

Policy & Spatial Planning
Solihull MBC
Council House
Manor Square
Solihull
B91 3QB

VIA EMAIL

30293/A3/HK/sw

15th March 2019

Dear Sir/Madam,

REPRESENTATIONS TO THE SOLIHULL DRAFT LOCAL PLAN SUPPLEMENTARY REGULATION 18 CONSULTATION – LAND EAST OF GRANGE ROAD, DORRIDGE AND LAND SOUTH OF ARDEN ROAD, DORRIDGE

Barton Willmore LLP is instructed by Duchy Homes Ltd (the 'Client') to submit representations to Solihull Metropolitan Borough Council's Draft Local Plan Regulation 18 Supplementary consultation (the 'draft Plan') in relation to their land interests at land east of Grange Road, Dorridge (hereafter referred to as the 'Site 1') and land south of Arden Road, Dorridge (hereafter referred to as the 'Site 2'). Part of Site 1 is referenced in the Council's Site Assessments document as 344 'Land off Grange Road'. Our Client is promoting Site 1 for residential development, which will require the relocation of the village hall to Site 2. This is reflected in the enclosed Call for Sites Submission.

Whilst we appreciate that this is a non-statutory consultation and it does not seek to deal with Birmingham's unmet needs, this is clearly a significant factor in the overall housing requirement for Solihull which should be considered properly now. If, as numerous parties have identified, the overall numbers increase through the Regulation 19 consultation, additional sites will need to be identified. As we will set out in this response, our Client's land is particularly well placed to address this need. Our main concern however lies with the way in which the site has been assessed previously by the Council.

We set out below our comments and responses to the questions we consider are relevant to our Client's land interests.

Question 1: Do you believe that that there are exceptional circumstances that would justify the Council using an existing alternative approach, if so, what are the exceptional circumstances and what should the alternative approach be?



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Given the findings of the Employment Land Review (2017), we query whether there is adequate evidence regarding employment needs to answer this question. There is scope for an uplift in the housing requirement as a result of the HS2-related growth, as well as the potential to capitalise on the clear need for wider than local employment growth identified through evidence such as the 2015 West Midlands Strategic Employment Site Study (WMSESS), which identifies the M42 corridor as the area of highest demand for strategic industrial and commercial uses (Area A). The forthcoming new WMSESS is likely to be published before the draft Plan is adopted. On top of Birmingham's unmet housing needs, the potential for higher housing numbers as a result of these points could be an exceptional circumstance to justify an uplift beyond the standard method minimum (which we currently calculate to be 777 dwellings per annum).

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

Whilst we broadly agree with the methodology, we raise issue with the way this has been applied inconsistently across the borough. We specifically object to the manner in which part of our site (Site 1) (reference 344) has been assessed as 'red', with the following conclusion:

'The site, which is in a lower performing parcel of Green Belt is in two parts; development of the southern part would result in unacceptable incursion into the countryside, creating an indefensible Green Belt boundary and setting a precedent for the development of surrounding land. The northern part of the site is contained by existing roads, but development would extend the built-up area of Dorridge to the west, eroding the narrow gap between Dorridge and Blythe Valley Park'.

We address these comments in respect of Site 1 (but in respect of the expanded site) but also Site 2 (not previously assessed).

We consider Site 1 should be assessed as 'green' for the reasons set out below, and related to this, Site 2 should also be identified as a suitable site for the relocation of the village hall to facilitate the residential development on Site 1.

Accessibility Study

Part of Site 1 has been assessed as having low/medium accessibility to a Primary School, despite Dorridge Primary School located 1.2km north east of the site (approximately 15-20 minutes' walk). There are clear footpath linkages along Grange Road and Station Road connecting the Site to the Primary School. As per the Institution of Highways and Transportation (IHT) publication 'Guidelines for Providing for Journeys on Foot', this is considered an acceptable walking distance. **Suggested change – Primary School: High.**

Accessibility to nearby services and amenities such as a food store and GP surgery is scored 'Highly-Very Highly'. We agree with this score as Dorridge Local Centre is located approximately 600m north east of the site which comprises a range of services and facilities to support the community. Accessibility to Transport also scores 'Highly' given that Dorridge train station is located approximately 0.6km to the north east (approximately 10-minutes' walk) providing onward connections to Solihull and Birmingham. The nearest bus stop is located on Grange Road approximately 42m to the north.

The overall accessibility score granted is 'High'. We agree with this. The Site is in a highly sustainable location and therefore in accordance with local and national policy.

Green Belt Assessment

The Council's assessment of part of the Site (reference 344, Land off Grange Road, Dorridge) against the purposes of the Green Belt results in a combined score of 5. This reflects the Council's Green Belt Assessment undertaken in July 2016, which identifies that the parcel in which Site 1 (and Site 2) is located (RP48) performs poorly against purpose 1 (To check the unrestricted sprawl of large built-up areas) and purpose 4 (To preserve the setting and special character of historic towns) and moderately performing in terms of purposes 2 (To prevent neighbouring towns merging into one another) and 3 (To assist in safeguarding the countryside from encroachment).

A number of sites within the Site Assessments document which have a higher contribution to the purposes of the Green Belt have been assessed as 'green' without further justification. Our site has scored poorly overall and therefore a consistent approach is required.

In terms of the Council's concern regarding the Site being 'detached from the main built up area', we consider this can be addressed through the formal designation of the land to the north as open space. This is illustrated on our Proposed Green Belt Amendment Plan (reference BM-02).

This enclosed Plan also identifies the Brook as a defensible boundary to the east of Site 1. Alongside the mature tree belt to the east and south, this provides a strong defensible natural boundary. Given this and the adjacent built form along Grange Road, defensible boundaries can clearly be demonstrated for Site 1.

