



14th March 2019

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Dear Sir/ Madam

Response to Draft Local Plan Supplementary Consultation (January 2019)

I write on behalf of my client, Spitfire Bespoke Homes Ltd in relation to the above consultation. As you will be aware, we have previously submitted representations to the Draft Local Plan Review Consultation in January 2017.

Spitfire Bespoke Homes are a forward thinking, modern, privately owned property development company specialising in the construction of sustainable, high-quality bespoke residential dwellings. Spitfire is an award-winning house builder, and in 2018 won a total of 7 national awards for design excellence including Silver for Best Medium Housebuilder at the Whathouse Awards, Gold for Best Development at the Whathouse Awards and Best Medium Housebuilder at the Housebuilder Awards 2018

Spitfire have a varied range of development sites ranging between 3 dwellings in Henley-on-Thames to 13 new homes on Previously Developed Land near Knowle in the Solihull Green Belt to 125 new homes in Broadway within the AONB, which includes affordable housing extra care provision.

Having reviewed, the consultation documents we wish to make the following representations:

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

The Planning Practice Guidance is clear that “there is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances” (ref ID: 2a-003-20190220). Within the document that has been issued for consultation, there appears to be no justification for moving away from the standard methodology.



The consultation document sets out that from 2014/15, there have been on average 657 net completions per year and before that the average net completions were significantly lower. The standard methodology taking into account the affordability ratio, states that 767 dwellings per annum would be required based on the 2014 household projections. The updated Planning Practice Guidance has confirmed that the 2014 household projections are to be used which generates the higher figure.

However as has been set out within the Draft Local Plan Consultation document, there is a need to accommodate 2,000 dwellings from the wider Housing Market Area. It is therefore very clear that whilst the 767 dwellings per annum is required, this must be seen as the minimum figure. This is particularly the case with HS2 due to pass through the Borough. It is acknowledged that if the shortfall within the wider HMA was picked up, this would mean that 885 dpa. would be required over the plan period. The Government aim is to significantly boost the supply of homes (para. 59 of the NPPF) and therefore all opportunities to increase house building within the Borough to help meet the council's economic ambitions and affordable housing should be sought.

Whilst it is acknowledged that this consultation does not focus on the unmet need from the wider Housing Market Area, there is a significant need to meet. The Council is going to look to meet the need within the Borough and wider HMA. The Borough therefore needs to be confident that there is a sufficient supply of sites coming forward over the plan period to meet both the Boroughs needs and wider HMA.

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

The approach taken at paragraph 67 that does not seek to allocate a particular number to be accommodated in each settlement is welcomed.

Firstly, before the consideration of the site selection methodology there are some concerns that the Draft Local Plan does not include any small sites within the methodology. Paragraph 68 of the NPPF is clear that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. This includes identifying sites through the Development Plan process, which the Draft Local Plan fails to do.

As you will be aware, representations have been previously made to the draft Local Plan consultation. The sites; Land north of Waste Lane (part of site 102) and Land at Old Waste Lane (site 102) are both just over 1 hectare. Whilst slightly above this threshold, as will be demonstrated later within this representation, both of these sites are suitable, available and achievable for development. As a result, these sites should be considered favourably respecting the contribution small sites make as set out in paragraph 68 of the NPPF. Paragraph 67 of the NPPF

requires a sufficient supply and mix of sites. This should therefore include the widest mix of sites to provide not only a mix for different housebuilders but also the consumer.

The site selection process was originally set out in the Draft Local Plan. Concerns have been previously raised to the site selection methodology. The SHELAA previously acknowledged that only 1,090 units have been identified on sites that are not within Green Belt. As a result, it is acknowledged that the Draft Local Plan will need to propose the remove of Green Belt land. Given this recognised need, sustainable sites within the Green Belt should rank higher.

Whilst it is acknowledged that the stage 2 assessment is subject to planning judgement, it is not particularly clear as to why some sites have been excluded.

Having reviewed the site assessments, the following comments should be made.

Land at Meeting House Lane and Waste Lane, adjacent to Barratts Farm (part of site 102).

- A copy of the site plan is set out at Appendix 1. The site selection at step 1 sets out that site would be identified as a 6, which is a blue site. At stage 2, the site assessment identifies the only negative of this site as its proximity to the listed building. The site in question is located a significant distance from the listed buildings on the main allocation and would be viewed in the context of existing residential development on the site. The site assessment identifies the distance to key economic assets as a constraint, however it is suggested that this site is considered as part of the wider allocation, and parts of the proposed allocation are further from key economic assets than this site.
- The conclusions identify this site as green and therefore the site should be allocated for development, as with the proposed allocation at Barratts Farm this site will be entirely surrounded by development.

