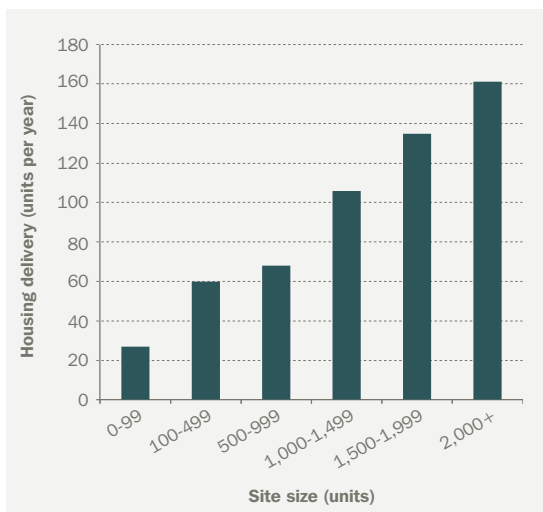
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



Start to Finish

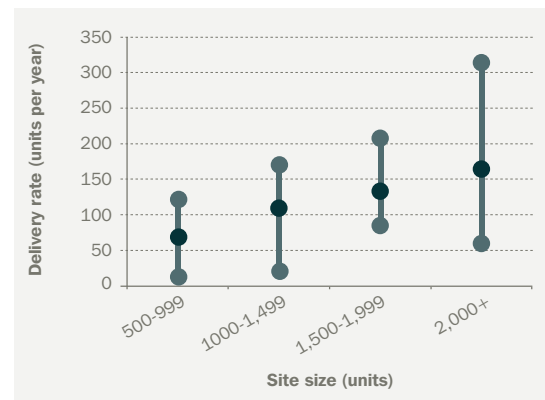
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



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## Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding<sup>15</sup>.

*“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.*

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

## Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

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<sup>15</sup> <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

## Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

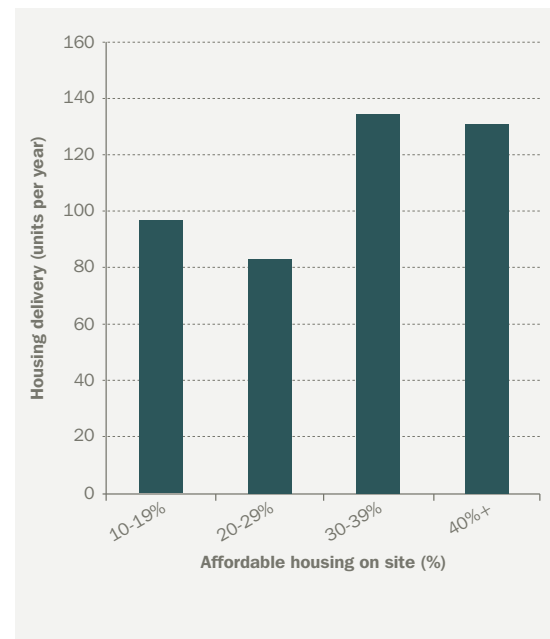
## Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

## The Timeline of the Build-out Period

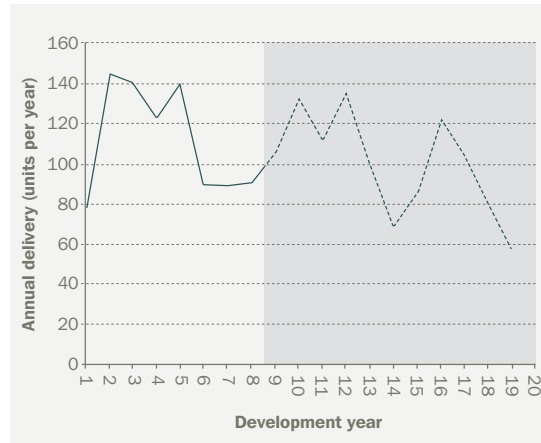
Many planners' housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP's research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for

rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

## Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not be present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.