In terms of Site 2, the relocated village hall will in part utilise the previously developed part of the site, and will look to establish a strong landscape buffer to the south which continues to facilitate access to the open space. Dorridge Wood to the east provides a strong defensible boundary.

Our suggested amendment (plan reference BM-02) to the Green Belt boundary reflects the irregular nature of the current Green Belt boundary to the south of Dorridge and visual encroachment would be minimised given the landscape context of both sites. Development on both sites will be designed to sit sensitively within their surroundings in this respect.

Accordingly, we request that the site is re-assessed on the basis of this information.

Landscape

The site has been assessed by the Council as lying 'within a landscape character of medium sensitivity, low visual sensitivity, medium landscape value and low capacity to accommodate change'. There is little to be taken from the conclusions of this high-level assessment and there are numerous allocations within the draft Plan which propose development on sites with the same landscape character assessment. Notwithstanding this we will undertake our own Landscape and Visual Appraisal in due course in support of the promotion of our Client's Sites. This will build upon our initial observations that both are well enclosed, with capacity for development – particularly Site 1.

Full consideration will be given to the protection and enhancement of trees and hedgerows to ensure development responds to the landscape context, including the trees surrounding both Sites. Whilst there may need to be some selective loss of trees to facilitate access on Site 1, this will be minimised and informed by a full tree survey and arboricultural impact assessment. Any loss of trees would be offset by replacement planting.

As shown on the enclosed plan, the linear strip of open space north of Site 1 would be retained and protected from future development as formal open space.

Overall, we do not consider that landscape character will be adversely affected by development on either Site and the Council's assessment should reflect this.

As we have set out above, development on both Sites can be accommodated sensitively by utilising the existing defensible boundaries and the creation of new landscape buffers. Overall, both Sites are located in highly sustainable and accessible locations within walking distance of public transport, community services/facilities and a primary school. On this basis, Site 1 should be considered 'green' and therefore suitable for residential development; and Site 2 should be considered acceptable to accommodate the relocated village hall to facilitate the development of Site 1. We request that the site is re-assessed on the basis of the evidence we have provided.

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

Yes, we would agree. Our Site would be able to provide much needed housing within Dorridge, which is in a highly sustainable and accessible location. Furthermore, developer contributions from this development could assist in meeting the infrastructure improvements as identified within the consultation document.

Question 23/24: Knowle, Dorridge and Bentley Heath - Proposed Allocations

Only two sites have been identified for residential development within and around Dorridge (Site 8: Hampton Road, capacity 300-350 and Site 9: Arden Triangle, capacity 600), both of which are large sites. There is no evidence provided on the deliverability of these sites, include the timescales for housing to come forward. However, smaller Sites such as our Client's, are more deliverable within the early years of the Plan. This will help to address the known affordability issues in Dorridge and the wider Borough.

Question 37: What compensatory provision should be made for land being removed from the Green Belt? Where relevant please give examples that are specific to individual sites proposed for allocation.

Paragraph 138 of the NPPF states:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land".

Our Sites could adequately offset the impacts of removing land from the Green Belt, for instance through the enhancement and strengthening of the surrounding landscape / green infrastructure and wildlife corridors. In addition, access to the adjacent Dorridge Park and surrounding countryside will be included in any proposals.

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

Yes, we consider our Client's Site (Site 1) should be reassessed as a 'green' site in light of the information we have provided in response to question 2. Related to this, the relocation of the village hall from Site 1 to Site 2 should also be assessed as suitable for inclusion within the draft Plan to facilitate this. Both sites are included in the enclosed Call for Sites submission.

Paragraph 138 of the Revised NPPF states;

"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport"

Both Sites are in a highly sustainable and accessible locations. In addition, there are parts of both Sites which include previously developed land, including the village hall and car park on Site 1; and the scout hut and car park on Site 2.

As indicated on the enclosed Site Location Plan (reference BM-M-02-A), Site 1 has the potential for two vehicle accesses from Grange Road – one through the Council owned land to the north and one to the south which is not reliant on the Council's land.

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

This approach would cause uncertainty for developers and the Council and is not likely to work in practice. It would not be clear how much affordable housing which will be delivered through the draft Plan. If the Council allocate sufficient sites which have proportionate evidence regarding their viability and deliverability, this would be the best way of addressing the delivery of much-needed affordable housing.

Conclusion

As detailed above, our Client's concern relates to the manner in which their land interests at Site 1 has been assessed by the Council previously (in part). As we have demonstrated, Site 1 is highly accessible and is a suitable and sustainable location for residential development. There are existing

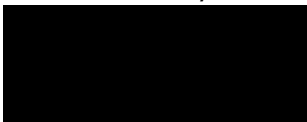
defensible boundaries that can be strengthened, and the landscape character is such that it has capacity for change, if developed sensitively. On this basis, we consider the Site should be assessed as 'green' and therefore should be included in the draft Plan as an allocation.

The Site is available now and offers a suitable location for development that is achievable in the short term. It is in an area of high demand for housing with a realistic prospect that housing will be delivered within the first five years of the Plan. As such, this Site can be considered deliverable in terms of the definition within the NPPF and as such it can play an important role in addressing the known affordability issues. Given the proximity of the Site to Dorridge train station, this will also make a clear contribution to Birmingham's unmet housing needs.

In order to deliver this development in Site 1, we propose to relocate the village hall to Site 2, which we have also identified as suitable, given part of the Site is previously developed, there are strong defensible boundaries to the east and west, and a defensible landscape buffer can be delivered to the south.

We would welcome the opportunity to discuss these matters further and would be grateful if you could consider our comments in assessing our Client's Sites. If you have any queries regarding the above, please do not hesitate to contact Hiteshree Kundalia or me.

Yours faithfully



ALASTAIR BIRD

Associate

Enc.