Land at Old Waste Lane/ Waste Lane (site 101).

- The site selection at stage 1 identifies the site as blue. At stage 2, the site is considered to be too small and poorly related in isolation. Although it is acknowledged that the site may be suitable if wider alterations to the Green Belt are pursued. The site assessment at step 1 identifies the site as a 7, however the neighbouring site is identified as a 6. Given the proposed allocation at Barratts Farm, this site should be identified as a 6 within the step 1 selection.
- As can be seen on the indicative layout below, the site could accommodate 40 dwellings, which would be in line with the density of existing neighbouring development and the density would be in line with that proposed for the edge of the Barratts Farm allocation. The character of the area will change significantly once development commences at Barratts Farm and as such, development at this site would be a logical

extension to the allocation and the proposed allocation to the north and west of the site would mean it would become more accessible and therefore should not be identified as having a low level of accessibility.



Indicative Layout for Land at Old Waste Lane/ Waste Lane

- As has been set out above, this site would be removed from the Green Belt due to the allocation at Barratts Farm. It should therefore be allocated as a small site in accordance with paragraph 68 of the NPPF.

Land at Oakes Farm (Appendix 3) and site assessment reference 304.

- As has been set out in the previous representations, this site is available and considered to be suitable for development. In the stage 1 assessment, the site performs better than the proposed allocation at Barratts Farm. The assessment for by the Council at stage 2 appears to suggest that the site has no defensible boundaries. However, the site is bounded by hedgerow and the commercial buildings to the south, along with hedgerow to its north, east and west boundaries. This provides clear boundaries as to the extent of development. The sites proximity to key economic assets is noted and therefore the site should be seen as suitable for development.
- The plan should therefore reconsider Oakes Farm and its location within the Green Belt. It has been set out previously that the site would be able to accommodate around 150 dwellings. As is set out on the site plan

below, the layout has been designed to respond to the Balsall Street Character, as well as maintain a route to the existing farm shop. Furthermore, the layout seeks to provide a transition from the built form to the north to the countryside to the south with a lower density and open space being located on the southern boundary of the site.



Indicative Site Layout for Land at Oakes Farm

- Overall, land at Oakes Farm is considered to be suitable, available and achievable for future residential development and there is no reason why the site cannot be removed from the Green Belt to deliver housing in the next five years. Furthermore, residential development in this location would meet the three overarching aims of sustainable development as set out in accordance with the NPPF.

Land at east of Warwick Road and north of Wyndley Garden Centre.

- Spitfire have previously submitted this site, although it does not appear to have been included within the site assessments. Spitfire have an option on Land at east of Warwick Road and north of Wyndley Garden Centre which has the potential to deliver 70 units alongside land south of Knowle. In terms of its impact on the Green Belt, it is considered to score 6 as per the proposed allocation on the opposite side of Warwick Road.



Indicative Site Plan for Land East of Warwick Road and North of Wyndley Garden Centre

- The initial site layout above, demonstrates that the existing hedges and ditches would be retained, with access from Warwick Road. Open space within the site would contribute to the retention of existing ecological habitats and enhancing them where possible. With the proposed allocation, this site will be significantly more accessible and therefore is suitable for development as a further phase of development and is therefore a logical extension to the proposed allocation.

Question 3: Do you agree with the infrastructure requirements identified for Balsall Common, if not why not; or do you believe there are any other matters that should be included?

The draft Local Plan acknowledges that Balsall Common has a full range of services and facilities. The Local Plan sets out ambitious infrastructure requirements for the settlement including:

- Balsall Common By-Pass
- An Enhanced Centre

- Station Parking
- Improved Public Transport
- New Primary School
- New Secondary School

It is not clear from the consultation exactly how the infrastructure improvements would be funded although some would come through Section 106 and CIL contributions. Given the scale of improvements sought, it is unlikely the proposed developments allocated would be able to fully fund the improvements sought. In order to meet these ambitious infrastructure requirements in the local area, it will be necessary to allocate additional sites for development within Balsall Common, for example Land at Meeting House Lane and Waste Lane, adjacent to Barratts Farm (part of site 102), Oakes Farm (site 304) and Land at Old Waste Lane/ Waste Lane (part of site 101).