# A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016<sup>16</sup> suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

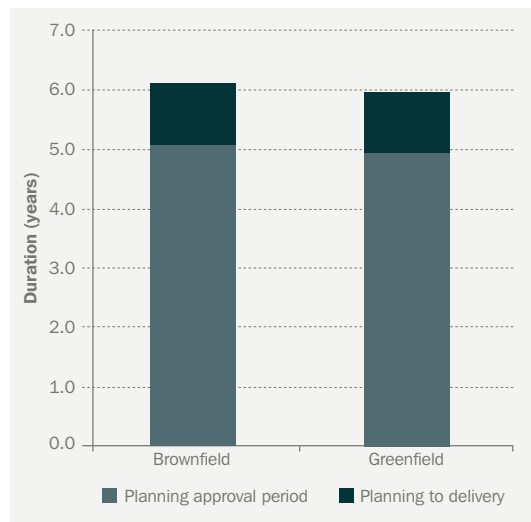
## The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	<b>Total/Average</b>	<b>43</b>	<b>5.0</b>
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	<b>Total/Average</b>	<b>27</b>	<b>5.1</b>

Source: NLP analysis

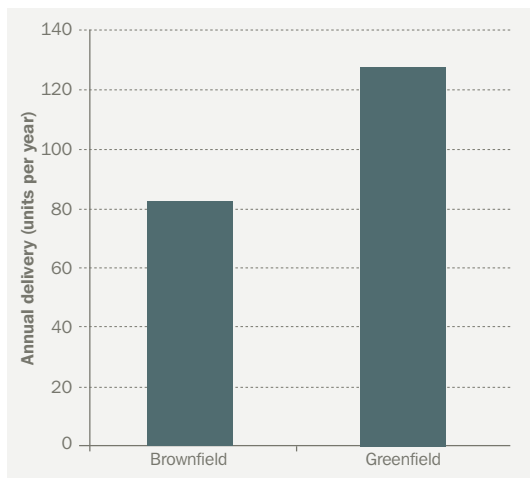
<sup>16</sup> Brownfield comes first: why brownfield development works CPRE, March 2016

## Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	<b>Total/Average</b>	<b>43</b>	<b>128</b>
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	<b>Total/Average</b>	<b>27</b>	<b>83</b>

Source: NLP analysis

## Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.



# Conclusion

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There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government’s target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that “*you cannot live in a planning permission*”.

Part of the debate has focused on perceptions of ‘land banking’ – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be ‘protected’ from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-built (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.

## A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<input checked="" type="checkbox"/> Is the land in existing use?	<input checked="" type="checkbox"/> How large is the site?
<input checked="" type="checkbox"/> Has the land been fully assembled?	<input checked="" type="checkbox"/> Will the scale, configuration and delivery model for the site support more sales outlets?
<input checked="" type="checkbox"/> If in multiple ownership/control, are the interests of all parties aligned?	<input checked="" type="checkbox"/> How strong is the local market?
<input checked="" type="checkbox"/> To what extent is there any challenge to the principle of development?	<input checked="" type="checkbox"/> Does the site tap into local demand from one or more existing neighbourhoods?
<input checked="" type="checkbox"/> Is the site already allocated for development? Does it need to be in order for release?	<input checked="" type="checkbox"/> Is the density and mix of housing to be provided consistent with higher rates of delivery?
<input checked="" type="checkbox"/> Does an SPD, masterplan or development brief help resolve key planning issues?	<input checked="" type="checkbox"/> What proportion of affordable housing is being delivered?
<input checked="" type="checkbox"/> Is the masterplan/development brief consistent with what the developer will deliver?	<input checked="" type="checkbox"/> Are there other forms of housing – such as build to rent – included?
<input checked="" type="checkbox"/> Is there an extant planning application or permission?	<input checked="" type="checkbox"/> When will new infrastructure – such as schools – be provided to support the new community?
<input checked="" type="checkbox"/> Are there significant objections to the proposal from local residents?	<input checked="" type="checkbox"/> Are there trigger points or phasing issues that may affect the build rate achievable in different phases?
<input checked="" type="checkbox"/> Are there material objections to the proposal from statutory bodies?	
<input checked="" type="checkbox"/> Are there infrastructure requirements – such as access – that need to be in place before new homes can be built?	
<input checked="" type="checkbox"/> Are there infrastructure costs or other factors that may make the site unviable?	
<input checked="" type="checkbox"/> Does the proposal rely on access to public resources?	
<input checked="" type="checkbox"/> If planning permission is secured, is reserved matters approval required?	
<input checked="" type="checkbox"/> Does the scheme have pre-commencement conditions?	
<input checked="" type="checkbox"/> Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder?	







# Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kyliins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145

Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

# About NLP

Nathaniel Lichfield & Partners (NLP) is an independent planning, economics and urban design consultancy, with offices in Bristol, Cardiff, Edinburgh, Leeds, London, Manchester, Newcastle and Thames Valley.

We are one of the largest independent planning consultancies in the UK and we offer the broadest range of skills of any specialist planning firm. This includes services in economics, spatial analytics, heritage, sustainability, urban design, graphics and sunlight and daylight, as well as a full range of planning skills. NLP was RTPI Planning Consultancy of the Year for three years running to 2014.

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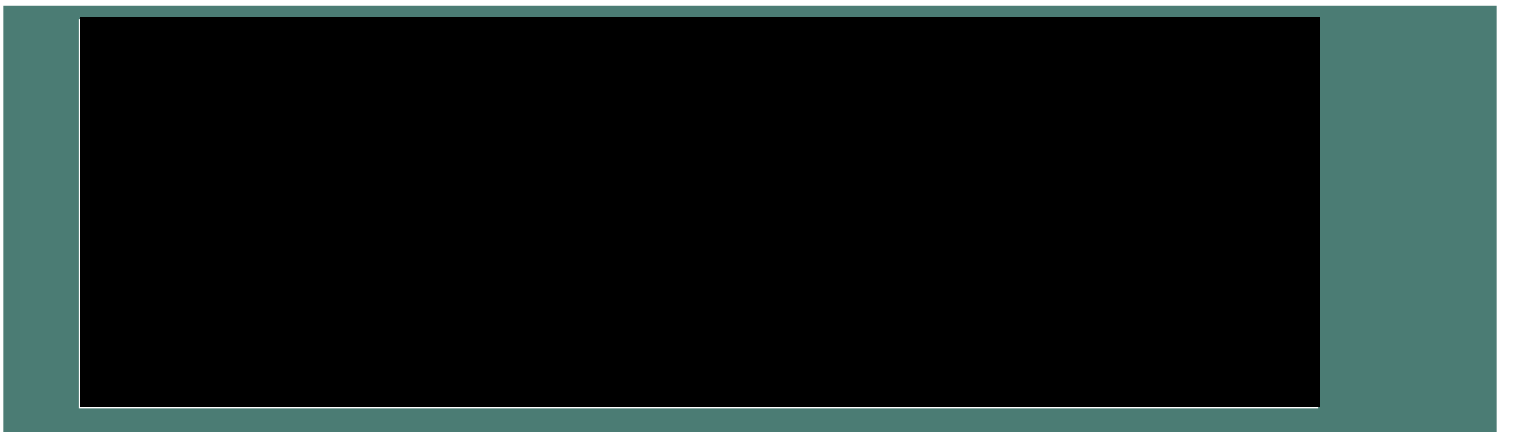
Assessing five year housing land supply positions

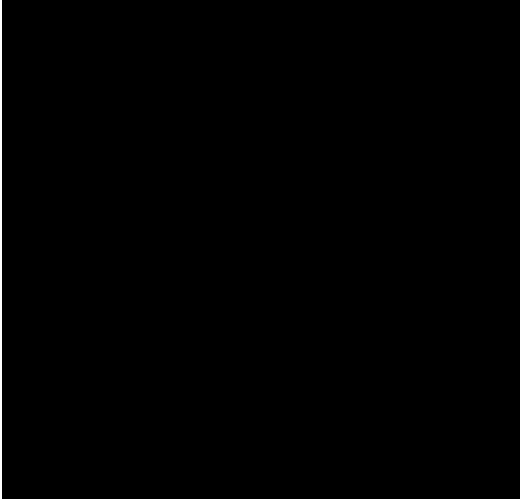


Evidencing Development Capacity









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