Question 4: Do you believe that Site 1 Barratt's Farm should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

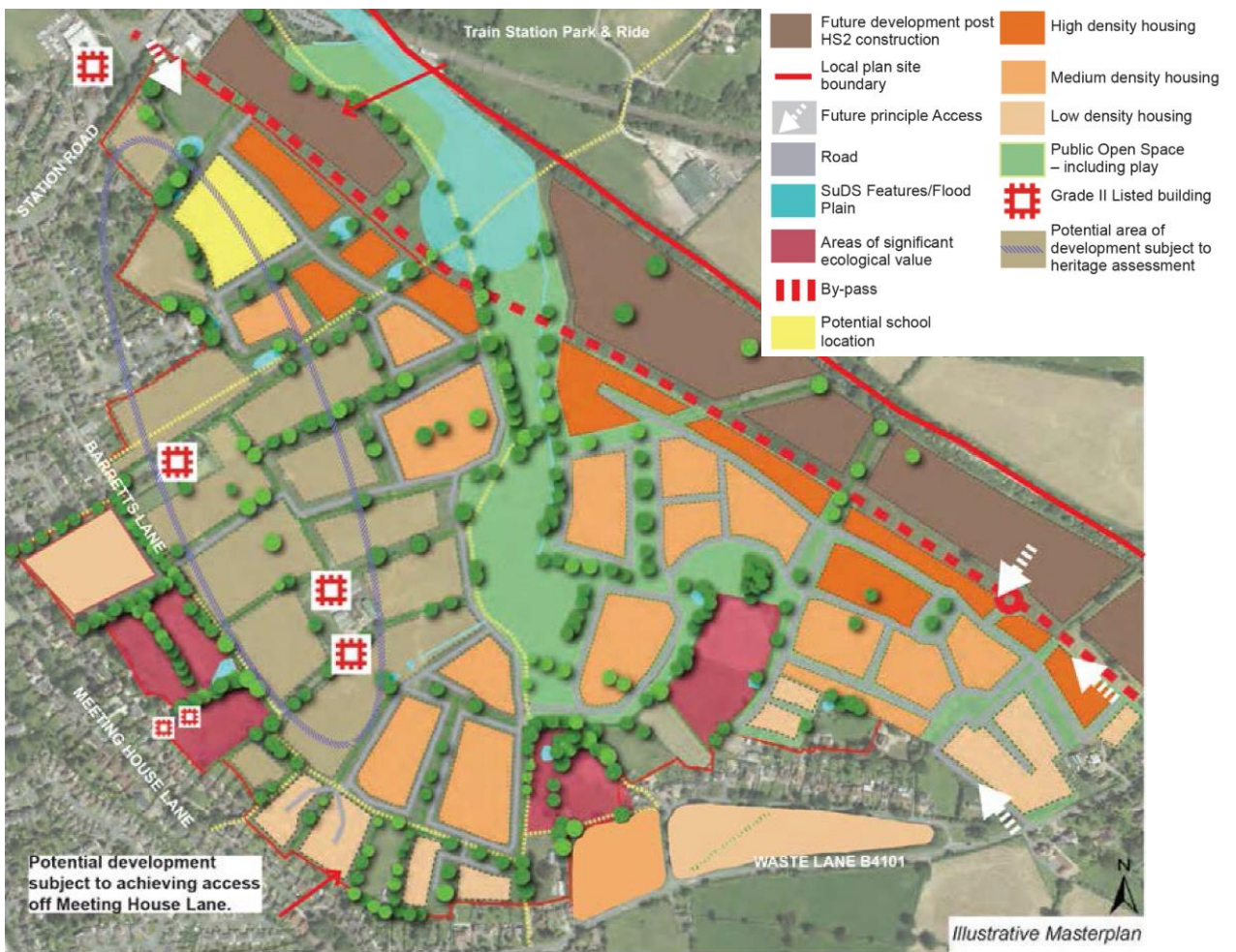
The indicative masterplans for the site suggest that this would be for around 900 dwellings, an increase in 100 over the Draft Local Plan consultation. There appears to be no reasoning for the increase in numbers. Having regard to the proposed allocation at Barratt's Farm, Spitfire does not contest the principle of an allocation being made. It does however contest that based on the current site boundaries, the number of dwellings being proposed is too high when proper consideration is given its constraints including, amongst other things, its sensitivity in relation the Green Belt and listed buildings.

The masterplan document acknowledges that the developable area of the site may be limited in part due to the heritage, with a significant area of the site subject to a detailed heritage assessment. Given the uncertainties about the development potential of this area, a Heritage Assessment should be undertaken now to inform the quantum of development as this may be required to be reduced based on its recommendations.

The proposal to deliver high density development along the proposed by pass route at the site is also out of character with the local area and will create an urbanising effect on Balsall Common. This could also result in a poor-quality environment being created for future residents.

This representation promotes a piece of land (referred to as Land at Meeting House Lane and Waste Lane, adjacent to Barratts Farm (part of site 102)) that should be included as part of the allocation. It provides a very logical rounding off of the settlement boundary. Conversely, it does not represent land within the overall site at Barratt's Farm which is considered to be sensitively located in the Green Belt, nor is it a parcel of land within the overall allocation which is affected by other known constraints, for example, listed buildings. The Site Assessment suggests that this site should be allocated as above.

It is understood that there are complex land ownership issues with this site, and therefore delivery of this strategic site is uncertain as set out in the masterplan document. It appears from the Masterplan document which forms part of this consultation that there are a number of uncertainties in relation to how this site will come forward. As has been set out above, in addition to the site above, Spitfire has also agreed an option on land at Old Waste Lane/Waste Lane (site ref: 101). Both of these sites are available immediately and there are no known constraints which would prevent delivery. The site is adjacent to existing development and the proposed allocation at Barratts Farm. Development of these sites are already surrounded by existing residential dwellings and would represent a logical rounding off of the Barratts Farm allocation as can be seen from the plan below.



Indicative masterplan for Barratts Farm, including Spitfires sites

As a result, the allocation should be extended to include Spitfire’s sites Land at Meeting House Lane and Waste Lane, adjacent to Barratts Farm (part of site 102)) and land at Old Waste Lane/Waste Lane (site ref: 101). As can be seen from the plan above, the inclusion of these sites into the Barratts Farm allocation represents a logical extension to the settlement.

These sites can come forward in accordance with the proposed masterplan and will ensure that this site delivers homes in a timely manner. The NPPF at paragraph 68 supports working with developers to encourage the subdivision of large sites where this would help to speed up the delivery of homes.

Question 5: Do you believe that Site 2 Frog Lane should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

Within the Draft Local Plan, this site was previously allocated for 150 units, Spitfire previously raised concerns that Land at Frog Lane is also constrained by heritage assets. A grade II listed cottage lies in the south-eastern corner of the site.

To minimise the harm caused to these assets there will be a need to provide mitigation in the form of boundary treatments or open space/buffers around the margins of the site. This would reduce the capacity of this site significantly for housing development. The masterplan suggests that the site is constrained on one side by the listed buildings and on the other by existing playing fields. As a result, the proposals would be at a significantly higher density than surrounding development and would not respect the edge of settlement location.

This allocation has already been reduced in numbers to around 100-110 and questions must be raised as to whether it will be able to deliver the amount set out.

Question 6: Do you believe that site 3: Windmill Lane should be included as an allocated site, if not why not? Do you have any comments on the draft masterplan for the site?

The masterplan states that the development must be set back from the listed buildings, this together with the distance from the main services within Balsall Common. This site appears to be an illogical extension to the settlement, when considered in its wider context and should therefore not be allocated.

Question 7: Do you believe that Site 21 Pheasant Oak Farm should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

As a full site appraisal has not yet been carried out, it is difficult to provide comments on this site. It appears that little work has been undertaken to assess whether the site is really deliverable, for example the time taken to relocate existing businesses may impact on the site's deliverability. Given the commercial uses currently on the site, would this site be better as a commercial allocation?

Question 8: Do you believe that Site 22 Trevallion Stud should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

It is acknowledged that a full appraisal has not yet been carried out for this site. The developer's masterplan shows a high-density development, which does not accord with the Council's open space requirements. The density of development also appears to be at odds with the density of the surrounding area on the edge of this settlement. As a result, it is highly unlikely the site would be able to deliver 300 dwellings, particularly also given the existing woodland and trees on the site.

Question 9: Do you believe that Site 23 Lavender Hall Farm should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

The NPPF at paragraph 80 places significant weight on the need to support economic growth and productivity. It is not clear whether the existing businesses on the site would be relocated as part of the site's redevelopment. Nevertheless, the loss of employment generating uses appears to be at odds with the wider economic ambitions of the Council. The site would also be bounded on two sides by the railway line with what appears to be a limited buffer. This therefore raises concerns over amenity for future occupiers.

Question 10: 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?

Spitfire Homes welcomes the changes to the Green Belt Boundary. It is recognised that this is necessary and welcomed in order to meet the Council's housing target. The level of growth proposed for Balsall Common should be seen as a minimum figure.

Spitfire welcomes the acknowledgement at paragraph 98 that its site; Land at Old Waste Lane/ Waste Lane (ref: 101) and set out in Appendix 2 would fall within the settlement boundary if the Green Belt boundary was amended. As has been set out within previous representations, Spitfire is committed to delivering a high-quality development that integrates well with the surrounding community and will deliver additional benefits for use by existing and future residents. The developer is therefore happy to discuss possible community benefits with the community.

There are no legal issues which preclude delivery well within the future plan period, or earlier. Spitfire Bespoke Properties now have an option agreed on the land thus helping to ensure its timely delivery. The site is available immediately with delivery of all units within 5 years. The site is therefore available.

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?

As with Balsall Common, a significant amount of new infrastructure is proposed for the area including:

- Improved public transport
- Parking improvements
- Highway improvements
- Pedestrian and cycle connectivity
- New primary school
- Play and open space
- Sport and recreation

The emerging strategy also requires affordable housing and smaller market homes for young people hoping to stay in the area.

It is not clear from the consultation exactly how the infrastructure improvements would be funded although some would come through Section 106 and CIL contributions. Given the scale of improvements sought, it is unlikely the proposed developments allocated would be able to fully fund the improvements sought. It also appears that a number of developments have been recently completed in the area and it is not clear whether they contributed towards the infrastructure requirements identified.

In order to meet these ambitious infrastructure requirements in the local area, it will be necessary to allocate additional sites for development within the area.

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

Whilst the ambitions of this site to provide a sports hub should be welcomed. There appears to be a number of questions over the size of buffer required between the site and nearby listed buildings. As a result, questions need to be raised over the whether this will be possible to deliver the number of dwellings set out in the masterplan.

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

An allocation on land to the south of Knowle is welcomed, however given the uncertainties around the number of units that can be realistically be delivered on site 8 at Hampton Road, the site to the south of Knowle should be extended to include additional land. Previously it was suggested that land to the south of Knowle would be capable of delivering 750 dwellings, however the revised masterplans appear to suggest this would now be closer to 600.

Spitfire have an option on Land at east of Warwick Road and north of Wyndley Garden Centre which has the potential to deliver 70 units alongside reduced allocations at Hampton Road and land south of Knowle. In terms of its impact on the Green Belt, it is considered to score low. Secondly, as identified within the SHELAA that accompanies the Draft Local Plan Review, the suggested delivery of 300 dwellings at Hampton Road will trigger the need for highway capacity improvements at the A4141 junction and require speed reduction and access improvements along Hampton Road. A greater number of sites around the settlement boundary of Knowle, such as the delivery of land east of Warwick Road would ensure that traffic movements are more dispersed and result in a less detrimental impact upon the A4141 junction.

By dispersing the required housing numbers across a greater number of sites around the settlement edge of Knowle, such as land east of Warwick Road and north of Wyndley Garden Centre, residential development will come forward in a more organic manner without the need for a 'suburban style' urban extension bolted on to the settlement edge of Knowle.

Land at east of Warwick Road and north of Wyndley Garden Centre is being promoted by a housebuilder who can ensure the site is brought forward and developed in a timely manner, whereas larger sites and the additional infrastructure will ultimately take longer to be delivered.

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?

Spitfire are not supportive of the Council's revised approach to affordable housing contributions which is are not supported by any evidence and will cause complexities/ delays in the delivery of all future housing sites within the Borough.

Whilst we do not seek to repeat the comments made by the HBF, Spitfire are aware of representations prepared by the HBF and concur with the comments made in respect of Question 40.

Question 41: If so, what is the most effective approach? Is it to calculate affordable housing as: (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?


Spitfire are aware of representations prepared by the HBF and concur with the comments made in respect of Question 41.

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

Spitfire are not supportive of the Council's revised approach to affordable housing provision and concur with the views made by the HBF.

Spitfire are committed to the delivery of affordable homes on their residential schemes so that a range of new homes are delivered. The emphasis should be on delivering a range of quality new homes to ensure the demographic and economic requirements of the Borough are met. These should be delivered on a range of sites varying in size in accordance with National Planning Policy.

I trust these representations will be taken into account. If you require any further clarification, please do not hesitate to contact me.



Guy Wakefield MRTPI
Partner
For Ridge and Partners LLP

Enc.

Appendix 1: Site Plan for Land at Meeting House Lane and Waste Lane

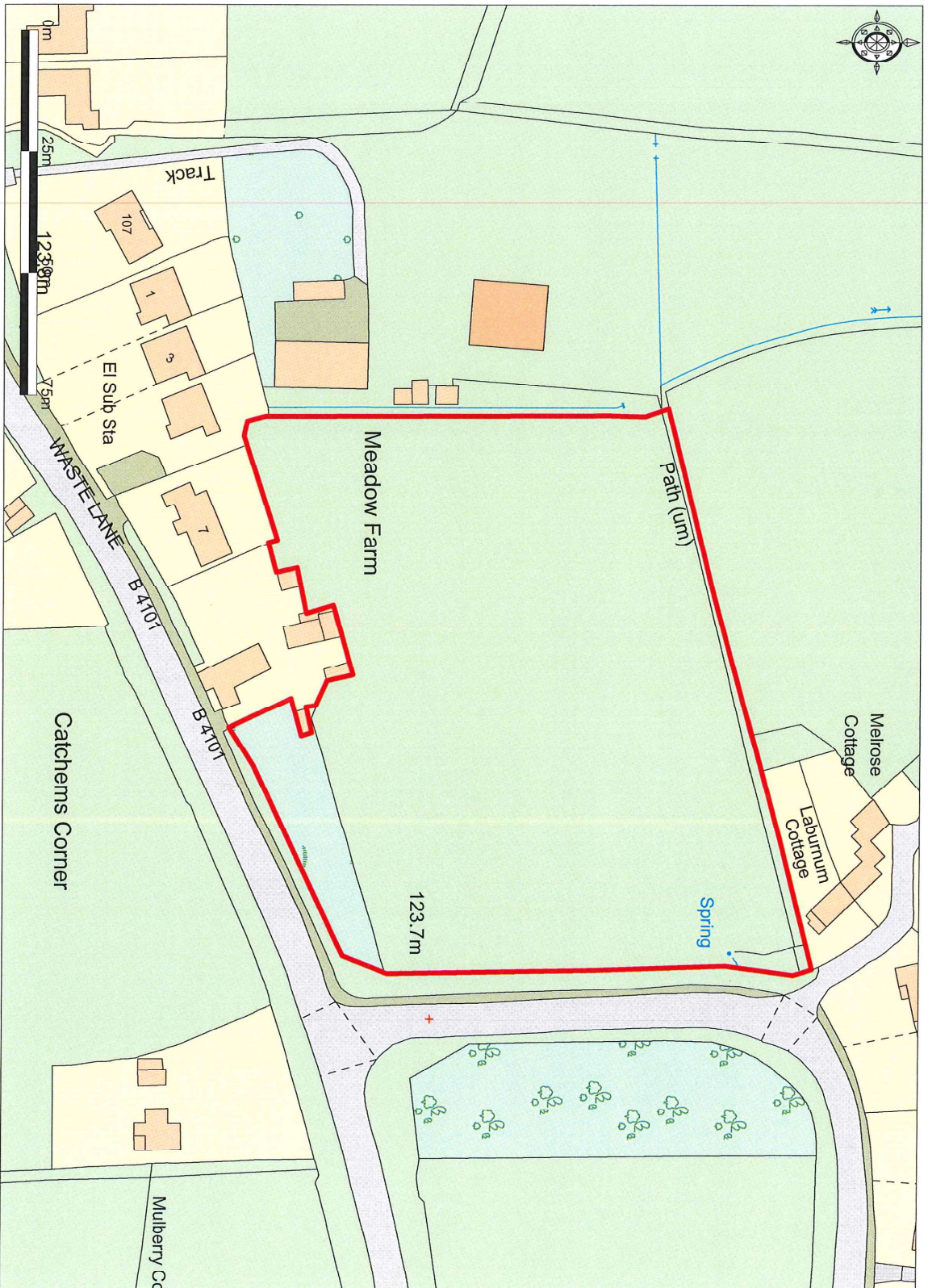
Appendix 2: Site Plan for Land at Old Waste Lane/ Waste Lane

Appendix 3: Site Plan for Land at Oakes Farm

Appendix 4: Site Plan Land at east of Warwick Road and north of Wyndley Garden Centre

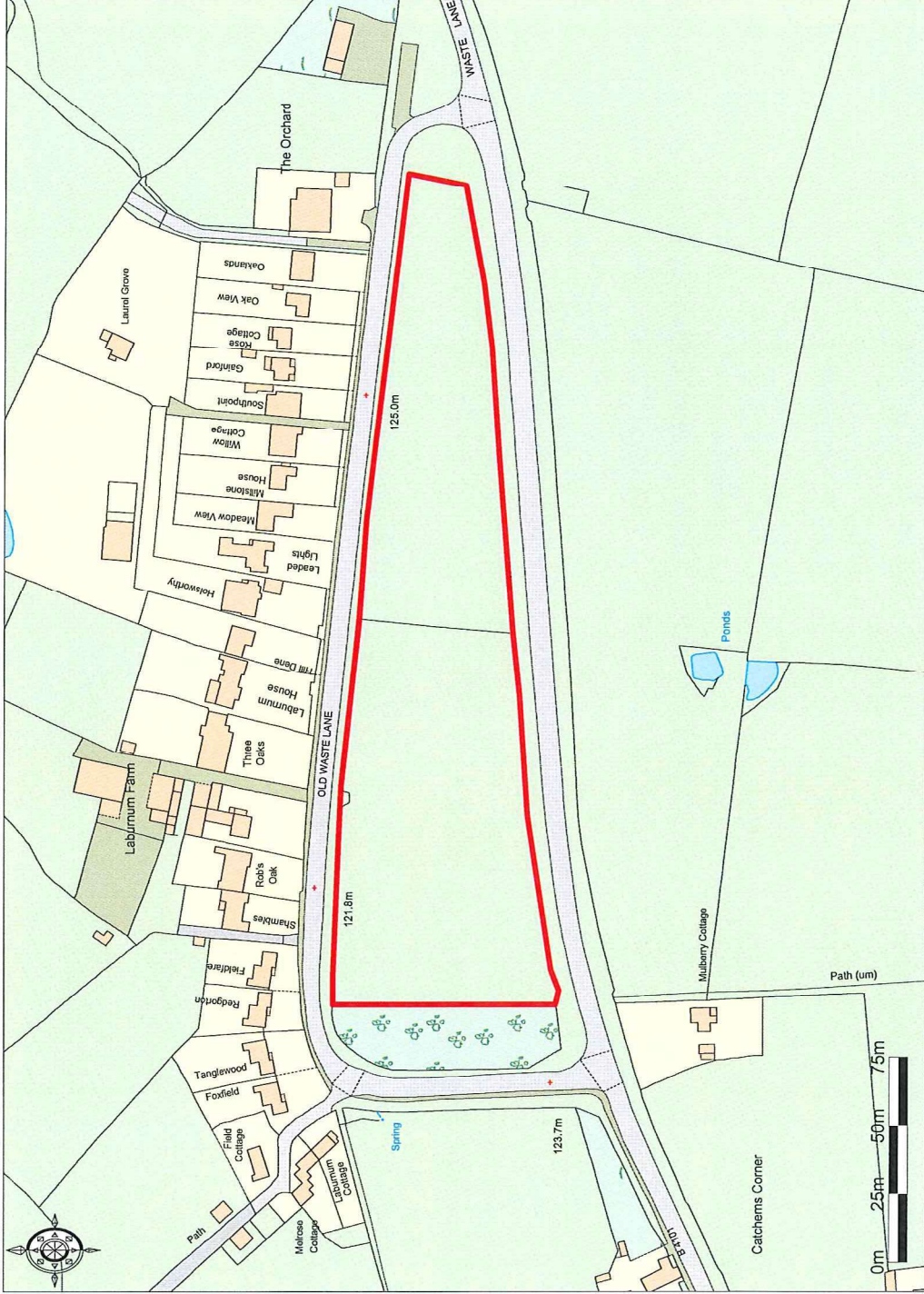
Appendix 1: Site Plan for Land at Meeting House Lane and Waste Lane

Land at Waste Lane, Balsall Common



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Appendix 2: Site Plan for Land at Old Waste Lane/ Waste Lane



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Appendix 3: Site Plan for Land at Oakes Farm

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DRAWING 3/16/16

- PRELIMINARY
- TENDER
- CONSTRUCTION



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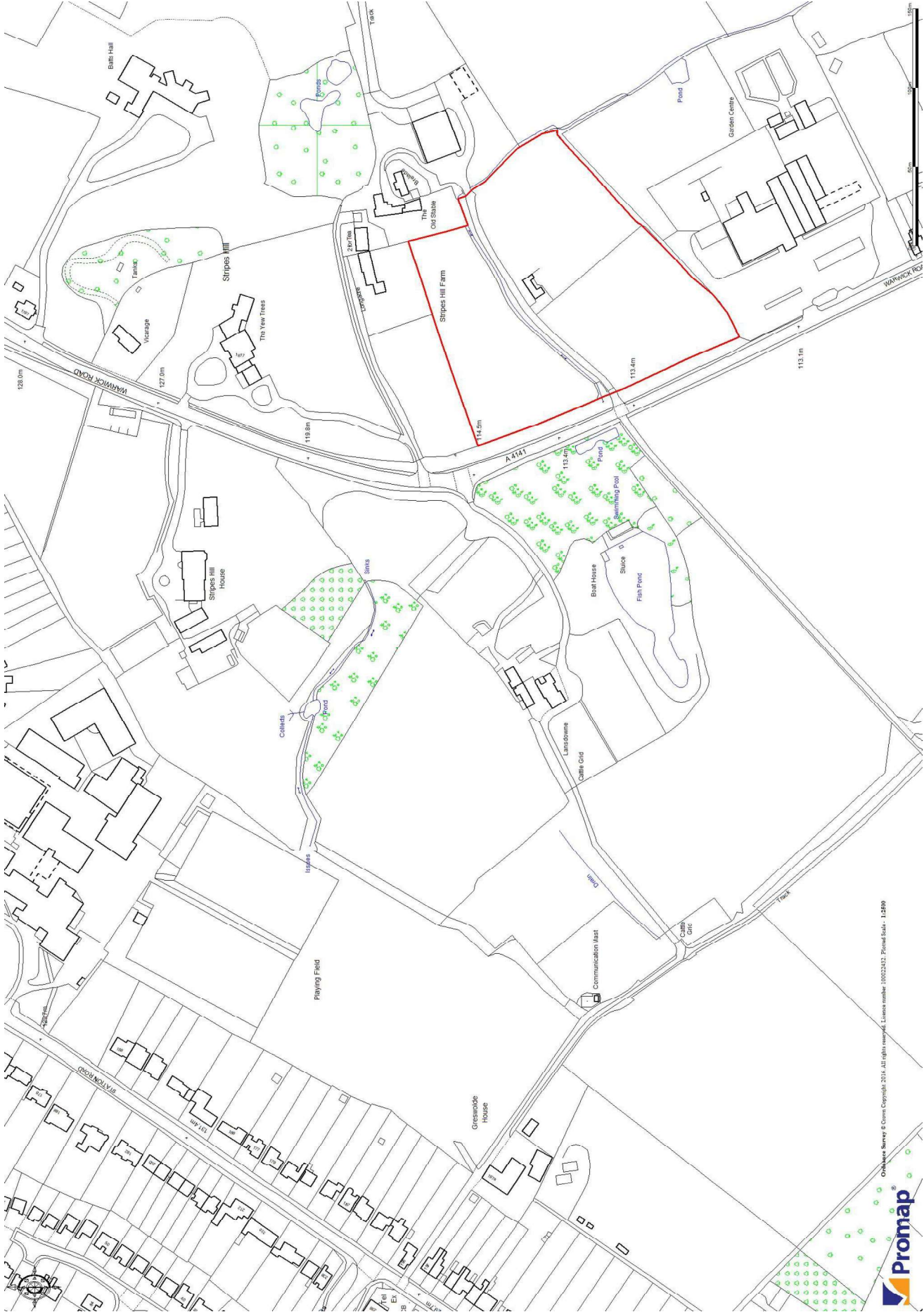
PROJECT:
**Oakes Farm
Balsall Common**

TITLE:
Site Location Plan

SCALE:	1:1250 @ A2	ISSUED:	APC
DATE:	08/08/2016	DESIGNER:	
PROJECT NO.:		REVISION:	
DOCUMENT NO.:	LOC/01		

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Appendix 4: Site Plan Land at east of Warwick Road and north of Wyndley Garden Centre



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